



**Environment and Climate Change
Office of the Minister**

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40100-30-317

March 9, 2022

Robert Apold
CEO, Natural Forces Developments Limited Partnership
1205-1801 Hollis Street
Halifax, NS B3J 3N4

Dear Robert Apold:

**Re: Environmental Assessment – Natural Forces Developments Limited
Benjamins Mill Wind Project - Hants County Nova Scotia**

The environmental assessment of the proposed Benjamins Mill Wind Project in Hants County, Nova Scotia has been completed.

This letter is to advise that, pursuant to Section 13 (1)(a) of the Environmental Assessment Regulations, I have determined that the Registration Document provided is insufficient to allow me to make a decision, and that I require additional information. Specifically, the review determined that the following additional information is required in order to evaluate potential environmental effects that may be caused by the undertaking.

In consultation with Nova Scotia Environment and Climate Change (ECC), and other Departments where specified, provide the following additional information:

1. In consultation with Natural Resources and Renewables (NRR) Geological Survey Division Mineral and Management Division, provide a comprehensive review and presentation of all historical geoscience data for the project footprint. This includes but is not limited to:
 - a. Detailed geological map(s) of the development footprint and project area.
 - b. Uranium distribution map layer(s) based on geological, geophysical and geochemical data.
 - c. A technical summary that:
 - i. Identifies and describes known occurrences of uranium;
 - ii. Describes geological controls related to primary occurrences, and potential secondary distribution of uranium;
 - iii. Identifies and describes common benchmark standards for naturally occurring uranium mineralization and human health and safety considerations; and
 - iv. Identifies and describes the local health and safety risk to known and potential occurrences of uranium mineralization.
 - d. Provide an avoidance and mitigation plan which includes:
 - i. A general exposure assessment related to geoscience site characterization.
 - ii. An exposure assessment for planned activities including infrastructure development and all primary or secondary ground disturbance activities.

2. In consultation with NRR Wildlife Branch, and Environment and Climate Change Canada Canadian Wildlife Service provide:
 - a. Additional details for all flora and fauna surveys including but not limited to methodology, timing, coverage, weather conditions, equipment used, and incidental species observances, particularly for Species at Risk (SAR).
 - b. Details and results of additional flora and fauna surveys, if required.
 - c. Explanation of the discrepancies related to rate of nocturnal passage/migration in research conducted for nearby projects.
 - d. Additional information to support conclusions regarding potential turbine collisions.
 - e. Proposed mitigation measures for project impacts to birds, bats, SAR and habitat.
 - f. Clarification on how the results of bird monitoring informed the placement of proposed turbines and other infrastructure, particularly in relation to SAR and their habitats.
 - g. Rationale for conducting only one year of avian surveys or provide details and results of an additional year of surveys completed in consultation with the above listed departments.
 - h. An adaptive management plan.
3. In consultation with ECC Wetland Specialist provide:
 - a. Functional assessments for wetlands in the project boundary and information to determine Wetlands of Special Significance.
 - b. Details of each wetland in the project boundary in relation to project infrastructure, including any proposed wetland alterations.
 - c. Proposed mitigation and monitoring for wetlands.
 - d. Fish and fish habitat assessments in wetlands within the project boundary.
4. In consultation with Fisheries and Oceans Canada provide fish and fish habitat surveys for watercourses and wetlands in the project area. Provide details of each watercourse and wetland in the project boundary in relation to project infrastructure, including any proposed watercourse and wetland alterations.
5. In consultation with ECC Water Resources Management Unit provide a surface water management plan developed by a qualified engineer and an analysis of post-construction water flows.
6. Provide justification for the noise assessment methodology used and how the modelling software addresses these larger scale commercial wind-turbines (5 MW) and their sound level outputs at the nearest receptor locations. Refer to Guidance for Evaluating Human Health Impacts in Environmental Assessment: Noise (Health Canada, 2017) as necessary. The noise assessment should also ensure the modulation of sounds from operations, low frequency noise, proposed mitigation and monitoring, and a complaint resolution plan are provided in detail.
7. In consultation with ECC Protected Areas and Ecosystems Division provide an analysis of potential impacts to biodiversity values and land-scape scale ecological connectivity from habitat fragmentation. Identify any associated mitigation measures.

8. Provide the final Archaeological Resource Impact Assessment, reviewed and approved by Nova Scotia Communities, Culture, Tourism and Heritage.

This information must be submitted by Natural Forces Developments Limited Partnership within one year, as an addendum to the original Registration Document. Upon submission of the information, I will have 50 days to make my decision. Registration of the Addendum will require publication of a Notice to inform the public of the 30-day Addendum public comment period. If you have any questions regarding this decision, please contact Helen MacPhail, Supervisor, Environmental Assessment Branch, at (902) 483-2696 or via email at Helen.MacPhail@novascotia.ca.

Sincerely,

A handwritten signature in blue ink, appearing to read 'T. Halman', written in a cursive style.

Honourable Tim Halman, MLA
Minister of Environment and Climate Change

c: Lorrie Roberts, Executive Director, Policy, Environment and Climate Change