

Via email to:
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Attn: The Honourable Jonathan Wilkinson
Minister of Environment and Climate Change
Environment and Climate Change Canada: Pacific and Yukon Office
401 Burrard Street, Vancouver, BC V6C 3R2

April 7, 2021

Re: Request for federal review of Montem Resources' Tent Mountain project

Dear Minister Wilkinson:

The Yellowstone to Yukon Conservation Initiative (Y2Y) supports the Kainai and Siksika Nations' request that the Minister designate Montem Resources' Tent Mountain mining proposal (hereafter, "proposed mine" or "mine") for an impact assessment under section 9(1) of the Impact Assessment Act, SC 2019, c 28, s 1.

Y2Y has worked to connect and protect habitat so that people and nature can thrive along the Rocky Mountain corridor since 1994. The proposed Tent Mountain open-pit coal mine will irreversibly damage the southern Canadian Rocky Mountains on both sides of the Alberta-BC border. The proposed mine and associated roads and processing plant will contribute to increasing cumulative impacts on an ecologically sensitive region that abuts the Castle Parks in Alberta to the east, and critical wildlife connectivity habitat in both provinces. The mine is in the traditional territory of the Kainai, Siksika and Piikani Nations in Alberta, and the Ktunaxa Nation in BC.

Our efforts to conserve and protect this part of the greater Y2Y corridor are built on thousands of years of Indigenous stewardship. We respect the critical role the area plays in the practice of Indigenous traditional rights, including harvesting, trade and spiritual practices. We also recognize and share the concerns of the Kainai and Siksika Nations about activities which threaten source waters, especially those within the Oldman River Basin, which provides water to these Nations and to communities downstream in Alberta and the Prairie Provinces. In BC, deleterious impacts to transboundary waters are a major issue. Tent Mountain has the potential to add to selenium levels in the Elk River system, which at entry to Montana already exceed the threshold set by the US EPA.

In our view, a federal review is warranted for the following reasons:

1. The potential impacts to the rights of Indigenous people are a matter of federal concern. The Kainai and Siksika Nations are members of the Blackfoot Confederacy and are signatories to Treaty 7. Tent Mountain is within the traditional territories of the Kainai and Siksika Nations, as well as several others.
2. The proposed project may adversely impact several areas of federal jurisdiction. In addition to Indigenous rights per the above, these include federal reserve lands, transboundary waters, and fish/fish habitat. Potential pollution of drinking water is a concern for on-reserve Indigenous populations as well as Alberta's general population.



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3. This area is part of the internationally significant “Crown of the Continent Ecosystem”, an ecological region that comprises the headwaters of North America’s three great watersheds: the Pacific, Arctic and Atlantic drainages. It is critically important for listed species-at-risk, including grizzly bears, wolverines, west slope cutthroat trout, and bull trout. The Alexander-Michel corridor, in which this mine is situated, has been identified by wildlife connectivity experts as one of the most important in North America for wide-ranging animals like grizzly bears and wolverine.
4. The local area in which the proposed mine is situated is environmentally sensitive. Notably, on the Alberta side, it is in the Livingstone Public Land Use Zone which is subject by law to ecological threshold limits under the SSRP-LFMP. Currently, coal exploration and other industrial impacts have exceeded the linear density threshold limits in the Livingstone PLUZ.

In summary, like the Kainai and Siksika, we request you designate Montem Resources' Tent Mountain Coal Mine project for a federal impact assessment under section 9(1) of the Impact Assessment Act. We believe there is ample evidence to support a federal assessment given the size of the mine, its location, the lack of adequate consultation with Indigenous Peoples and the adverse effects the proposed mine would have on species at risk and water quality in the Oldman River basin and potentially in the Elk River system. These issues have the potential for environmental impacts beyond Alberta’s borders, including BC and the US.

While we are aware of submissions from other organizations which lay out in the details the issues associated with the Tent Mountain Mine project, we are happy to clarify any material presented or questions raised.

Mining pollution will endure for centuries, and a federal assessment can evaluate these impacts, not the least of which is impact to the ability of First Nations to exercise their treaty rights. Please grant federal assessment of Montem Resources proposed Tent Mountain Mine project. Thank you.

Sincerely,

<original signed by>

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Senior Alberta Program Manager

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