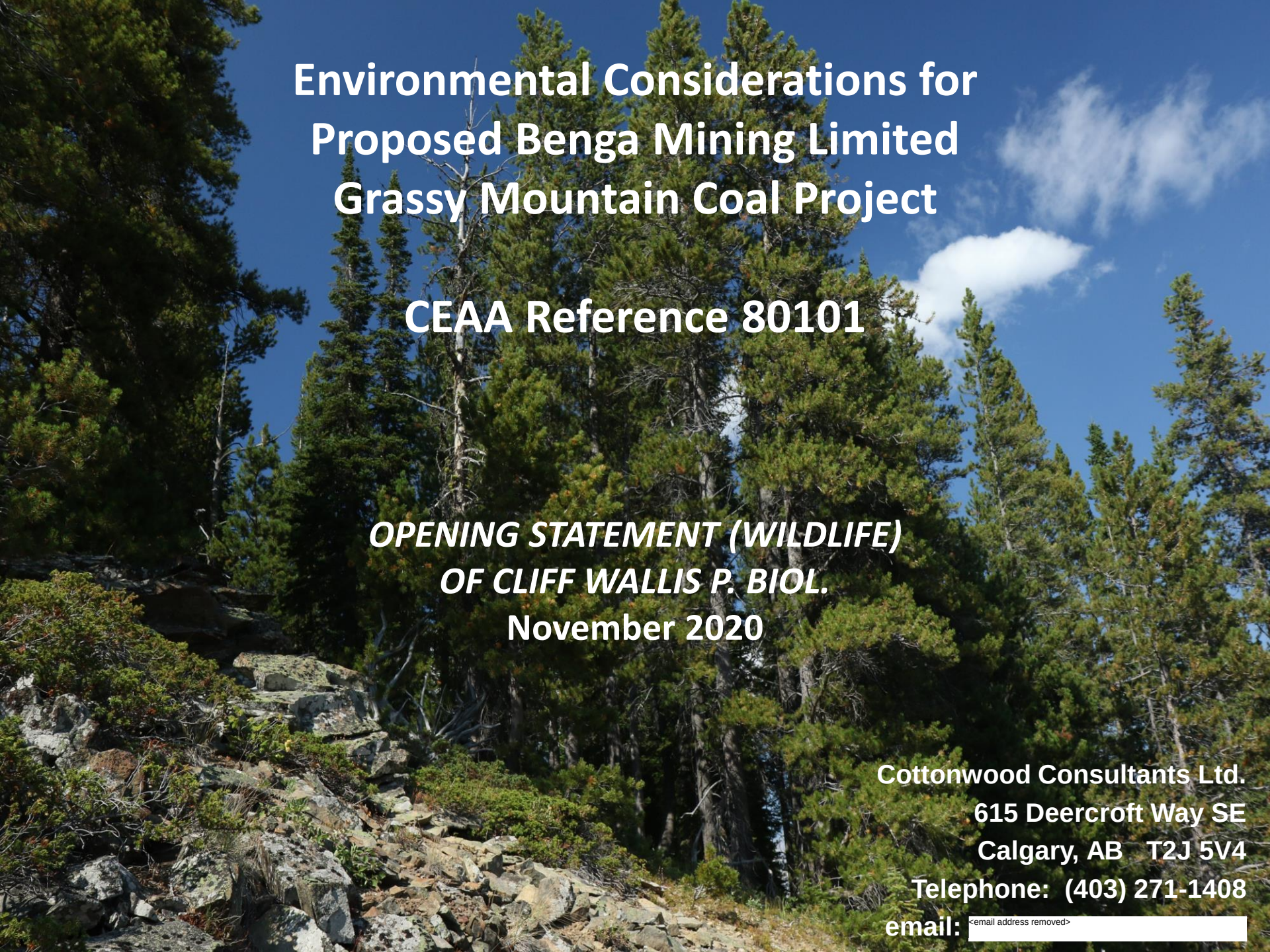

Environmental Considerations for Proposed Benga Mining Limited Grassy Mountain Coal Project

CEAA Reference 80101

OPENING STATEMENT (WILDLIFE)
OF CLIFF WALLIS P. BIOL.
November 2020

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KEY WILDLIFE CONSIDERATIONS

- South Saskatchewan Regional Plan (SSRP) -- recognizes a wide range of fish, wildlife and plants species and a broad range of ecosystem services provided
- Grassy Mountain Coal Project is located in one or more Environmentally Significant Areas
- “Species at Risk” and other species of management concern, with particular emphasis on federally listed species

Alberta Environmental Protection (1995) describes the Montane:

- *“The montane occupies a relatively small portion of Alberta, covering about 5897 km2, or less than 1 percent of the province’s land area, but it is disproportionately important for biodiversity conservation.*

KEY WILDLIFE CONSIDERATIONS

Wildlife of Conservation Concern:

- pdf 181 CIAR 69 5th Addendum: *"magnitude of potential effects on habitat availability for olive-sided flycatcher and little brown myotis was conservatively characterized as moderate . . . reclaimed landscape is anticipated to be different from the current landscape; more different than would happen from natural disturbance such as fire. Because reclamation aims to restore the area to natural land cover representative of the area and consisting of suitable habitats for these three species, the magnitude of effects is believed to be lower than high."*

KEY WILDLIFE CONSIDERATIONS

Wildlife of Conservation Concern (Little Brown Myotis):

Recovery Strategy for Little Brown Myotis suggests management:

- *"Consider the species' requirements in management plans and policies for public lands, environmental assessments, and land-use (energy, forestry, mining, agriculture, etc.) planning initiatives."*

- Difficult to reconcile development of the Grassy Mountain coal project with conservation objectives for Little Brown Myotis when significant use has been recorded in parts of the project -- would effectively remove a variety of productive habitats for Little Brown Myotis for decades or longer

KEY WILDLIFE CONSIDERATIONS

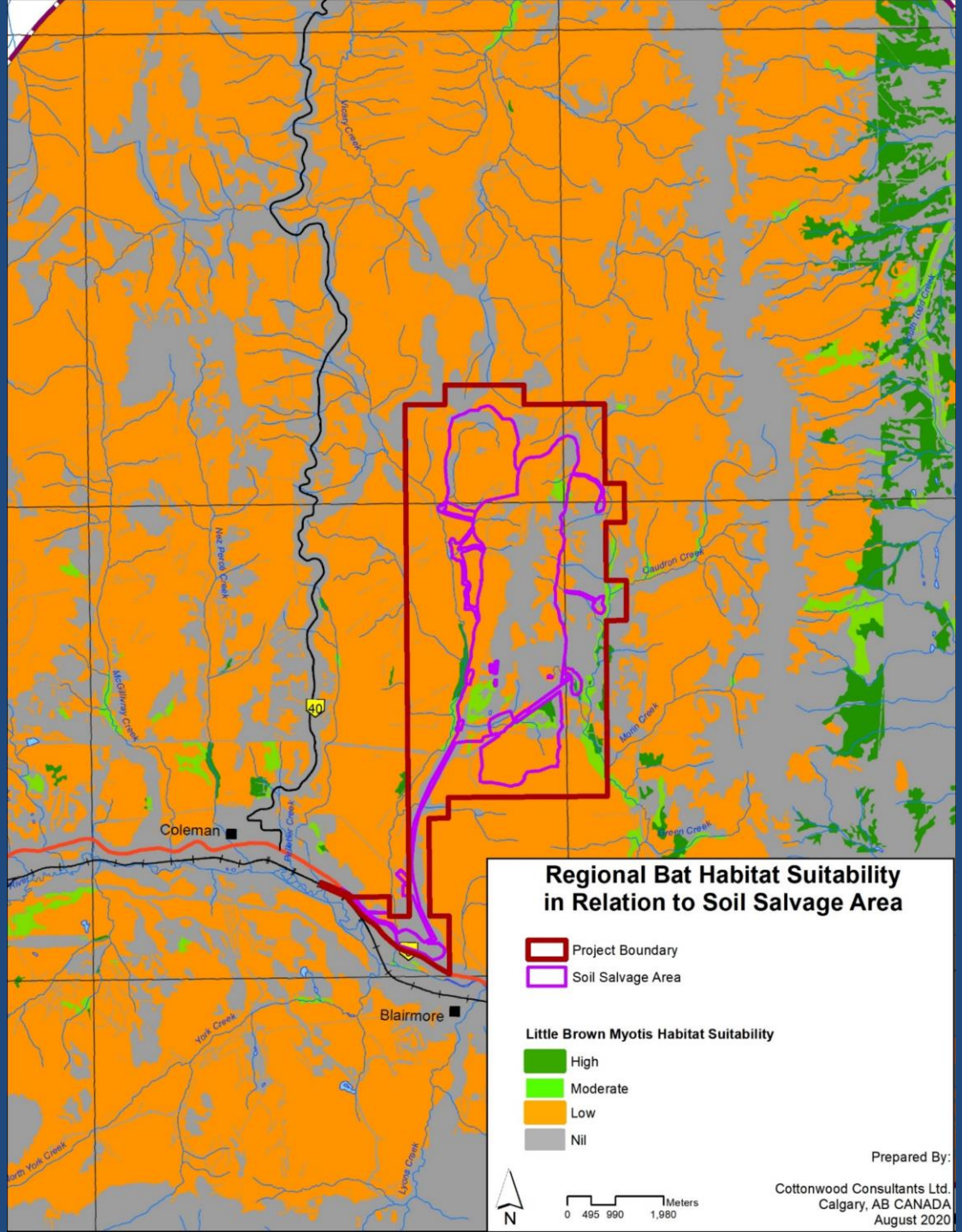
Wildlife of Conservation Concern (Little Brown Myotis):

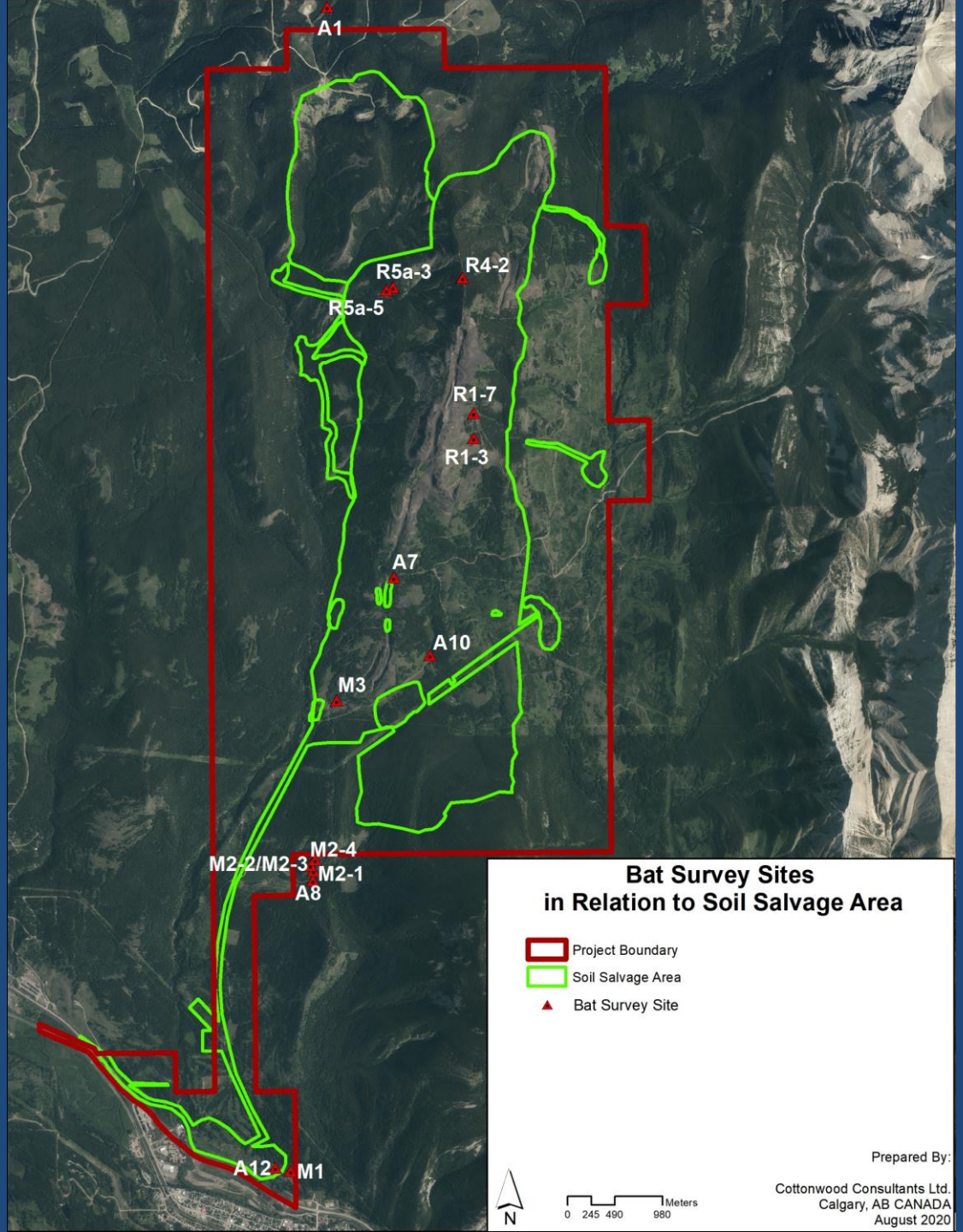
- difficult to make an accurate assessment of cumulative effects on Little Brown Myotis and supporting habitats without sufficient data
- in project footprint are habitat complexes with mature forest along some of the small drainages which have pools of slow-flowing open water that may be suitable foraging habitat for Little Brown Myotis
- even within areas mapped as moderate and low for Little Brown Myotis Habitat Suitability, e.g. bat survey stations A7 and A10, there are significant numbers of bat passes for the Little Brown Myotis/Long-legged Myotis group (CIAR 44, First Addendum, Wildlife Addendum, Little Brown Bat, pdf pages 11, 13, 33, and 34)

KEY WILDLIFE CONSIDERATIONS

Wildlife of Conservation Concern (Little Brown Myotis):

- project would effectively remove a variety of productive habitats for Little Brown Myotis for decades or longer
- alone, this may not be sufficient reason to deny the project but it adds weight to other valued components of this project that emphasize the project area's environmental significance


Coleman
Blairmore
40
Regional Bat Habitat Suitability
in Relation to Soil Salvage Area
Project Boundary
Soil Salvage Area
Little Brown Myotis Habitat Suitability
High
Moderate
Low
Nil
Prepared By:
Cottonwood Consultants Ltd.
Calgary, AB CANADA
August 2020
N
0 495 990 1,980
Meters


A1
R5a-3
R4-2
R5a-5
R1-7
R1-3
A7
A10
M3
M2-4
M2-2/M2-3
M2-1
A8
A12
M1
Bat Survey Sites
in Relation to Soil Salvage Area
Project Boundary
Soil Salvage Area
Bat Survey Site
N
0 245 490 980
Meters
Prepared By:
Cottonwood Consultants Ltd.
Calgary, AB CANADA
August 2020

KEY WILDLIFE CONSIDERATIONS

Cumulative Effects:

Atrum Elan South coal project not considered in cumulative effects in CIAR 251 or Appendix A-2, CIAR 70, Sixth Addendum, or Appendix A-1 of CIAR 89, Eighth Addendum

- regional cumulative effects would be more significant if other coal projects considered: habitat will be further alienated from their use for an extended period of time, which in conjunction with other projects like Elan South, impoverishes biodiversity
- long-term effect on some species acknowledged by Benga on pdf page 182 of CIAR 69, Fifth Addendum: "*Habitat will be progressively reclaimed throughout the lifespan of the Project, making the loss of olive-sided flycatcher habitat temporary but long-term.*"

KEY WILDLIFE CONSIDERATIONS

Cumulative Effects:

pdf page 73 of CIAR 251, 10th Addendum, Package 2, Vegetation and Reclamation, Benga notes reduction of biodiversity persisting for some time:

- *"The ecosite phases impacted by Project development have mostly moderate to high biodiversity potential. After mine closure and reclamation, native species richness is expected to be lower than the intact naturally developed vegetation . . ."*

KEY WILDLIFE CONSIDERATIONS

Cumulative Effects:

- improper to characterize the residual effects as “not significant”

- approach of arriving at “not significant” effects is not supported by the evidence given the continued declining populations of many species. If each project takes the view that there is no significance to the effects that it has on habitats and species, the declines of species and the loss of valuable, sometimes irreplaceable habitats, will continue