



ALBERTA CHAPTER OF THE WILDLIFE SOCIETY

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Honorable Jason Nixon
Alberta Environment and Parks
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February 18, 2021

Re: The impacts of open-pit coal mining on water quantity

Dear President Pushor and Minister Nixon:

The Alberta Chapter of The Wildlife Society (ACTWS) is a non-profit organization representing over 425 wildlife professionals in the province of Alberta. Our mission is to inspire and empower wildlife professionals to engage in science-based management and conservation of wild animals and their habitats. Our dedication to that outcome is reflected in our thoughtful, innovative work. We are affiliated with The Wildlife Society, the largest organization of wildlife professionals in the world. Each of our members loves Alberta for the diversity of economic, wilderness, and wildlife opportunities it provides.

Water is an essential habitat requirement for all species. For trout species at risk, water quality is just as important as water quantity. Based on information provided during the Joint Review Panel hearing for the proposed Grassy Mountain coal mine, there is a requirement in the order of 3.0 billion liters of water per year to facilitate coal mining/processing. The ACTWS understands there are multiple coal companies, with several potential coal mines proposed for southwestern Alberta. Each of these proposed mines will have a water requirement for operation; these water requirements will be cumulative, each of them taking more water from a finite system.



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As a science-based organization, the ACTWS is interested in the data used in decision-making. In areas where data gaps exist, we may be able to offer expertise as our membership spans all areas of wildlife research and management in Alberta. In the case of water and coal mining proposals on the eastern slopes, we would like to understand the following:

1. What are the projected annual water requirements for coal mines proposed in southwestern Alberta?
2. Where will the source of water be, in terms of individual river/stream systems and segments for these proposed coal mines?
3. How many of these river/stream systems and segments have trout species at risk (Westslope cutthroat trout and bull trout) inhabiting them? Would other trout species be affected?
4. What factors must the Director in Alberta Environment and Parks (AEP) consider in making decisions on applications for water licences as they pertain to:
 - a. Existing, potential, and cumulative effects on the aquatic environment – including no significant adverse effect on the aquatic environment?
 - b. Existing, potential, and cumulative effects on any applicable instream objective (IO) and/or Water Conservation Objective (WCO) – including no significant adverse effect on existing instream objectives or water conservation objectives?
 - c. Existing, potential, and cumulative hydraulic, hydrological and hydrogeological effects – including no significant adverse effects?
5. If it is the Alberta Energy Regulator that makes these decisions, are the guidelines similar to what the Director (AEP) must consider on water allocation decisions for industry?
6. Have detailed, field-level measurements been made of annual flow regimes in any of the affected rivers/streams? How many years of data are available to provide a reliable assessment of the hydrologic regimes?
7. Have detailed, field-level instream flow needs (IFN) assessments been made on any of the affected rivers/streams? If so, which river/stream systems have had IFN studies completed and what do the results indicate in terms of the impacts of water removal for coal mine operations? Will proposed water withdrawals for coal operations impact trout species at risk, their protection and recovery success?



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8. How will new allocations to mining companies affect the moratorium on new water licenses in the South Saskatchewan basin that will affect fisheries downstream of the Eastern Slopes?

The ACTWS would appreciate your early attention to these questions as we understand your ministry is now considering water allocations to the coal industry in the southwestern Eastern Slopes. The ACTWS is concerned that making such decisions prematurely, before basic hydrologic and instream flow need measurements and studies are completed, would not be in the best interest of conserving trout species at risk, a commitment of the province of Alberta.

We look forward to your response and are happy to work with you to ensure that trout and other species at risk along the eastern slopes have sufficient available habitat to ensure their recovery.

Respectfully,

Alex Beatty, President
Alberta Chapter of The Wildlife Society

cc. Jason Kenney, Premier of Alberta
Rachel Notley, Leader of the Opposition
Marlin Schmidt, Environment Critic