



ALBERTA CHAPTER OF THE WILDLIFE SOCIETY

Laurie Pushor
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T2P 0R4

Honorable Jason Nixon
Alberta Environment and Parks
323 Legislature Building
10800 - 97 Avenue NW
Edmonton, AB
Canada T5K 2B6

June 30, 2020

Re: Proposed Cabin Ridge Coal 2020 Exploration Drilling Program (Application # A10104523) and Elan Coal Ltd. 2020-2025 Isolation South Coal Exploration Program (Application # A10104623).

Dear President Pushor and Minister Nixon:

The Alberta Chapter of The Wildlife Society is concerned with two coal exploration projects that have recently been proposed following the cancellation of the 1976 Coal Policy for Alberta. These programs fall within the Northwest Branch of the Oldman Watershed in southwestern Alberta, an area covered by the Livingstone/Porcupine Hills Sub-Regional Plan (LPSRP). This area is known for its recreational opportunities, grazing lands, fish and wildlife resources and most importantly, it's major contribution to water quality and quantity for southern Alberta.

The Cabin Ridge project is proposing 199 drill sites accessed by bulldozing reclaimed trails from the early 1970's and constructing 166 new trails. The Elan Coal project is requesting 458 drill sites accessed by 29.7 km of previously disturbed/existing access and 66.4 km of new access road. The LPSRP designated this area as important for bull trout, westslope cutthroat trout, and grizzly bears. It also provides important range for elk, and Cabin Ridge is essential winter range for our provincial mammal, bighorn sheep. The increasing linear disturbance created by reactivating these reclaimed trails and building new roads will further impact a landscape that in many areas already exceeds linear disturbance thresholds for grizzly bears and westslope cutthroat trout, both of which are threatened under the Alberta Wildlife Act. The Ministry of Environment and Parks is compelled to recover species that are listed at risk; these coal projects will reduce the efficacy of existing government efforts and species recovery programs.



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Alberta's Land-use Framework (2008) consists of seven strategies including using cumulative effects management at the regional level to manage the impacts of development on land, water and air. The LPSRP indicates that a Cumulative Effects Management Decision Tool will be used by the three land-use agencies (Alberta Energy Regulator, Alberta Environment and Parks, Alberta Agriculture and Forestry) to evaluate new projects in terms of cumulative effects management indicators and thresholds. We are interested in the outcome of this tool relative to the aforementioned species and in light of these new coal exploration project proposals. We recently released a cumulative effects assessment of the Bow and Oldman watersheds along the Eastern Slopes conducted by ALCES™¹. The timber harvest that has occurred in the Upper Oldman watershed combined with the existing access development already puts trout in this watershed in a precarious position. These coal exploration programs will exceed responsible conservation requirements for bull trout, westslope cutthroat trout, grizzly bears, elk, and bighorn sheep.

Moreover, the Eastern Slopes in southwestern Alberta provides essential downstream water resources for 45% of Albertans. A Policy for Resource Management of the Eastern Slopes (1978, modified in 1984) has long recognized that watershed management is the primary consideration for the mountains and foothills of Alberta. The South Saskatchewan Regional Plan reinforced this watershed management priority. Selenium effluent leaching into streams from coal mining activities continues to be unmanageable throughout Alberta despite research efforts over the last 20 years. Most recently, the US Environmental Protection Agency demanded that the BC Government provide data explaining why Teck Resources coal mines in southern BC are allowed to exceed guidelines for toxic metals, particularly selenium (May 11, 2020 Toronto City News). The Teck mines are located immediately adjacent to the Upper Oldman watershed on the west side of the Continental Divide and the BC government has a responsibility to our neighbors in the United States to maintain requirements for water quality. Alberta has the same responsibility to our neighbors to the south and the east through its transboundary obligations under the Master Agreement on Apportionment and the Boundary Waters Treaty.

The LPSRP indicates that "land managers and regulators must operate with a common objective to minimize footprint". This responsibility is to be reinforced through integrated management, the precautionary principle and evidence-based decision making. Consequently, we would like to meet to discuss our assessment of these coal exploration programs and the implications of mining including a railway from the Crowsnest Pass that would cross other important watersheds such as Racehorse Creek, Dutch Creek, and others. In the interim, we respectfully request that these coal exploration programs be denied at this time.

¹ A copy of this report was sent to your Ministry and other senior level bureaucrats on June 24, 2020. The report has been posted to our website and can be downloaded via [this link](#).



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We look forward to a reply at your earliest convenience.

Respectfully,

Alex Beatty

Alberta Chapter of The Wildlife Society President

cc: Roger Reid, UCP MLA, Livingstone-McLeod
Rachael Notley, Leader of the Opposition
Irfan Sabir, Energy Critic
Marlin Schmidt, Environment Critic