



Red Deer River Naturalists

PO Box 785
Red Deer, AB T4N 3M4
403.347.8200
rdrn.nature@gmail.com

February 3, 2022

Hon. Jason Nixon, House Leader
Minister of Environment and Parks
MLA Rimbey - Rocky Mountain House - Sundre
Office of the Minister
323 Legislative Building
10800-97 Avenue NW
Edmonton, AB, T5K 2B6

Re: Report of the Auditor General Nov. 2019 and Nov. 2021 regarding sand and gravel extraction

Dear Minister Nixon,

The Red Deer River Naturalists Society (RDRN), <https://rdrn.ca/>, was incorporated in 1976 but our roots go back to 1898. The objectives of our Society include: conservation of natural areas and of species native to Central Alberta and prevention of the abuse of natural resources.

We are concerned that sand and gravel operations in Alberta are increasingly putting Alberta's natural ecosystems at risk as has been outlined in recent reports of the Auditor General and the Red Deer Watershed Alliance (RDRWA).

Alberta's Auditor General determined in November 2019 that:

- Un-reclaimed sand and gravel pits expose Albertans to unnecessary risks such as destroyed ecosystems and habitats, water pollution and riverbank erosion.
- Alberta Environment and Parks does not collect enough security from pit operators to compel them to reclaim the land [or] to cover the cost of reclaiming pits

The November 2021 Report of the Auditor General found little or no resolution of these concerns, and recommended:

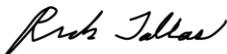
- the Department of Environment and Parks improve the effectiveness and efficiency of reclamation monitoring and enforce reclamation requirements,
- the Department of Environment and Parks collect sufficient security to compel operators to reclaim the land and to cover reclamation costs if operators fail to do so, and
- the Department of Transportation improve its processes to assess, estimate and account for environmental liabilities related to its sand and gravel pits and highway maintenance yards.

The Red Deer River Watershed Alliance has cited a number of scientific studies that indicate aggregate extraction within the floodplain poses risks to shallow groundwater, species habitat and river morphology. Since there has been little progress rectifying deficiencies identified by the Auditor General in both 2019 and 2021, the RDRN feels it is prudent that we support recommendation #4 from the RDRWA *Policy Statement - Sand and Gravel Program Review* issued in April 2017:

“4. Suspend new aggregate extraction approvals within alluvial (shallow) aquifers in the 1:100-year floodplain zone until further research analyzing risks to water security and aquatic ecosystem health is completed.”

The Red Deer River Naturalists Society respectfully requests that the Government of Alberta resolve deficiencies outlined by the Auditor General and suspend new aggregate extraction approvals within alluvial (shallow) aquifers in the 1:100-year floodplain zone until further research analyzing risks to water security and aquatic ecosystem health is completed. Two resolutions to that effect from the RDRN membership are attached. These resolutions were passed unanimously at our Annual General Meeting on January 27, 2022. Please contact me for additional information.

Sincerely,



Rick Tallas
President, Red Deer River Naturalists Society

Attachments: Resolution #1
Resolution #2

CC: Hon. Jason Kenney, Premier
Hon. Doug Schweitzer, Minister of Jobs, Economy and Innovation
Hon. Nathan Cooper, Speaker, MLA, Olds, Didsbury, Three Hills
Hon. Ron Orr, MLA, Lacombe Ponoka, Minister of Culture and Status of Women
Hon. Adriana LaGrange, Red Deer-North, Minister of Education
Jason Stephan, MLA, Red Deer-South
Devin Dreeshen, MLA, Innisfail-Sylvan Lake
Marlin Schmidt, NDP Critic for Environment and Parks
Mayor Ken Johnston, City of Red Deer
Mayor James Wood, Red Deer County
Reeve Daryl Lougheed, Clearwater County
Reeve Barbara Shepherd, Lacombe County
Reeve Angela Aalbers, Mountain View County
Richard Schneider, Executive Director, Nature Alberta
Josee Methot, Executive Director, Red Deer River Watershed Alliance
Delinda Ryerson, Executive Director, Alberta Fish and Game Association
Silvia D'Amelio, Chief Executive Officer, Trout Unlimited Canada
Ian Urquhart, Executive Director, Alberta Wilderness Assn.
Red Deer Advocate Newsroom
CBC News Edmonton
CBC News Calgary
RDRN membership

Resolution 1 presented to the assembled membership of the Red Deer Naturalists Society at the January 27, 2022 Annual General Meeting and passed unanimously:

Whereas, sand and gravel deposits in Central AB tend to be associated with bio-diverse, well-connected habitats such as river flood plains and riparian areas,

and whereas, such areas are of interest to the Red Deer River Naturalist Society whether they are public or private property,

and whereas, Alberta's Auditor General determined in November 2019¹ that:

- Un-reclaimed sand and gravel pits expose Albertans to unnecessary risks such as destroyed ecosystems and habitats, water pollution and riverbank erosion.
- Alberta Environment and Parks does not collect enough security from pit operators to compel them to reclaim the land [or] to cover the cost of reclaiming pits

and whereas the Report of the Auditor General—November 2021² found little or no resolution of these concerns, be it resolved that the RDRN supports the following recommendations from The Report of the Auditor General—November 2021:

- the Department of Environment and Parks improve the effectiveness and efficiency of reclamation monitoring and enforce reclamation requirements, and
- the Department of Environment and Parks collect sufficient security to compel operators to reclaim the land and to cover reclamation costs if operators fail to do so, and
- the Department of Transportation improve its processes to assess, estimate and account for environmental liabilities related to its sand and gravel pits and highway maintenance yards.

¹[https://www.oag.ab.ca/wp-content/uploads/2020/05/Environment Sand and Gravel Pits Followup Nov2019 GllmxXZ.pdf](https://www.oag.ab.ca/wp-content/uploads/2020/05/Environment_Sand_and_Gravel_Pits_Followup_Nov2019_GllmxXZ.pdf)

²<https://www.oag.ab.ca/wp-content/uploads/2021/11/oag-report-of-the-auditor-general- nov-2021.pdf#page=95>

Resolution 2 presented to the assembled membership of the Red Deer Naturalists Society at the January 27, 2022 Annual General Meeting, and passed unanimously:

Whereas the Red Deer Watershed Alliance (RDRWA) has cited scientific studies that indicate aggregate extraction within the floodplain poses risks to shallow groundwater¹, species habitat, and river morphology²,

and whereas many RDRN members share the RDRWA's concern that shallow aquifers and critical surface water - groundwater interactions [could] be significantly affected by aggregate development in the floodplain,

and whereas many RDRN members share the RDRWA's position that risks to surface-water groundwater interactions, channel morphology, and alluvial aquifers should be key screening parameters for aggregate development on floodplains within the Red Deer River drainage, be it resolved that the RDRN supports recommendation #4 from the *Policy Statement - Sand and Gravel Program Review*³ issued in April 2017 by the RDRWA:

“4. Suspend new aggregate extraction approvals within alluvial (shallow) aquifers in the 1:100 year floodplain zone until further research analyzing risks to water security and aquatic ecosystem health is completed.”

¹ Hauer, F.R., et al. 2016. Gravel-bed river floodplains are the ecological nexus of glaciated mountain landscapes. *Science Advances*, Vol. 2., No. 6..

² Hatva, T. 1994. Effect of gravel extraction on groundwater. *Future Groundwater Resources at Risk* (Proceedings of the Helsinki Conference, June 1994). IAHA Publ. no. 222, 1994

³ <https://rdrwa.ca/wp-content/uploads/2020/12/Sand-and-Gravel-Policy-Statement.pdf>