

February 24, 2024

Here's my review/summary of what an AI identified as some of the most important elements, both pro and con in the Crown Mountain Coking Coal Project - Reference number 80087 - Application for an Environmental Assessment Certificate / Environmental Impact Statement.

I have done my analysis of 10 potential negative and 10 positive environmental and social impacts mentioned and provided my opinions on potential solutions or comments to some of the most important issues or indicated that I don't believe they are significant in my opinion, which may or may not align with the view expressed by the proponent:

I lived and worked in this area for more than forty years, and watched the direct impacts of mining both pros and cons during that time. I have seen the booms in the late '70s and early '80s brought about by the creation of Line Creek and Greenhills and then the pain experienced with the bankruptcy of Westar in the early '90s coupled with an 8-month strike.

I did not emphasize the Indigenous interests, that was obvious from the submission and a function of what the AI chose as the top 10 pros and cons. I reviewed each and inserted my opinion based on my 40-plus years of work experience and over 60 years of life on this planet.

I do not want to come across as insensitive to Indigenous or other stakeholder interests and may have stated some of my comments more bluntly than a person with more modern thinking would do, so I have taken poetic license the latitude of age should give me.

That being said, in an ideal world, this project would address everyone's interests and everything would be rainbows and unicorns but that is not reality. The need for metallurgical coal, oil, and gas will not end during the life of this project. In addition, lower quality or thermal coal that is mined should not be wasted and should be marketed to ensure additional economic viability. While I do not like the (what should be short-term) loss of hunting and recreation access, I no longer need industry for my livelihood but acknowledge the need for it for my children and grandchildren therefore I accept it as necessary.

I also acknowledge my bias towards the interests of Sparwood and I do not apologize for that.

Environmental:

1. **Significant adverse residual effect on Westslope Cutthroat Trout:** This is a threatened fish species, and the project is expected to have a negative impact on its population.

- The proponent could be required to do enhancement work offsite to mitigate the impact and increase the viability of this species greater than the estimated impact.
2. **Significant adverse residual effect on old-growth and mature forests:** These forests are important for biodiversity and carbon storage, and the project will result in their loss.
 - Trees will regrow and it could be a requirement of reclamation and at mine closure that a forest is viable.
 3. **Other potential effects on various Valued Components (VCs) like air quality, greenhouse gases, soil, water quality, wildlife, and human health:** While most of these are assessed as "not significant", there is still some level of uncertainty and potential for negative impacts.
 - These impacts are acceptable and should be monitored so the actual impact does not exceed to any unmanageable degree the estimated impacts.

Social:

4. **Impact on Indigenous communities' rights and interests:** The project may affect traditional activities like hunting, fishing, and gathering for some Indigenous communities.
 - I do not know that this is a significant issue however I do know from firsthand knowledge that it does have an impact on recreation and hunting by local area residents so all of those impacts should be mitigated and restored after the mine closure.
5. **Creation of 330 full-time jobs, but also displacement of traditional livelihoods:** While the project may create jobs, it could also negatively impact the traditional ways of life for Indigenous communities.
 - It is more likely to have a positive impact on employment initially but unfortunately, it will have more of a negative impact on indigenous communities when the mine closes. The loss of over 300 jobs along with the loss of spinoff contractor employment and businesses will have a significant negative impact. This will spill over into the local communities and more specifically Sparwood and the Crowsnest Pass although the latter is not as much my concern being I am in BC.
 - To my understanding, the current Elk Valley Mine Tax Pool does not account for a new mine's revenue separately; instead, it is simply added to the existing tax pool. Consequently, the existing mines (Teck) pay less without a proportional increase in revenue for the Elk Valley municipalities to manage the additional impact of a new mine within their respective areas. I propose that new mines should directly pay property taxes, treating the amount as new revenue in addition to the existing tax pool. Furthermore, I recommend

allocating a portion of these funds to a reserve specifically accessible during mine shutdowns or closures. This reserve would help communities address the negative impact resulting from the loss of over 300 jobs and associated business disruptions. Planning for such scenarios is crucial to mitigate adverse effects

6. **Potential for social and health impacts on nearby communities:** The project could lead to increased noise, dust, and traffic, which could impact the quality of life for residents in nearby communities.
 - If managed onsite, dust is less likely to have a direct impact from the mine given the distances however it is suggested that onsite vehicle washes including undercarriage washes be used to manage migrant mud and dust escaping the mine site on vehicles.
7. **High reliance on long-term coal price forecasts, which are uncertain:** The project's economic viability depends on coal prices remaining high, which is not guaranteed.
 - While true little can be done to control world prices therefore the regulator could require security for closure.
8. **Potential for future regulatory changes:** The project could be impacted by future changes in environmental regulations.
 - While true little can be done to control world prices therefore the regulator could require security for closure.
 - The mine operator should post security to ensure the resources are available to properly close the mine or manage it should this circumstance happen however there should also be contractual arrangements in place where the Government compensates the mine if they change the goalposts. (Not sure how to address this as there is concern that a change is made purely for political reasons and not necessarily for scientific reasons.)
9. **Lack of Project-specific traditional land use studies from potentially impacted Indigenous communities:** This makes it difficult to fully assess the potential impacts on their rights and interests.
 - Not sure how this could ever be addressed.
10. **Project approval would require balancing societal needs with environmental and social impacts:** This is a complex decision and although there are no easy answers, decisions and choices need to be made in a timely fashion. (Not years and years of changing goalposts and naval gazing.)

It's important to note that this is just a summary of the potential issues, and there are other perspectives to consider. Ultimately, the decision of whether or not to approve the project is a complex one that needs to weigh all of the potential costs and benefits.

While the project raises significant environmental and social concerns, it's also important to acknowledge potential positive aspects. Here are 10 potential benefits associated with the project based on the information provided:

Economic:

1. **Job creation:** The project promises 330 full-time jobs during operation, potentially boosting the local economy.
 - There are also spinoff benefits of additional contractor and business employment, in local communities.
 - The best way to ensure the greatest benefit to the health and well-being of the workforce and communities is to implement 8-hour shifts where employees are more dedicated to the company and live in the communities impacted by the mine.
2. **Investment and tax revenue:** The project would attract investment and generate tax revenue for local, provincial, and federal governments.
 - The current Mine Tax Pool in the Elk Valley does not properly address new mines as they are simply added to the tax pool and then Teck pays less without a proper increase in revenue to the Elk Valley municipalities to deal with the impact of the new mine on their respective jurisdictions. New mines should have to pay property taxes directly and the amount should be new money added in addition to the pool with a portion dedicated to a reserve fund that may only be accessed at the time of this mine shut-down or closure to assist communities in addressing this as we all know it is a known issue.
3. **Value-added spin-offs:** The project could create opportunities for businesses in the region to provide goods and services.
 - See 1. Above to ensure this happens the most at the local level.

Social:

4. **Community development:** The project could contribute to the development of infrastructure and services in the area.
 - See 1. and 2. Above.
5. **Training and skills development:** The project could provide training and skills development opportunities for residents.
 - Perhaps tie the on-site training of new employees to an employment commitment of a set duration in exchange for the training.
6. **Potential for improved community relationships:** NWP's commitment to open dialogue with stakeholders could foster positive relationships.

- A commitment of the company to improve the building of community cohesiveness as outlined above on several points listed above would go a long way.

Environmental:

7. **Mitigation measures:** The proposal outlines mitigation measures to minimize environmental impacts, potentially reducing harm compared to historical practices.
 - This backed by security is commendable.
8. **Follow-up and monitoring:** The plan includes monitoring potential effects, allowing for adjustments to minimize negative impacts if needed.
 - This backed by security is commendable.
9. **Compliance with regulations:** The project would need to comply with environmental regulations, potentially setting a higher standard for future projects.
 - This backed by security is commendable.
10. **Addressing global demand for metallurgical coal:** The project could contribute to meeting global demand for a resource used in steel production.
 - The need for metallurgical coal is expected to increase and mining it in Canada with a responsible regulatory scheme is a globally responsible approach.

I support this project and believe that the benefits outweigh the risks of environmental and social concerns provided changes are made to mitigate them and restore this area to nature as soon as possible post-closure.

Please focus on the real issues that can be mitigated and managed and do not waste time chasing hypothetical ones that do nothing but waste everyone's time and resources.

Sincerely

Old Retired Guy

Sparwood, BC