

Wolfe Island Wind Project

Table 1: Stakeholder Comments Specific to the Draft Post-Construction Follow-Up Plan for Bird and Bat Resources for the Wolfe Island Wind Project (“PCFP”) and Associated Parties Responses

Stakeholder Comment	Parties Response
<p>Will the results of the PCFP be factored into the ESP for the Amherst Island Wind Project?</p>	<p>Neither Canadian Hydro nor its subsidiaries are engaged in a wind project on Amherst Island. Thus, the company is not involved with the Environmental Screening Process (“ESP”) for that potential project.</p> <p>With respect to the federal EA process, the <i>Canadian Environmental Assessment Act</i> (“CEA Act”) is the legal basis for the federal EA process. Under the CEA Act, federal departments and agencies (Federal Authorities [“FA”]) are required to ensure an environmental assessment (“EA”) is undertaken for projects relating to a physical work and for any proposed physical activity listed in the Inclusion List Regulations where an FA exercises one or more of the following CEA Act triggers:</p> <ul style="list-style-type: none"> • Proposes or undertakes a project; • Grants money or any other form of financial assistance to a project; • Grants an interest in the land to enable a project to be carried out in whole or in part; • Exercises a regulatory duty in relation to a project, such as issuing a permit or license that is included in the Law List Regulations. <p>Federal Authorities required to ensure that an EA is undertaken are called Responsible Authorities (“RA”).</p> <p>For NRCan, in the event that the developer of a wind power project applies for federal funding under the ecoENERGY for Renewable Power program, a Government of Canada initiative to invest \$1.5 billion in Canada’s clean energy resources, NRCan may be required to undertake a federal EA before providing funding. To date, NRCan has not received an application for funding for any other projects in the Kingston-Prince Edward County area (e.g., Amherst Island Wind Farm).</p> <p>If a federal environmental assessment is required, this would generally be conducted at the Screening level and a cumulative effects assessment would be required.</p>

Stakeholder Comment	Parties Response
	<p>With regard to the Wolfe Island Wind Project, the final version of the bi-annual post-construction monitoring reports will be posted on the project website. This will not only facilitate information delivery to the public and agencies, but also to other wind project proponents.</p> <p>As noted in PCFP section 2.2, in the event that other wind energy facilities are developed in the vicinity of the Wolfe Island Wind Project during the implementation of the PCFP, the proponent will discuss with EC, MNR, and NRCan whether the monitoring program should be revised as appropriate.</p>
<p>Why has NRCan and other agencies decided to include Amherst Island, Howe Island and other areas at this stage?</p>	<p>Aerial waterfowl surveys were conducted through the autumn of 2008, and will be repeated again in the spring 2009, throughout an expanded study area including Amherst Island, Howe Island, the entirety of Wolfe Island, and the Cataraqui River to estimate baseline abundance, distribution, and diversity of waterfowl species staging in these areas.</p> <p>If during post-construction monitoring, a potentially significant decline in staging waterfowl is observed in the bays in the vicinity of the Wolfe Island Wind Project, the aerial survey will be repeated in these areas to assist in determining if waterfowl are re-distributing themselves from the western portion of Wolfe Island to other areas / locations. Without the baseline surveys contemplated above, such comparisons post-construction would not be efficient / practicable.</p> <p>Federally, under the CEA Act, subsection 16(1), RAs (NRCan and CSC in the case of the Wolfe Island Wind Project) are required to consider "any cumulative environmental effects that are likely to result from the project in combination with other projects or activities that have been or will be carried out." As the federal EA progressed over approximately one year following the release of the ERR, it was subsequently determined that it was appropriate to consider the potential development of the wind farm on Amherst Island in the Cumulative Effects Assessment as a Notice of Commencement had been filed by that proponent in the intervening period between ERR release and the federal EA decision on the Wolfe Island Wind Project.</p>
<p>The public notice indicates that instead of individual responses to comments from stakeholders, a summary of comments will be provided. This does not meet an appropriate standard of public transparency.</p>	<p>The summary format is meant to provide an efficient mechanism to respond to comments in the event that similar comments are submitted by multiple individuals. As indicated in PCFP section 2.3.2, the proponent, NRCan, EC, and the MNR will consider all comments received and make changes to the PCFP as appropriate.</p> <p>Nevertheless, in light of this comment, all comments received related to the draft PCFP have been placed into an appendix attached hereto (Appendix A). Furthermore, Table 2 summarizes all stakeholder comments on the draft PCFP in order to provide direction on how each comment has been considered.</p>
<p>All comments on the PCFP from stakeholders and agencies, and all correspondence between partners of</p>	<p>As per the response to stakeholder comment No. 3 above, all comments received from stakeholders on the draft PCFP have been attached as Appendix A and are summarized in Table 2.</p>

Stakeholder Comment	Parties Response
the PCFP regarding its development, should be made publicly available.	Correspondence between Parties of the PCFP regarding its development are publicly available. Members of the public may request this documentation from NRCan through the Canadian Environmental Assessment Registry.
The PCFP should be considered a component of the ERR.	The ESP for this project has been completed and the requisite Statement of Completion filed with the Ministry of the Environment. Development of the PCFP was a commitment that was made by the proponent during the ESP. As demonstrated by the amount of effort put into the draft PCFP, consultation on the draft, and the finalization of the PCFP, the proponent is and will fulfill this commitment.
Clarify under what provision of the <i>Canadian Environmental Assessment Act</i> the PCFP is being considered.	NRCan, as a Responsible Authority for the Project under the CEA Act, determined pursuant to section 38 of the CEA Act that a post-construction follow-up program for the Project was appropriate. Under subsection 17(1) of the CEA Act, NRCan delegated the design and implementation of the PCFP to the proponent. The design and implementation of the PCFP must be done to the satisfaction of NRCan.
Ongoing invitations for public comment are being offered as an alternative to a full and meaningful public review.	As all stakeholders will recall, development of the ESP for this Project was carried out over a period of several years. During this time substantial stakeholder consultation and engagement have taken place – providing not only substantive opportunity for meaningful input, but also great transparency related to the development of this Project. Building from this effort, and after substantial work by many agencies, the draft PCFP was posted on the Project website on 26 November 2008 for stakeholder review and comment. The review period extended to 16 January 2009 – creating a document specific comment period of 51 days. Additionally, all individuals that were on the Project mailing list for the ERR were sent notification of the draft PCFP posting and comment period. As indicated in section 2.3.2 of the PCFP, the proponent, NRCan, EC, and the MNR will consider all comments received and make changes to the PCFP as appropriate – fulfillment of that commitment is documented herein.

Stakeholder Comment	Parties Response
Blade feathering and turbine shutdown are mitigation measures under the sole discretion of CREC (a discretion that will be exercised only if technically and financially viable).	<p>As indicated in PCFP section 3.2.2.1, the proponent is committed to implementing technically and economically feasible operational mitigation (including blade feathering and/or turbine shutdown) after exhausting reasonable efforts to determine the cause of mortality, if unanticipated potentially significant adverse environmental effects persist.</p> <p>As detailed in section 1.4 of the PCFP, CREC, NRCan, EC and the MNR will work together in an open and honest manner, with the goal of making decisions collectively on matters related to this Plan (e.g., the need for blade feathering or turbine shutdown). In the case where a collective decision cannot be achieved, NRCan will consider the expert advice of MNR and EC as appropriate and reasonably determine what is required on the part of the proponent, which may include the implementation of mitigation measures that are technically and economically feasible, in order to ensure that the Project does not cause significant adverse environmental effects.</p>
There has been no opportunity for public input into the design and development of the PCFP.	See response to stakeholder comment No. 7 above.
Where in the PCFP is the section on adaptive lighting?	<p>The PCFP recognizes that the effect of turbine lighting on mortality should be analyzed. PCFP section 2.2.1 indicates “data collected during the mortality monitoring surveys will also be analyzed to determine if mortality rates are different at lit versus unlit (i.e., aviation safety lights) WTGs.”</p> <p>The consideration of changing the lighting regime as a mitigation tool would be considered under PCFP sections 3.2.2.1 and 3.2.2.2, which state that “after exhausting reasonable efforts to determine the cause of mortality, as determined through discussions with the Parties, and if unanticipated potentially significant adverse environmental effects persist that cannot be mitigated by managing those factors, the proponent is committed to implementing technically and economically feasible operational mitigation...”</p> <p>Under these sections, if it were determined that turbine lighting was the direct cause of mortality, alternate turbine lighting or communication tower lighting would be considered. Any alternative lighting considered would have to adhere to marking and lighting requirements of the Aerodrome Safety Branch of Transport Canada.</p>
The monitoring strategy outlined in the PCFP seems quite thorough and well-designed. The proposed strategy appears to be a good basis for the monitoring program.	Much research and effort has been allocated to the development of the PCFP. The PCFP is among the first of its kind in Canada and we thank you for the comment and acknowledgement of these efforts.
Monitoring of Short-eared Owls in the northwest corner of the Island should be required immediately.	Monitoring of wintering raptors and owls was conducted throughout the northwest corner of the Island in 2006 and again in 2007 to assist in establishing baseline conditions.

Stakeholder Comment	Parties Response
	Monitoring during construction will not generate data relevant to either baseline or post-construction conditions. Post-construction monitoring for wintering raptors and owls will be conducted to assess potential disturbance effects beginning in early December 2009 and extending to late March 2011 and for two subsequent monitoring periods as noted in PCFP section 2.2.3.
All adaptive management strategies must be available and realistically implemented.	As noted in PCFP section 3, the various mitigation strategies are available for implementation following the applicable assessment process.
There should be a commitment in the PCFP that the site plan as approved does in fact allow for turbine shutdown.	As indicated in PCFP section 3.2.2.1, the proponent is committed to implementing technically and economically feasible operational mitigation after exhausting reasonable efforts to determine the cause of mortality, if unanticipated potentially significant adverse environmental effects persist. Blade feathering and/or turbine shutdown will be considered on a turbine by turbine basis, based on the results of the monitoring program.
Public participation should be included in the monitoring program, including data collection and reporting, evaluation, and discussions regarding implementation of mitigation measures.	<p>Data collection related to indirect effects during the monitoring program must be conducted by experienced field personnel skilled at identifying birds by song and sight and bats by sight. EC's protocols indicate that it is usually desirable to have the same person conduct post-construction surveys as had conducted the baseline surveys, to ensure comparable methodology and reduce observer effects. Data will be collected in an objective, professional, and unbiased manner, following the applicable protocols and program as reviewed by the expert agencies.</p> <p>Due to the need for training and for searcher efficiency testing over a period of several weeks, several times per year, it is important that data related to direct effects (i.e., mortality monitoring) be collected by a limited number of dedicated field staff. As discussed in PCFP section 2.2.1, all data collected will be corrected to account for scavenger and searcher efficiency biases in accordance with EC protocols.</p> <p>All wind turbines are located on private land and are not accessible to the public, except through permission from individual landowners.</p> <p>Should it ultimately be required, as stated in PCFP section 3.2, the implementation of a mitigation measure(s) will be determined between the participating agencies and the proponent.</p> <p>The Parties are currently working to develop a mechanism for additional public involvement in the PCFP. An opportunity has been extended to various stakeholders to identify one to two community representatives to observe monitoring activities on specified dates once the monitoring program commences. Further, EC and MNR biologists will observe some of the monitoring activities to ensure the PCFP is being executed in an acceptable manner.</p> <p>The community representatives will be invited to observe the monitoring work on the same days that EC and MNR biologists are present. It is assumed that the community representatives would in turn accurately report their observations to the public / membership to keep stakeholders apprised of the works completed under the PCFP.</p> <p>Additionally, it is CREC's intent to maintain the Project website during implementation of the PCFP. Recognizing that not all wildlife observations will be related to the wind plant, incidental observations on birds and bats from the public can be submitted through</p>

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	<p>the website/email. The proponent will develop a specific wildlife observation form for members of the public to submit their observations. The comments will be summarized in an appendix to the bi-annual monitoring reports.</p> <p>It is noted that members of the public are cautioned not to collect any bird or bat carcass and are advised to leave any fatality in-place. Collection and storage of bird and bat carcasses requires permits from the appropriate agency – collection and storage without the appropriate permits can be a criminal offense.</p> <p>The Community Liaison Group will meet twice per year over the course of wind plant operations, in accordance with the Minutes of Settlement of the OMB hearing. These public meetings will provide an appropriate forum for community discussion regarding the bi-annual monitoring reports as necessary.</p>
<p>Independent expert participation should be included in the monitoring program, including the provision of data from CREC in a timely fashion, and the ability to conduct independent field studies.</p>	<p>See also response to stakeholder comment No. 15 above.</p> <p>NRCAN, EC and the MNR have agreed that EC and MNR biologists will observe some of the monitoring activities to be carried out by the proponent to ensure that the PCFP is being executed in an acceptable manner. A section 1.7 has been added to the PCFP to reflect this agreement.</p>
<p>Thank you for providing the various stakeholders an opportunity to comment on the PCFP.</p>	<p>Thank you for your comment.</p>
<p>The PCFP needs better plans than additional monitoring for the case of habitat loss for raptors.</p>	<p>The adaptive management program, as outlined in PCFP section 3, allows mitigation measures to be implemented in the event that unanticipated potentially significant adverse environmental effects are observed post-construction.</p> <p>In the case of disturbance to wintering raptors, PCFP section 3.3 identifies several potential mitigation measures. Assuming there are no other external factors contributing to low numbers (e.g., a year at the low end of the vole population cycle, natural variation, etc.) mitigation measures may include expanding the survey to adjacent areas to determine if the effects on wintering raptors is localized, mitigation banking, land donation for habitat protection or enhancement, and a financial contribution from the proponent to an independent third party to further expand the knowledge base related to raptor conservation.</p>
<p>Mitigation measures should focus on preventative measures; protection of the habitat on Wolfe Island itself.</p>	<p>The first level of measures (e.g., avoidance, protection) have been assessed and documented in the project's ERR. The PCFP has been developed as a supplemental tool to be implemented in the event that unanticipated potentially significant adverse environmental effects are observed following construction completion.</p> <p>Section 3.3 of the PCFP discusses land donation as a potential mitigation strategy for disturbance effects. This section of the PCFP has been amended to reflect that land donation will be considered on Wolfe Island if suitable habitat is available and considered useful in mitigating the potential adverse effect.</p>

Stakeholder Comment	Parties Response
	First consideration will be given based upon the most suitable available habitat for the species of interest. In the event that unanticipated potentially significant adverse environmental effects are observed, and through discussions with EC, MNR, and NRCan it is deemed necessary to implement a land donation strategy, consideration may also be given to off-island land parcels.
There is a lack of precedent for rebuilding winter raptor habitat.	Noted, but for anything there is a first time and being first is not sufficient rationale to discard this option from consideration. Such an option provides a creative mechanism by which to address any unanticipated potentially significant adverse environmental effects post-construction should they ultimately occur.
Baseline data to be used for PCFP monitoring is inadequate.	Baseline data for bird and bat resources, collected as part of the ESP, is among the most comprehensive of any dataset in Canada. The data were gathered through multi-year and multi-season surveys by experienced field personnel. All work plans for the baseline surveys were reviewed and accepted by EC and MNR, the federal and provincial authorities legally responsible for these resources, prior to their implementation.
An independent qualified party should determine the quantitative benchmarks that trigger mitigation measures.	The quantitative benchmarks that trigger mitigation measures, as outlined in PCFP sections 3.2, 3.3, 3.4, 3.5, and 3.6, were determined by experts at EC and the MNR, the federal and provincial authorities whose collective jurisdictional responsibility provide for the protection of migratory birds, federal and provincial species at risk, raptors, owls, and bats.
The language in the PCFP should be definitive; not left open to interpretation that may allow inaction.	As stated in PCFP section 1.4, the proponent, NRCan, EC, and the MNR will work together in an open and honest manner, with the goal of making decisions collectively on matters related to the PCFP. In the case where a collective decision cannot be achieved, NRCan will consider the expert advice of EC and MNR as appropriate and reasonably determine what is required on the part of the proponent. The PCFP has been designed to allow for dialogue amongst the proponent, NRCan, EC, and MNR about occurrences or observations before determining if mitigation measures are necessary. The language in the PCFP is not definitive as there are far too many factors and scenarios (e.g., species, external effects causing reduction in numbers (e.g., vole populations), etc.) to develop absolute thresholds for all possibilities.
All correspondence, including reports, between CREC, contractors, and agencies during operation regarding implementation of the PCFP should be made publicly available in a timely fashion.	<p>Bi-annual post-construction monitoring reports will analyze the results of all bird and bat surveys. Each report will be submitted to NRCan, EC, and MNR within three months of the bi-annual dates of June and December.</p> <p>Experts at EC and MNR will conduct reviews of the reports and report back to NRCan. DUC will be circulated the bi-annual reports for review and comment on the waterfowl portion as appropriate. The final version of all bi-annual monitoring reports, along with EC and MNR comments on the final reports as appropriate, will be posted on the Project's website for stakeholder information. Notification that a bi-annual report is available for review will be provided on the Project website.</p> <p>In addition to soft copies of the reports being posted to the Project website, pending agreement by the following offices, hard copies of the final bi-annual monitoring reports would also be made available at the Township office on Wolfe Island and the public library on Wolfe Island.</p>

Stakeholder Comment	Parties Response
<p>Notification and hard copy distribution of the Final PCFP and all future reports should follow the same protocol as for the ERR.</p>	<p>Following the same process for stakeholder notification of the draft PCFP, notification of the final PCFP will be sent to all individuals on the mailing list compiled during the ESP.</p> <p>The final version of the PCFP and all bi-annual reports will be posted on the Project's website for stakeholder information.</p> <p>See response to stakeholder comment No. 24 above.</p>
<p>Neighbouring constituencies (e.g., Amherst Island) should be included in notification and distribution of hard copies.</p>	<p>See response to stakeholder comment No. 25 above.</p>
<p>The PCFP should not restrict monitoring to habitat areas proximate to turbines.</p>	<p>Monitoring activities will be carried out as described in PCFP section 2. For continued reference, all habitat types throughout the study area will be surveyed at various times of the year. The areal extent of each specific type of survey was determined based on previously published documentation and/or probable reactions of each type of bird. For example, to assess potential disturbance effects to inland foraging waterfowl, and to be consistent with baseline survey methodologies, data on species, numbers, location, and activity of geese and ducks observed in inland agricultural fields, regardless wind turbine location, will be recorded.</p>
<p>Interest Groups (e.g. Community Liaison Committee) and other stakeholders should have a formal role in the PCFP.</p>	<p>The draft PCFP was developed in consultation with experts from NRCan, EC, MNR, and with DUC on issues related to waterfowl. Additionally, the draft PCFP has been available to stakeholders for review and comment, and the final PCFP has been refined based upon stakeholder comments received on the draft.</p> <p>EC and MNR are the federal and provincial authorities whose collective jurisdictional responsibilities provide for the protection of bird and bat resources. EC's jurisdictional responsibilities relate to the protection of migratory birds and species at risk as mandated by the <i>Migratory Birds Convention Act</i>, and the <i>Species at Risk Act</i>. MNR's jurisdictional scope is related to bird and bat species as mandated by the <i>Fish and Wildlife Conservation Act</i> and the <i>Endangered Species Act</i>.</p> <p>The proponent is responsible for implementing the PCFP within this regulatory context and with the input and insights of these expert agencies. The various data and reports derived under the PCFP will be scrutinized by the expert agencies prior to the final bi-annual reports being posted on the Project's website for stakeholder information.</p> <p>See also response to stakeholder comment No. 15.</p>

Stakeholder Comment	Parties Response
<p>The Community Liaison Committee, along with any other organized groups representing community interests, should have recourse to binding arbitration in the event that an issue cannot be resolved.</p>	<p>See response to stakeholder comment Nos. 15, 23, and 28 above.</p>
<p>Wolfe Island must not be permitted to degrade below the status of Level 4 as identified according to federal law. This must be spelled out in the PCFP.</p>	<p>The level of potential effects of the Project have been identified in ERR section 7 with post-construction monitoring identified in ERR section 9.4.2.3.</p> <p>As noted in the response to stakeholder comment no. 5, the PCFP has been developed as a commitment by the proponent under the ESP and federal EA. An overarching objective of the PCFP is to provide a framework to verify predicted effects to birds and bats that may be associated with the Wolfe Island Wind Project through a comprehensive post-construction monitoring program. Implementation of the adaptive management strategies identified in PCFP section 3 will assist in mitigating unanticipated potentially significant adverse environmental effects before they become significant.</p>
<p>Monitoring periods should not be adjusted or shortened by CREC. There are no benchmarks for this protocol.</p>	<p>As indicated in PCFP section 4.1, the proponent does not have sole discretion to arbitrarily shorten or lengthen monitoring periods. Any of the elements of the post-construction monitoring program may be extended, altered or added to if unanticipated potentially significant adverse environmental effects related to mortality or disturbance are confirmed and additional study deemed necessary by the Parties (i.e., NRCan, EC, MNR, and the proponent). In cases where mortality and disturbance is low, the Parties may shorten or revise the monitoring program accordingly.</p> <p>The post-construction monitoring program will be reassessed by NRCan, EC, MNR, the proponent, and as necessary, DUC at the end of each monitoring year. Pending the reassessment results, the program methodologies, frequencies, and durations may be reasonably modified by the Parties to better reflect the findings, and the PCFP will be updated accordingly.</p>
<p>The PCFP should not allow segmentation of individual monitoring components.</p>	<p>See response to stakeholder comment No. 31 above.</p> <p>In reviewing the bi-annual reports, the Parties will consider each component discretely, but also review the report as a whole which includes cross-analysis of survey results. While it is understood and appreciated that the ecosystem on and around Wolfe Island is a complex inter-related system, the ability of the Parties to lengthen, alter or shorten monitoring components based on consistent and reliable data, is reasonable.</p> <p>For example, if after two consecutive years of rigorous monitoring, staging waterfowl abundance and diversity remains unchanged as compared to baseline conditions, and there has been no significant reduction or displacement of field feeding waterfowl, then the Parties may reasonably conclude that no unanticipated potentially significant adverse environmental effects have occurred as a result of wind plant operations on waterfowl staging or foraging. In this example, to repeat the staging waterfowl surveys in the third year would not yield any insight beyond what is already learned during the first two years of surveying.</p>

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	In situations where the survey results are variable from year to year, and the variability is thought to be an effect of wind plant operation and is not attributed to other environmental factors, an extended study of the specific component may be warranted.
The responsibility of reporting negative impacts is solely CREC's, which may affect the final outcome. Therefore, the monitoring requires government supervision.	See response to stakeholder comment No. 28 above. As noted in section 1.3 of the PCFP NRCan is responsible for ensuring the implementation of the PCFP as per subsection 38(1) of the CEA Act and EC is responsible for providing any assistance requested by NRCan concerning the implementation of the Plan on which NRCan and EC have agreed. NRCan and EC have agreed that EC biologists will participate in some of the monitoring activities to be carried out by the proponent to ensure that the PCFP is being executed in an acceptable manner. A section 1.7 has been added to the PCFP to reflect this agreement.
The role and responsibilities of Ducks Unlimited Canada should be clarified.	DUC has been consulted in the development of the draft PCFP on issues related to waterfowl. DUC will also be circulated the bi-annual monitoring reports for review and comment. Also, the post-construction monitoring program will be reassessed by NRCan, EC, MNR, the proponent, and as necessary, DUC at the end of each monitoring year.
Sections 3.1.3 (Other Sources of Collision Mortality) and 3.1.4 (Other Sources of Mortality – House and Free-Roaming Cats) are irrelevant to the PCFP and should be removed.	These sections were included in the draft PCFP to place <i>context</i> around the limited effects of wind generation facilities on bird mortalities when compared to other anthropogenic sources of bird mortalities. This information provides a useful comparison of the wind industry in context with other effects.
Transparent and comprehensive post-construction follow-up is merited due to the ecological sensitivity of the project site and the high degree of public concern.	As noted herein, experts at EC and MNR have been significantly engaged in the development of the PCFP. DUC has also been consulted on issues relating to waterfowl. The PCFP provides a solid framework to confirm the predictions contained within the ERR and to assess potential effects on bird and bat resources through an industry leading comprehensive post-construction monitoring program. The results of the monitoring program will be analyzed and summarized in bi-annual monitoring reports that will be made available to stakeholders following scrutiny by the expert agencies. See response to stakeholder comments No. 24 and 25 above.

Stakeholder Comment	Parties Response
<p>All locations composed of woodlands, grasslands and wetlands should be routinely monitored, not just a selection of these locations.</p>	<p>As documented in ERR Technical Appendix C5, natural habitats such as woodlands, grasslands, and wetlands were surveyed over several years to assist in establishing baseline conditions. In order to assess any potential disturbance effects from the Project, and draw meaningful conclusions, these same habitats will be re-surveyed post-construction.</p> <p>In order to undertake a proper assessment of potential effects, the post-construction surveys must be implemented at the same baseline locations and during the same time periods. This approach allows for a direct comparison between pre and post-development conditions and is a generally accepted best-practice.</p> <p>The areal extent of each specific type of survey was determined based on previously published documentation and/or probable reactions of each type of bird by the expert authorities.</p>
<p>Support the inclusion of blade feathering and turbine shutdown as mitigation measures that may be necessary. It is suggested that CREC and the parties to the PCFP should not hesitate to implement these measures if effects on bird and bat populations cannot otherwise be mitigated.</p>	<p>See response to stakeholder comment Nos. 8 and 14 above.</p>
<p>Turbine shutdown should also be considered to mitigate species at risk mortality and disturbance to winter raptors, staging waterfowl, grassland breeding birds, and wetland breeding</p>	<p>PCFP section 3.2.2.3 includes operational controls as a potential measure to mitigate species at risk mortality.</p> <p>While it has been demonstrated that operational controls can be successful in reducing mortality, it is less certain that disturbance effects to some types of birds are related to turbine operation (rather than simply the presence of turbine towers and their infrastructure). The results of the PCFP can be utilized to further this understanding.</p>

Stakeholder Comment	Parties Response
<p>birds.</p> <p>Raptor mortality thresholds are based on a worst-case scenario; they are comparable to the highest incidences and rates of raptor mortality ever recorded, save that recorded in the Altamont Pass in California.</p>	<p>As indicated in PCFP section 3.2.1.1, NRCan, EC, and MNR will be immediately informed if the projected annual mortality rate at Wolfe Island, derived from six consecutive weeks of surveys, is greater than or equal to 0.09 raptors/MW (which represents approximately one-twentieth of the corrected mortality observed at Altamont Pass). This threshold for notification has been derived from the highest rate of raptor mortality in North America, outside California, at the Stateline, Oregon facility as reported in Arnett, et al., 2007¹. In the context of the Wolfe Island Wind Project, this means that NRCan, EC and MNR will be contacted if two raptor fatalities are noted over a six week period.</p> <p>The adaptive management program of the PCFP allows mitigation measures to be implemented in the event that unanticipated potentially significant adverse environmental effects are observed. For raptors, NRCan, EC and the MNR will be contacted if two raptor fatalities are noted over a six week period. Two raptor fatalities noted over a six week period would not be considered significant on its own, but could indicate a potential for significant adverse environmental effects into the future. The notification thresholds are set to ensure that discussions on the need for mitigation occur as early as possible and, if necessary, mitigation measures are implemented so that significant adverse environmental effects do not occur. Responses to these effects, through mitigation, will be decided upon collectively by NRCan, EC, MNR, and the proponent.</p>
<p>Mortality monitoring should be conducted in the immediate area of the two new meteorological towers and the overhead power line along 2nd Line Road.</p>	<p>The power line installed along the 2nd Line, Wolfe Island, is replacing an existing overhead line. As this work involved the replacement of an existing line, no additional monitoring is required in this location.</p> <p>Post-construction monitoring of the two new meteorological towers has been incorporated into the PCFP. These towers will be monitored for bird and bat mortality in accordance with PCFP sections 2.2.1 and 2.2.2. The final PCFP section 2.2.1 reflects this addition.</p>

¹ Arnett, E.B., D.B. Inkely, D.H. Johnson, R.P. Larkin, S. Manes, A.M. Manville, R. Mason, M. Morrison, M.D. Strickland and R. Thresher. 2007. Impacts of wind energy facilities on wildlife and wildlife habitat. The Wildlife Society Technical Review 07-2. The Wildlife Society, Bethesda, Maryland, USA.

Stakeholder Comment	Parties Response
<p>The PCFP needs to provide more detail regarding the implementation of mitigation banking, including:</p> <ul style="list-style-type: none"> • Existing public policy framework • Financing • Measurable goals • Allocation of funds to private agencies • Location of lands • Exchange ratio and type • Public verification of effectiveness • Government regulation • Successful examples 	<p>The PCFP provides the framework (e.g., regulatory context, surveys to be carried out, thresholds, etc.) and commitments (e.g., adaptive management tools) for the effective implementation of both the post-construction monitoring activities (PCFP section 2) and adaptive management measures (PCFP section 3).</p> <p>The detailed specifics of any mitigation strategy will be further developed in consultation with NRCan, EC, and MNR in the event that unanticipated potentially significant adverse environmental effects are recorded. As the need for adaptive management strategies is unknown at this time, the PCFP contains an appropriate level of detail and commitment to ensure such measures could reasonably be implemented if ultimately required.</p> <p>In the event that a specific mitigation strategy is deemed necessary by the Parties to prevent an unanticipated potentially significant adverse environmental effect from becoming significant, information regarding the mitigation strategy will be posted on the Project website as appropriate.</p>
<p>The PCFP needs to provide more detail regarding the implementation of financial donations, including:</p> <ul style="list-style-type: none"> • Existing public policy framework • How donation will result in restoration of Short-eared Owl population on Wolfe Island 	<p>See response to stakeholder comment No. 42 above.</p>

Stakeholder Comment	Parties Response
<p>The PCFP needs to provide more detail regarding the implementation of land donations, including:</p> <ul style="list-style-type: none"> • With the possibility of new development in the region, what will happen if lands with suitable habitat are not available • Legal liability if no alternative habitat protected and available if alternative habitat procurement is required in the future • How will areas defined as critical and irreplaceable habitat in the ERR be replaced? • If land will be donated for the lifetime of the Wolfe Island Wind Plant, or in perpetuity? • Who will manage the land • Will the responsibility for land donation be transferable to the new owner of the Wolfe Island Wind Plant, should CREC choose to sell. 	<p>See response to stakeholder comment No. 42 above.</p>
<p>The PCFP needs to provide more detail regarding the criteria for success of the PCFP, including:</p> <ul style="list-style-type: none"> • Goals • Performance standards • Sanctions if criteria are not met 	<p>The purpose of the PCFP is threefold, to: i) verify the accuracy of the predicted potential effects documented in the ERR; ii) determine the effectiveness of the measures taken to mitigate adverse environmental effects of the Project documented in the ERR; and iii) provide adaptive management tools in the event unanticipated potentially significant adverse environmental effects are recorded.</p> <p>At this stage of the Project, the PCFP contains an appropriate level of detail and commitment to ensure the verification of ERR predictions, effectiveness of the measures, and the implementation of adaptive measures should such measures ultimately be required.</p>

Stakeholder Comment	Parties Response
<ul style="list-style-type: none"> Program evaluation / audit 	
<p>The PCFP needs to provide more detail regarding the implementation of land-use controls by landowners, including:</p> <ul style="list-style-type: none"> Method of scrutiny by agencies, when contracts are private Publication of compensation packages for landowners Program evaluation Existing public policy framework 	<p>See response to stakeholder comment Nos. 42 and 45 above.</p>
<p>Mortality surveys should be more frequent than twice per week; daily surveys are much more accurate.</p>	<p>EC's 'Recommended Protocols for Monitoring Impacts of Wind Turbines on Birds' (Environment Canada, 2007) suggests that a subset of wind turbines at large facilities be initially monitored twice-weekly. In accordance with this recommendation, half of the wind turbines (i.e., 43 turbines) will be searched twice a week and the other half once a week. The two groups will be rotated so that one week they receive the less intensive treatment, the next week the more intensive.</p> <p>It is also important to note that the frequency of mortality monitoring events may be adjusted seasonally based upon the results of the scavenger trials, and in consultation with NRCan, EC, and MNR.</p>
<p>Since Stantec is the author of the ERR, it is a conflict of interest for that consulting firm to carry out the post-construction mortality studies.</p>	<p>See response to stakeholder comment Nos. 15, 23, and 28 above.</p>

The above response were collectively developed and agreed upon by the Parties involved in the development of the PCFP:

- Natural Resources Canada
- Environment Canada / Canadian Wildlife Services
- Ontario Ministry of Natural Resources
- Canadian Renewable Energy Corporation