



Alberta Wilderness Association  
"Defending Wild Alberta through Awareness and Action"

January 15, 2026  
Director, Environmental Assessment  
Regulatory Applications  
Alberta Energy Regulator  
Suite 1000, 250-5th Street SW, Calgary, AB T2P 0R4  
E-mail: AEREnvironmental.Assessment@aer.ca

**Re: Proposed Terms of Reference for Environmental Impact Assessment Report  
Northback Holdings Corporation — Grassy Mountain Project**

Dear Director, Environmental Assessment,

Alberta Wilderness Association (AWA) appreciates the opportunity to provide comments regarding the Proposed Terms of Reference for the Environmental Impact Assessment Report completed by Northback Holdings Corporation for the Proposed Grassy Mountain Project.

AWA is an Alberta-based conservation group with more than 10,000 members and supporters across Alberta, Canada, and around the world. AWA seeks the completion of a protected areas network in the province and is mandated to ensure the good stewardship of Alberta's public lands, waters, and biodiversity so that future generations can enjoy the abundant benefits they provide.

Please see AWA's comments on the Proposed Terms of Reference below.

**General Comments:**

AWA asks to see a regional cumulative effects analysis that includes legacy mine issues and how additional operational mine materials will impact all sectors of the local environment, including water and air quality, fish habitat, and wildlife habitat and biodiversity.

Proponents must identify boundaries for the Local Study Area and Regional Study Area, as dictated in Section 2.1.2 of the *Guide to Preparing Environmental Impact Assessment Reports in Alberta* ("the Guide").

Proponents must explicitly address all three development scenarios (Baseline, Application, and Planned Development Case) outlined in Section 2.2 of the Guide.

As described in section 2.3.2 of the Guide, proponents must describe all techniques used to identify and evaluate the environmental impacts of the Project, including the criteria used to determine the significance of Project impacts on spatial, temporal, and cumulative scales. The scientific rationale behind the techniques and criteria chosen must be provided.

Alternatives to the Project or components of the Project must be outlined and discussed, as noted in 3.2 in the Guide.

## **Section-Specific Comments:**

### **1 Public Engagement and Indigenous Consultation**

[A] If public input was not incorporated into the Project, discuss why it was excluded from the Project development, impact mitigation, monitoring, and any implications for future public engagement with the Project.

[A] Discuss how the EIA will address the specific concerns listed by First Nations which will be directly or indirectly impacted by the Project.

[B] Explain how public feedback during the development, operation, and reclamation stages of the Project will be incorporated and addressed in decision-making processes and operational standards.

### **2 Project Description**

#### **2.1 Overview**

[A,B] Descriptions and maps of the Project site should also include information on environmental features; rivers/waterbodies/wetlands, drainage/direction of flow, ecosites, wildlife sensitivity zones, species at risk ranges, critical habitat for species at risk, wildlife corridors, key wildlife and biodiversity areas, and Government of Alberta/Alberta Biodiversity Monitoring Institute's biodiversity indicator values and rates of change for interior habitat, landscape connectivity, stream connectivity, and native cover (terrestrial and aquatic) for the Local Study Area and Regional Study Area.

[C] The Development plan should provide specifics on the reclamation plan, including anticipated time to complete, costs, resources, and labour required, techniques used, end land use plans, and discussions on how ecosystem function and health will be restored and monitored following mine closure.

[D] Discuss any emissions and environmental/societal risks associated with the product's transportation and end use (EIA should provide a complete life-cycle assessment of the mine).

[H] Provide basis/evidence/citations that support/substantiate all benefits claimed by the Project.

[I] Describe specific indicators and thresholds in the adaptive management plan that will trigger review, action, and/or change in practices. Describe how the adaptive management plan will be evaluated for efficacy.

#### **2.2 Constraints**

[A] Discussion of the environmental setting should include everything previously mentioned in 2.1[A,B] comment. Discussions on cumulative impacts should include both existing and anticipated projects in the region. Cumulative impacts should consider the Project from cradle to grave, inclusive of the impacts

associated with the extracted product's transportation and end use. Proponents must discuss all technology/practices anticipated to be used in the Project, not just for resource recovery. The limitations and potential failures of the technology/practices should be explicitly addressed; the Project constraints should identify back-up or response plans to address any issues identified. Any challenges and limitations associated with reclamation and ecosystem restoration plans should also be discussed in this section.

## 2.4 Transportation Infrastructure

[A] Discuss any potential direct or indirect impacts to wildlife passage/movement and recent government investments in wildlife-friendly infrastructure in the region from the Project. Describe how the Project will address impacts.

[C] The EIA must discuss how fugitive coal dust emitted during transportation by truck and rail will be monitored and addressed in the Project.

## 2.5 Air Emissions Management

[B] Fugitive coal dust must be one of the emission types discussed. The Project's anticipated contribution to cumulative fugitive coal dust emissions in the region should be discussed, along with implications for the environment.

## 2.6 Water Management

The current and anticipated health and function of the watershed should be discussed in the EIA. The Project should describe how the quality and quantity of surface and groundwater will be monitored, reported, and responded to through a water management plan. A description of the anticipated volume of mine water tailings to be generated, stored, and/or reused in the Project, as well as a discussion of impacts and potential for tailings discharge into the environment, whether controlled or accidental, should be included in the EIA. Specific chemical, physical, and biological indicators, thresholds, and monitoring locations and frequency should be identified in the EIA. The Project must describe what environmental conditions will trigger review, action, and changes in practices.

The EIA must incorporate a detailed plan for ensuring that no additional selenium enters waterways as a result of the Project. Proponents must identify how the proposal is and will remain consistent with the best available science, including the Canadian Water Quality Guidelines for the Protection of Aquatic Life and the Environmental Quality Guidelines for Alberta Surface Waters, as well as the *Fisheries Act*, the *Water Act*, and the *Species at Risk Act*.

### 2.6.2 Surface Water

[A,B,C] Any Project infrastructure or activity that occurs nearby or within critical habitat for aquatic species at risk must be identified and mapped, including a discussion on how any impacts will be avoided and/or addressed.

### 2.6.3 Wastewater Management

[A] The EIA must incorporate a management plan for the appropriate storage of wastewater during emergency flooding events when normal storage and disposal solutions may be compromised.

## 2.7 Waste Management

[B] The Project must describe how it will evaluate the efficacy of the management plans for exploratory drilling wastes, overburden, and other mining wastes/byproducts in preventing pollution/minimizing waste.

## 2.8 Conservation and Reclamation

[A-F] The conservation and reclamation plan must incorporate projected ecosystem and climatic changes over the life course of the mine. These projections must be used to adapt the reclamation strategy accordingly to ensure that reclamation efforts are successful and that vegetative communities are able to thrive in the altered landscape.

[A] The conceptual conservation and reclamation plan must address the existing disturbance left by legacy surface and underground mines on Grassy Mountain.

[B] List anticipated plant species and techniques for establishment to be used at each ecosite.

[C] Compare the location, proportion, and composition of predicted ecosites to historical conditions and surrounding undisturbed landscapes.

[F] Describe challenges, constraints, and limitations of reclamation techniques and plans.

## 2.9 Environmental Management Systems

[B] Adaptive management plans must describe how they will incorporate/address the best available science on coal mining and its impacts on biodiversity, land, water, air, and climate into the Project. Stringent environmental standards based on the best available science must dictate the management plan, i.e. if regulations change and standards weaken, the management plan should remain committed to achieving the requirements based on scientific research and evidence.

[C] Monitoring and response programs must also be developed for receiving environments downstream/downwind.

[D] The Emergency response system should plan for current and future climate realities in the region, which includes more frequent, severe, and unpredictable natural disasters.

The risk and potential impacts of land subsidence from the Project must be evaluated and addressed.

### **3 Environmental Assessment**

#### **3.1 Air Quality, Climate and Noise**

Climate change contributions, considerations, and adaptations in relation to the Project should be described.

##### *3.1.2 Impact Assessment*

[C] The EIA should discuss how noise from facility-related heavy truck traffic and vibration impacts from facility operations will be monitored and their impacts mitigated during the Project's lifetime.

Describe programs to protect air quality and prevent pollution from particulate deposition and noise, including a) the early detection of potential contamination or impacts; b) options in the event that adverse effects are detected; and c) monitoring parameters and associated changes due to operation.

#### **3.2 Hydrogeology**

##### *3.2.2 Impact Assessment*

[B] The EIA should discuss how land subsidence from groundwater removal or alterations to natural flow patterns will be avoided and mitigated during Project operations.

#### **3.3 Hydrology**

##### *3.3.2 Impact Assessment*

[A] The EIA must comprehensively describe and map the entirety of both the Project and other surface water users' potential or existing water use or modifications. These cumulative surface water uses must be considered as a whole when determining the hydrological changes that may result in and around the Project area, and the Project must reduce its impacts in relation to the surface water users who have existing approvals, permits or licenses.

#### **3.4 Surface Water Quality**

##### *3.4.2 Impact Assessment*

Describe programs to protect surface water quality, including a) the early detection of potential contamination or impacts; b) options in the event that adverse effects are detected; and c) monitoring parameters and associated changes due to operation.

#### **3.5 Aquatic Ecology**

##### *3.5.1 Baseline Information*

[A,B] Describe population trends and existing threats to species and their habitats.

### *3.5.2 Impact Assessment*

[A] Discuss how the project may impact population trends and interact with existing threats to species and their habitats.

[D] Describe programs to protect aquatic species and habitat, including a) the early detection of potential impacts; b) options in the event that adverse effects are detected; and c) monitoring parameters and associated changes due to operation. It is not enough to offset any loss in productivity; the EIA must also address any potential losses of biodiversity/populations.

## 3.7 Wildlife

### *3.7.1 Baseline Information*

[A,B] Describe population trends and existing threats to species and their habitats. Consider impacts resulting from existing and approved projects, climate change, habitat loss, habitat avoidance, vehicle-wildlife collisions, hunting pressure, and others.

### *3.7.2 Impact Assessment*

[A] Discuss how the project may impact population trends and interact with existing threats to species and their habitats, as well as how the Project will reduce its impacts in relation to these disturbances.

Describe programs to protect wildlife populations, including a) the early detection of potential impacts; b) options in the event that adverse effects are detected; and c) monitoring parameters and associated changes due to operation.

## 3.8 Biodiversity

### *3.8.2 Impact Assessment*

Describe programs to protect biodiversity, including a) the early detection of potential impacts; b) options in the event that adverse effects are detected; and c) monitoring parameters and associated changes due to operation.

## 3.9 Terrain and Soils

### *3.9.2 Impact Assessment*

Describe programs to protect soil quality, structure, composition, and capability locally and regionally, including a) the early detection of potential contamination or impacts; b) options in the event that adverse effects are detected; and c) monitoring parameters and associated changes due to operation.

### 3.10 Land Use and Management

#### 3.10.2 Impact Assessment

Describe how changes to public or Indigenous land access or traditional use will be minimized during and after the Project's lifetime.

The EIA should include a visual impact assessment to determine how mine activities will impact viewpoints and local scenery, including the influence of light pollution during the night.

### 7 Socio-Economic Assessment

[A] A Health Impact Assessment (HIA) must be undertaken in this section to identify the Project's potential direct and indirect costs on human health for a) workers, b) local communities, c) on a regional scale, in both the near and long-term. The HIA must be comprehensive, considering the physical, mental, and social dimensions of health.

#### 7.2 Impact Assessment

[A] The effects of construction and operation of the Project on ecosystem services and climate change should be described.

[B] Crown land discussions must address how the increased project footprint impacts the environment, public use of public lands, and other land uses.

Thank you for your consideration of these comments. We hope to see this input reflected in the final Terms of Reference for the EIA.

Sincerely,

ALBERTA WILDERNESS ASSOCIATION



Kennedy Halvorson  
Conservation Specialist



Sara Heerema  
Conservation Outreach Specialist