

Ms. Jennifer Howe Project Manager  
Springbank Off-Stream Reservoir Project # 80123

Greetings;;;

Enclosed below are the Submissions which I rendered to the Project documents file. It indicates the direct connection with Stantec Consulting via their subcontracted management of collaborating the Open House Survey Forms. They show that the interpretation of previous submittals were manipulated to diminish my IDC critique to a simple generic Question and Stantec Response to restate their previous work as being undertaken, as below;

Issue or Concern Question Response

**Decision Making Process** **What other options has the** **The project team provided information, considered aside from SR1?** **in electronic format, information on the Government of Alberta's responsibility in regard**

Therefore Stantec received all ATTACHMENTS which described the MICRO WATERSHED IMPOUNDING CONCEPT.

Respectfully Submitted;;;

Charles Hansen

HANSEN REGIONAL COMPREHENSIVE PLANNING CONSULTING  
**STRATEGIC CONCEPTUAL LAND USAGE -----EKISTICAL**  
**COMPREHENSIVE DEVELOPABILITY PLANNING**  
<Personal information removed>

**From:** Scandinavian <Personal information removed>  
**Sent:** June-15-18 4:10 PM  
**To:** 'CEAA.Springbank.ACEE@ceaa-acee.gc.ca'  
**Subject:** FW: August 2017 Open House Exit Survey Form - Public Engagement Process Evidence-SUBMISSION #3

Springbank Off-Stream Reservoir Project 80123  
Canadian Environmental Assessment Agency  
Canada Place  
9700 Jasper Avenue, Suite 1145  
Edmonton, Alberta T5J 4C3

Ms. Jennifer Howe Project Manager  
Springbank Off-Stream Reservoir Project # 80123

Greetings;;;

I am here by submitting my Public Engagement Process Evidential communications with **COMMUNICA PUBLIC AFFAIRS INC.** Suite 200, 215 - 12 Avenue S.E. Calgary, AB, T2G 1A2.

It is the firm that was hired by STANTEC to independently conduct the “Public Participation” in the Project Open Houses engagement results. I was told by a STANTEC EIA/EIS Manager that Communica was engaged to provide independence from STANTEC, to validate the public’s “participation”.

STANTEC also stated that the entire Public Participation process was set in motion and determined all levels of tabulation and evaluation without any prejudicial interference. However, they told me that all interpretation of the Public’s submissions were to be done by their Communica staff drafting of their ”Springbank Off-Stream Reservoir Questions and Responses Summary” tabulation sheets which contained three columns as shown on the ATTACHMENTS.

“COMMUNICA Feedback”

The feedback we have heard so far has been documented and provided to the design team. We will continue to have discussions with stakeholders and record how the project will affect them, building on what we’ve heard so far. If you have questions or comments, email [springbank-project@gov.ab.ca](mailto:springbank-project@gov.ab.ca) at any time.

Below is one of my 4 Emails to COMMUNICA to register my Public critique of the EIS/EIA along with the ATTACHMENTS herein.

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**From:** Scandinavian <Personal information removed>  
**Sent:** September-08-17 4:39 PM  
**To:** 'springbank@communica.ca'  
**Subject:** August 2017 Open House Exit Survey Form

SR1 FLOOD MITIGATION PROJECT PROPOSAL  
ENVIRONMENTAL FLOOD MITIGATION ENVIRONMENTAL IMPACT ASSESSMENT.  
**Alberta Transportation Environmental Coordinator Mark Svenson**  
**Alberta Environment and Parks**  
**COMMUNICA PUBLIC AFFAIRS INC. KATE McEWEN** SENIOR ADVISOR, ABORIGINAL AND  
STAKEHOLDER ENGAGEMENT

Please accept my SR1 Project evaluations with my sincerest intention to offer my professional 60 years experience of dealing, planning, designing, infrastructural engineering, environmental assessment planning and experience across Canada, USA, Africa, Europe, China. I have worked with Jim Howell P.Geol, Hydro Geologist and compliment his continual EIA Professional experience.

This Submission is one of 2 which I have researched since 2003 with various other consultants on a visionary effort to bring some sense of creative scientific solution to a Comprehensive Master Planning speculative offering of a collaborative consortium method of examining the

feasibility of projected government endeavors to plan for the proposed South West Calgary Ring Road (SWCRR) 37<sup>th</sup> Street Southwest crossing and the attached ancillary flooding 83 years of sedimentation of the Elbow River into the Glenmore Reservoir. My focus on the Elbow River Watershed as a design landscape framework for scientific planning was always salient.

During those years I have assembled and benefitted from the volunteered consultant inclusion into my Master Planning effort to provide creative visionary solutions to major projects to the lesser endowed technical government agencies and their limited traditional habit to engage certain prequalified engineering consultants.

The CEAA Ministers' refusal to examine SC1 with a Panel of Experts to evaluate Environmental, Hydrological, Geospatial, Geophysical, Morphological and Ecological effects within the Calgary urban area before the Public, Province and the Federal Court ruling is indicating the level of importance on one major item. The CEAA EIS requires an examination and evaluation of "Alternative Project Possibilities". The SR1 alternative reference to MC1 will not receive an independent evaluation by an arms length outside panel of experts now because the Minister Catherine McKenna has determined that she acknowledges her satisfaction of the CEAA ALBERTA AGENCY decision to approve the Proposed Project as-is to be sufficient.

#### **A. OPTIONAL VIEW OF RE-EXAMINING ALTERNATIVE PROJECT SOLUTIONS**

The following quoted process may provide the working vehicle to address Alternative Flood Regional Planning Solutions:

"Major Projects Management Office" (MPMO) of the Government of Canada:

The [MPMO](#) provides overarching project coordination, management and accountability for major resource projects within the context of the existing federal regulatory review process. It can undertake research and identify options that drive further performance improvements to the federal regulatory system for major resource projects."

It can then be concluded that if the CEAA/MPMO have enough evidence to schedule independent EIA HEARINGS and fund Intervention to the Alberta Ministry of Transportation because the Navigable Elbow River is a Natural Geological Resource as :

- Potable physiological human health living existence;
- River Risk Factors;
- The meandering Elbow River habit east of the 2 Elbow Projects has not evaluated the Risk Factors which have been cited by the Alberta Auditor General in the March 2015 report. See OAG and AUDITOR GENERAL and the UBC-Hugenholtz-Drone ATTACHMENTS.
- SR1 Project has not complied with the City of Calgary Wetland Conservation Plan ( ATTACHED )

- Springbank Off Stream Project volumetrics have not been evaluated to assess any Risk Factors. There was no thorough environmentally wholistic scientific geospatial examination and alternative design evaluation of the Elbow River Watershed Drainage Courses.
- Optional opportunities to impound temporary storage to be sequentially released on command by the non-flooding flood flow within Calgary and Bragg Creek urban developable land were not done by the Flood Mitigation Advisory Committee single sourced consultant STANTEC Consulting.

## **B. ALTERNATIVE OPTIONAL SEQUENCE OF EVENTS.**

The following reprint is a Tue Copy of what was first presented to the Public at the first public meeting of Alberta's scoping at the October 4<sup>th</sup>, 2013 Symposium announcing the scope of the upcoming process that was prepared by STANTEC CONSULTING.



“Additional Considerations for Water Management Infrastructure

- Scope and Scale

The potential facilities range in height from 30 to 50 m and from 600-1100 m in length, with storage capacities from 35 61 Mm<sup>3</sup>.

- Risk Assessment

The dam safety consequence rating of any potential structures will likely be high to very high due to significant downstream population at risk. This will set the design criteria.

Flood control structures must be fully capable of storing large volumes of water at all times

- Ownership and Control

Other critical aspects requiring consideration include: determining the appropriate project proponent, long term ownership, resources required for operation, maintenance and surveillance, emergency preparedness and response, safety assessments and evaluations.

Normal Regulatory process for Water management Infrastructure

- Environmental Assessment based on scale and complexity of proposed project. Necessary to determine environmental impacts and assess whether the project is in the public interest.
- Environmental Assessment is mandatory for:\

--Water management structures above 15m in height

--Diversions with a capacity greater than 15 cubic metres per second

--Reservoirs with a capacity greater than 30 million cubic metres “

1 , STANTEC determined that the only considerable up stream watershed solution could be attended by massive civil engineering “*rubble imported*” to construct two EC1 & EQ1 massive 50 metres high and 2.6 to 5 kilometers long dams within 2 major Elbow tributaries. They were not feasibly resourced and constructible by a Geologist estimated 5,000+ truckloads of 5,000,000 m<sup>3</sup>+/- of “*rubble-gravel-rock-boulders*” from where ?. RE: the last ATTACHED Flood Advisory Panel 2013 Report and Public Presentation. Public critique followed.

2. STANTEC Subsequently determined that “the only remaining solution was to build a large civil engineering dam along and within the Elbow River Chanel. Thus the current Springbank Off-Stream Reservoir Project#80123 SR1 was envisioned. The second could be the McLean Creek/Elbow River Dam MC1.

- A subcontract review to AMEC Earth & Environmental Sciences confirmed the selection of SR1.
- STANTEC was next hired by Alberta Transportation to conduct the final civil engineering design & cost estimation of the Diversion Canal, Impounding Dam and sequential release outlet mechanism. SR1 was scoped as “A natural basin that will be used to hold floodwater.
  - Storage capacity at top of dam: 104,600,000 m<sup>3</sup>
  - Design flood storage capacity: 70,200,000 m<sup>3</sup>
  - Maximum depth: 25 m
  - Surface area at top of dam: 884 ha (includes back flooding area)
  - Surface area at design storage capacity (at FSL): 789 ha ” (True Copy STANTEC CEAA PROJECT DESCRIPTION EXECUTIVE SUMMARY) , is without any determination of downstream earth & environmental and adjacent public *Risk Factors*.
- STANTEC was engaged by Alberta Transportation to conduct an Environmental Impact Analysis of the civil engineering Dam Project.
- The Project was then applied to the Minister of Environment and Climate Change.
- CEAA determined that the Project submit an Environmental Impact Statement in accordance with their EIS GUIDELINES..

1. The CEAA GUIDELINES for an Environmental Impact Statement were authored to include consideration of “*alternative means of carrying out the Project*”. This was not done. Deltares Research Foundation—(“Our main focus is on deltas, coastal regions and river basins”)-- was engaged to compare MC1 to SR1, not to envision other *alternatives* as is required in the CEAA Environmental Impact Statement Sectrion 3.2.
2. The CEAA Federal Minister denying an independent panel on the Provincial Application, would invalidate the EIS GUIDELINES Section-3.2. So there would be no true independent evaluation. (*so it’s the [non-legal] fox guarding the hen-house*).
3. Alberta does not have a “ CEAA-EIS Provincial EIA Agreement” as is done in British Columbia. CEAA/MPMO-BC have entered Agreements to conduct the CEAA Act required EIS unilaterally within their BC Environment Assessment Office (EAO) on numerous other Proposed Projects. The Major Project Management Office (MPMO) allocates all project EIS-EIA costs to a BC EAO Panel review, Hearing and Intervention to satisfy Section 38 of the CEAAct (2012).

**A. THE FOLLOWING IMPACT CONDITIONS OF SIGNIFICANT BEARING ON THE OUTCOME OF FLOOD CONTROL MITIGATION RISK FACTOS:**

- The Project is under approval by a Federal Court Decision for the Ministers denial to accommodate “the Project to a review panel”.
- untested release and encroaching atmospheric river flowing climatologically will increase levels of untimely flooding precipitation,
- The ATTACHED drone/GPS survey of Dr. Chris Hugenholtz, a University of Calgary showed how the River bed and embankment changed with the 2013 Flood at Redwood Meadows. How might that affect the risk of the diversion channel
- It could also offer evidence as to the aquatic life of the “The Elbow River contains a variety of valued fish species including brook trout, brown trout, bull trout, turbot, cutthroat trout, mountain whitefish, rainbow trout, white sucker, longnose sucker, and mountain sucker. Gravel spawning beds for trout species, or scoured pools that provide high quality overwintering habitat to fish, are present in the Elbow River”. The Navigable Elbow River is indeed a qualified “NATURAL RESOURCE” under the MPMO

**B. CONCLUSIVE RECOMMENDATION:**

- Solicit the CEAA Minister to present her recommendation to obtain Cabinet approval to invoke the Major Projects Management Office:
- independent EIA/EIS HEARINGS and fund Intervention to the Alberta Ministry of Transportation for Flood Control including Dam Safety, Geotechnical, Geological, Hydrological, Geospatial, Environmental, Morphological, Wet Lands and aqua/animal wildlife habitat.
- Examine the missing EIS GUIDELINE Alternative Option other than SR1. Require Performance of Comprehensive Master Planning for an Alternative scheme to retain flood surge within the Elbow River Micro Watershed upstream locations.

Respectfully Submitted;;;

Charles Hansen

HANSEN REGIONAL COMPREHENSIVE PLANNING CONSULTING  
STRATEGIC CONCEPTUAL LAND USAGE -----EKISTICAL  
COMPREHENSIVE DEVELOPABILITY PLANNING  
<Personal information removed>

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**The above original Emailed copy and ATTACHMENTS were my submittals to the COMMUNICA :**

- The Word ATTACHMENT “SR1 CEAA.doc” illustrates the level of interpretation of all that I formally submitted.

- Their “ Questions and Responses Summary” sheets within Volume 4, Appendix 4, have synthesized my voluminous critique into “What other options has they considered aside from SR1” .
- The Response was that “The project team Provided information on the Alberta http/flood-mitigation.
- Therefore no other option exist.

**The “Exit Survey (3).doc”** ,ignorantly suggests that the choice of;

- “please select the **top 5 in order of priority** for the Government of Alberta to address regarding the EIA for the Springbank Off-stream Reservoir: “ , is a legitimate option for Alberta’s SR1 Project Environmental Engineering Consultants to consider.
- **This element of the COMMUNICA Public Invitation to participate is an expensive portion of the Project which is entirely misleading throughout the STANTEC Flood Mitigation engagement TO THE Public which is led to believe that their concerted attention is worthwhile to any Project Plans.**

Respectfully Submitted

Charles Hansen

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COMPREHENSIVE DEVELOPABILITY PLANNING**  
<Personal information removed>

## **SR1 CEEA/NRCB – EIS Section 2.2/ STANTEC EIA Volume 4 Appendix 4**

**CEEA EIS GUIDELINES:** Volume 1, Section 3.0 of the EIS provides a description of the various Project components including the diversion system (floodplain berm, access road, auxiliary spillway, diversion structure, and diversion inlet), diversion channel, emergency spillway, off stream reservoir, off stream dam, and lower outlet works. The EIS includes information on the Project Alternatives considered and a detailed comparison of the Project with a location upstream on the Elbow River near McLean Creek. However, there is no description of the alternative means considered for the specific Project components and design components listed in Part 2 Section 2.2 of the EIS Guidelines, other than the design criteria outlined in Volume 1 Section 3.1 of the EIS. There is no description of the evaluation criteria considered (e.g., the approach used in identifying a preferred means), including the environmental effects used to evaluate the alternative means.

The EIS includes information on the Project Alternatives considered and a detailed comparison of the Project with a location upstream on the Elbow River near McLean Creek. However, there is no description of the alternative means considered for the specific Project components and design components listed in Part 2 Section 2.2 of the EIS Guidelines, other than the design criteria outlined in Volume 1 Section 3.1 of the EIS. There is no description of the evaluation criteria considered (e.g., the approach used in identifying a preferred means), including the environmental effects used to evaluate the alternative means.

### **Information Required to Conform**

- a) Update the EIS and EIS Summary, as applicable, to include an alternative means assessment in accordance with the Agency's Operational Policy statement entitled "Addressing "Purpose of" and "Alternative Means";
  - i. An analysis of alternative means for the main Project components and for Project design components described above;
  - ii. Identification of the evaluation criteria for the alternative means analysis; and
  - iii. An assessment of the environmental effects (as per Section 5 CEEA 2012) for the alternative means considered.

### **STANTEC EIA Volume 4**

Questions and Comments Taken Into Consideration for the EIA or Project Design

(No Follow-up Requested) Issue or Concern Question Consideration or Result of Question

### **Appendix B Springbank Off-stream Reservoir Questions and Responses Summary**

Summary of Questions and Responses Provided

Issue or Concern

**Decision Making Process**

Question

**What other options has the considered aside from SR1?**

Response

**The project team provided information, in electronic format, information on the Government of Alberta's responsibility in regard**



**From:** Scandinavian <Personal information>  
**Sent:** September-10-17 5:49 PM  
**To:** 'springbank@communica.ca'  
**Subject:** FW: Springbank Off-stream Reservoir Project EIA Open house  
**Attachments:** ELBOW MICRO  $\mu$  WATERSHED.docx; Hansen Daffern\_Elbow\_Micro\_Watershed Master Plan.pdf; RESPONSE#3-B PROPOSED SOLUTION-2013 FLOOD CONTROL Regional Master Plan of Remediation.doc; 2017 07 31 - August 2017 Open House Exit Survey.docx; Hansen Daffern Micro Watershed Concept.pdf; Micro watershed.pdf

Greetings Kate;;;

I made a mistake on the First two ATTACHMENTS: Please delete these and replace them with those following:

1. Elbow MICRO  $\mu$  WATERSHED. Doc(17 KB)
2. Hansen Daffern Elbow Micro Watershed Master Plan.pdf (641 KB)

Replace them with the following 2:

1. Hansen Daffern Micro Watershed Concept.pdf (5 MB)
2. Micro watershed.pdf (447 KB)

Thank You for your courtesy;;;

*Charles Hansen* -EKISTICAL URBAN ARCHITECT PLANNER  
B ARCH – MAJOR THESES URBAN DESIGN INFRASTRUCTURAL PLANNING

**HANSEN REGIONAL COMPREHENSIVE PLANNING CONSULTING**  
STRATEGIC EKISTICAL CONCEPT EVALUATION-----DYMATION DEVELOPABILITYURBAN DESIGN

<Personal information removed>

**From:** Scandinavian <Personal information  
**Sent:** September-08-17 1:31 PM  
**To:** 'springbank@communica.ca'  
**Subject:** Springbank Off-stream Reservoir Project EIA Open house

Good Day Kate McEwen;;;

ATTACHED are additional evidence of my critique of the Scope of the SR1 EIA/EIS for subsequent submission to the CEAA –EIS Guidelines.

These were my original research which applied for my proposed 19 Consultant Collaborative Feasibility and Planning Funding from the Provincial post flood Directorate for Resilience and Flood Mitigation. It was denied.

Thank you for your cooperation and your valued service.

*Charles Hansen* EKISTICAL URBAN ARCHITECT PLANNER  
B ARCH – MAJOR THESES URBAN DESIGN INFRASTRUCTURAL PLANNING

**HANSEN REGIONAL COMPREHENSIVE PLANNING CONSULTING**  
STRATEGIC EKISTICAL CONCEPT EVALUATION-----DYNAMIXION DEVELOPABILITYURBAN DESIGN  
<Personal information removed>

**From:** Scandinavian <Personal information>  
**Sent:** September-11-17 11:20 AM  
**To:** 'kmcewen@communica.ca'  
**Subject:** FW: Springbank Off-stream Reservoir Project EIA Open house-  
REPLACE ATTACHMENTS  
**Attachments:** ELBOW MICRO  $\mu$  WATERSHED.docx; Hansen  
Daffern\_Elbow\_Micro\_Watershed Master Plan.pdf; RESPONSE#3-B  
PROPOSED SOLUTION-2013 FLOOD CONTROL Regional Master  
Plan of Remediation.doc; 2017 07 31 - August 2017 Open House Exit  
Survey.docx; Hansen Daffern Micro Watershed Concept.pdf; Micro  
watershed.pdf

**From:** Scandinavian <Personal information>  
**Sent:** September-11-17 11:13 AM  
**To:** 'springbank@communica.ca'  
**Subject:** FW: Springbank Off-stream Reservoir Project EIA Open house

**From:** Scandinavian <Personal information>  
**Sent:** September-10-17 5:49 PM  
**To:** 'springbank@communica.ca'  
**Subject:** FW: Springbank Off-stream Reservoir Project EIA Open house

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STRATEGIC EKISTICAL CONCEPT EVALUATION-----DYNAMIXION DEVELOPABILITYURBAN DESIGN  
<Personal information removed>

Thank you for taking the time to provide your input on the proposed Springbank Off-stream Reservoir (SR1) project. Your comments will be compiled and submitted as part of a summary for the Environmental Impact Assessment (EIA) application for this project.

1. Of the following issues or concerns listed, please select the **top 5 in order of priority** for the Government of Alberta to address regarding the EIA for the Springbank Off-stream Reservoir:  
(1 = highest priority, 5 = lowest priority)

2	Air Quality
2	Aquatic Environment (animals and plants)
2	Economic Impacts
2	EIA Process and Opportunities for Input
2	Engineering Concept and Design
2	Fish and Fish Habitat
2	Geomorphology and/or Sediment Transport (stability and sediment supply effects on SR1 and the Elbow River)
2	Geotechnical Assessment (testing on subsurface soil and bedrock conditions)
2	Heritage Sites
2	Historical Resources
2	Hydrogeology (groundwater and subsurface geology)
5	Noise

1	Project Alternatives
1	Project Planning
1	Project Schedule
2	Recreation (impacts to recreational activity in the area)
5	Road Alterations
1	Safety
2	Social Impacts
2	Surface Water
2	Terrain and/or Soils
2	Traditional Knowledge and Traditional Land Use
2	Vegetation and Wetlands
1	Visual Quality
2	Wildlife

2. The information provide at the Open House was (check one):

**Inadequate** – The information was not detailed enough and my questions were not answered

**Adequate** – The information was vague or confusing and I still have questions

**Sufficient** – There was enough information to understand the Project

**Excellent** – The information provided was substantial and clearly communicated

3. Do you support the Springbank off-stream Reservoir Project?

**Yes**       **No**       **Undecided**

4. Rate the Government of Alberta’s efforts to engage with and share information with stakeholders about the proposed Springbank Off-stream Reservoir Project.

**Excellent**       **Good**       **Satisfactory**       **Poor**

5. Do you have any further questions or comments for the Government of Alberta regarding the proposed Springbank Off-stream Reservoir Project?



200, 2015 – 12 Avenue SE  
Calgary, AB  
T2G 1A2

[springbank@communica.ca](mailto:springbank@communica.ca)

Personal information is being collected by Alberta Transportation under the authorization of Section 33(c) of the Freedom of Information and Protection of Privacy (FOIP) Act and is managed in accordance with part 2 of the FOIP Act. Your name and email address will be used for contact purposes to send updates. Your postal code is being collected for analysis of location to river and to the proposed Springbank Off-stream Reservoir Project. Your personal information will be shared with the Department of Environment and Sustainable Resource Development, the Canadian Environmental Assessment Agency, and to anyone viewing this sheet during sign-in. Should you wish to have your personal information removed, corrected or have concerns pertaining to the Springbank Off-stream Reservoir Project, please contact Mark Svenson, Alberta Transportation Environmental Coordinator at (780) 644-8354 or [springbank-project@gov.ab.ca](mailto:springbank-project@gov.ab.ca).