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| Mi'kmaq Relations Unit | The proponent has indicated this technical position has not been filled due to a lack of interest. It is recommended that the proponent continue these discussions and engagement with the Mi'kmaq to pursue both the MEKS and the Mi'kmaq technician position. | An MEKS for this site is ongoing and scheduled to be completed in January 2023. | N/A |
| | Potential impacts to fish and fish habitat may potentially have an adverse impact to Aboriginal and Treaty rights. Additional information should be provided on the potential impact on fish and fish habitat in the project area. Additionally, water quality monitoring programs should be considered for any terms and conditions of the EA Approval, or subsequent Part V Approvals, if issued. | Acknowledged. An addition year of surveys (2022) has been conducted and results are included in the Addendum and Appendix E. | 3.1.4 Aquatic Environment 3.2.4 Watercourses and Fish Habitat Appendix E: Watercourse and Fish Habitat Assessment |
| | However, the proponent should rely on the Mainland Moose Recovery Plan to determine potential impacts of activities to the recovery of the species. Although moose hunting is not permitted on the mainland, Moose are a culturally important species to the Mi'kmaq of Nova Scotia. As such, additional information should be provided to determine the potential of Moose presence in the project area and the potential for the project to impact Moose and Moose habitat. | Acknowledged. An additional year of field surveys (2022) has been conducted. Field biologists were aware of the potential for moose presence and instructed to record any signs or sightings. There were no signs or sighting of Mainland Moose nor is the Project located in their core habitat. | 3.1.2 Terrestrial Wildlife 3.1.7 Species at Risk 3.2.2 Terrestrial Wildlife 3.2.7 Species at Risk 4 Biodiversity and Ecological Connectivity Appendix C: Wildlife Assessment Appendices I and J: AC CDC Reports |
| | The proponent should continue to engage with the Mi'kmaq as it relates to archaeology for the area. | The proponent continues to engage with the Mi'kmaq as it relates to archaeology for the area. An Archaeological Resource Impact Assessment (Appendix N) has been completed with Mi'kmaq engagement. Kwilmu'kw Mawklusuaqn's Archaeological Research Division (KMK-ARD) was informed of the Project and any available information pertaining to traditional or historical Mi'kmaw use of the study area was requested. The knowledge gained from this engagement expanded upon the results of other forms of background research, providing a better understanding of the cultural and archaeological importance of the study area. | 6 Archaeological and Cultural Resources Appendix N: Archaeological Resource Impact Assessment |
| Geological Survey Division | <ol style="list-style-type: none"> 1. Detailed geological map(s) of the development footprint and project area (on a LIDAR base), which identify the relevant structure and stratigraphy of the project area. 2. Uranium distribution map layer(s) based on geological, geophysical and geochemical data. 3. A technical summary that: <ol style="list-style-type: none"> a. Clearly identifies and describes known occurrences of uranium mineralization (e.g., geological, geophysical and geochemical). b. Clearly identifies and describes geological controls (e.g., glaciation, structure and stratigraphy) related to primary occurrences, and potential secondary distribution of uranium mineralization. c. Clearly identifies and describes common benchmark standards for naturally occurring uranium mineralization and human health and safety considerations. d. Clearly identifies and describes the local health and safety risk (i.e. frequency and severity) pertaining to a) known occurrences of uranium mineralization, b) potential occurrences of uranium mineralization and c) naturally occurring secondary geological pathways (e.g., structures and till dispersion). 4. Recommended as part of potential mitigation and or avoidance planning: <ol style="list-style-type: none"> a. An exposure assessment (general) related to geoscience site characterization. b. An exposure assessment for planned activities (e.g., infrastructure development and all primary or secondary ground disturbance activities) | A comprehensive geotechnical review and site visits were conducted to identify the distribution and abundance of Uranium within and near the Project (Appendix L). A human health risk study to Naturally Occurring Radioactive Materials (NORM) (Appendix K) has been conducted in conjunction with the site visits to assess and mitigate the potential interactions with Uranium in the environment. An avoidance and mitigation plan has been developed to screen and respond to the presence of NORM. | 5.1 Geology Appendix L - Geoscience Research, Compilation and Site Visits Summary Report Appendix K - Naturally Occurring Radioactive Material Response |

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| Special Places, Culture and Heritage | <p>The long-term positive impact of the project on carbon emissions is quite clear, but the short-term negative impacts, and mitigations for them, are not as well documented (or at least not as clearly presented) as they could be.</p> <ul style="list-style-type: none"> In particular, there is no comment on the expected reduction in carbon sequestration capacity that would accompany tree felling or land conversion from early successional forest, and whether it could be mitigated by planting in areas that are not converted to road or pad. Although such sequestration would be a small proportion of the overall project impact, with appropriate vegetation management and tree planting, the project can likely achieve a net carbon benefit in a shorter time. | <p>Acknowledged. Project area required for construction will be minimized as much as feasible. The revegetation plan is detailed in the EMPP and will promote revegetation with non-invasive species.</p> | <p>3.2 Effects of the undertaking on the Environment 3.2.1 Terrestrial Habitats and Vegetation 3.2.9 Cumulative Effects Appendix B - Vegetation Assessment</p> |
| Special Places, Culture and Heritage | <p>(130) A buffer of 100 m is being applied to lichens within the PDA, but at least one lichen SOCC (Frosted Glass Whiskers) appears to intersect the road footprint between T2 and T1. If this SOCC lichen cannot be avoided, a specimen and relevant forest data should be collected and submitted to the Nova Scotia Museum before the site is disturbed.</p> | <p>The proposed project road layout has been updated to maintain a 100 m buffer of the Frosted Glass Whiskers observation. Updated mapping is included with the Addendum.</p> | <p>3.1.1 Terrestrial Habitat and Vegetation 3.1.7.1 Vegetation SAR Assessment 3.2.2 Terrestrial Habitats and Vegetation 3.1.7 Species at Risk 3.2.8 Species at Risk Appendix B - Vegetation Assessment</p> |
| NRR - Crown Lands | <p>2.2 Geographical Location</p> <ul style="list-style-type: none"> The document says that that 4 WTGs (Wind Turbine Generators) will be located on Crown land, and access for the overall project will be over a network of existing privately maintained forestry roads. A Crown Land Lease would be required for those turbines and would include access and utilities over the Crown Land. Letter of Authority/Permits would be required for construction of new access roads and/or modification to existing roads on Crown lands <p>Project Layout - Figure 2</p> <ul style="list-style-type: none"> This map shows up to 5 turbines on Crown land PID 45063443 (T1, T2, T3, T4, and T5). New site roads are also shown on the Crown PID. In section 2.2 above it states that 4 WTGs will be located on Crown. This discrepancy (4 vs 5 WTGs) could be due to the scale of the map. According to the legend, Crown land is outlined on this figure in gold. PID 45259694 is outlined in gold but Property Online shows it as a private PID. <p>2.3.1.1 - Access roads</p> <ul style="list-style-type: none"> The widening or other modification to existing access roads and clearing and/or grubbing on any Crown parcel requires authority from Land Administration. This requirement also applies to access roads to transmission lines that are on Crown land. <p>2.3.6 - Interconnection to grid</p> <ul style="list-style-type: none"> Interconnection to the grid will involve a transmission line, switching substation and a control building and protection system. If any aspect of this interconnection, including overhead wires cross Crown land then authority will be required from the Department's Land Administration Division (licence or easement). <p>Schedule</p> <ul style="list-style-type: none"> Proposed pre-construction activities and clearing are expected to start in Q4 of 2022. Letter of Authority from the Department's Land Administration Division needs to be obtained before any work can commence on Crown land. <p>Table 48 - Potential Interactions & Proposed Mitigation for Unplanned Events, Malfunctions, and Accidents</p> <ul style="list-style-type: none"> A Crown Land Lease will contain a requirement for insurance, the type of coverage and coverage amounts would be determined prior to issuance of the lease. | <p>The proponent is in the process of obtaining a Crown Land Lease and the appropriate permits for construction and/or modification of roads on Crown Lands.</p> <p>This is due to a mapping error. Project layout figures have been updated.</p> <p>Acknowledged. The proponent is in the process of obtaining a Crown Land Lease and the appropriate permits for construction and/or modification of roads on Crown Lands. Authority from NSDNRR Land Administration will be obtained.</p> <p>Acknowledged. The proponent is in the process of obtaining a Crown Land Lease and the appropriate permits for construction and/or modification of roads on Crown Lands. Authority from NSDNRR Land Administration will be obtained.</p> <p>Acknowledged. The proponent is in the process of obtaining a Crown Land Lease and the appropriate permits for construction and/or modification of roads on Crown Lands. Authority from NSDNRR Land Administration will be obtained.</p> <p>Acknowledged. The proponent is in the process of obtaining a Crown Land Lease and the appropriate permits for construction and/or modification of roads on Crown Lands. Authority from NSDNRR Land Administration will be obtained..</p> | <p>N/A</p> <p>1.3 Project Description</p> <p>N/A</p> <p>N/A</p> <p>N/A</p> <p>N/A</p> |

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| | <p>Appendix C – Sound Assessment Map</p> <ul style="list-style-type: none"> This map shows up to 5 turbines on Crown land PID 45063443 (T1a, T2b, T3a, T4a, and T5a). In section 2.2 above it states that 4 WTGs will be located on Crown. Figure 2 (noted above) also shows up to 5 turbines on Crown. This discrepancy (4 vs 5 WTGs) could be due to the scale of the map. | <p>This is due to a mapping error. A new sound assessment has been conducted, factoring in ambient sound levels. Sound Assessment Maps have been updated.</p> | <p>5.2 Ambient Sound Levels Appendix M – sound Levels Assessment</p> |
| <p>NRR</p> | <p>The Department recommends that the proponent provide information on results of reptile targeted surveys with a specific survey for turtles.</p> | <p>A targeted habitat search of reptiles and amphibians was conducted in 2022.</p> | <p>3.1.2 Terrestrial Wildlife 3.1.4 Watercourses and Fish Habitat 3.1.7 Species at Risk Appendix C – Wildlife Assessment</p> |
| <p>Previous records of listed species from ACCDC are noted in Appendix L. In the report it was stated that moose were not observed but no mention of turtles or various bird species were reported. Provide details of fauna species observed in various habitats and maps.</p> | <p>Acknowledged. An additional year (2022) of surveys has been conducted and an additional custom ACCDC report has been produced.</p> | <p>3.1.2 Terrestrial Wildlife 3.1.7 Species at Risk Appendix C – Wildlife Assessment Appendix J – 2022 AC CDC Report</p> | |
| <p>Nocturnal bird surveys and nighthawk surveys were performed but no mention of the species observed. Provide details of species observed or heard. Appendix H is mentioned but none of the data is in the actual report.</p> | <p>Species observed and heard have been included in the Addendum and the Birds and Bird Habitat Study.</p> | <p>3.1.5 Birds and Bird Habitat Appendix F – Birds and Bird Habitat Assessment Appendix G – Radar and Acoustic Monitoring Report</p> | |
| <p>Fig 10 - only shows 2 diurnal watch count locations, yet there is mention of 4 transects based routes where surveys were done. Provide information related to the missing 2 transect survey routes.</p> | <p>Transect routes have been added to survey methodology maps in the Birds and Bird Habitat Study.</p> | <p>3.1.5 Birds and Bird Habitat Appendix F – Birds and Bird Habitat Assessment Appendix G – Radar and Acoustic Monitoring Report</p> | |
| <p>Section 6.2.2- Birds and Bird Habitat is missing information on the species found the kind of habitat and location. Provide a table of birds observed, related bird habitat, observation method, location/transect, etc.</p> | <p>More detailed results from surveys have been included in the Birds and Bird Habitat Study.</p> | <p>3.1.5 Birds and Bird Habitat Appendix F – Birds and Bird Habitat Assessment Appendix G – Radar and Acoustic Monitoring Report</p> | |
| <p> <ul style="list-style-type: none"> The Department observed that research has been conducted on wind farms not far from the proposed Benjamins Mills Wind Project. This research contradicts the migratory information provided by the proponent in this EA. It would be helpful if an explanation was provided as to why this project has different results: <ul style="list-style-type: none"> See South Canoe Wind Farm documents (2015-2018): https://johnfkearney.com/reports-birds-and-wind-energy/ Monitoring performed for South Canoe Wind Farm had a monitoring station only 2.6km from the boundary of the proposed project. This monitoring was found to have the second highest rate of nocturnal passage at inland sites and are consistent with early radar studies related to autumn migration. </p> | <p>An explanation for contradicting results from previous nearby studies has been included in the Radar and Acoustic Study.</p> | <p>Appendix G – Radar and Acoustic Monitoring Report</p> | |
| <p> <ul style="list-style-type: none"> “Six acoustic survey stations were installed at within the Study Area of the proposed Project as a mechanism to capture the various terrain and habitat types within the Study Area.” <ul style="list-style-type: none"> The Department is concerned that there is no mention of bat detection equipment being used at all in the main document. From the statement above it appears the stations were installed to capture terrain and habitat types. This is stated in Appendix J as well but is followed by mentioning the use of the bat detectors. Details about any bat roosting locations in the Project Area </p> | <p>Bat detection equipment and bat roosting location details have been included in the Addendum.</p> | <p>3.1.6 Bats and Bat Habitat Appendix H – Bats and Bat Habitat Assessment</p> | |
| <p>Recognize that a Deer Wintering Area (DWA) is adjacent to the Project Area and is within 10 km of the Project Area (Pg 93) and that the project may change where deer congregate.</p> | <p>The Deer Wintering Area and the Project's impact on deer have been recognized in the addendum.</p> | <p>3.1.7.6 Environmentally Sensitive or Managed Areas 3.2.8 Species at Risk 4 Biodiversity and Ecological Connectivity</p> | |

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| | <ul style="list-style-type: none"> • Provide details about the potential interaction of the turbines with birds and mitigation measures. <ul style="list-style-type: none"> o Avian mortality studies should cover a larger search area around a wind turbines (more than 100m radius) as smaller birds may get tossed further than heavier birds. Trained search dogs should also be used as the detection rate of carcasses by humans is low and dogs can search thick vegetation and find smaller birds. Both factors can give a better understanding of impacts of the turbines on birds. | A literature review was conducted, and experts were consulted to determine best practices for avian mortality studies. An Adaptive Management Plan (AMP) has been created to ensure mitigation measures are implemented, evaluated and continually improved upon. | Appendix Q - Adaptive Management Plan |
| | <ul style="list-style-type: none"> • Mitigation measures for developments regarding Frosted glass-whiskers. This species is not yet listed Provincially under the Nova Scotia - Endangered Species Act but does have development requirements under the At-Risk Lichen Special Management Practices - See the following document https://novascotia.ca/natr/wildlife/habitats/terrestrial/pdf/SMP_BFL_At-Risk-Lichens.pdf | The Potential Development Area does not intersect with the protected zone around any at-risk lichen species found within the Local Assessment Area. | 3.1.7.1 Vegetation SAR Assessment 3.2.2 Terrestrial Habitats and Vegetation 3.2.8 Species at Risk |
| | <ul style="list-style-type: none"> • Protection measures for SAR and SOCC. See Nova Scotia Special Management Practices - At risk Lichens. It is not stated which species needs protection and buffer size, where they are located, etc. <ul style="list-style-type: none"> o Breakdown of results (pie charts) de-emphasizes the importance of the listed species present and need for protection of habitat present and mitigation measures need. Provide details about protection of habitat and SAR associated with the project. | Protection measures and buffers for SAR lichen species have been added to addendum. | 3.1.7.1 Vegetation SAR Assessment 3.2.2 Terrestrial Habitats and Vegetation 3.2.8 Species at Risk |
| | <ul style="list-style-type: none"> • Figure 11 shows location observations of SAR and SOCC and Table 14 provides some details, but it is unknown what species relates to what points and what habitat. Provide a list of species detected during nocturnal migration including SAR and SOCC, number estimations and approximate height. Based on the unit used, identification of calls should be able to be performed. A number of species have distinct nocturnal calls and should be identified. | A list of species detected during nocturnal migration has been provided. | Appendix G - Radar and Acoustic Monitoring Report |
| | <ul style="list-style-type: none"> • Buffer areas are incorrect. Some species require a 200m buffer, some require 100m buffer. <ul style="list-style-type: none"> o "One SAR and four SoCC lichens were identified in the Terrestrial LAA. As a result of the field survey findings, the PDA was modified so that no clearing within 100m of the identified SAR lichen will occur, as recommended by NSDRR (NSDRR 2018)". | No species requiring a 200m buffer were observed in the field studies or ACCDC report. | 3.1.1 Terrestrial Habitat and Vegetation 3.1.7.1 Vegetation SAR Assessment 3.2.2 Terrestrial Habitats and Vegetation 3.2.8 Species at Risk |
| | Lichens in Table 11 and Table 20 do not match up. Wrinkled Shingle Lichen is missing from Table 11. Data is not consistent; revisions are to be made to fully understand what is present in the Project Area. | Tables have been consolidated for clarity purposes. | 3.1.7 Species at Risk |
| | In the GIS data - the NS Points of Interest- two points are labelled as <i>Hydrotheria peltigera</i> (Eastern waterfan - Threatened) but no information is provided in the Report or Appendices. | The <i>hydrotheria peltigera</i> datapoints are from a different wind project and have been removed. | N/A |
| | Information to support this statement has not been provided: "...which would indicate that there isn't a greater risk of avian collision if turbine heights were increased to 200 m." There is little to no discussion provided about potential interaction with bats or mitigation measures. | The bat monitoring surveys collected data within the entire range of the Rotor Swept Area where feasible. Further detail and discussion regarding bat collision risk and mitigation have been provided. | 3.1.6 Bats and Bat Habitat 3.2.7 Bats and Bat Habitat Appendix H - Bats and Bat Habitat Assessment |
| | Bat mortality studies should cover a larger search area around wind turbines (more than 100m radius) like birds; bats are small and may get tossed further. Trained search dogs should also be used as the detection rate of carcasses by humans is low and dogs can search thick vegetation and find bats. Both factors can give a better understanding of impacts of the turbines on bats. | A literature review was conducted, and experts were consulted to determine best practices for avian mortality studies. An Adaptive Management Plan has been created to ensure mitigation measures are implemented, evaluated and continually improved upon. | Appendix Q - Adaptive Management Plan |
| | Mitigation measures are required for species even if they were not observed during surveys. The proponent must provide mitigation measures for various species that have not been observed but have historical records in the Project Area. The proponent is also required to contact the NRR Biodiversity Program if SAR are observed. | Acknowledged. Employees will be educated on processes for reporting sightings or evidence of other SAR and the appropriate follow through. | 3.2 Effects of the Undertaking on the Environment 3.2.7 Species at Risk Appendix O - Environmental Management and Protection Plan |
| | Construction within the site and roads are threats to moose in the Project Area. The proponent must have an educational plan for employees to report sightings or evidence of moose presence and submit it to the local NRR office. | Acknowledged. Employees will be educated on processes for reporting sightings or evidence of moose and other SAR and the appropriate follow through. | 3.2 Effects of the Undertaking on the Environment Appendix O - Environmental Management and Protection Plan |

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| | <ul style="list-style-type: none"> • GIS attribute information that includes species, and wetland ID. Currently, information is lacking in the report. While some information may be found in the appendices and GIS files, none of the information correlates with each other. GIS files are also missing attribute information. In some cases, codes are used but have not been provided. Example: bird is heard singing, but species unknown and wetland ID, not enough information for review. | GIS attribute information has been updated to include more data and has been made clearer. Consistency between data, appendices and body of document has been ensured. | N/A |
| | Provide a species of seed mix that will be used to restore the area after construction and decommissioning. If the area is not seeded, non-natives and/or weed species will take over an area. Not all seed mixes provide native species. | Reseeding will be conducted using native seed mixes if possible. If not possible, it will be ensured that the seed mixes do not contain invasive species. | 3.2.2 Terrestrial Habitats and Vegetation Appendix O – Environmental Management and Protection Plan |
| | A restoration plan was mentioned in Section 2.8 – Decommissioning. Provide the restoration document for further review | Details of the post-decommissioning restoration plan have been provided. | 1.3.7 Decommissioning |
| | <ul style="list-style-type: none"> • Provide more information about when the Adaptive Management Plan will be available and be reviewed for comment. | The Adaptive Management Plan has been included as Appendix Q. | Appendix Q – Adaptive Management Plan |
| ECCC | While there is no bat SAR critical habitat (CH) identified in the project study area, there are several known bat hibernaculum in the surrounding area of the proposed project. Hibernating bats are known to travel several hundreds of kilometres between overwintering and breeding locations. | Acknowledged. This is understood by the proponent and accounted for in assessments, mitigation measures and the AMP. | 3.1.6 Bats and Bat Habitat 3.2.7 Bats and Bat Habitat Appendix Q – Adaptive Management Plan |
| | Acoustic monitoring (2021) found occurrences of resident (i.e. non-migratory) bat SAR, as well as, detections of migratory bat SoCC. Note: A status report for Hoary Bay and Silver-haired Bat is being prepared and will be undergoing an assessment by COSEWIC soon. | Acknowledged. The Proponent will review these materials when they become available (expected April, 2023). | N/A |
| | Any additive mortality of SARA listed bats in an area affected by White-Nose Syndrome (WNS), including mortality at wind turbines, has the potential to be biologically-important. Even mortality of a small number of remaining individuals, particularly breeding females, has the ability to negatively impact the survival of local populations, their recovery, and potentially, the development of resistance to the fungus that causes WNS. | Acknowledged. This is understood by the proponent and accounted for in assessments, mitigation measures and the AMP. | 3.1.6 Bats and Bat Habitat 3.2.7 Bats and Bat Habitat Appendix Q – Adaptive Management Plan |
| | ECCC-CWS recommends that monitoring for nocturnal migrants should occur from March 15 - June 7 and July 15 - November 31. | Acknowledged. The nocturnal migration monitoring was conducted within as much of these time frames as feasible. | 3.1.5 Birds and Bird Habitat |
| | The 2021 spring radar/acoustic monitoring is currently underway, and is planned to continue this fall from July 15 - October 31, 2021. If possible, ECCC-CWS recommends extending the fall radar/acoustic monitoring window into November to capture nocturnal seaduck migration. Note: Seaducks can migrate over land and at lower altitudes. | Acknowledged. The fall migration season was extended into November. | 3.1.5 Birds and Bird Habitat Appendix F – Birds and Bird Habitat Assessment Appendix G – Radar and Acoustic Monitoring Report |
| | ECCC-CWS classifies proposed wind energy sites using turbines greater than 150m in height as Very High sensitivity due to their placement in known 150 - 600 m nocturnal flight corridor of songbirds (Horton et al. 2016) (CWS (2007a), Table 1). ECCC CWS recommends a minimum 2 year consecutive baseline, including radar and acoustic, in order to compare one year to the next in terms of trends, consistency of movements under comparable conditions between years, and provide an understanding of flight height variance in relation to environmental conditions under various types of weather. According to the proposed protocol, radar and acoustic monitoring is planned for one year. It should be clarified whether it will be possible for a second year (2022) of radar and acoustic monitoring. | Acknowledged. An addition year of surveys and radar and acoustic monitoring (2022) has been conducted and results are included in the Addendum. Analyses have been provided regarding the trends between years, across flights and environmental conditions. | 3.1.5 Birds and Bird Habitat Appendix F – Birds and Bird Habitat Assessment Appendix G – Radar and Acoustic Monitoring Report |
| | It is recommended that baseline monitoring be conducted pre-construction to quantify and assess site risk, and inform mitigation options. If project registration is scheduled after only one year of baseline, ECCC recommends continuing the second consecutive year (2022) of baseline radar/acoustic monitoring in parallel with provincial environmental assessment and permitting processes in order to fill information gaps, inform the environmental assessment decision, post-construction monitoring conditions and adaptive management plan (if required). | Acknowledged. An addition year of surveys and radar and acoustic monitoring (2022) has been conducted and results are included in the Addendum. A post-construction monitoring plan and AMP have been produced. | 3.1.5 Birds and Bird Habitat 3.2.6 Birds and Bird Habitat Appendix F – Birds and Bird Habitat Assessment Appendix G – Radar and Acoustic Monitoring Report Appendix Q – Adaptive Management Plan |

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| | <p>The fall field survey (September 1 - October 15, 2021) will not capture shorebird early migration movements which commence as early as July 15. While ECCC-CWS is not very concerned with daily "tidal" movements, there is potential interactions with departing migrants, which should be verified. Most sandpipers departing the region fly southeast over mainland NS and findings show departures are highly correlated with north and northwesterly winds of moderate speeds with high atmospheric pressure. ECCC-CWS recommends including surveys undertaken during evenings when N and NW winds are of moderate speed and when barometric pressure is high; observations can start 2 hours prior to sunset and finish when birds are no longer distinguishable.</p> | <p>Acknowledged. The fall field surveys and radar and acoustic monitoring were conducted during a variety of conditions and at a variety of times of day.</p> | <p>3.1.5 Birds and Bird Habitat Appendix F – Birds and Bird Habitat Assessment Appendix G – Radar and Acoustic Monitoring Report</p> |
| | <ul style="list-style-type: none"> The proposed site is just south (10-20km) of Minas Basin, a major staging area for Semipalmated Sandpipers in the Bay of Fundy. A consideration of monitoring shorebird movements in conjunction with extreme high tides (spring tides¹ that coincide with perigee²) is recommended. When spring tides coincide with perigee, normally exposed roosts are flooded, forcing shorebirds to go elsewhere. Anecdotal information suggests that during periods of extreme high tides, sandpipers have been observed to fly inland to nearby Black River Lake to roost. There will be a close coincidence of spring tide and perigee in July and August 2021, but no direct overlap, therefore we suggest focussing surveys during the highest daytime tides in Minas Basin from mid-July to end of September; start observation 2 hours prior to high tide and stop at high tide. | <p>Acknowledged. The fall field surveys and radar and acoustic monitoring were conducted during a variety of conditions and at a variety of times of day in locations focused in the direction of the Minas Basin.</p> | <p>3.1.5 Birds and Bird Habitat Appendix F – Birds and Bird Habitat Assessment Appendix G – Radar and Acoustic Monitoring Report</p> |
| | <p>Summer field surveys will include monitoring for Common Nighthawk (CONI). While rare in NS, Eastern Whip-poor-will (EWPW) is a provincially and federally listed 'Threatened' species at risk. ECCC recommends monitoring for EWPW, which are nocturnal and begin to vocalize 30 minutes after sunset which is later than CONI. The Canadian Nightjar Survey Protocol is recommended as a reference, available at: National-Nightjar-Survey-Protocol-WildResearch-2019.pdf.</p> | <p>Acknowledged. Monitoring for Eastern Whip-poor-will was conducted during twilight hours.</p> | <p>3.1.5 Birds and Bird Habitat Appendix F – Birds and Bird Habitat Assessment Appendix G – Radar and Acoustic Monitoring Report</p> |
| | <ul style="list-style-type: none"> ECCC-CWS defers advice related to the development of bat monitoring protocols to NS Lands & Forestry; however, the following additional advice may be considered when monitoring for bat species at risk: <ul style="list-style-type: none"> In considering bat activity with the study area, ECCC-CWS recommends a monitoring plan equivalent in detail and effort to the bird monitoring plan (e.g., cover all seasons of activity from spring emergence to pre- hibernation/swarming – April to October – for two years pre-construction). A similar set of steps used in the assessment of birds should be considered for the assessment of bats: species list, baseline bat activity, baseline habitat assessment and use, seasonal and nightly movement/use patterns and geographic context (e.g., local migration and travel corridors); Surveys should include monitoring for bat activity within the projected rotor swept area of the turbines; ECCC-CWS suggest increasing the summer season sampling period to 6 weeks (June to mid-July). Include an inventory of important/high value habitat and geographic features, including landforms that might influence movement/congregation, mature trees with cavities for roosting, buildings that might be housing Little Brown Myotis maternity colonies, old mines/caves that may be used as hibernacula, etc. If the site requires vegetation/forest clearing, the attached Survey Protocol for Bats in Treed Habitats (maternity roosts) (ON, 2017) should be considered. In addition to the Olsen 2017, the North American Bat Monitoring Program (NABat) guidance should be referenced for methods/protocols related equipment calibration and set-up, sampling times, site selection, colony counts or emergence surveys (if required), etc., and the proponent is encouraged to submit collected data through the NABat Partner Portal. | <p>Detailed bat survey methodology has been included in the Bats and Bat Habitat Study. Additionally, a bat maternity roost study has been conducted.</p> | <p>3.1.6 Bats and Bat Habitat Appendix H – Bats and Bat Habitat Assessment</p> |
| | <p>Existing infrastructure found on or near the proposed site, agriculture, forestry operations, as well as, new infrastructure required (e.g. turbines, staging areas, substation, access roads, transmission lines, lighting, etc.) should be included as part of the assessment of cumulative effects. If available, a consideration of baseline, assessment of effects and post-construction monitoring results from the South Canoe site should be considered as part of the assessment of cumulative effects.</p> | <p>The cumulative effects of the Project and other anthropogenic activities on the environment has been reviewed and discussed in the Addendum.</p> | <p>3.2 Effects of the Undertaking on the Environment 3.2.9 Cumulative Effects</p> |
| | <p>ECCC-CWS recommends that the baseline avian and habitat assessments be consolidated with radar and acoustic data, and include an analysis and discussion of overall risks.</p> | <p>Baseline avian and habitat assessments have been consolidated with radar and acoustic data. The results have been discussed in the Addendum.</p> | <p>3.1.5 Birds and Bird Habitat Appendix F – Birds and Bird Habitat Assessment Appendix G – Radar and Acoustic Monitoring Report</p> |

| Regulator | Regulator's Comment | Proponent's Response | Addendum Section |
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| Protected Areas and Ecosystems | <p>Could the proposed project affect existing protected areas and/or does it overlap with lands that have been identified as potential new protected areas, and if so, how is this addressed in the registration document.</p> | <p>With respect to Question 1, no existing or candidate protected areas occur within or in the vicinity of the proposed project. A ~1,100 ha block of Crown land that overlaps with a portion of the eastern end of the proposed project contains multiple protection values and could potentially be of interest for protection to help meet government's 2021 legislated commitment to protect 20% of Nova Scotia's land and water by 2030; however, a review of the relative significance of this Crown land for potential protection and selection of candidate protected area sites across the province has not yet been undertaken.</p> | 3.1.7.6 Environmentally Sensitive or Managed Areas |
| | <p>Does the proposed development avoid or minimize: (i) fragmentation of relatively intact natural areas and (ii) overlap with lands that may be important for landscape-scale ecological connectivity; and are any proposed mitigation measures sufficient to address potential impacts?</p> | <p>An analysis of potential impacts to biodiversity values and land-scape scale ecological connectivity has been conducted and reviewed by a third party.</p> | 4 Ecological Connectivity |