



The Honourable Jonathan Wilkinson MP
Minister of Environment and Climate Change
200 Sacré-Coeur Boulevard
Gatineau QC K1A 0H3

cc:
Impact Assessment Agency of Canada
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July 15, 2020

**RE: Request for Designation of the Castle Project under s. 9(1) of the
Impact Assessment Act**

Dear Minister Wilkinson:

The Yellowstone to Yukon Conservation Initiative (Y2Y) has actively promoted conservation in the transboundary Crown of the Continent region of the Rocky Mountains since our inception in 1995. We are concerned about the likely impacts of coal mine expansion in the Crown of the Continent. We therefore request that you designate Teck's Castle coal mine expansion project for review under the Impact Assessment Act. We further request that this review be undertaken by a panel.

A federal impact assessment is appropriate for a number of reasons:

1. The impacts of the Castle project would be transboundary, and a provincial assessment would likely not assess impacts in Montana and Idaho. We have recently seen concerns about the downstream water pollution from existing mines being voiced by International Joint Commission Commissioners, the US EPA, the States of Montana and Idaho, US Tribes, and US citizens and organisations. BC's environmental assessments of all previous mine expansions and of current new mine proposals have not considered impacts in the US.
2. The potential impacts to the rights of Indigenous people are also a matter for federal concern. We note that the Ktunaxa Nation and the Confederated Salish and Kootenai Tribes and Kootenai Tribe of Idaho



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have requested a federal impact assessment, including due to concerns about white sturgeon, a federally-listed species at risk in both countries. We stand in solidarity with the Ktunaxa/Kootenai people.

3. We are concerned about the potential for long-term, cumulative impacts on wildlife, including the connectivity corridor from Glacier-Waterton International Peace Park to Canada's Rocky Mountain National Parks complex. We are particularly concerned about wide-ranging species including grizzly bears and wolverines; connectivity in the region is already compromised by historic industrial impacts and fragmented by Highway 3 and the Canadian Pacific Railway.
4. The potential impacts to Canada's ability to meet our national climate goals, due to the greenhouse gas emissions associated both with coal mining operations and the burning of that coal.
5. Finally, a federal assessment could consider the potential cumulative impacts in the context of the other coal mines that are undergoing impact assessment in the same region, in both BC and Alberta. (We have separately requested a federal impact assessment of the Vista coal mine in Alberta.)

We are aware of submissions from other organizations which lay out in the details the issues associated with selenium pollution in the Elk River. While we believe Teck is making efforts in good faith to address the selenium issue with water treatment technologies, those systems are unproven and have thus far not worked. Mining pollution will endure for centuries, and a federal assessment can evaluate these impacts in the appropriate time scale, which has not occurred in previous provincial environmental assessments of mine expansions in the Elk Valley.

Please grant federal assessment of Teck's proposed Castle project (and the Vista project in Alberta). Thank you.

Sincerely,

<original signed by>

Sarah Palmer
Director, Conservation Programs