

**From:** <email address removed>

**Sent:** Thursday, October 24, 2019 4:38 PM

**To:** Grassy Mountain (IAAC/AEIC) <[iaac.grassymountain.aeic@canada.ca](mailto:iaac.grassymountain.aeic@canada.ca)>

**Subject:** Public Comment Deadline & Brief Submission

Dear Panel,

Full participation in this process and the review of so much information requires resources in time and expertise that most NGOs and individuals like me simply do not have, especially when the information provided is so disparate, requiring endless cross-referencing. Today, however, is the deadline for comment so may I simply submit the following:

1. The fundamental premise, to engage in open cut – even mountaintop removal – coal mining in the 21<sup>st</sup> century, is simply wrong and nothing in the new information submitted by the proponent can effectively ameliorate this basic premise.
2. Knowing what we know about the extremely serious – even existential – consequences of burning coal, especially coal that is near 80 percent carbon, how can we morally justify the approval of this mine? Whether or not the burning of coal is accounted for in Canada, Australia, China or elsewhere, we are all at risk.
3. The southwest corner of Alberta is dry; all water is precious. The proposed mine threatens both water quality and water quantity on a scale, given the value of this limited resource, that is truly alarming:
  - a. The proposed mine will certainly contaminate both Blairmore Creek and Gold Creek with selenium and other toxic runoff which in turn will contaminate the Crowsnest River which may then compromise the Oldman River and perhaps even the South Saskatchewan River and – if all the other mines awaiting are also approved – perhaps even Hudson Bay and the Arctic Ocean;
  - b. Downstream surface and ground water, on which everyone to the east of the mountains depends, will to be contaminated by:
    - i. Runoff from extensive bared ground, from blasting and from toxic ponds;
    - ii. Particulate matter blown by high winds which will then percolate into both surface and groundwater;
    - iii. Particulate matter blown onto the snowpack which will not only affect downstream surface and ground water, but result in accelerated melt of the snowpack where it is already at risk.
  - c. The proponent expects to use significant amounts of water for operations, for dust control and for any reclamation. But there is not enough water in these creeks and rivers, which are in drought years already oversubscribed, to maintain the ecological health of the rivers and species - including bull trout and west slope cutthroat trout- but also for the use of other humans and animals and economies that depend on this very limited water supply.

- d. If this proposed mine is approved, its short lifespan – even if it is the full 24 years, which is doubtful – will result ongoing leaching of contaminants into our water, as it does in SE BC, for hundreds of years.
4. Southwest Alberta is renowned for its extreme foehn or chinook winds and inversions caused by air strata layering which trap a continuous and dangerous buildup of dust, particulate matter and the entire roster of pollutants associated with coal mining in the area:
  - a. The Crowsnest Pass is the epicentre of chinook winds which will dry and blow bare contaminated soil and particulate matter downwind long distances;
  - b. Any assurances that dust control in such widespread soil disturbance and routine use of explosives in 100km – and even up to 180km – winds should be viewed with extreme skepticism;
  - c. Any assurances that vegetation will be routinely replaced and disturbed soil will be reclaimed are not to be believed. Significant amounts of topsoil are likely to blow away and wind and evaporation are likely to make regrowth of any preferred groundcover and trees very difficult;
  - d. Any assurances that dust control will limit the dispersal of particulate matter and other pollutants are simply not credible.
5. The health effects of particulate matter, VOCs and the very long list of severe pollutants associated with coal mining very alarming, including respiratory and pulmonary diseases, cancers, reproductive issues, premature death, loss of IQ, depression, dementia caused by particulate matter crossing the blood/brain barrier – as well as the sadness and loss that accompanies the loss of Home or habitat as we have known it.
6. This proposed project and others awaiting the outcome of this permitting process, if approved, will take this area back to a boom/bust fossil fuel dominant economy, instead of building on a healthy and more diverse economy already based on quite exemplary agriculture, recreation, tourism, Castle Park, Waterton Lakes National Park, fly-fishing, skiing, second homes and a fledgling retirement mecca. Who wants to live, ranch or recreate in the degraded environment of Appalachia North?
7. Jobs and investment at all cost is the justification for such projects, no matter how harmful. But coal mining, like other fossil fuel extraction, is a boom/bust industry dependent on world prices. So what do we really get from such jobs and investment?
  - a. Jobs that are unstable and ephemeral, jobs that entice young people away from an education leaving them vulnerable to recurring unemployment with no options, jobs that are increasingly replaced by AI, jobs that are inherently physically unhealthy given the ubiquity of pollutants, living conditions in “man camps” which are surely mentally and socially unhealthy, a society full of angry young men....
  - b. Investment that takes the often extreme profits and leaves the environmental and social clean up to taxpayers, investment that leaves Albertans vulnerable to corporate demands and decisions, investment that leaves Albertans and Canadians with little return in extremely low and unpaid royalties while we offer subsidies both direct and indirect of billions of taxpayers dollars annually.

- c. We back into the future embracing the past as a modern economy passes us by. We are not the masters in our own house, corporations are. Our democracy has become stunted. We are like a third world country, but we do not seem to have noticed and we persist, unable to imagine an better economy for Albertans.
8. Any one of these concerns – our water, our air, our health, any real benefits – should be enough to make coal mining in the 21<sup>st</sup> century a path not taken. And those of us who are participating in this review would like to trust that this project will be judged on its true merits or lack thereof, on a true and thoughtful cost benefit analysis. But it would take a very courageous panel to say no. Neither the federal nor the provincial government is going to be willing to say no. The provincial government, after their election, counted this project as ongoing and under construction on their major project website – until we complained - and, as the panel observed on its flyover in September, the project is very clearly underway already. As if the outcome is certain, as if this process is for naught, as if the panel is only allowed to weave a fig leaf of conditions and justifications which need not stand the test of time.
9. Solastalgia is the distress that is produced by environmental change impacting on people and their home environment. Research teams have found solastalgia to be evident with respect to climate change, persistent drought, fire, other environmental disasters and the impact of large-scale open-cut coal mining. People exposed to environmental change experienced negative affect that is exacerbated by a sense of powerlessness or lack of control over the unfolding change process.
10. This project and the ones waiting in the wings, if approved, will not only affect those of us who call SW Alberta home. These coal extraction projects will affect all of us – those who live nearby, those who live close to sea level, those who depend on rain, those whose homes will be flooded, those whose landscapes will burn, all of us who depend on Arctic sea ice to ameliorate our climate, those of us who eat and depend on pollinators and insects, those of us who respect and love the natural world, who respect and love birds and animals and biodiversity, those of us who love and understand the value of healthy oceans, those who love their children, even those who believe this world was created by God, those who breath, those who wish to be healthy in body and mind, those of us who see the wonder of this world and those of us who do not choose to live in what O.E. Wilson calls The Age Of Loneliness.
11. Please say No.

Very sincerely,

Jillian Lynn Lawson  
Porcupine Hills AB