



## Grasslands Conservation Council of British Columbia

Feb 26, 2024

The Environmental Assessment Office (EAO) and Impact Assessment Agency of Canada (IAAC)

### **Re: Crown Mountain Coking Coal Project – Grasslands Conservation Council Comments**

The GCC brings together a broad base of conservationists, ranchers, resource management professionals and First Nations to speak for the grasslands. Our BC Grasslands cover less than 1 % of the province but support over 30% of the Species at Risk. Our rare grasslands cannot be replaced once lost to development.

Existing current cumulative effects associated with coal mining, and mine exploration on high elevation grasslands in the Elk Valley are significant. The Elk Valley is the heart of the red-listed rough fescue Gg16 (rough fescue - sulphur buckwheat - thread-leaved sandwort) community that is unique and may only occur in BC. It has both low and high-elevation species and many plants that are restricted to southeast BC. With the loss of significant areas to mining already, elk and bighorn sheep have been concentrated in smaller areas and grazing is likely degrading the remaining grasslands. Existing grasslands have been fragmented by mining, and coal dust is having unknown impacts. Mining exploration roads have also caused direct grassland losses and degraded remaining grasslands.

The Crown Mountain development will have additional significant negative impacts on remaining high elevation grasslands in the Elk Valley, and impacts associated with direct loss of high elevation grasslands will not be mitigatable. There are 5 high elevation grassland (HEG) types in the Elk Valley that are red or blue-listed within British Columbia due to their rarity and high threats from permanent conversion to coal mines and mine infrastructure (B.C. CDC 2021). They are not known to occur elsewhere in British Columbia (B.C. CDC 2021). Almost all significant sized occurrences of the rough fescue type (Gg16) occur within the east side of the Elk Valley

More research on impacts of mountain removal to localized weather patterns is required to understand impacts of mountain removal coal mining on the broader landscape. Existing and future impacts of mountain removal on adjacent high elevation grasslands needs to be considered during the effects assessment phase. Research is being undertaken to quantify and qualify drivers of grassland change, and to develop a seral grassland classification to better understand patterns of grassland condition across the Elk Valley. Data and learnings from this work will be publicly available as analysis progresses.



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Please consider the permanent loss of native high elevation grassland areas associated with coal mining and exploration, and subsequent changes to condition of remaining high elevation grasslands, when assessing expected impacts from Crown Mountain and other projects in the Elk Valley. The value of these grasslands is immeasurable and the disturbance to grasslands is irreversible..

Yours in Conservation,

Chair, Grasslands Conservation Council of BC

cc: Honorable Josie Osborne, Minister of Energy, Mines and Low Carbon Innovation  
Mike Dedels, Executive Director, Grasslands Conservation Council of BC