

Wolfe Island Wind Project

Table 2. Summary of Stakeholder Comments Submitted on 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
Are herptiles included in the PCFP?	Comment is not directly applicable as the PCFP deals specifically with bird and bat resources. The effects of the Wolfe Island Wind Project on herptiles is considered in section 7.10 of the proponent’s ERR. It was concluded that no specific mitigation was required for herptiles since no wind turbines or access roads were planned through existing areas of significant natural cover. Given this, no follow up and monitoring was required for herptiles.
Construction plans in the Little Sandy Bay area have been altered to include placement of a series of hydro poles and lines above ground, through the Little Sandy Bay wetland.	Comment is not applicable to the PCFP. The existing pole line is being removed and replaced with a new pole line.
Disturbance is likely for hibernating reptile and amphibian populations in the Little Sandy Bay area.	Comment is not applicable to the PCFP as it deals specifically with bird and bat resources.
Will the maintenance program for the poles (vegetation control) in the wetland involve spraying with pesticides?	Comment is not applicable to the PCFP. Any vegetation control along the pole line is currently carried out by Hydro One; Hydro One will continue to carry out this activity following its operational practices.
Could you please direct me to the plans in place to monitor turtles, snakes and frogs?	Comment is not applicable to the PCFP as it deals specifically with bird and bat resources.
Kindly indicate what monitoring NRCan has undertaken during the construction phase of the project. Has NRCan visited the site during construction? How is NRCan monitoring development now?	<p>Comment is not applicable to the PCFP as this is a post-construction document.</p> <p>CREC has identified several construction monitoring measures, the implementation of which is the responsibility of the Construction Manager. These measures are summarised in section 9.4.1 of the proponent’s ERR. NRCan will be requesting that CREC provide the results of these monitoring activities to NRCan.</p> <p>NRCan also expects to visit the Wolfe Island Wind Project site to verify the implementation of mitigation measures and verify that the Project was constructed as expected. The timing of this/these visit(s) has not yet been determined.</p>

Stakeholder Comment	Parties Response
Did the proponent consult with NRCan regarding the design changes at Little Sandy Bay wetland?	Comment is not applicable to the PCFP. The Environmental Review Report (ERR) does indicate that overhead power lines would be constructed where underground was not possible or practicable. The proponent has provided NRCan with a letter sent to the Township which addresses environmental and technical items. The existing pole line is being removed and replaced with a new pole line.
Will the results from the Wolfe Island Wind Project PCFP be factored into the ESP for the Amherst Island Wind Project?	Please refer to Project Response #1 in <i>Table 1 – Stakeholder Comments Specific to the Draft Post-Construction Follow-Up Plan for Bird and Bat Resources for the Wolfe Island Wind Plant</i> ("Table 1").
Why has NRCan and other agencies decided to include Amherst Island, Howe Island and other areas at this stage when requests for the inclusion of these areas was determined by these agencies to be unnecessary during the ESP for Wolfe Island.	Please refer to Project Response #2 in Table 1.
Will the Wolfe Island Wind Project be considered in the cumulative effects component of the ESP for the Amherst Island Wind Project?	Please refer to Project Response #1 in Table 1.
The public notice indicates that individual responses to commentary from stakeholders will not be provided by the proponent; rather, a "summary" of comments will be made public through the proponent website. I am concerned that this does not meet an appropriate standard of public transparency. My expectation is that I will receive individual responses to my comments.	Please refer to Project Response #3 in Table 1.
My expectation is that concerns of other stakeholders, including government agencies and concerned environmental groups, will be accessible to the public.	Please refer to Project Response #4 in Table 1.
I would draw your attention to the precedent set in the ERR process for publication. I would ask NRCan to consider that the PCFP is a component of the environmental review process, as its development and implementation was a condition of the decision to deny an individual environmental review.	Please refer to Project Response #5 in Table 1.
We continue to be confused about the process that is being followed by NRCan. Can you please clarify under what provision of the Act the follow-up program is being considered? It is our understanding that such a program would be considered either when a decision is being taken under s. 20(1) (e), which we understand has not yet been done, or as a mandatory requirement under s. 37(1) (a).	Please refer to Project Response #6 in Table 1.

Stakeholder Comment	Parties Response
We are concerned that the ongoing invitations for public comment are being offered as an alternative to a full and meaningful public review as anticipated under the legislation.	Please refer to Project Response #7 in Table 1.
It is difficult to accept that the proponent has not yet made irrevocable decisions, as the proponent is actively and fully engaged in working toward completion of the project. However, accepting that the proponent continues to take that position that the decisions made to date are not in fact irrevocable, and have been made at their own risk, we continue to take the position that a full public review of the proposed siting and density of the project is required.	Comment is not applicable to the PCFP as this issue was addressed and concluded through the federal Environmental Assessment Process.
It is clear on a brief review of the draft follow-up plan that the adaptive management options of turbine blade feathering and shut down remain turn off continue [<i>sic</i>] to be in the proponent's discretion; a discretion that will be exercised only if "technically and financially viable". The proponent has clearly stated in previous correspondence that such options are not financially viable, and therefore, it is our position that the project must be assessed accordingly.	Please refer to Project Response #8 in Table 1.
It appears that meetings are being held and decisions are being made without full disclosure or opportunity for meaningful input.	Please refer to Project Response #9 in Table 1.
We would appreciate your acknowledgement of our concerns and any information you may have to clarify the status of the project and NRCan's role.	Comment is not applicable to the PCFP. NRCan is a responsible authority under the <i>Canadian Environmental Assessment Act</i> for the Wolfe Island Wind Project. The role of NRCan with respect to the PCFP is clearly described in section 1.3 of the PCFP.
<p>I cannot locate a reference to adaptive lighting of towers (including the two communication towers added after the ERR as a minor modification to the project) within the PCFP. I understand the proponent committed to adaptive lighting in the letters of commitment following the ERR process, but I cannot locate a specific reference to lighting in the PCFP. Could you kindly direct me to this reference within the Draft PCFP and indicate the parameters set out in the PCFP for lighting as a mitigation tool.</p> <p>Please note that this question does not constitute a comment within the process for public consultation on the PCFP, but a direct question to your office. I require this information in order to participate meaningfully in the public consultation process.</p>	This comment is not applicable to the PCFP as indicated it was a separate question for NRCan. NRCan responded to this question directly. For the response provided please refer to Project Response # 10 in Table 1.

Stakeholder Comment	Parties Response
We have been satisfied every step of the way that CHD has taken all reasonable measures to address the concerns of the public & landowners, while developing a project that will also meet all the requirements of the various levels of environmental standards.	Comment does not require a response.
The PCFP is further evidence to us of how professionally conducted this entire project has been & continues to be managed with such integrity.	Please refer to Project Response #11 in Table 1.
We continue to support this worthy project as it moves forward into eventual commissioning sometime in the near future.	Comment does not require a response.
There are 22 towers erected in the northwest corner of the project. This habitat was the most important habitat identified for wintering raptors and the Short-eared Owl. Monitoring of this area should be required immediately.	Please refer to Project Response #12 in Table 1.
The issue of alternative habitat procurement has not been fully addressed or reviewed as a reasonable adaptive management strategy. As per the ERR, the habitat in the northwest corner of the project was identified as critical and irreplaceable.	Please refer to Project Response #44 in Table 1.
It is respectfully submitted that the issue of alternative available habitat must be fully explored and identified, as there are currently multiple proposals for further wind projects in the area. Given the current process that allows wind farm proponents to contract directly with private landowners, the issue of protection of habitat must be taken at the front end of the process. Provincial authorities must be fully alerted and involved in the issue of alternative habitat identification and protection.	Please refer to Project Response #44 in Table 1.
Wolfe Island is a level 4 Important Bird Area, and as such, current provincial recommendations would preclude it from consideration as a site for wind farm development.	Comment is not applicable to the PCFP as this issue was concluded through the federal environmental assessment and provincial Environmental Screening Process.
As this project was approved on the basis of a post construction monitoring plan which includes adaptive management strategies, all such strategies must be available and realistically implemented.	Please refer to Project Response #13 in Table 1.

Stakeholder Comment	Parties Response
<p>Given the species and the critical habitat that is under study, the failure to identify and protect possible alternative habitat in the area is in our submission a critical and reviewable error. Should such an adaptive management strategy be required in the future, and there is in fact no alternative habitat protected and available, it is our submission that all parties involved in the review and approval of the PCFP would share legal liability under any applicable legislation.</p>	<p>Please refer to Project Response #44 in Table 1.</p>
<p>With respect to the issue of cumulative impact as outlined in the ERR, it is respectfully submitted that the issue of alternative and additional wind farms in the area must be considered in view of current information. The proponent and the reviewing agencies cannot rely upon dated information.</p>	<p>Comment is not applicable to the PCFP as this issue was addressed and concluded through the federal environmental assessment process. Nevertheless, as indicated in section 2.2 of the PCFP, CREC will discuss with EC, MNR, and NRCan whether the PCFP should be revised as appropriate in the event that other wind energy facilities are developed in the vicinity of the Wolfe Island Wind Plant.</p>
<p>With respect to reliance upon turbine shut down as a realistic adaptive management strategy, we respectfully submit that the proponent has clearly and consistently stated that such a strategy would not be economically or technically feasible.</p>	<p>Please refer to Project Response #8 in Table 1.</p>
<p>It is our submission that this issue should have been clearly and fully canvassed prior to taking a decision to approve the project, but in any event, there should be a commitment in the PCFP that the site plan as approved does in fact allow for shut down in critical and predicible areas of concern.</p>	<p>Please refer to Project Response #14 in Table 1.</p>
<p>We note that there is no basis for ongoing public input or participation into the monitoring of the impact of the project on critical species or habitat.</p>	<p>Please refer to Project Response #15 in Table 1.</p>
<p>We propose that experts in the field such as those who have previously made submissions on behalf of our clients be provided with ongoing access to monitoring and participation.</p>	<p>Please refer to Project Response #16 in Table 1.</p>
<p>At minimum, a public website that allows individuals to submit siting and other observations directly to the reviewing agencies would be critical.</p>	<p>Please refer to Project Response #15 in Table 1.</p>
<p>Thank you for providing the various stakeholders an opportunity to comment. I hope you can make good use of these comments.</p>	<p>Please refer to Project Response #17 in Table 1.</p>

Stakeholder Comment	Parties Response
Given the critical nature of the wintering raptor habitat and the uncertainty presented by the project, you'd think someone would err on the side of caution, although I can understand that when there's big money involved there might be a lack of concern for the birds.	Comment is not applicable to the PCFP as this issue was addressed and concluded through the federal environmental assessment and the provincial Environmental Screening Process.
I hoped for some plans on what you would do if the loss of habitat became a reality. However the PCFP contained nothing of value for saving the raptors on Wolfe Island. I don't consider additional monitoring an adequate response to the potential loss of the habitat.	Please refer to Project Response #18 in Table 1.
In the PCFP I find out what your plans for mitigating the loss of Wolfe Island habitat would be. You can imagine my disappointment when I discover that, in effect, you will do nothing to save the habitat on Wolfe Island itself.	Please refer to Project Response #19 in Table 1.
(Reference to Section 3.3): Perhaps you think these are adequate responses, regardless of the lack of any precedents for rebuilding winter raptor habitats. That somehow some organization will be able to take whatever money you decide to give them and rebuild another Wolfe Island with it.	Please refer to Project Response #20 in Table 1.
(Reference to Section 3.3): Or that maybe "saving" one of the other two Ontario winter raptor "hot spots" will somehow atone for the loss of Wolfe.	Please refer to Project Response #19 in Table 1.
(Reference to Section 3.3): Or that yet more studies will somehow lead to higher numbers of these magnificent creatures.	Please refer to Project Response #18 in Table 1.
(Reference to Section 3.3): I'm sure you are aware of (for example) the Sierra Club's opinion of mitigation banking. To me it is simply a way for you to buy your way out of dealing with the consequences of what you've done.	Please refer to Project Response #42 in Table 1.
As great as my disappointment is in your actions, it is far greater in the actions of the governments, mostly Provincial but also Federal, who have failed to take any meaningful action to fulfill one of government's most basic functions – the protection of resources, both human and natural.	Comment is not applicable to the PCFP as this issue was addressed and concluded through the federal environmental assessment and provincial Environmental Screening Process.

Stakeholder Comment	Parties Response
<p>If I thought it would be useful, I would provide my own set of potential responses. However, my responses would concentrate on actions that would try to save the habitat on Wolfe Island itself, and given the acquiescence of the various governments you've got little incentive to take those sorts of actions (like taking multiple turbines out of production for extended periods).</p>	<p>Please refer to Project Response #19 in Table 1.</p>
<p>The PCFP, to be reliable, must have scientifically reliable estimates of animal numbers and their habitat use in order to detect potential changes due to turbines and all activities associated with their construction and operation. The ERR did not produce this level of comprehensive data. Additional sources of baseline data may be needed.</p>	<p>Please refer to Project Response #21 in Table 1.</p>
<p>Implementation of any action needs to be guided by quantitative benchmarks that trigger mitigation without wrangling and negotiation about what is or is not an acceptable level of impact.</p>	<p>Please refer to Project Response #22 in Table 1.</p>
<p>Assessment of monitoring studies should be done independently by a qualified university team.</p>	<p>Please refer to Project Response #22 in Table 1.</p>
<p>The language in the PCFP needs to be defined operationally, that is with a quantitative, independently confirmable, measurements that can be used for mitigation decisions that do not involve ad hoc negotiation or interpretation. Otherwise this document could be rejected by critics as unscientific, or as some critics maintain, laced with "weasel words" that have the potential for intractable arguments and inaction in the face of damage to wildlife resources. This applies to this aspect of the Plan: "allows mitigation measures to be implemented in the event that unanticipated potentially significant adverse environmental effects are observed".</p>	<p>Please refer to Project Response #23 in Table 1.</p>
<p>Insert language that permits independent investigators to access the land around the towers to assess bird strikes and enumerate dead birds as to species and numbers.</p>	<p>Please refer to Project Response #16 in Table 1.</p>
<p>The suggestions of others commenting on the PCFP should be made available to interested citizens by posting documents on WIWP website.</p>	<p>Please refer to Project Response #4 in Table 1.</p>
<p>Correspondence between CHD, its contractors and government biologists should be made available to interested citizens by posting documents on WIWP website.</p>	<p>Please refer to Project Response #24 in Table 1.</p>

Stakeholder Comment	Parties Response
There has been no opportunity for public input into the design and development of the PCFP.	Please refer to Project Response #9 in Table 1.
There is no indication that local groups or agencies have been consulted in PCFP design and development.	Please refer to Project Response #9 in Table 1.
There is no indication that local groups or agencies will be included in implementation of the PCFP.	Please refer to Project Responses #15 and #16 in Table 1.
There is no provision for reporting or evaluation of the monitoring and mitigation measures by individual island citizens or local groups, stakeholders or agencies.	Please refer to Project Responses #15 and #16 in Table 1.
CHD did not follow the precedent for distribution and communication established in the ERR process – there were no hard copies made available at local municipal offices or libraries.	Please refer to Project Response #25 in Table 1.
The PCFP is a component of the ERR, since the ERR was not elevated to an Individual EA contingent on the PCFP. Yet the PCFP did not undergo the same rigorous public scrutiny as did other elements of the ERR.	Please refer to Project Response #5 in Table 1.
The PCFP was developed with the understanding that the cumulative effects of this development would contribute to science and public policy pertaining to future wind development in other constituencies in Ontario. But neighbouring constituencies were not provided notification of the PCFP, and therefore were not afforded the opportunity to be meaningful stakeholders.	Please refer to Project Response #26 in Table 1.
The reporting mechanism proposed lacks transparency regarding inter and intra-agency correspondence and also correspondence between CHD and agencies.	Please refer to Project Response #24 in Table 1.
Government and its agencies and CHD must be mindful that it is Wolfe Island's natural heritage that is being monitored for negative impact, not just CHD's optioned land.	Please refer to Project Response #27 in Table 1.
All reports should be published on the project website in a timely fashion. This includes public agency communication and communication between all partners to the PCFP regarding significant negative effects and all immediate and progressive programs for mitigation specific to bird and bat mortalities.	Please refer to Project Response #24 in Table 1.

Stakeholder Comment	Parties Response
Injuries to species at risk, precipitous declines in populations not foreseen in the ERR should be published as they are observed and reported to all public partners, on an ad hoc basis as well as seasonally. Relying on an annual summary report compiled by a party with corporate interest does not meet the standards of scrutiny expected by public partners to this project.	Please refer to Project Response #24 in Table 1.
Many Island residents are unable to frequent the Internet; therefore hard copies should be provided to municipal offices and libraries. Distribution should include Kingston, Cape Vincent and Amherst Island.	Please refer to Project Responses #25 and #26 in Table 1.
All individuals and agencies who have participated as stakeholders in this process should receive personal notification of these reports.	Please refer to Project Response #25 in Table 1.
It is imperative that Wolfe Island citizens be involved in negotiations and discussions regarding any proposed and ongoing mitigation strategies, land donations, mitigation banking and financial contributions.	Please refer to Project Response #15 in Table 1.
A public forum should be held in the community, to enhance local awareness and support for mitigation measures, increase transparency and allow for independent verification of claims.	Please refer to Project Response #15 in Table 1.
Provision should be made for private citizens and/or local groups and agencies to report observations of bird and bat mortality and injury.	Please refer to Project Responses #15 and #16 in Table 1.
All correspondence from stakeholders regarding the PCFP, and all correspondence between public and private partners in the development of the PCFP should be published in an appendix on the project website.	Please refer to Project Response #4 in Table 1.
The Final PCFP, along with appendices, should be made available to stakeholders on the website and in hard copy at municipal offices on Wolfe Island, Kingston and Cape Vincent, as well as Amherst Island.	Please refer to Project Responses #25 and #26 in Table 1.
The Ontario Government made the decision to deny elevation of the ERR to an Individual Environmental Assessment, effectively refusing to submit the company's claims, findings and predictions in the ERR to scrutiny and verification.	Comment is not applicable to the PCFP as this issue was addressed and concluded through the Environmental Screening Process.

Stakeholder Comment	Parties Response
<p>The Community Liaison Committee was referenced in the Minister's decision as a component that made elevation of the ERR unnecessary. At this time the Community Liaison Committee has no terms of reference, no guidelines, no authority and no meaningful accountability to either the community, the municipal government or to the partners to the PCFP.</p>	<p>Please refer to Project Response #28 in Table 1.</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>Please refer to Project Response #30 in Table 1.</p>
<p>WIRE has grave concerns regarding the accuracy of the baseline data. The baseline data provided by Stantec to CHD was not verified by an independent agency as a direct result of the decision by the Minister to deny the elevation of the ERR.</p>	<p>Please refer to Project Response #21 in Table 1.</p>
<p>WIRE objects to the options provided within the PCFP for CHD to adjust or shorten the monitoring periods (Section 2.2 & 2.2.1). There are no benchmarks for this protocol.</p>	<p>Please refer to Project Response #31 in Table 1.</p>
<p>Concerns regarding accuracy of baseline data throws any benchmarks developed in the PCFP into question.</p>	<p>Please refer to Project Response #21 in Table 1.</p>
<p>The PCFP allows for the segmentation of individual monitoring processes (Section 4.1). It would seem that each component is not related to other components. This is completely unacceptable. How can an account of cumulative effects be achieved, if the language of the PCFP does not provide "cross analysis" of survey results, and does not view the habitat as an inter-related system?</p>	<p>Please refer to Project Response #32 in Table 1.</p>
<p>The PCFP allows for certain monitoring commitments to be disengaged, while other species experience negative effects. This does not support the assessment of cumulative effects of the project. There may be links established between declining raptor populations and increases or decreases in other avian and animal resources.</p>	<p>Please refer to Project Response #32 in Table 1.</p>
<p>The PCFP lacks protocol for how securities for mitigation banking will be registered and how mitigation measures by third parties will be scrutinized and the results verified. Transparency about the allotment of money and the measurable goals of land management practices should be spelled out in the PCFP. Measures excluded from the PCFP will not be verifiable (Section 3.5).</p>	<p>Please refer to Project Responses #42 and #46 in Table 1.</p>

Stakeholder Comment	Parties Response
The section dealing with land purchase and banking allows for purchase of land off Wolfe Island (Section 3.2.2.1). Is our provincial government prepared to accept the possibility that there will be no lands left on Wolfe Island that could/would be appropriate after construction/operation of the wind plant?	Please refer to Project Response #19 in Table 1.
Is on-Island land donation and habitat preservation unlikely because there are plans for either a second phase of this development, or subsequent developments of wind power on Wolfe Island (Section 2.2)	Please refer to Project Response #19 in Table 1.
The responsibility of reporting unforeseen significant negative effects of turbines and supporting structures is left solely to CHD.	Please refer to Project Response #33 in Table 1.
There is no reference to the responsibilities of Ducks Unlimited Canada. Their status and role is not adequately defined (Section 1.3).	Please refer to Project Response #34 in Table 1.
The reference provided regarding the impact of cats and other obstructions on bird kill is not only irrelevant to the PCFP but is promotional rhetoric of wind plant proponents (Sections 3.1.3 & 3.1.4)	Please refer to Project Response #35 in Table 1.
There is no opportunity for community involvement in the development, implementation, scrutiny, evaluation or adjustment of this plan.	Please refer to Project Responses #9 and #15 in Table 1.
The Post Construction follow-up process must be transparent and inclusive. It must involve the community and concerned parties, and respect their expertise on local and scientific issues.	Please refer to Project Response # 15, #16 and #36 in Table 1.
The Community Liaison Group, along with any other organized groups representing community interests, should be granted formal status as part of the PCFP, with recourse to binding arbitration in the event that an issue cannot be resolved.	Please refer to Project Responses #28 and #29 in Table 1.
The pre-construction data collected by the proponent should not be used as the source of background, or baseline numbers for birds and bats. Independently collected surveys and studies should be used to establish the baseline.	Please refer to Project Response #21 in Table 1.

Stakeholder Comment	Parties Response
All scientific data collected as part of the PCFP should be made available to independent scientists and the public as soon as possible after it is collected. The public should have received information about potentially significant environmental effects as soon as possible after it is discovered.	Please refer to Project Response #15 and #16 in Table 1.
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.	Please refer to Project Response #11 in Table 1.
The PCFP should not restrict monitoring to habitat areas proximate to turbines, but should provide for monitoring in all areas near developments associated with the project, whether constructed by CREC or another party	Please refer to Project Response #27 in Table 1.
It is not sufficient to survey only a selection of marshes, woodlands, grasslands, and wetlands; instead, every instance of these important habitat types on Wolfe Island must be monitored.	Please refer to Project Response #37 in Table 1.
Lake Ontario Waterkeeper supports the notification of all parties to the PCFP immediately upon the discovery of a potentially significant adverse environmental effect. This information should also be made public upon discovery.	Please refer to Project Response #24 in Table 1.
<p>Turbine shutdown is the most important mitigation measures in the PCFP as it provides the parties with a fast and effective means of reducing negative environmental effects. The proponent and the parties to the Plan should not hesitate to implement this measure if effects on birds and bat population cannot be otherwise mitigated.</p> <p>The inclusion of blade feathering and turbine shutdown as mitigation measures is a strong show of support for the environment. It is particularly important that these measures are included because of the proponent's history of refusing to consider feathering or shutdowns.</p>	Please refer to Project Response #38 in Table 1.
Turbine shutdown and blade feathering should not be limited to instances of bird and bat mortality, but should also be included in the mitigation strategy for species at risk mortality and disturbance to wintering raptors, staging waterfowl, grassland breeding birds, and wetland breeding birds.	Please refer to Project Response #39 in Table 1.

Stakeholder Comment	Parties Response
Recommend that the federal agencies review with all partners and stakeholders efficacy of the EA process undertaken; with a view to enhancing public understanding, participation and transparency.	Comment is not applicable to the PCFP.
Regret that the federal Environmental Assessment Screening Report would appear to be a mere summary of the Proponent's presentation under the ERR process. It was not referred to any independent agency for verification, despite many requests for elevation to a panel review from a variety of reliable stakeholders.	Comment is not applicable to the PCFP as this matter was concluded through the federal environmental assessment process.
My recommendation and comments are grounded in the assumption that the PCFP is a component of the ERR.	Please refer to Project Response #5 in Table 1.
The ERR, federal Environmental Assessment Screening Report, and PCFP were never developed with concern for preventative measures to sustain species populations and habitat.	Please refer to Project Response #19 in Table 1.
PCFP is limited to responding to significant loss of species around discrete turbine sites, does not deal with potential cumulative effects of habitat loss to the island, the region, the continent and the globe.	Please refer to Project Response #27 and #31 in Table 1.
PCFP is not concerned with sustainability, sustainability of current resource but with cataloguing the anticipated loss of the resource.	Please refer to Project Response #19 in Table 1.
Concerns were expressed during the ERR process regarding the potential negative effects from the close proximity and intensity of turbines and access road development to critical wetland habitat, woodlots and grassland supporting VTE species, large populations of migratory and breeding avian species, bat populations, vegetation and habitat.	Comment is not applicable to the PCFP as this issue was addressed and concluded through the Environmental Screening Process.

Stakeholder Comment	Parties Response
<p>CHD committed to completing tree and bush removal between May and June 31st for the purpose of limiting the potential negative effects on breeding and migrating avian species.</p> <p>Tree and bush clearing takes place as construction moves across the Island – there is little evidence to suggest that it was completed between May and June 31st 2008. It is noteworthy that this commitment in the ERR and Federal EA was contingent on CHD's own evaluation and prioritization of its commercial interests.</p>	<p>Comment is not applicable to the PCFP. Clearing of vegetation was avoided during the nesting period of May 1 to July 31.</p> <p>As stated in ERR section 7.10.3.1, tree and/or brush clearing will be completed prior to or after the core nesting season for migratory birds (i.e., May 1 to July 31). No tree or brush removal took place within this breeding bird window as part of construction works.</p>
<p>Significant bush clearing and tree removal in Little Sandy Bay Wetland PSW was conducted in October and November 2008. Majority of construction taking place in critical Short-ear Owl habitat was conducted between October 2008 and January 2009 – this schedule of construction meant that mitigation measures in summary chart were not undertaken by CHD.</p>	<p>Comment is not applicable to the PCFP. Clearing of vegetation was avoided during the nesting period of May 1 to July 31.</p> <p>As stated in ERR section 7.10.3.1, tree and/or brush clearing will be completed prior to or after the core nesting season for migratory birds (i.e., May 1 to July 31). No tree or brush removal took place within this breeding bird window as part of construction works.</p>
<p>Turbine blade tips encroach Little Sandy Bay PSW inside the 120 m exclusion zone for PSWs.</p>	<p>Comment is not applicable to the PCFP as this issue was addressed and concluded through the Environmental Screening Process.</p>
<p>Turbines destined for foundation sites adjacent to Little Sandy Bay PSW were conveyed along 2nd Line Road. CHD provided 'excavation material' from a foundation site east of 2nd Line Road to the Township of Frontenac Islands for the purpose of widening 2nd Line Road in advance of turbines conveyance and the conversion of overhead lines along 2nd Line Road. Road traversing the wetland was straightened along the east side only, with an encroachment of 6m x 20m x an unknown depth of excavated material from CREC's worksite.</p>	<p>Comment is not applicable to the PCFP as the road widening works in question were undertaken by the Township, within their established road right-of-way, and not at the request or need of the Project.</p>
<p>No normal preventative measures to capture and filter fine particulate and contaminants were used in this activity.</p>	<p>Comment is not applicable to the PCFP as the road widening works in question were undertaken by the Township, within their established road right-of-way, and not at the request or need of the Project.</p>
<p>Numerous trees, hedgerows, and bushes were cleared in the wetland and adjacent land to undertake this encroachment and conveyance to access roads on 2nd Line Road and Hwy 96.</p>	<p>Comment is not applicable to the PCFP as the road widening works in question were undertaken by the Township, within their established road right-of-way, and not at the request or need of the Project.</p>

Stakeholder Comment	Parties Response
<p>There is no indication that any surveys and consultations took place with local MNR officials to identify exclusion zones for vegetation removal. When contacted in mid-January 2009, the local MNR office was completely unaware of this work, which was conducted prior to delivery of turbines components to foundation sites east of 2nd Line Road and west of 3rd Line Road.</p>	<p>Comment is not applicable to the PCFP as the road widening works in question were undertaken by the Township, within their established road right-of-way, and not at the request or need of the Project.</p> <p>As stated in ERR section 7.10.3.1, tree and/or brush clearing will be completed prior to or after the core nesting season for migratory birds (i.e., May 1 to July 31). No tree or brush removal took place within this breeding bird window as part of construction works for the Wolfe Island Wind Project.</p>
<p>Direct result of this encroachment is permanent loss of riparian vegetation, fish habitat, avian foraging, breeding and nesting habitat, herptile habitat and animal habitat, as well as permanent significant degradation of recreational use for tourists and residents. Combined with the close proximity of turbines and access roads, the cumulative effect of Little Sandy Bay PSW is significant.</p>	<p>Comment is not applicable to the PCFP as the road widening works in question were undertaken by the Township, within their established road right-of-way, and not at the request or need of the Project.</p>
<p>Repeated requests for full disclosure to CREC, CHD, and to the Office of the Clerk of the Township of Frontenac Islands has not been satisfied. The Mayor of Frontenac Islands at a public meeting of Council refused to answer questions pertaining to road upgrading activities related to the Project and to this specific encroachment, and has indicated that Township officials will not answer questions in the future regarding what he considers 'trivial matters'.</p>	<p>Comment is not applicable to the PCFP as the road widening works in question were undertaken by the Township, within their established road right-of-way, and not at the request or need of the Project.</p>
<p>I have been unable to locate a reference within the ERR authorizing CREC and CHD to provide excavated material from turbine foundation worksites to the Township of Frontenac Islands for upgrading of roads within the project areas.</p>	<p>Comment is not applicable to the PCFP as the road widening works in question were undertaken by the Township, within their established road right-of-way, and not at the request or need of the Project.</p>
<p>PCFP was designed without input from official stakeholders who were invited to participate in the development of the ERR (e.g. Kingston Field Naturalists).</p>	<p>Please refer to Project Response #9 in Table 1.</p>
<p>Role of local agencies and official stakeholders of the ERR within the PCFP is that of observers and commentators – not stakeholders, partners, or valued contributors familiar with the resource and directly impacted by the WIWP and PCFP.</p>	<p>Please refer to Project Response #28 in Table 1.</p>

Stakeholder Comment	Parties Response
PCFP includes proposals for monitoring, reporting and mitigation measures in areas beyond the Study Area (namely Amherst Island and other jurisdictions). But the PCFP was not distributed in hard copy to these jurisdictions, nor was commentary actively sought from interested parties in these jurisdictions.	Please refer to Project Response #26 in Table 1.
Recommend the Final Draft of the PCFP be provided in hard copy according to the precedent for distribution established in the ERR process.	Please refer to Project Response #25 in Table 1.
Recommend that efforts be made to engage additional parties, particularly from those jurisdictions mentioned in the PCFP that are not in the immediate Study Area.	Please refer to Project Response #26 in Table 1.
Network of distribution of PCFP differs from that of the ERR. Hard copies of final ERR were distributed to libraries, municipal offices of Frontenac Islands, Kingston, and Cape Vincent. Many residents do not have reliable internet access, and may not have had opportunity to participate in the commentary process for the PCFP.	Please refer to Project Response #25 in Table 1.
Discrepancies between level of public disclosure and engagement of the ERR process (open houses, public meetings, hard copy distribution) and that of the PCFP process extends to reporting of results from monitoring of avian and bat populations.	Please refer to Project Responses #24 and #25 in Table 1.
Recommend the PCFP and all reports produced throughout the life of the PCFP be provided in hard copy to this more comprehensive distribution list. May contribute to achieving goals of the PCFP, particularly the provisions of meaningful scientific research and improved public policy are met (for example, documentation of species specific effects, understanding of cumulative effects of intensive wind turbine development in IBAs and other migratory bird and bat corridors, and efficacy of mitigation measures proposed within PCFP).	Please refer to Project Response #25 in Table 1.
PCFP does not provide for participation of local interested stakeholders and does not engage the community most directly impacted by the WIWP and most familiar with the resources in the Study Area. PCFP refers to the potential need to engage both participating and non-participating adjacent landowners in land management practices that support mitigation for grassland species. PCFP does not invite any local participation in reporting.	Please refer to Project Response #15 in Table 1.

Stakeholder Comment	Parties Response
Local engagement is critical to success of habitat mitigation because local residents and management agencies best understand the resource and in most cases, own habitat resources.	Please refer to Project Response #15 in Table 1.
Local residents and their organizations involved in land management, Friends of Big Sandy Bay Management Area, Kingston Field Naturalists, Lake Ontario Waterkeeper, Wolfe Island Residents for the Environment, adjacent non-participating land owners and the Frontenac Islands Council, have no standing and no role in the PCFP.	Please refer to Project Response #28 in Table 1.
Landowners leasing land for turbines are contracted under confidentiality clauses, and thus are constrained from transparent participation.	Comment is not applicable to the PCFP as the Lease Agreement is between the proponent and the landowner.
No entry point for Wolfe Island residents in the PCFP, or provision for reporting or evaluation of the monitoring and mitigation by the individual Island citizens or local groups, stakeholders or agencies.	Please refer to Project Response #15 in Table 1.
Recommend that partners to the PCFP develop within the PCFP provisions for participation of the local community in reporting, verification and programme evaluation, with particular focus on established local land management agencies and land owners adjacent to land leased for turbines.	Please refer to Project Response #15 in Table 1.
Recommend the partners of the PCFP should undertake a programme of education and awareness of issues related to land management and habitat preservation in the Study Area, designed to reach all stakeholders, local land management agencies, tourists and the local municipal government. This programme should be designed as a preventative measure and not be implemented as a possible 'reaction' to unforeseen negative effects.	Please refer to Project Response #46 in Table 1 for a discussion on potential land use control mitigation. Development and implementation of an education awareness program lies beyond the scope of the PCFP.
Further loss of habitat is foreseen as a direct effect of operation. This is acknowledged in the ERR and the PCFP by all partners. Awareness of the value of remaining resource has been raised among stakeholders, casual observers and other agencies to the benefit of all Ontarians and Canadians. Efforts at preserving that habitat which is still valuable on Wolfe Island should be undertaken irrespective of any additional and potential negative effect which may be reported under the PCFP.	Comment is not applicable to the PCFP as this issue was addressed and concluded through the federal environmental assessment process and provincial Environmental Screening Process

Stakeholder Comment	Parties Response
<p>Public's reporting of significant unforeseen negative effects monitoring by CHD through the PCFP is limited to an annual summary published on the website. CHD is not obligated to publish all ad hoc reports in the event of an observed significant incident (defined in the PCFP according to species specific schedules for monitoring, for example a 50% decline in raptor populations in the Study Area known to support raptors, unusual and precipitous mortality at specific turbines and during specific migratory behaviours such as flocking), nor is it obligated to report immediate mitigation measures undertaken to stem or remediate these incidents in advance of reporting. Seasonal reports are similarly not prescribed for publication.</p>	<p>Please refer to Project Response #24 in Table 1.</p>
<p>Correspondence related to the consultation and negotiations between partners of the PCFP as it pertains to the application of mitigation measures is similarly stricken from publication through the PCFP. Indicates that the partners to the PCFP have not undertaken sufficient measures to ensure public transparency regarding monitoring of avian and bat populations, immediate and ongoing mitigation, verification, and evaluation of the programme.</p>	<p>Please refer to Project Response #24 in Table 1.</p>
<p>Recommend that all reports be published through the Project website and in hard copy along the lines for distribution recommended earlier in this submission, and that these reports should be published in a timely fashion. This recommendation refers to correspondence between partners to the PCFP regarding ad hoc reports, seasonal, and annual reports and correspondence regarding immediate mitigation measures taken by CHD in advance of reporting and ongoing mitigation measures.</p>	<p>Please refer to Project Responses #24 and #25 in Table 1.</p>
<p>Reporting should make reference to input from local agencies and individuals (recommended earlier in this submission) regarding significant unforeseen negative effects and all immediate and progressive programs for mitigation (for example specific bird and bat mortalities, injuries to species at risk, precipitous declines in populations not foreseen in the ERR).</p>	<p>Please refer to Project Response #15 in Table 1.</p>
<p>Relying on annual summary report compiled by the proponent does not meet the high standards of scrutiny expected of public partners to this project.</p>	<p>Please refer to Project Response #24 in Table 1.</p>

Stakeholder Comment	Parties Response
<p>Reporting specific to raptor monitoring and the type of mortality thresholds that might trigger an immediate report to PCFP partners, for example mortality of 11.7 raptors in 3 week survey period – were designed with reference to other wind projects, and are comparable to the highest incidences and rates of raptor mortality ever recorded, save that recorded in the Almont Pass in California. Disturbing that PCFP would set threshold for notification so high, and would seem interested only when the worst possible scenario for raptor mortality occurs. Seems inconsistent with the expectations of the public regarding the ERR, and with communication of CHD to stakeholders and media through the ERR and CHD's website.</p>	<p>Please refer to Project Response #40 in Table 1.</p>
<p>Recommend the PCFP thresholds for reporting unusual unforeseen raptor mortality and triggering mitigation measures be reviewed by the partners to the PCFP and referred to independent agencies for verification and recommendations. Did not expect partners to the PCFP to base their thresholds on worst possible scenario and would appear to embrace the lowest common denominator when it comes to mitigation measures when significant population declines of wintering raptors are observed in the Study Area.</p>	<p>Please refer to Project Response #40 in Table 1.</p>
<p>PCFP references CanWEA material regarding other environmental objects that cause bird mortality in rural settings. It charts potential impacts of overhead power lines, communication towers and cats, and concludes that blade strikes from wind turbines have limited and minimal negative effect on avian populations. Recommend that partners to PCFP review whether distributing material from CanWEA is appropriate in the PCFP.</p>	<p>Please refer to Project Response #35 in Table 1.</p>
<p>Recommend that given that the CanWEA document states that communication towers and overhead power lines are major contributors to avian mortality in rural settings, the PCFP should provide for monitoring mortality in the immediate area of the two communication towers added to the ERR in the Minor Modification Report, and the overhead power line conversion along 2nd Line Road.</p>	<p>Please refer to Project Response #41 in Table 1.</p>

Stakeholder Comment	Parties Response
I might direct the proponent to the potential efficacy of utilizing confidentiality clauses within the land lease contracts as a mechanism by which CHD might convince participating landowners to reduce cat populations – mitigation measures taken by CHD and participating landowners to eliminate cats – because they are under the auspices of confidential contracts, are not publicly verifiable.	Comment is not applicable to the PCFP as the Lease Agreement is between the proponent and the landowner.
It is reasonable to ask at this juncture, exactly how would voluntary land-use controls by landowners be scrutinized by public agencies when contracts are private? Would compensation packages proposed in the PCFP for landowners undertaking land management practices as mitigation measures be published? How would the efficacy of these practices be evaluated? Is there a public policy framework in place for this type of mitigation measure?	Please refer to Project Response #46 in Table 1.
Unclear as to whether there exists supportive public policy framework and legal framework at the provincial and federal levels for the implementation of mitigation banking.	Please refer to Project Response #42 in Table 1.
Mitigation banking has a short history and is limited to wetland creation, enhancement, and restoration.	Please refer to Project Response #42 in Table 1.
Is financing guaranteed for this? Are there sufficient securities registered for this, and with whom are securities registered? Would the bank be a public-private collaboration?	Please refer to Project Response #42 in Table 1.
Will the mitigation bank be on-site or off-site? A single user bank? Out-of-kind or in-kind replacement? An exchange ratio of 1:1 net loss replacement or a different ratio? Is there going to be an established system of mitigation credits?	Please refer to Project Response #42 in Table 1.
How will the public be able to verify the efficacy of mitigation banking? What will be local input into choices regarding mitigation? Please note, DUC has some experience with recovery of wetlands and waterfowl, but is a private organization, despite receiving significant public financing through the OPA, and many members are land owners leasing land to the company and operating under commercial confidentiality clauses.	Please refer to Project Response #42 in Table 1.
Which agency would provide overarching regulatory support for mitigation banking, given the many conflicting and intersecting government jurisdictions (federal, provincial and municipal) and corporate interests?	Please refer to Project Response #42 in Table 1.

Stakeholder Comment	Parties Response
<p>It would be reasonable to expect the partners to identify regional resources that might be suitable. The plan for mitigation banking and land donation hinges on the actual availability of suitable habitat in the region. This is particularly relevant, given that expressed unwillingness of provincial regulatory agencies and the Minister of Tourism to undertake any review of cumulative effects according to the provincial ERR process.</p>	<p>Please refer to Project Response #42 in Table 1.</p>
<p>Noteworthy that the 2008 Helimax study commissioned by the Ontario government dissuaded regulators and wind industry from seeking intensive wind development in IBAs and major bird migratory pathways. Project proposals allowed to proceed by the Ontario government would appear to contradict the Helimax study's recommendations.</p>	<p>Comment is not applicable to the PCFP as this issue was addressed and concluded through the federal environmental assessment and provincial Environmental Screening Process.</p>
<p>It is reasonable for the public to question whether there will be sufficient habitat available for purchase, management and species recovery.</p>	<p>Please refer to Project Response #42 in Table 1.</p>
<p>What is the company's track record with mitigation banking? Can the proponent point to an example for mitigation banking that they have managed? Is this example related to the specific type of habitat and species loss that is anticipated to occur on Wolfe Island? What is the track record of provincial and federal agencies when it comes to mitigation banking?</p>	<p>Please refer to Project Response #42 in Table 1.</p>
<p>Can the partners refer the public to any long-term scientific studies and project examples of mitigation banking for grassland species with similar habitat? Is there any example for raptors? What would mitigation for short-eared owls look like? The text of the PCFP does not point to sufficient research into Short-eared Owl recovery requirements and therefore does not provide any mitigation banking proposal for this species. It is noteworthy that none of the studies referenced in the ERR with regard to wind development in other jurisdictions occurred on an island or major archipelago.</p>	<p>Please refer to Project Response #42 in Table 1.</p>

Stakeholder Comment	Parties Response
<p>Recommend the partners of the PCFP review the mitigation banking proposals and provide detailed public policy framework including benchmarks and programme evaluation models which would support mitigation banking as it is proposed in the PCFP. This needs to be better fleshed out before it can be evaluated as a reliable, verifiable, and transparent proposal. Current proposal for mitigation banking does not meet normative standards of scientific review or reliability, it is not a practice embraced by non-governmental agencies such as the Sierra Club, Audubon Society, or Suzuki Foundation and it's efficacy as a reliable mitigation measure is suspect.</p>	<p>Please refer to Project Response #42 in Table 1.</p>
<p>Lack of public policy framework for proposal of financial donation to a research facility. This mitigation measure is the only measure proposed in the event of foreseen negative effects on Short-eared Owl populations. The partners to the PCFP should clarify how donation to a research project may result in material restoration of the Short-ear Owl population of Wolfe Island.</p>	<p>Please refer to Project Response #43 in Table 1.</p>
<p>Would appear the financial donation mitigation measure is not directed to the preservation and restoration of resources in the Study Area.</p>	<p>Please refer to Project Response #19 in Table 1.</p>
<p>Land donation is fraught with the same difficulties as mitigation banking. PCFP suggests that land donation should include land of similar habitat, supporting similar species in the area adjacent to the Study Area. Reference is made in the PCFP to the possibility of further wind development on Wolfe Island. Further wind turbine development on Wolfe Island would render the proposal for land donation adjacent to the Study Area improbable.</p>	<p>Please refer to Project Response #44 in Table 1.</p>
<p>Exponential increase in wind turbine development lining the lakeshore of Lake Ontario brings into question the reliability of any land donation proposals made in the PCFP. Would the donation be managed for the lifetime of the WIWP or in perpetuity. Who would manage it, and would any responsibility for land donation be transferable to new owner, should CHD choose to sell the WIWP.</p>	<p>Please refer to Project Response #44 in Table 1.</p>
<p>Recommend that partners to the PCFP review proposals for land donation, with a view to developing the supportive public policy framework required across intersecting and conflicting jurisdictions and constituencies (private land, municipal, provincial, federal) to effectively implement and manage this proposal</p>	<p>Please refer to Project Response #44 in Table 1.</p>

Stakeholder Comment	Parties Response
Need to explain the statement “each element of the document will be treated independently”. Seems to limit the usefulness of the document, as it relates to the contribution to science and public policy as to the cumulative effects of wind turbine development.	Please refer to Project Response #32 in Table 1.
PCFP is only means by which the partners can verify the predictions of the ERR. ERR has been promoted as a comprehensive document that takes into consideration the whole of the Study Area, not just its constituent parts. PCFP should not be subject to salami tactics.	Please refer to Project Response #32 in Table 1.
If this statement on the segmentation and isolation of discrete components of the PCFP is accepted, would it mean that mitigation measures would be restricted to efforts to restore or enhance small isolated pockets of suitable habitat? Such efforts have not been proven successful, and most well established environmental organizations and environmental scientists recommend more holistic efforts involving large watersheds.	Please refer to Project Response #32 in Table 1.
What are the criteria for success of the PCFP? What sanctions are in place if the proponent and the public partners do not meet the criteria for success? Are there clear goals? Performance standards? Will it undergo any programme evaluation and audit to ensure public confidence?	Please refer to Project Response #45 in Table 1.
Surveying for collision fatalities twice a week is not the most robust of fatality studies. Such a low search rate leaves the results subject to greater influence from statistical correction procedures for searcher efficiency and scavenging, and thus potentially reduces the accuracy of the fatality study.	Please refer to Project Response #47 in Table 1.
Results from Maple Ridge wind project fatality studies in 2006 and 2007 suggest that daily surveys are much more accurate, and in that case let to a higher collision fatality estimate than concurrent 1x or 3x a week survey fatality estimates.	Please refer to Project Response #47 in Table 1.
Of further concern is that Stantec essentially predicted low or minimal avian impacts. By also carrying out the post-construction fatality study where bird impact concerns are in the public eye, there is a potential conflict of interest. Ideally, one would want a consultant for this job who had no stake in validating their earlier premise.	Please refer to Project Response #48 in Table 1.

Stakeholder Comment	Parties Response
If the project's post construction study continues with only twice a week fatality surveys and Stantec carries out the work the results may potentially lack weight gaining public confidence.	Please refer to Project Responses #47 and 48 in Table 1.
This study makes no contribution to advancing the science of post-construction monitoring at wind energy facilities. As such, it is a missed opportunity to grow environmental science in Canada. Mediocre approach does not serve the public because it will not conclusively answer the question on the extent of collision fatalities at the project.	Please refer to Project Responses #47 and 48 in Table 1.
The Plan fails to name optioned landowners, non-optioned landowners, and the Township as participators in the plan.	Please refer to Project Response #28 in Table 1.
We are concerned the plan would cut back the monitoring process after one year, since one year is not enough time for Wolfe Island's environment to settle down after all the construction and destruction to the wildlife and amphibian habitat and wetlands.	Please refer to Project Response #31 in Table 1.
The importance of this area initiated the concern that was supported by wildlife experts that led to the prompt for an elevated environmental review before the project was allowed to start. Because this request was denied, the PCFP has to verify the initial data as well as account for the changes in Wolfe Island's pre-construction environment.	Please refer to Project Responses #36 and #45 in Table 1.
Concerned the company's bias will affect the final outcome and result in an untrue level of significant concern.	Please refer to Project Response #33 in Table 1.
Feel it will be extremely important that the Plan be well supervised and regulated by government environmental agencies both federally and provincially.	Please refer to Project Response #33 in Table 1.
Equally important that all decisions and correspondence be open and transparent to the public.	Please refer to Project Response #24 in Table 1.
Concerned that the Plan does not take into account habitat loss to amphibians and other wildlife affected by this wind project.	Comment is not applicable to the PCFP as it deals specifically with bird and bat resources. This issue was addressed and concluded through the federal environmental assessment and provincial Environmental Screening Process.
Concerned that Ducks Unlimited Canada is named repeatedly in the Plan as being participants and possible beneficiaries in most of the mitigation processes including data collection, does not appear to have any responsibility or accountability to government agencies for or to the Plan.	Please refer to Project Response #34 in Table 1.

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

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