After thorough review of the NWP (hereafter known as the Proponent) Crown Mountain Coal Project (hereafter known as the Project) located twelve kilometers (km) north of the District of Sparwood, British Columbia (BC), it can be determined that this Project is not in the public's best interest.

For example, although the Proponent identified approximately 55 Valued Components (VC), of which three are regionally valued components through the Elk Valley Cumulative Effects Management Framework (EV-CEMF) (Grizzly bear, Old and Mature Growth forests, and Riparian Areas), their sheer lack of respect and ignorance for the detrimental cumulative and initial effects, of a Project of this capacity, is outstanding. Not only does the Proponent not believe that the Project will cause any significant, residual effects, but they have not yet developed any formal, practical mitigation measures to compensate for any VC, even those that have been identified as regionally valued components, or the federally endangered whitebark pine or limber pine. For sake of clarity, I will focus on only two of the Projects VC.

Bighorn sheep: It has long been known by the province (BC) and local residents that there is great movement of sheep because of extensive access to high elevations, especially within Alexander Creek because of access to Alberta and other historical migration routes (Kuzyk et al. 2012, Stent et al. 2013, Poole et al. 2016). For example, in a study by Kim Poole (2022), he stated that one of the corridors that had the greatest use of movements, in the entire Elk Valley (3,568 km^2), occurred in the Line Creek Canyon (within the project's footprint). With the current mine plan in place, how will NWP ensure that wildlife mortality is completely avoided and mitigated? At other open-pit operations in BC, one of the biggest risks continue to be wildlife-vehicle collisions, not only on site, but through personnel driving to site. In NWP's current mine plan, there is no action to address these risks, and the Proponent currently sees this detrimental effect as having negligible effects on the local wildlife population.

Grizzly bear: Currently grizzly bears are listed as a *special concern* under the federal government's Species at Risk Act and have been given a *blue-list* conservation status rank from the BC provincial government (COSEWIC 2012), as the species is extremely sensitive to anthropogenic changes. Grizzly bears in the Elk Valley face the utmost amount of pressures that has resulted in the most significant amount of mortality in the Kootenay Region (EV-CEMF, 2018). A road density threshold has been identified for grizzly bears (0.6km/km^2), as that was found to be the dominant stressor contributing to the additive mortality rates.

With the addition of a new open pit coal mine, the amount of habitat for grizzly bears in an area of high habitat suitability, will significantly decrease. However, because the Proponent has not created appropriate habitat suitability models for VCs in the Projects footprint, the actual impact extent is unknown. In order to create habitat suitability models, Terrestrial Ecosystem Mapping (TEM) is used to characterize vegetation ecosystems and soil mapping, to determine habitat classifications. Most projects tend to use a smaller scale approach (i.e., 1:5000) to fully capture the variation of ecosystems that exist on the landscape and provide a better understanding of what ecosystems could be disturbed. However, the Proponent opted to use a 1:20,000 scale approach, which leads to coarser results, and a large areas for inaccuracy for the full extent of the Projects effects. Moreover, because of the scale used, any habitat models will undoubtably be extremely invalid. Nonetheless, even without the proper habitat models, how will NWP reduce impacts to an already threatened population of an iconic species?

Additionally, through following the mitigation hierarchy, NWP has not committed to any type or value of offset and has admitted that "there will be some residual effects… but they're (the offset) not one for one" (Dave Baines, pers. comm).

Lastly, as stated in the Proponents Executive Summary Report (2024), “the proposed Project strives to use best practice mining and environmental management methods to extract shallow steelmaking coal reserves”. How can the best mining and environmental management methods be utilized when neither NWP, nor their parent company, Jameson Resources, are a member of any kind of international agreement that has committed to mitigate nature or biodiversity loss? For example, members of the ICMM have recently committed to a 2030 timeline to become Nature Positive. To date, neither Jameson Resources nor NWP have committed to anything that is substantial in regard to biodiversity loss. Even if a Nature Positive commitment is too large to uphold, other alternatives such as “No Net Loss,” or “Net Positive Impact” (NPI) which have been an industry standard for over a decade (i.e., Rio Tinto first committed to NPI in 2004) have not been entertained.

Although NWP Coal performed a reliable Environmental Assessment for the Project, while reviewing the risk assessment and effect classification as provided by the EIA, it can be determined that the Crown Mountain Coking Coal Project will have **Long term** *(<2 years),* **high frequency** *(Effects occur continually through to closure)*, **irreversible** *(will not return parameters to baseline levels prior to Project disturbance),* **with more (or at least a) Moderate level of magnitude** *(A defined change to an indicator that is potentially detrimental but manageable, and expected to result in a clearly defined change to the population, but within the resilience limits and adaptive capacity)* level of effect.

Moreover, using the EIA *risk matrix*, it can also be easily determined that the Project will have **direct effects** *(change in environmental that results immediately from a project, activity, or action, caused by the action and occurring at the same place and time. For example, the removal of mountain tops, high quality habitat for wildlife, etc.).* This is clearly in contrast to the final statement from the Proponent. However as identified above, without any regard to proper mitigation or management of any identified VC, this result is painfully evident, with the highest risk being that the Proponent makes these assumptions, and does not mention any type of uncertainty throughout any point in the assessment.

This review does not fully capture all of the effects that a Project of this size will have on the landscape, however it does provide a unique perspective on two terrestrial VC that are under an utmost amount of pressure in a region that has hit its tipping point of residual and cumulative effects. This project will destroy habitat, kill, and displace wildlife, contribute to increased air, and water quality issues, eliminate recreational opportunities and be a scar on the landscape for decades to come. Overall, even if the total lifespan of the Project is 15 years, is it worth the thousands of years of legacy effects? This Project will affect not only your generation, but your grandchildren’s generation. Is this worth it? This is where the line needs to be drawn.

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