

Concerns re Tent Mountain Coal Mine redevelopment and potential end-of-life renewable energy proposal

Calgary River Forum Society (also known as Calgary River Valleys or CRV) is a not-for-profit environmental stewardship organization. We are a stakeholder in the South Saskatchewan River Basin and have participated in the development of government policies designed to safeguard water quality, water quantity, and biodiversity, including locally, regionally and through the full length of the watershed. Our organization does much of its work within Calgary's rivers and creeks and adjacent riparian lands.

We believe this proposed project by Montem Resources to redevelop the former Tent Mountain Coal Mine site requires a rigorous federal impact assessment to ensure the impacts are minimized on the local and regionally-connected watersheds, the airsheds, and the local and migratory biodiversity in the region, including now and in the future.

Our concerns are in three main categories. First, it is not clear what this project in fact is. The information posted on the IAAC website indicates it is to restart the disused Tent Mountain Coal Mine to mine for metallurgical coal, to be used in steel-making rather than burning for electricity. However, other information available, including that on the Montem Resources website, indicates the project has changed to involve the creation of a "hydro-pump" powered by a wind farm, and using the difference in elevation of upper and lower water reservoirs to generate electricity, and to produce hydrogen. There is competing information which makes it unclear if this "hydro-pump" project is intended to be a substitute project for the Tent Mountain site, or just to be implemented at the end of the 14-year span of the coal mining project.

Second, we are concerned that the use of the "green energy" hydro-pump project is being used as justification for the coal mining project. The IAAC needs to ensure the planned uses of these lands and water resources are appropriate uses and will be of net benefit to Canadians. It is not clear what the impacts on the land and water in the area locally, as well as regionally, will be from either or both project components. The Impact Assessment needs to review the impacts of all three components (wind farm, hydro-pump, and hydrogen electrolyser) "green energy" project, in addition to the coal mining project component. The impacts of any chemicals or byproducts leaching into the groundwater from either or both the coal mining and "green energy" projects should also be known before it is considered for approval.

Third, we are concerned that the cumulative impacts from this project, in addition to the other existing and planned projects, has not been properly evaluated. There are already multiple dams throughout the South Saskatchewan river basin which impact the water quantity, and

development impacts all along the basin which impact both water quality and the quality of the terrestrial environment for the creatures (including humans) that live and migrate through the area. History has shown that cumulative impacts upstream have severely damaged the downstream fisheries, riparian habitats, and the riverine ecosystem.

There's an obvious need, based on past experiences, to require that any company that financially benefits from this or other similar projects, must provide insurance or other secure guarantee to ensure remediation and or payment for all undesirable impacts and damages or default that may arise from such projects. These guarantees should survive well beyond the life of the land uses in question.

Calgary River Valleys requests that the IAAC conducts a comprehensive Impact Assessment, to determine the local and regional impacts, looking at the impacts on the watershed, airshed, and the local and migratory biodiversity. We are concerned that the impacts downstream and down-wind may not have been fully considered.