



Alberta Wilderness Association

"Defending Wild Alberta through Awareness and Action"

January 31, 2022

Alberta Environment and Parks,  
Approvals Unit,  
Floor 5,  
South Petroleum Plaza,  
9915 – 108 Street,  
Edmonton, AB T5K 2G8

### **Statement of Concern Regarding DAPP0001717, a *Water Act* Application from Mountain Ash Ltd. Partnership to Remove 13 Wetlands**

Alberta Wilderness Association (AWA), founded in 1965, is dedicated to conserving the unique and vital landscapes that are the source of our clean water, clean air, and wildlife habitat. With more than 7,000 members and supporters in more than 200 communities in Alberta, AWA is committed to promoting the protection of wildlife and wild places in Alberta for all Canadians.

This statement of concern pertains to the *Water Act* application from Mountain Ash LP to destroy/remove 13 wetlands in W ½ of 31-026-03-W5 in order to mine aggregates. AWA believes this application is contrary to the purposes of the Act as outlined in section 2 therein. AWA believes the Mountain Ash LP application is especially at odds with section 2 (a): “the need to manage and conserve water resources to sustain our environment and to ensure a healthy environment and high quality of life in the present and future”.

AWA does not own property in the immediate vicinity of this proposed surface mine. However, our organized conservation outreach activities have introduced Association members and others to Big Hill Springs Provincial Park. Our members are some of the 250,000 people estimated to visit the park annually. AWA has provided interpretive opportunities at the park where children examined the waterfall, learned how to do kick samples and to examine pond insects under microscopes. These educational opportunities helped them to learn how important this welcoming little stream and waterfall area could be for them and for wildlife.

AWA believes the proposed surface mine, since it is situated above the aquifer that feeds the unique springs in the Park, poses an existential threat to the natural history, features, and values that our members enjoy through AWA’s outreach activities. As such, the proposed mine poses a threat to our Association’s future plans to introduce members and the general public to this unique natural setting. This forms the basis for our claim to be directly affected by this project.

The 70-acre provincial park is located in 29-026-03-W5 and is located approximately 800 metres southeast of the proposed mine site.

The national importance of the springs that will be in jeopardy if gravel mining was recognized by S.J. Houseknecht in the 1984 study *Natural History of Mineral and Thermal Springs in Canada*. There the Big Hill springs was labeled as “one of the top four mineral springs found in Canada.”

Over thousands of years, these mineral springs have deposited mineral calcium onto vegetation and debris, forming an unusual feature called tufa. The tufa has built into a series of formations that the creek attractively tumbles over. The springs also supply 50 percent of the flow in Big Hill Creek that enters the Bow River at Cochrane, bringing reliable amounts of high quality water. Such water is increasingly precious as the effects of climate change become more threatening.

In February 2021 Dr. Jon Fennell prepared a review of hydrogeology, geochemistry, fish and aquatic habitat, and climate change for the Friends of Big Hill Springs Provincial Park and the Bighill Creek Preservation Society. Dr. Fennell’s study informs importantly AWA’s statement of concern regarding the Mountain Ash LP *Water Act* application.

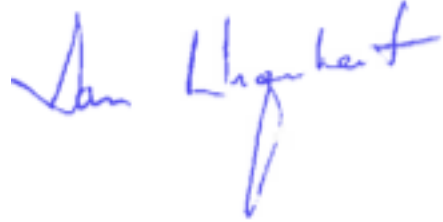
When AEP reviews Dr. Fennell’s study as part of this application process, you will see that Fennell raises serious concerns about the impact that mining activities such as the removal of wetlands will have on the quantity and quality of the groundwater that feeds Big Hill Springs and Bighill Creek. In his professional opinion, the Mountain Ash mining proposal “is lacking in critical detail and is conceptual at best.”(5) He did not believe the company had explored sufficiently the impacts this mine would have on the springs and creek. He concluded that the company did not include any “evaluation of how removal of a substantial part of this aquifer might affect the local aquatic environment (and terrestrial wildlife habitat).” (5) These weaknesses of the Mountain Ash proposal speak powerfully to why this *Water Act* application should not be approved.

Those who support the Mountain Ash *Water Act* application also may cite the purposes of the Act in their defense of the wetland removal proposal. Section 2 (b) states that “the need for Alberta’s economic growth and prosperity” should be recognized when interpreting the purpose of the Act. AWA doesn’t dispute the importance of that goal and the potential contribution of aggregate mining in that respect. However, as the Fennell study noted, “there are plenty of gravel resources in other locations in the County and away from this sensitive headwater.” (24: his emphasis) By directing aggregate mining operations to other locations in Rocky View County, the County could collect levies from miners and preserve the conditions that have produced the signature feature of Big Hill Springs Provincial Park.

For the reasons stated herein, AWA respectfully requests that Alberta Environment & Parks deny the Mountain Ash LP application to destroy/remove 13 wetlands.

Sincerely

ALBERTA WILDERNESS ASSOCIATION



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Executive Director  
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References:

Houseknecht, S.J. 1984. *Natural History Study of Mineral and Thermal Springs in Canada*. Tera Environmental Consultants Ltd., Vancouver, British Columbia.

Mountain Ash Limited Partnership Summit Gravel Pit, Review of hydrogeology, geochemistry, fish and aquatics, and climate change

Prepared by: Dr. Jon Fennell, M.Sc., Ph.D., P.Geol. Hydrogeologist and Geochemist Water Security | Climate Resiliency

On behalf of: Friends of Big Hill Springs Provincial Park and Bighill Creek Preservation Society

For: Rocky View County Council Re: Bylaw C-8051-2020 February 2021