



**BACKCOUNTRY
HUNTERS & ANGLERS
ALBERTA**

P.O. Box 10294
Airdrie, Alberta
T4A 0H6

Honourable Jonathan Wilkinson
Minister of Environment and Climate Change
Environment and Climate Change Canada: Prairie and Northern Regional Office
Canada Place, 9700 Jasper Avenue, Suite 1145, Edmonton, Alberta T5J 4C3

March 30, 2021

Re: Request for Federal Review of Montem Resource's Tent Mountain Project

Dear Minister Wilkinson,

Alberta Backcountry Hunters and Anglers (ABHA) would like to express its support for the Blood/Kainai and Siksika First Nations in their request for federal intervention in proposed Montem Resources Ltd. Tent Mountain coal mine in southwest Alberta, in the form of an impact assessment under section 9(1) of the Impact Assessment Act, SC 2019, c28, s1. ABHA is an organization composed of and funded by Albertan hunters and anglers, many of whom live or hunt and fish within the affected watershed. Our mandate includes preserving access to public lands and waters necessary for such recreation, and conservation of the supporting environment.

The Tent Mountain project, if permitted as currently proposed, will deny the public access to a large area that currently sees significant recreational use. These impacts will be felt for decades to come — perhaps longer if the mine operator ceases to exist before its cleanup and restoration obligations are met. The de facto loss of access for hunting and angling may likewise spread beyond the limits of the mine itself in the event of the reduction or extirpation of fish and game species due to mining-related activities and their consequences. Furthermore, the project seems deliberately designed to enable the maximum potential extraction without triggering a federal review. Given the changes in mining practices and deteriorating local conditions for fish and wildlife in the nearly forty years since this site was last mined, we believe a thorough assessment is necessary. From a cumulative effects perspective, the Tent Mountain project itself sits astride the provincial border with British Columbia, and it lies in close proximity to North Coal's Michel Coal Project. Its potential impact should thus not be considered solely by the Alberta Energy Regulator.

The Tent Mountain project represents an urgent risk to a fragile and important ecosystem. Numerous game and fish species live in the area or use it as a migration corridor, and the mine sits in the headwaters of a watershed that provides critical habitat for numerous species, including two listed under the Species at Risk Act (SARA): Bull Trout and Westslope Cutthroat Trout. Efforts to identify critical habitat and assess recovery options for these species are still underway. We are concerned that in the absence of a proper impact assessment, SARA-mandated activities may not be given sufficient time to complete their work so that regulators have a full consideration of the project's effects on threatened game fish.

It is clear that the Tent Mountain project has the potential for impacts far beyond the boundaries of the mine, affecting First Nations traditional practices as well as the health of the landscape and watersheds across an enormous area of Canada, and, if we sensibly include the adjacent Michel Coal Project, across the border into the United States as well. We support the Blood/Kainai and Siksika in their requests for a federal impact assessment. The stakes for the health of public lands and waters are simply too high to let this project pass unexamined.

We would welcome the chance to meet with you to discuss our concerns regarding the project, and look forward to your reply.

Sincerely,

Neil Keown, Chair
Alberta Backcountry Hunters & Anglers

cc: Janet Shaw, Impact Assessment Agency of Canada (janet.shaw@canada.ca)