

February 17, 2021

Legislative Services
Rocky View County
262075 Rocky View Point
Rocky View County, AB
T4A 0X2

Re: BYLAW C-8051-2020

Dear Rocky View County:

Alberta Environment and Parks has been made aware of a groundwater technical report related to the Mountain Ash Limited Partnership, Summit Gravel Pit proposal. This report, prepared by Dr. Jon Fennell, provides a review of hydrogeology, geochemistry, fish and aquatics and climate change related to the proposal. Our interest in this report is related to the potential effects of the proposal on Big Springs Provincial Park.

Alberta Environment and Parks (herein Parks) manages Big Hill Springs Provincial Park, which is located adjacent to a number of existing and potential aggregate extraction developments including the Mountain Ash proposal. Parks wants to highlight the importance of Big Hill Springs Provincial Park and its nationally significant year round springs, unique tufa deposits and vegetation communities. To ensure these values persist for future generations, Parks needs to secure the protection of these values.

Over the years, Parks has provided comments to developments including:

- 2013 - Redesignation of South Rock lands.
- 2018 - Draft Aggregate Resource Plan.
- 2019 - Amendments to Hillstone Aggregates.
- 2020 - Redesignation and MSDP for Mountain Ash.

Parks response to aggregate development applications has been consistent in requesting that proponents conduct a thorough assessment of surface and groundwater quality and quantity impacts related to the Park and the Big Hill spring. Parks reviewed the Biophysical Impact Assessment Report (SLR, January 2020) that supports the Mountain Ash proposal and notes that although the consultant links Big Hill Springs to the site's groundwater and notes increase in spring flows, the report does not assess impact of water chemistry changes in the spring as a potential impact of the development.

In Dr. Jon Fennel's report, geochemistry results indicating increases in metals due to the removal of overburden (exposing subsurface material) are concerning. As the Big Hill springs are so closely linked to the groundwater at the Mountain Ash site, we question the proposal's potential impact in groundwater quality and spring chemistry, affects on tufa formation, and its effects on fish and fish habitat.

In light of the new information presented in Dr. Jon Fennel's report, we request that Rocky View County consider additional assessment for the Mountain Ash site and delay its decision on the planning application PL20200031 and the associated Mountain Ash Summit Pit Master Site Development Plan (PL20200034) until the assessment is complete. The assessment should consider project effects and cumulative effects. The assessment should also use criteria ratings such as duration, frequency, reversibility, magnitude, probability supported by quantitative data and comparisons with provincial and federal water quality guidelines. To reiterate, the assessment needs to link groundwater between the site and the springs not only for quantity but also for quality (chemical changes).

We also request that Rocky View County considers the recommendations outlined in Dr. Jon Fennel's report as a means of mitigating project and cumulative impacts including:

- Aggregate Development Setbacks
 - Specifically 1.6 km setback from the boundary of Big Hill Springs Provincial Park.
 - Additional 800 m setback whereby development does not occur within 4 m of the water table.

We are confident that Rocky View County will manage aggregate resources so that values that inspired the establishment of Big Hill Springs Provincial Park will remain intact. If you require further clarification or information regarding the comments outlined above, please contact me at 403-678-9545.

Sincerely,



Michael Roycroft
Regional Director, Kananaskis Region

cc.
Andrew Schoepf, Kananaskis East Area Manager
Maria Lynn, Senior Park Planner, Kananaskis Region
Thea Mitchell, Park Planner, Kananaskis Region