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March 30, 2021

Director, Environmental Assessment
Regulatory Applications
Alberta Energy Regulator
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RE: Tent Mountain Project proposed Terms of Reference for upcoming Environmental Impact Assessment Report

Dear Director,

The Oldman Watershed Council has reviewed the proposed Terms of Reference (TOR) for Montem's upcoming Environmental Impact Assessment (EIA). We have focused on the topics most relevant to the watershed, and provided our feedback below. We appreciate the opportunity to participate.

Area of Interest

The TOR references the regional area but does not define what the regional area includes. A definition of the regional area is required to better understand how potential impacts will be assessed. We suggest the regional area should include at least the Crowsnest River watershed, so that downstream impacts are included in the assessment. If water is withdrawn from, and/or wastewater is discharged to the Crowsnest River and/or its tributaries, it is important that potential downstream impacts are monitored and reported.

Water Treatment

The TOR states that a Surface Water Management Strategy and Wastewater Management Strategy will be described in the EIA, both of which will provide critical information to our stakeholders. For clarity and reassurance, we recommend that the TOR clearly state that the EIA will include a description of what steps will be taken if water treatment processes are not effective at removing contaminants, like selenium, to an acceptable level for discharge to the watershed. This information is of vital importance to our community, and our watershed.

Monitoring and Public Reporting

2.9 Environmental Management Systems

Page 12, section [C] lists current and proposed monitoring programs but is missing stream flow, surface water and groundwater quality, biodiversity, aquatic ecology, vegetation, wildlife, linear features density, and soils which we suggest must also be monitored, and the results reported publicly. Though these topics are included elsewhere in the TOR, a monitoring plan is not listed under every topic. For clarity and reassurance, we would like to see the monitoring plans detailed for these topics.

10 Monitoring

Page 24, section 10 [A] describes the general approach to how monitoring programs will be detailed in the EIA, but does not list what topics or parameters will be monitored. For clarity and reassurance, we would like to see the list of what will be monitored, and how each topic will be monitored. Stream flow, surface water and groundwater quality, biodiversity, aquatic ecology, vegetation, wildlife, linear features density, and soils each require a monitoring and reporting plan.

Page 24, section 10 f) states that the TOR will outline “how monitoring data will be disseminated”. We strongly encourage annual public reporting of not only data, but also analysis and results, in a manner that is easily accessible and understandable to local stakeholders. This will build trust in the regulatory system, and ensure the local community is informed.

Cumulative Effects

Page 7, section 2.2 [A] f) lists “cumulative environmental impacts in the region” as a constraint to the Project, but the TOR does not state that a cumulative effects assessment will be completed, nor does it describe what would be included in such an assessment. A cumulative effects assessment is needed to better understand the potential impacts of the Project, and should be added to the TOR.

Linear Features Density

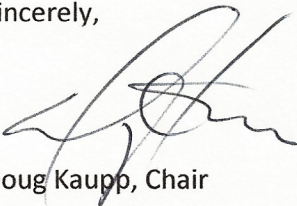
The TOR does not specifically state that linear features density will be monitored or minimized. Given that linear features density is a critical pressure indicator for watershed health, we recommend that the EIA describe; 1) how this indicator will be monitored, and 2) a mitigation plan to minimize the impacts. Linear features density should also be included in the cumulative effects assessment of the regional area.

Climate Change

We strongly support Montem’s intention to include the potential impacts of climate change and extreme precipitation (section 3.1) in the assessment. In particular, we would like to see information ensuring that catchment and treatment ponds would be of adequate size and design to withstand extreme precipitation events, without breaching or overflowing. The assessment should also take into consideration how stream flow patterns are shifting and how the Project will account for this in its plans to protect aquatic health.

Please direct any questions or correspondence to OWC’s Executive Director, Shannon Frank, by emailing shannon@oldmanwatershed.ca or calling 403-317-1328. Thank you for your consideration.

Sincerely,



Doug Kaupp, Chair