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Please accept Northwest Institute's submission to the British Columbia Environmental Assessment Office regarding the draft Application Information Requirements (dAIR) for the proposed Tenas Project. Attached is a memo prepared by Dr. Freed and Dr. Littlejohn, who conducted a technical review of the dAIR with a focus on how the project could potentially impact water quality in the nearby environment. In addition, we have some comments on the process.

This is a proposal for a mine with high potential for acid mine drainage and metal leaching that is close to a settled area of the province and close to the migration route of all species of Pacific salmon and steelhead. The connectivity between intended and unintended acid and metal runoff from the Tenas Mine and stream, river and groundwater flows is unknown. The community of Telkwa is less than ten kilometres away from the proposed mine and draws its drinking water from that interconnected water.

Many of the Bulkley-Morice salmon stocks migrate both downstream in the spring as emerging fry and upstream later in the year as spawning adults. Again, this significant salmon highway is less than ten kilometres from the mine. Acidity and metal runoff can not only cause mortality and morbidity in migrating salmon but sub-lethal levels can also hold up migrations causing later failure to spawn or adverse behaviour in juvenile fish.

From previous attempts to justify coal mine at the Tenas site, we know that the distribution of acid-generating rock – both in the coal itself and in the waste rock that needs to be removed – is highly variable with numerous hotspots. This will require dense sampling to confirm that acid drainage and metal leaching information is such that the mine is financially and environmentally feasible before an environmental assessment certificate is granted. That informational density does not appear to be close to the level required.

Therefore, we consider the current draft AIR to be a preliminary document. Substantially more work needs to be completed by the proponent and by the EAO

before it can be posted for public comment. The draft AIR is so poorly put together and so vague that neither the director, under s. 16(2) of the *Environmental Assessment Act, 2002* (the “Act”), nor the public can be assured that an application for an environmental assessment certificate by the proponent based on the draft AIR would meet the requirement of s. 16 of the Act.¹

This project is of significant public concern and the draft AIR for public review should be completed with sufficient professionalism so that a meaningful review of the document is possible. Therefore, we request that a revised AIR be prepared and there be an additional public review period following its posting on the EAO website.

There is considerable interest in the proposed Tenas Project and several public interest groups like ourselves have contracted technical experts to assist with the review and we have the ability to assist with the screening and detailed review during the environmental assessment.

We request that groups’ technical advisors be included in the Working Group for the EA review and permitting of the project.

This approach would meaningfully consider the public’s significant concerns with the proposed project. This comment is relevant to the draft AIR, Section 2.1.

We also ask that a Community Advisory Committee (COC) be set up to include members of the public with an interest in the project. Such committees are mandated in the 2018 Environmental Assessment Act. While the Tenas Project is being reviewed under the old Act we believe it would be useful to establish a COC as a vehicle for sharing information and highlighting issues needing further consideration.

¹ The following examples illustrate some of the deficiencies:

- a. Section 4.6.1: The description of the RSA and LSA is unclear in terms of potential for downstream impacts from the project on water quality including any measurable change in water quality from current conditions in the Telkwa River downstream of the proposed discharge. The LSA/RSA depiction (Figure 9) is not legible. The legend has text running off the page. A corrected version is requested.
- b. Figure 2 is not legible and a corrected version is requested.
- c. In Section 4.6 (top page 63) there is reference to the Fish and Fish Habitat VC assessment supporting and being supported by ICs and VCs. It is concerning that this list does not include surface water quality and water quantity. It seems evident that fish need water and therefore this is important linkage (that is missing).
- d. There are track changes and errors in the document. A more readable and finished product is requested for the review of the draft AIR.
- e. The variation of blue/black writing is odd and distracting throughout the document. It is not clear what the blue/black writing indicates.

Based on the draft AIR (page 15), it would appear that the project is intended to proceed with concurrent permitting during the EA review. If so, could our group view the draft Information Requirements Table (IRT) for the permitting process and provide comment? If concurrent permitting is proceeding, the scope of the concurrent permitting of the project should be defined in order to meet the requirements of s. 16 of the Act.

We look forward to working with the EAO to bring the draft AIR up to the requirements of the Act.

Sincerely,

A handwritten signature in dark ink, appearing to read "P. Moss". The signature is written in a cursive, flowing style.

Pat Moss
Executive Director