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Grassy Mountain Coal Project
Impact Assessment Agency of Canada
160 Elgin St, 22nd Floor
Ottawa, Ontario K1A 0H3

January 14, 2021

To the Impact Assessment Agency of Canada,

Thank you for the opportunity to comment on Benga Mining Ltd.'s proposed Grassy Mountain Coal Project. As the Joint Review Panel writes its final report, I add my voice to the voices of many concerned Canadians who are in opposition to the Grassy Mountain Coal Project.

Water Quality

Coal mining projects along the Eastern Slopes of the Rocky Mountains, such as the proposed Grassy Mountain metallurgical coal project, will degrade the upstream water quality of the Crowsnest River and upstream tributaries that flow through the proposed project. The approval and advancement of this open-pit mining project is highly likely to contaminate local waterways, such as the Oldman watershed, which is a crucial water source for hundreds of thousands of Albertans and for the southern plains extending all the way to Saskatoon.

The Grassy Mountain Coal Project poses the likely risk of selenium leaching and downstream contamination. Several independent studies have revealed high levels of selenium in creeks and rivers downstream of active coal mines in central Alberta and British Columbia. Open-pit mining projects on the British Columbian side of the Crowsnest Pass, such as Teck Resources' Elk Valley mines, have produced severe downstream contamination that have raised concerns as far as the United States.

Teck Resource was fined \$1.4 million for releasing effluent contamination to fish in Line Creek and polluting BC's waterway. A recent report published this year in the Environmental Research Letters journal outlines that "upstream areas with high runoff



that serve downstream areas with high demand are the most important for freshwater provision” and are therefore assigned a high value for conservation.¹ This perfectly describes the Crowsnest River area of the Eastern Slopes where the Grassy Mountain Coal Project seeks approval.

Biodiversity Protection

The Eastern Slope region of the Rocky Mountains provide unique and essential habitats for a variety of wildlife species, such as the grizzly bear and native trout populations which include the Westslope Cutthroat Trout and the Alberta Bull Trout. The Westslope Cutthroat Trout is identified as “threatened “under the federal Species at Risk Act (SARA).

Water contamination will impact these threatened trout populations. Approving the Grassy Mountain Coal Project and other proposed mining projects in the area may lead to the total collapse of these already threatened populations. That places the Government of Canada with a positive statutory duty to reject this project.

The Eastern Slopes of the Rocky Mountains are classified as a hotspot for ecosystem services and must be protected rather than offered up for coal mining projects.²

Regulatory Changes in Alberta Threaten Key Ecosystems

On May 15, 2020, Alberta's Energy Minister, Sonya Savage, announced that the province's coal policy would be modified as it was "redundant" and "outdated". This modified coal policy came into effect on June 1, 2020 and abolished the graduated protections that have been in place since 1976.

These protections have safeguarded Alberta’s southwestern foothills. The amended policy has made the land that runs alongside the Rockies available to developers of open-pit coal mines. Albertans were shocked that this policy was passed without any public consultation. The province assured citizens that the mountains themselves would remain protected. Concerned Albertans and British Columbians are now speaking up and calling for the rejection of the Grassy Mountain Coal Project, and other open-pit coal mining projects that have been proposed in the Crowsnest Pass region.

Following the receipt of the final report from the Joint Review Panel, the federal government, in cooperation with the Alberta Energy Regulator, must reject the Grassy Mountain Coal project.

¹ Matthew G E Mitchell et al 2021, “Identifying Key Ecosystem Service Providing Areas to Inform National-Scale Conservation Planning,” *Environ. Res. Lett.* 16 014038, p. 4

² *Ibid.*, p. 6-7



Many thanks for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, reading "Elizabeth May". The signature is fluid and cursive, with the first name and last name clearly distinguishable.

Elizabeth May O.C., M.P.
Member of Parliament for Saanich-Gulf Islands
Parliamentary Leader of the Green Party of Canada

