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May 26, 2021

Subject: Y2Y Comments re: Phase I Vista Test Underground Mine and Vista Mine Phase II Expansion Projects. IAAC project reference number 80731

Dear Impact Assessment Agency of Canada Vista Mine Expansion Review Committee,

The Yellowstone to Yukon Conservation Initiative (Y2Y) is concerned about the Phase I Vista Test Underground Mine and Vista Mine Phase II Expansion projects (hereafter: 'Vista Mine expansion') outside of Hinton, Alberta. Y2Y is a conservation organization that has worked for the past 25 years with over 450 partners to protect and connect habitats so that people and nature can thrive. We submit this letter of concern on behalf of our supporters, including those who live, work, and/or recreate on Alberta's Eastern Slopes, and who value the fish and wildlife that live and move through this ecologically significant landscape.

We were pleased to read about what appears to be a thorough public and First Nations consultation associated with the Vista Mine expansion. It is not clear, however, how the results of these consultations were used to influence the project details. Conducting consultation is a legal requirement, but conducting consultation is not the same as incorporating input into project plans. In particular, the table on page 6 of the project summary highlights issues raised by Indigenous groups. The responses to Indigenous concerns do not consistently demonstrate an interest in altering project plans to address concerns. Coalspur Mines Limited's (the proponent) response relies almost exclusively on monitoring and reclamation activities, or employment opportunities for the local community. Given the uncertainties associated with reclamation success and how the results of monitoring are used to influence management practices, we would like to see specific details about how the project plan was influenced by feedback from the public and Indigenous groups.

The proponent states that the regional assessments from 2012 have been re-evaluated with updated information pertaining to the current market and changes to the operating status of mines nearby. We hope that recent wildlife and environmental research was also included in this update. Among other things, recent wildlife-related research has better quantified the potential pollution risks of coal mining to aquatic habitats, the cumulative impacts of industrial activity on grizzly bear habitat use and movement, the impacts of climate change on migratory birds, and the impacts of coal mining reclamation activities on sheep habitat.

Our other concerns regarding the Vista Mine expansion project are: 1) the proponent's inadequate recognition of cumulative effects, and 2) the proponent's calculated economic contributions of the project. To more effectively address these concerns, our recommendation is that the proponent be required to complete a Federal Environmental Impact Assessment.



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Cumulative effects

Alberta's Eastern Slopes are a busy landscape with abundant industrial activity associated with forestry, oil and gas, and coal mining, increasing recreational popularity amongst a diversity of Albertans, transportation and utility corridors, and towns of various sizes. The Eastern Slopes also contain some of Alberta's most critical ecosystems, including the headwaters for interprovincial river systems. Due to their ecological significance, the Eastern Slopes also provide essential habitat for dozens of species-at-risk, from amphibians to grizzly bears, and function as a critical corridor for wide-ranging mammal species.

The proponent's project description repeatedly states that these two independent project expansions do not require Federal review. When the underground mine and the Phase II expansion are considered together, however, they exceed the production threshold that requires Federal Review and come very close to exceeding the size threshold as well. While their reasoning that the Federal review will take several years and increase project costs substantially is understandable, their continued requests for the Federal Court to reverse the Minister's decision requiring Federal Review exemplify their misunderstanding of the importance of cumulative effects.

The reality is that with the current level of activity on the Eastern Slopes, *all* projects should be planned and considered within the context of cumulative effects. The impacts of new projects, whether they be within existing approved footprints or in new areas, do not occur in isolation on the landscape. From a landscape perspective, the impacts of multiple developments are additive and combine to create deleterious effects for wildlife and their habitats. These impacts would be more thoroughly addressed through a Federally-required Environmental Impact Assessment.

The proponent repeatedly states that there is environmental benefit associated with underground mining activity in that it reduces surface disturbance. While this may be true, the proposed underground mine is being used to examine the feasibility of this methodology in extracting coal in the area. The proponent does not address what their course of action will be if the underground test does not prove to be economically feasible. Will they come back with a plan to open-pit mine this section of their development? Or will they abandon efforts to extract this coal?

One of the biggest impacts of development along the Eastern Slopes is associated with linear disturbance density resulting from roads used to access industrial activity. We appreciate the proponent's ability and willingness to use existing roads and infrastructure where possible. This is an important step in reducing the project's impact on the landscape. The Phase II expansion will also require construction of new access roads, but the project description does not define how much new road will be constructed. In addition, there is no mention of potentially reclaiming or decommissioning other roads to ensure that the extent of linear disturbance does not increase with the Vista Mine expansion project. We would like to see more detail about how much new linear disturbance will be created and how the proponent intends to decommission existing and future linear disturbance.

Economic implications

One of the justifications for the project is its potential economic contribution to Alberta. As with all industrial activity, the proponent estimates the economic benefit of coal mining based on projected volumes of coal extracted and projected market value. On page 8 of the project description summary, the proponent suggests that the "increased volume of coal for Phase II is necessary for the economic viability of the Vista Mine based on the decrease in coal prices since the economic feasibility studies completed at the start of operations." Given that coal prices have declined since the initial economic feasibility studies and the fact that more countries are

turning to renewable forms of energy, we are concerned that these economic projections are not realistic over the long term. If coal prices continue to drop, will the proponent continue to come forward with project expansion proposals to make the mine economically feasible? This is unacceptable.

The Canadian government has committed to reducing coal-related emissions as part of a multi-pronged effort to reduce carbon emissions. In 2018, Canada announced regulations to phase-out traditional coal-fired electricity by 2030. Canada has a role to play on the international stage as a leader in demonstrating how a reduced dependency on coal can be actualized. It is, therefore, disingenuous to support coal extraction for burning in other countries that will further increase carbon emissions on a global scale. Current coal development proposals and regulations in Alberta misalign with these commitments. In July of 2020, Minister Wilkinson was quoted as saying, “I think Canadians expect us to look at whether or not we should continue to be exporting thermal coal at a time when we’re telling other governments that they shouldn’t be using it.” (Globe and Mail, July 30, 2020).

The Vista Mine extracts thermal coal that is exported to Japan, Korea, and Taiwan. The G7 countries recently announced they would no longer support investment in internationally-developed coal (May 2021). Japan, one of the proponent’s principle markets, has agreed with other G7 countries “to phase out new direct government support for carbon-intensive international fossil fuel energy”¹. The proponent should more clearly justify how their economic projections are an accurate reflection of the benefits to Albertans over the long term. Unfortunately, the Alberta landscape is laden with billions of dollars of reclamation costs resulting from coal companies not accurately projecting or planning for a dramatic decrease in fossil fuel prices, and then being unable to fulfill their reclamation requirements. Albertans need assurance that the proponent will not do the same as the coal market continues to decline.

Y2Y is concerned that the Vista Mine expansions will have significant negative impacts on wildlife and their habitats in the area. When considered along with other impacts already occurring on the landscape, these impacts will be irreversible in some cases and in others, not economically feasible to mitigate. Alberta’s Eastern Slopes are already a landscape under significant threat. On behalf of our organization and our supporters, we request that the Impact Assessment Agency of Canada require a Federal Impact Assessment and review associated with this project.

Please feel free to contact us with any questions or for additional input. We look forward to continuing to provide input on this file.

Sincerely,

<Original signed by>

Hilary Young, PhD
Senior Alberta Program Manager

¹ Fiona Harvey. 2021. Richest Nations Agree to End Support for Coal Production Overseas. The Guardian. May 21, 2021. <https://www.theguardian.com/environment/2021/may/21/richest-nations-agree-to-end-support-for-coal-production-overseas>. Accessed May 22, 2021.