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To Whom It May Concern,

We are the Crowsnest Conservation Society (CCS), a charitable organization working together with community to inspire collective action to protect our natural world through advocacy, research, education and habitat restoration. We advocate for responsible land and resource management practices that prioritize conservation. The CCS is located in the Crowsnest Pass, Alberta, and currently has 281 active members, 488 newsletter subscribers, and 890 Facebook followers.

We are writing to provide comments on, and to recommend substantive changes to, the *PROPOSED TERMS OF REFERENCE (PTOR) for the ENVIRONMENTAL IMPACT ASSESSMENT* for the Grassy Mountain Coal Project (Project) submitted by Northback Holdings Corporation (Northback), on November 5, 2025.

Given the sensitivity of the project location, the history of previous regulatory decisions, and the potential for significant and irreversible effects, the PTOR requires strengthening in several critical areas in order to meet the public-interest, scientific, and precautionary standards expected of an environmental impact assessment.

A. We respectfully submit as an attachment to this letter, our SPECIFIC recommended changes to the PTOR. Our proposed amendments are identified and inserted as red lower case letters within the Proposed Terms of Reference.

B. Following are the GENERAL concerns respectfully submitted by the Crowsnest Conservation Society:

1. Water Quality and Watershed Protection Must Be Treated as a Determinative Issue

The PTOR should be amended to require a higher evidentiary standard for assessing impacts to surface water and groundwater within the Oldman River watershed. This should include:

- Explicit evaluation of worst-case and post-closure contamination scenarios, including long-term selenium and trace metal loading.
- Independent validation of treatment technologies proposed to manage mine effluent, including performance under climate-stress conditions.
- Clear thresholds that would trigger rejection of the project should water quality objectives not be demonstrably achievable.

Given the importance of this watershed to drinking water, agriculture, and ecosystems, water quality protection should be framed as a determining constraint rather than a mitigable effect.

2. Stronger Requirements Are Needed for Fish, Aquatic Habitat, and Species at Risk
The PTOR should require:

- Assessment of irreversible habitat loss and fragmentation, not solely mitigated or offset impacts.
- Explicit consideration of recovery objectives for species at risk, including downstream populations affected by cumulative effects.
- Demonstration that proposed mitigation will not merely reduce harm, but avoid population-level impacts over the full life of the project and post-closure period.

3. Cumulative and Long-Term Effects Must Be Expanded
The cumulative effects section of the PTOR should be strengthened to require:

- Long-term modeling extending well beyond mine closure and reclamation certification.
- Explicit consideration of climate change-driven hydrological variability, drought, and extreme precipitation events.
- Precautionary assumptions where data gaps or uncertainty exist, rather than optimistic or best-case scenarios.

4. Indigenous Rights and Traditional Land Use Assessment Must Be Substantive
The PTOR should be revised to require:

- Clear identification of how Indigenous concerns raised during consultation will meaningfully influence project design or viability.
- Assessment of impacts to the exercise of rights, not merely land use presence.
- Demonstration of how unresolved impacts would be addressed, including the possibility that impacts cannot be mitigated.
- Demonstrate free, prior, and informed consent.

5. Neighbouring and Downstream Community Health Effects Must Be Recognized
The well-documented effects of coal mining on human health mean that the PTOR should be revised to require:

- Description of proposed coal dust mitigation efforts that have proven to be successful elsewhere.
- Description of proposed coal mining practices that reduce risk/hazards for workers, and for neighbouring and downstream residents
- Mitigation efforts to reduce contamination of water for downstream edible agricultural products (plant, fish, and animal)

6. Recognition That the Long-Term Demand for Coal Is Declining Is Required
The PTOR should require a realistic assessment of market risk and project viability in the context of declining global reliance on coal, including metallurgical coal. Assertions regarding the necessity of new coal supply for steelmaking should be tested against:

- Advances in alternative steel production technologies and recycling.
- The risk of premature closure and stranded assets.
- Implications for reclamation funding and long-term environmental liability.

6. Public Interest and Social Licence Must Be Explicitly Evaluated
Given the sustained and widespread opposition to coal mining on Alberta's Eastern Slopes, the PTOR should require:

- Assessment of social licence, including regional and downstream stakeholder concerns.
- Consideration of impacts to existing economic activities such as agriculture, tourism, and recreation.
- Evaluation of whether the project aligns with Albertans' expressed priorities regarding water protection and land stewardship.

7. Alignment With Past Regulatory Findings Is Essential
The PTOR should explicitly require the proponent to demonstrate:

- How the assessment will address and resolve the specific deficiencies identified in previous federal and provincial review decisions related to the Grassy Mountain project.
- That the assessment does not repeat arguments already determined to be contrary to the public interest.

Conclusion
In its current form, the Proposed Terms of Reference do not provide sufficient assurance that the Environmental Impact Assessment will adequately address the scale, duration, and irreversibility of potential effects associated with this project. The PTOR should be revised to incorporate the changes outlined above before being approved.

Thank you for the opportunity to provide these comments. We respectfully request that this submission be included in the public record and considered in the finalization of the Terms of Reference.

Sincerely,

Brenda Davison
President, Crowsnest Conservation Society

Enclosed: Crowsnest Conservation Society's Specific Critique of the 'Proposed Terms of Reference Environmental Impact Assessment Report for Northback Holdings Corporation Proposed Grassy Mountain Project'

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