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Dear Impact Assessment Agency of Canada (IAAC),

I write—in *strong opposition!*— in response to Montem Resources’ proposal to create an open-pit coal mine that would, if approved, remove Tent Mountain from the headwaters of the Oldman River, obliterate the mountain’s status as a landscape-defining component of the Alberta/British Columbia border, and eliminate the mountain as a place name in Canada.

It’s certain that most Canadians are unaware of Montem’s proposal, and that, once again, and like Benga’s Grassy Mountain proposal before it, Montem’s proposal, if approved, would destroy an integral and functioning critical component of Alberta’s fragile, vital, life-sustaining headwaters. And most people, even if they are aware of the proposal, don’t realize that, within the current review process, it’s imperative that the relative few who are aware and cognizant of watershed values and the wealth of other values that flow from intact landscapes stand up to oppose the colossal threats imposed by mountaintop-removal mining. These few, and I among them, find themselves caught—again, as was the case with Grassy Mountain—in a pre-Christmas crisis: the need to write, before Christmas, a letter outlining the grave concerns brought to Canada by Montem’s proposal.

How painful and pro-industry strategic to find that, amid the Covid pandemic, social upheaval, wild weather, and attempts to salvage Christmas, the people of Canada have to drop their daily needs and concerns to—if they’re to provide statements of concern regarding Montem’s proposal—rise above the rising riptide of daily chaos to, pen in hand, write to the Government of Canada in the hope of saving Alberta’s headwaters from mountain-leveling coal mines.

The government-prescribed review process, cold and unforgiving, favors development, and punishes a populace that, rendered weak and subservient, relies on provincial and federal governments to protect vital watersheds, species at risk, and a wealth of other once-taken-for-granted headwaters values.

I write in oceanic opposition to Montem Resources’ proposal due to its obvious and profound threats, quantitatively and qualitatively, to water. And here in southern Alberta, water, essential to life, is already threatened. It’s an increasingly rare and precious commodity. I write, too, in expectation that the project, if approved, will have a profound negative impact on human health, and to the health of all life on the downstream, downwind land.

The Montem proposal, if approved, is guaranteed to steal water, pollute water, and strip from the land its ability to capture and store water. And as water is stolen and compromised, the proposed project is guaranteed to employ mountain-leveling explosives and earthmoving industrial machines that spew clouds of dust, obliterate the sound of falling water and birdsong, and broadcast industrial noise. The project, too, based upon numerous studies of similar impacts on similar lands, is guaranteed to negatively impact human health, guaranteed to degrade the floral and faunal health of an entire watershed. And maybe two?

The proposed project, targeting the absolute hydrological apex of the Oldman Watershed, threatens the Oldman at its critical source, and would, if approved, destroy much of the defining core of Alberta’s rarest and most-threatened forest community.

Tent Mountain, standing on the AB/BC border, is at the eastern edge of the Elk River Watershed in British Columbia. The implications: Water flowing from Tent Mountain’s western ramparts becomes part of an existing and already contentious transboundary (Canada/USA) water quality issue that, flowing south from open-pit coal mines in the Elk Valley, is killing trout, making news, and generating international ire. Its epicenter is in Montana, but it radiates westward into Idaho and Washington.

Southwestern Alberta—including Tent Mountain—is characterized by schizophrenic weather extremes. Here, hurricane-force winds are common, droughts occur with frightening regularity, and three 100-year floods have occurred within the past 26 years. Within the same chaotic picture of punishing outcomes, the 2003 Lost Creek Wildfire burned 21,000 hectares (52,000 acres) of forest land in the headwaters of the Castle and Crowsnest rivers. Wildfires on this harsh, dry, wind-ravaged land are a 24/7 threat; they know no fire season, and exposed coal seams can supply wildfires with fuel that feeds multi-century burns.

Envisioning a future more chaotic than the past: Climatologists and hydrologists predict ever-decreasing flows in the Oldman, unprecedented and schizophrenic weather extremes with ever-expanding benchmarks for wild weather events, and an ever-increasing frequency and magnitude of wildfires. (The 2017 Kenow Wildfire, to the near south, burned 35,000 hectares.)

I’m gravely concerned as I envision, with Montem’s proposal riding on the heels of Benga’s, a cascading avalanche of anticipated development proposals for mountaintop-removal coal mining on revered and treasured lands throughout Alberta’s Eastern Slopes. Facing this envisioned nightmare, I, while brought to my knees, feel forced to step up to assume an active role in assessing the impact of proposed headwaters development. Resolute, I’m driven to do this whenever proposals are seen to generate grave health and welfare threats, cripple the land’s ability to sustain life for already threatened species, and destroy the internationally acclaimed and marketed essence of this world-renowned Crown of the Continent landscape.

I believe the region’s populace and its most viable long-range economic potential are best served by preserving the land’s world-class beauty, its ecological diversity. These raw and defining natural components constitute the gold standard that, today, paves the road to future prosperity. Open-pit coal mines have no place in this picture because they, in addition to the intense destruction they cause, kill all other forms of economic opportunity and, ultimately, overwhelm and eliminate the land’s head-turning splendor, its mountain-paradise intrigue, its virtue and appeal ... its capacity to deliver sustained, long-range revenue.

Tent Mountain, mined for coal during the past century, has been degraded by historic mining and has never been reclaimed. The mountain and the surrounding land are, however, healing slowly since the mine closed in 1983.

The current proposal for mountaintop-removal coal mining would, if approved, stop the healing, add orders of magnitude to the current level of ecological destruction, release countless tonnes of carbon

dioxide into the atmosphere, further reduce the capacity of the headwaters landscape to capture and store water, and further degrade the water that is released due to elevated concentrations of arsenic, selenium, and other toxins. It would do this at the worst possible location: the extreme upper (western) headwaters of the Crowsnest River (a tributary of the Oldman River that's historically known as the Middle Fork of the Old Man and, according to an early railway sign at the site of a huge spring that issues from a cave overlooking Crowsnest Lake, the "Source of the Old Man River.")

Historic wrongs should never form the foundation and rationale for further degradation. Tent Mountain, while scarred by past mining practices, still stands. And there's this: Prominent geologists have reported that Tent Mountain's coal reserves pale in both quality and quantity when compared with coal reserves currently available.

The people of Alberta—and particularly the people of southern Alberta—rely on the provincial and federal governments to protect and safeguard Canada's water. It's a vital and precious resource, and here in southern Alberta it's in short supply. Alberta's mountains and foothills capture, store, and slowly release this life-sustaining resource. Water is the lifeblood of southern Alberta. And the rivers of southern Alberta are essential to downstream users in Saskatchewan and Manitoba.

The proposed Tent Mountain mine, a virtual stone's throw from Castle Wildland Provincial Park in Alberta, identifies a haul road that, to the west of Tent Mountain, crosses the Alberta-British Columbia border via Tent Mountain Pass.

Tent Mountain Pass and Crowsnest Pass are the two lowest—*by far!*—trans-Rocky Mountain passes between New Mexico and Jasper National Park. These low elevation passes form an incredibly valuable, through-the-Canadian Rockies, mid-latitude wildlife corridor. It's a vital conduit for species dispersal due to its close proximity to the strikingly-low-in-elevation Columbia Trench.

Crowsnest Pass, slightly lower than Tent Mountain Pass, is almost certainly responsible for the presence of bull trout and westslope cutthroat trout in Alberta. How did this happen? A post-Pleistocene ice dam near Elko, BC backed up water and flooded the Elk River valley creating a vast lake. Its outlet: Crowsnest Pass. Here, as the envisioned picture unfolded, bull and cutthroat trout from the Elk Valley swam over the Rocky Mountains and entered present-day Alberta.

A rare and threatened forest community: Crowsnest Pass and Tent Mountain Pass are responsible, as aided by prevailing westerly winds, for atypical west-to-east plant colonization through the Rocky Mountains. The result: Forests in the western headwaters of the Crowsnest River are Alberta's rarest, most diverse, most threatened. They're home to tree species found nowhere else in the province. Here, Canada's easternmost western redcedars (commonly called "cedars" although they are not true cedars), and other exceedingly rare-in-Alberta tree species can be found. Look within the forests of southwestern Alberta to find ponderosa pines and western white pines, species as rare in Alberta as sage grouse and woodland caribou.

This same "low elevation" mountain pass landscape appears to have, in addition to enabling fish to swim over the Rockies, permitted amphibians and reptiles to cross the Rocky Mountains, and allowed, for example, western painted turtles and rubber boas to enter Alberta.

Tent Mountain Pass is also home to what may be the lowest elevation American pika colony—it's found at valley floor—in Canada. (Pikas are a charismatic indicator species of climate change on mountain ecosystems.)

Tent Mountain Pass, too, has a long history of human use, as evidenced by prehistoric archaeological features that include, unless it's been destroyed recently, a hunting blind that appears to have been designed to target bighorn sheep.

The preceding paragraphs form a footnote of sorts: Expect to find the unusual, the unexpected, and the unlikely on the land surrounding Tent Mountain.

Interestingly, it's likely society knows more about what's under the ground in the greater Crowsnest Pass than it does about what's living—and *threatened!*—on the surface.

The community of Crowsnest Pass, set amid some of Canada's most spectacular scenery and surrounded by stunning mountain ranges, has endured the ravages of industry's failure to save and safeguard the headwaters landscape. Scars from the unreclaimed abuses of open pit mining on Tent Mountain and Grassy Mountain are visible from space, and other mines in the headwaters of the Crowsnest River valley reveal similar degradation. There is, perhaps, no "finer" example of the government's appalling and continual failure to monitor and control industry—and destructive recreational activity—than the land surrounding the proposed project, no more compelling reason to do, today, far more to protect the environment than has been done in the past.

The historic Tent Mountain strip mine "wounded" Tent Mountain and Tent Mountain Pass, and its impact on Crowsnest Creek would appear to be responsible for the "sudden" disappearance of the stream's native trout. This early mining did not, however, "kill" and obliterate the mountain as open-pit coal mining would.

Alberta's capacity to be "open for business" needs to be reined-in to align with the environment's capacity to make business possible without degrading life for the people of Alberta, and without constantly devaluing the environment and, as a result, crippling its capacity to maintain its intrinsic ecological health.

Underground miners in days-of-old had a saying that, today, might be dragged from the dark and dangerous depths of yesterday's mines, exposed to the light of day, and used as a foundation for selecting members of a planning team assigned with the task of protecting Alberta's Eastern Slopes. The miners' mantra: *You're only as safe as the stupidest man in the mine.*

The bottom line: Alberta's headwaters landscapes must be treated as ecological gold mines. Water on Alberta's Eastern Slopes is gold. It's priceless, it's rare, and it's increasingly in peril. Canada can not allow it to be squandered, stolen, or poisoned.

Headwaters health and integrity are essential to a sustainable and prosperous tomorrow. The land's storage of life-sustaining water must be protected from erosional and aquifer degradation, and the flow of water from the land must be protected from the "theft" of water, and from multiple induced threats including coal mining's known impacts, its lethal "injections" of arsenic, selenium, sedimentation, and nitrates.

Within southwestern Alberta's remaining ecological gold mine, where grizzly bears roam, where wolverines lope past stands of ancient endangered pines, where threatened native trout exist in *only* isolated streams in the extreme upper headwaters of their historic range, it is imperative that sanctioned activity not be allowed to further compromise the frail life-sustaining thread that, today, is unraveling.

Alberta and Canada need to demonstrate, to Albertans, the Canadian populace, and to the world, that the elected provincial and federal governments are capable of governing Alberta and Canada, and saving Canada for the people of Canada.

Sincerely,

David McIntyre

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