

Regulator	Regulator's Comment	Proponent's Response	Addendum Section
Nova Scotia Department of Natural Resources and Renewables	VECs and Environmental Assessment Studies are not properly identified or associations are poorly made; e.g., VEC Bats and Bird Habitat has Wood Turtle Survey as an Environmental Assessment Study.	Content has been updated accordingly in throughout the Addendum.	3.1. Biophysical VECs
	Vegetation clearing and site preparation can only occur during the breeding season following consultation, development of guidance, and approval by the Wildlife Division, Department of Natural Resources and Renewables. Buffers may be required if active nests are discovered.	Acknowledged, this has been incorporated into project planning.	3.1.5 Birds and Bird Habitat 3.2.6 Birds and Bird Habitat
	Justification is lacking for the local area of assessment (LAA) for wildlife related VECs. Justifications (expert advice, report, or peer-reviewed research) that supports the use of these LAA boundaries has not been provided.	Further justification has been provided in this Addendum.	2.2.1 Spatial Boundaries
	It is not clear from the information provided how terrestrial habitat is defined, and how it was categorized.	Further justification has been provided in this Addendum.	3.1.1 Terrestrial Habitat and Vegetation
	The word "majority" is often used to describe the habitat types (e.g., the majority of the site is dominated by cultivated blueberry fields). Quantitative measurements should be provided.	The layout changes and adequate wording has been updated throughout the document.	3.1.1 Terrestrial Habitat and Vegetation
	"The assessment of wetlands within areas of the current LAA that were beyond the LAA of the previously proposed Project layout have been assessed via desktop using predictive mapping of potential wet areas." Information provided the proponent is incomplete; additional field programs may be required or information gaps reflected in proposed mitigations.	Further wetland delineation was conducted in 2022. Functional assessments were also conducted for all wetlands in the study area. The results of these studies have been included with the Addendum.	3.1.3 Wetlands 3.2.4 Wetlands
	The proponent has not adequately described the role of provincial Acts and regulations as they pertain to the protection of bird species. All bird species (regardless of whether they are migratory or not) are protected under the provincial Wildlife Act.	Content has been updated accordingly in this Addendum.	3.2.5 Birds and Bird Habitat 3.2 Effects of the Undertaking on the Environment
	Figure 11A. Survey coverage should not just be representative habitat, but also cover as much of the project footprint as possible, and include important ecological features which have a higher likelihood of containing SAR/SoCC (e.g., wetlands and watercourses).	Survey coverage was modified accordingly for 2022.	3.1.5 Birds and Bird Habitat
	Areas covering turbine locations T7, T13 and T9, T10, T16 are consistently underrepresented in survey efforts. Figure 8 shows these areas as hardwood-dominant (unmanaged) forests and may provide habitat for a number of species, including SAR/SoCC.	These turbine locations were further studied in 2022. Results and analysis of these studies have been included in the Addendum.	3.1.5.2 Field Assessments and Radar and Acoustic Monitoring
	The Guide to Preparing an EA Registration Document for Wind Power Projects in Nova Scotia (NSE 2021) recommends that proponents consult with regulators on methodology for bird migration assessment. At the time of consultation with the proponent, the Wildlife Division strongly recommended two (2) years of pre-construction monitoring.	The Proponent has conducted further studies in 2022 to fulfill the request for two years of pre-construction monitoring.	3.1.5.2 Field Assessments and Radar and Acoustic Monitoring
	A different altitudinal detection range was used in the spring versus fall migration survey	Justification for different ranges has been provided in the Addendum	3.1.5.2 Field Assessments and Radar and Acoustic Monitoring
	Description of malfunctioning equipment during survey periods is one reason the Wildlife Division requested that two (2) years of pre-construction surveys are conducted.	The Proponent has conducted further studies in 2022 to fulfill the request for two years of pre-construction monitoring.	3.1.6.3 Field Assessment
	"Based on Dillon's experience on similar bat acoustic programs throughout the country, both the total number of bat passes and the average bat passes per detector night (during the breeding period, fall migration, and entire survey period) are considered very low." The proponent is assuming that results indicate that low number of bats are found in the study area and therefore would not be significantly affected by the project. Review of data collection methodology and results in Appendix J indicates additional research is required before drawing any conclusions on bat use of the study area.	The Proponent has conducted further studies in 2022 to fulfill the request for two years of pre-construction monitoring.	3.1.6.3 Field Assessment 3.1.6.4 Assessment Conclusions Appendix I – Bats and Bat Habitat
	Table 21 is confusing in how it is presented.	Content has been updated accordingly in this Addendum.	3.1.7 Species at Risk
	There is inconsistency by the proponent in their approach to Mainland moose by discussing the concentration area while other sections and appendices of the EA reference the provincial recovery plan and identified core habitat.	Content has been updated accordingly in this Addendum.	3.1.2.3 Mainland Moose Field Assessment 3.1.7.2 Terrestrial Wildlife SAR and SoCC Assessment
	Blasting (as mentioned in Table 135) has the potential to impact wildlife and SAR/SoCC which has not been described here.	Mitigation measures for blasting have been included in this Addendum	3.2.5.1. Watercourse and fish habitat 4.2 Potential Interactions and Mitigations
	Eastern waterfan ( <i>Peltigera hydrothyria</i> ) is listed as Threatened under the Nova Scotia Endangered Species Act (NS ESA). It should be noted that legally no disturbance of the species or its habitat is allowed. Any mitigations proposed should reflect this requirement	Acknowledged, this has been incorporated into project planning.	3.1.7.1 Vegetation SAR and SoCC Assessment 3.2.2. Terrestrial habitats and vegetation 3.2.8 Species at Risk
	Table 40. Proposed mitigation measures are not described in sufficient detail. For example, any revegetation of a reclaimed site must be either naturally occurring or using native local vegetation.	This measure has been incorporated throughout the Addendum. The	3.2 Effects of the undertaking on the environment

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		Environmental Management and Protection Plan (EMPP) has also been updated and is included as Appendix O.	
	Table 40. "No work in streams which will avoid potential impacts to lichen SAR;" This should expand to riparian areas in order to maintain the integrity of the habitat. Appropriate buffers and mitigations should be developed in consultation with regulatory agencies.	Mitigation measures have been updated accordingly. The EMPP has also been updated and is included as Appendix O of this Addendum.	3.2.2 Terrestrial habitats and vegetation
	The proponent has demonstrated an understanding of Mainland moose biophysical needs. Mainland moose may not use agricultural areas as part of their habitat, but will likely move through the LAA to access more suitable habitat. Roads and disturbances associated with road use are considered a very high threat to recovery, and the increased disturbance associated with upgrading existing roads, new road construction, and increased use from historical levels has not been identified or addressed by the proponents.	Additional studies were conducted in 2022. Findings and further mitigation measures have been included in the Addendum.	3.1.2.3 Mainland Moose Field Assessment 3.2.3.1 Mainland Moose
	Table 40. Vehicle cleaning should occur away from any watercourse/wetland. Cleaning should also occur as vehicles leave the site to ensure that invasives already present are not spread to other areas.	Mitigation measures have been modified accordingly. The EMPP has also been updated and is included as Appendix O.	3.2.2 Terrestrial habitats and vegetation
	Table 40. "No work in streams which will avoid potential impacts to lichen SAR;" A buffer and allowable activities that can occur around the aquatic lichen occurrence will be established according to guidance provided through consultation with Nova Scotia Department of Natural Resources and Renewables (NSDNRR). Both the quality and integrity of the watercourse must be maintained to prevent disturbance or harm.	Lichen field assessments were conducted in 2022. Findings and mitigation measures were included in the Addendum.	3.1.1.3 Lichen Field Assessment 3.2.2 Terrestrial habitats and vegetation
	Table 41. Mitigations provided are not detailed enough or are insufficient. Reduced speeds in the vicinity of wildlife, dust suppression, and noise and lighting restrictions are all appropriate activities which can be used to minimize disturbance to wildlife in the PDA.	Table has been modified accordingly. The EMPP has also been updated and is included as Appendix O of this Addendum.	3.2.3 Terrestrial Wildlife
	Table 41. "(3) if a SAR or a nest of any bird is encountered during activities, work around the SAR or nest shall cease until a biologist is dispatched to assess the situation and appropriate mitigation is applied". Work must halt and regulatory agencies must be contacted for situations involving SAR and any mitigations and buffers developed in consultation with NSNSDNRR.	Acknowledged, this has been incorporated into project planning.	3.2.6 Birds and Bird Habitat
	"A significant environmental effect would result if a considerable change to migratory and breeding birds was the result of project activities." The proponent should define what constitutes a "considerable change".	Language has been updated accordingly.	3.2.9 Cumulative Effects
	Table 43. Under proposed mitigation measures, clearing and/or grubbing during the breeding season can only occur following approval and following survey requirements developed and approved in consultation with NSDNRR. Migratory birds and their nests are protected under both the Migratory Bird Convention Act (MBCA) and the provincial Wildlife Act.	Acknowledged, this has been incorporated into project planning.	3.2.6 Birds and Bird Habitat
	Table 43. "Workers will be familiarized with the SAR and SoCC that were identified at the site during the biophysical assessments prior to work commencing". Workers on site should be familiar with any SAR/SoCC that were identified as having the potential to occur on site through both field and desktop analysis.	Acknowledged, this has been incorporated into project planning.	3.2.6 Birds and Bird Habitat
	Table 43. "During the first year, post construction monitoring events will be targeted to capture the morning following nights with favorable tail wind conditions". One year of post-construction mortality surveys is insufficient. The requirements for the post-construction monitoring program and length of time of the program must be developed in consultation with appropriate regulatory agencies (NSDNRR, Canadian Wildlife Service (CWS)).	Acknowledged, this has been incorporated into project planning.	3.2.6 Birds and Bird Habitat
	Table 43. "A follow up avian mortality survey will be conducted after the Project commissioning and appropriate actions will be taken in consultation with CWS and NSDNRR." Please explain how this program is different from the one identified above.	Both statements reference the same program that will be developed in consultation with appropriate regulatory agencies. Terms have been harmonized throughout the submission to avoid any confusion.	3.2.6 Birds and Bird Habitat
	Table 46. Any possible or confirmed nesting of turtles in the PDA should be immediately reported to NSDNRR.	Table has been modified accordingly. The EMPP has also been updated and is included as Appendix O of this Addendum.	3.2.5.2 Turtle and Turtle Habitat
	The proponent does not adequately address additional wind farms in close proximity to one another and the impact on migratory birds and bats, nor the increase in road density and road disturbance on Mainland moose. Statements are made that cumulative effects on wildlife will be "negligible" or "low" without research or data to support the assertion.	Content has been updated accordingly in the Addendum.	3.2.9 Cumulative Effects
	Terms are not adequately defined	Content has been updated accordingly in the Addendum.	Updated throughout the document
	It is unclear where surveys were conducted within the LAA. Additional details on field surveys are required.	More details on surveys have been provided throughout the Addendum.	3.1 Biophysical VECs
	Information on invasives has not been provided.	Assessment and mitigation measures regarding invasive species are included in the Addendum. They have also been integrated into the EMPP (Appendix O)	3.1.1.4 Invasive Vegetation 3.2.2 Terrestrial Habitats and Vegetation

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	Figure F-1. Transects for Mainland moose do not appear to be located in conifer-dominant forest types within the LAA. The area with largest relatively contiguous area of conifer dominant forest (T1, T2, T11, T12) has no transects.	These areas were further studied in 2022. Results of these studies have been included in the Addendum in Appendix K.	3.1.2.3 Mainland Moose Field Assessment Appendix K - Mainland Moose
	Review of the data is challenging due to how the proponent has described results; e.g., summer survey program appears to summarize breeding bird survey results, which are also presented separately.	The Addendum has been restructured in an effort to improve ease of comprehension.	3.1.5.2 Field Assessments and Radar and Acoustic Monitoring
	Survey details are insufficient to assess validity of results.	More details on surveys have been provided throughout the Addendum.	3.1.5.2 Field Assessments and Radar and Acoustic Monitoring
	Given difficulty in detection, NSDNRR recommends two (2) surveys for Common nighthawk spaced 10 days apart. Surveys must be conducted in any habitat appropriate for nesting. Refer to the following protocol for further details: Government of Saskatchewan, 2020. Species Detection Survey Protocol: 15.0 Common Nighthawk Surveys. April 2020. Saskatchewan Ministry of Environment, Fish, Wildlife and Lands Branch, Regina, Saskatchewan, Canada. In the absence of surveys the precautionary principle applies in that mitigation measures for Common nighthawk are applicable in any potentially suitable nesting habitat.	Additional surveys were conducted in 2022. Findings and mitigation measures are included in this Addendum.	3.1.5.2 Field Assessments and Radar and Acoustic Monitoring 3.2.6 Birds and bird habitat
	During scoping meetings in 2021 with the proponent it was strongly suggested by Environment and Climate Change Canada (ECCC) and asked from NSDNRR that two (2) years of preconstruction surveys be provided. Only one year of preconstruction surveys have been provided.	The Proponent conducted further studies in 2022 to fulfill the request for two years of pre-construction monitoring.	3.1.5.2 Field Assessments and Radar and Acoustic Monitoring
	Audiomoth detectors only cover a range of 100 m and did not assess the full sweep of the turbine	Further radar and acoustic studies were conducted in 2022.	3.1.5.2 Field Assessments and Radar and Acoustic Monitoring
	Justification for the size of the Study Area (250 m buffer) has not been provided.	Content has been updated accordingly in the Addendum.	2.2.1 Spatial Boundaries 3.1.6 Bats and Bat Habitat
	In order to capture the full suite of migratory and resident bat species that may be present on site NSDNRR recommends two survey periods Spring - May 1st to June 30th Fall - August 15th to October 31 <sup>st</sup> .	The Proponent conducted further studies in 2022 to fulfill the request for two years of survey periods.	3.1.6.3 Field Assessment
	Only one of six (6) detectors captures the full sweep of the turbine rotor.	Additional surveys were conducted in 2022. Findings and mitigation measures are included in this Addendum.	3.1.6.3 Field Assessment
	Information presented showed that some detectors were moved or malfunctioned, highlighting concerns about results and the need for two (2) years of surveys.	Additional surveys were conducted in 2022. Findings and mitigation measures are included in this Addendum.	3.1.6.3 Field Assessment
	Turtle survey methodology is required in order to assess validity of survey results.	Survey methodology has been appropriately detailed in the Addendum and included in Appendix F.	3.1.4.2 Turtle and turtle habitat Appendix F - Turtle Assessment
<b>Air Quality Unit – Nova Scotia Environment and Climate Change</b>	The noise assessment is reported in Sections 6.1.1.4 and 7.1.1.4 of the Registration Document and Appendix C. The proponent has used Nova Scotia Guide to Preparing an EA Registration Document for Wind Power Projects as updated in 2021 as the basis for the assessment. The proponent does not appear to have consulted the Federal Guidance for Evaluating Human Health Impacts in Environmental Assessment: NOISE as part of the assessment. No background measurements are reported, and the assessment methodologies presented in the Federal guidance have not been used.	The sound model ran in 2022 took into consideration ambient noise after reviewing applicable methodologies.	4.1.2 Operational Sound Assessment Appendix L – Sound Level Assessment
	The proponent has assessed construction and operational noise impacts. For construction noise, the proponent calculated that 86 dB[A] is the highest expected sound level during combined construction activities, reportedly calculated using Washington State Department of Transport guidelines. These guidelines were used to determine that noise from construction would decline to 41 dB(A) at 975m from the source. Details with respect to what assumptions this is based on and how the calculations were made are not presented, and therefore cannot be verified	Additional details for this assumption have been included in the Addendum.	4.1.1 Construction Sound Assessment
	For the assessment of operational noise, the proponent used WindPRO v.3.5 which is a recognized noise propagation model for assessing noise impacts from wind farms. This model is reported to use the ISO 9613-2 model Attenuation of sound during propagation outdoors, Part 2: A general method of calculation methodology. All sixteen turbine locations were used in the modelling assessment. This would represent the worst case for all receptors as it is not clear which of the sixteen locations would be used in the final array of twelve turbines. The modelling output is presented in Appendix B of the assessment, with the predicted contours presented in Appendix A of the assessment.	The sound model ran in 2022 took into consideration ambient noise and was based on a realistic-case scenario for a representative 12 turbine layout.	4.1.2 Operational Sound Assessment Appendix L – Sound Level Assessment
	The sound pressure level for the turbine model that was selected for this assessment is not clearly identified. In Table 2 of the Registration Document, the maximum sound pressure level is reported as up to 107.6dB(A), however, it is not clear, from Appendix C, what sound pressure level was used for the assessment. The Nova Scotia Guide to Preparing an EA Registration Document for Wind Power Projects requires that the sound pressure level is clearly stated.	Sound level pressure was identified in the Addendum	4.1.2 Operational Sound Assessment Appendix L – Sound Level Assessment

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	<p>The modelling results predict that no identified receptor would experience noise levels from the combined sixteen turbines above 40dB(A). However, the Nova Scotia Guide to Preparing an EA Registration Document for Wind Power Projects states that:</p> <p>In establishing separation distances, a proponent must ensure that the wind farm design and turbine siting does not cause sound levels to exceed 40 dBA (A- weighted decibels) at the exterior of receptors.</p> <p>Therefore, it is not sufficient to state noise levels that are only produced by the proposed development. One receptor is predicted to experience noise from the proposed development of 36.6dB(A). If a background noise level is within 1dB(A) of this level, the combined sound level experienced at this receptor would be 39.6dB(A). This provides little margin for error.</p>	The sound model ran in 2022 took into consideration ambient noise and was based on a realistic-case scenario for a representative 12 turbine layout.	4.1.2 Operational Sound Assessment Appendix L – Sound Level Assessment
	For the low frequency sound assessment, it is not clear why the wind values are different to those used in the operational sound assessment, and why the immission value used was 4m, whereas 1.5m was previously used	Low frequency was further described in the Addendum, and the low frequency sound model was run in 2022.	4.1.2 Operational Sound Assessment Appendix L – Sound Level Assessment
	The mitigation measures should be considered with respect to the specific comments on the Environmental Management Plan and Complaints Resolution Plan below. No monitoring is proposed, however, the Department may request that ambient noise monitoring is undertaken before or during the construction and operation of the proposed project.	Acknowledged, this has been incorporated into project planning.	4.2 Potential Interactions and Mitigations Appendix O - Environmental Management and Protection Plan Appendix P – Complaint Resolution Plan
	With respect to the Environmental Management Plan, presented in Appendix O, activities should be restricted to daylight hours. Communication with residents should be prioritized to ensure that residents have advanced knowledge of particularly noisy events, such as blasting.	This has been included as a mitigation measures, and the EMPP has been updated accordingly (Appendix O) of the Addendum.	4.2 Potential Interactions and Mitigations Appendix O – Environmental Management and Protection Plan
	With respect to the Complaint Resolution Plan, presented in Appendix B, it is not clear if complaints will be addressed within twenty calendar days or twenty business days. In either case, noise complaints should be addressed promptly. Twenty days may be too long for complainants to wait for a response.	The Complain Resolution Plan has been updated and the response time has been shortened to five business days.	Appendix P – Complaint Resolution Plan
	Changes in noise levels at receptor locations as a result of increased vehicle movements does not appear to have been assessed. No assessment of the impact of project noise on wildlife was presented in the noise assessment sections.	Ambient noise have been incorporated into sound assessments.	4.1.1 Construction Sound Assessment 4.1.2 Operational Sound Assessment Appendix L – Sound Level Assessment
<b>Fish and Fish Habitat Protection Program – Fisheries and Oceans Canada</b>	A functional assessment of all affected wetlands within the Local Assessment Area (LAA) should be completed and reported before the project's anticipated direct and indirect effect(s) on fish and fish habitat can be evaluated.	Further wetland delineation was conducted in 2022. Functional assessments were also conducted for all wetlands in the study area. Full assessments are also included as Appendix D.	3.1.3.2 Wetland Delineation 3.1.3.3 Wetland Functional Assessment Appendix D – Wetland Assessment
	The effects of past development activities (e.g. layout of access roads and installation of the WCs) may presently be limiting the productivity of fish/fish habitat. Site planning within the LAA – for development and reclamation – should identify any such existing limiters caused by anthropogenic development activities and strive to support aquatic ecosystems to recover and function at their former inherent natural capacity.	Historic activities in the area were identified and described. Existing limiters have been incorporated into project planning.	3.1.4.1 Watercourses and fish habitat
	Atlantic salmon ( <i>Salmo salar</i> ) (Inner Bay of Fundy population), a species of conservation concern that is presently listed as Endangered under SARA, may occur within the LAA. A portion of the proposed project's LAA overlaps the species' critical habitat, which is also protected under SARA. Eastern waterfan ( <i>Peltigera hydrothyria</i> ), an aquatic stream-dwelling lichen of conservation concern that is listed as Threatened under SARA, occurs within the LAA. American eel ( <i>Anguilla rostrata</i> ), a species of conservation concern that is presently listed as Threatened by COSEWIC, may occur within the LAA.	Acknowledged, this has been incorporated and addressed in the original registration document as well as the Addendum.	3.1.4.1 Watercourses and Fish Habitat 3.1.7.1 Vegetation SAR and SoCC Assessment 3.1.7.1 Fish SAR and SoCC Assessment 3.2.2 Terrestrial Habitats and Vegetation 3.2.5.1 Watercourse and fish habitat
	The behavior and health of fishes (and other wildlife) are affected by seismic vibrations and anthropogenic sounds. The proponent should include an evaluation of the potential effects of sounds and vibrations associated with the construction (e.g. blasting) and daily operation of the proposed project to fishes occurring within the LAA.	Content has been updated accordingly in the Addendum.	3.1.4.1 Watercourses and Fish Habitat 3.2.5.1 Watercourse and fish habitat
	Should the EA be granted conditional approval, DFO will be requesting additional information be provided through the Nova Scotia of Environment Wetland and Watercourse Alteration Approval processes to determine if the project will result in the HADD to fish and fish habitat and require an authorization under the FA.	Acknowledged, this has been incorporated into project planning.	----
<b>Environmental Assessment – Environment and Climate Change Canada</b>	Several types of migratory bird habitat are in decline in Nova Scotia, including mature coniferous forest, mature deciduous forest and mature mixed forest. A map that identifies mature forest habitat in relation to proposed project infrastructure should be included in the review, including an analysis of project impacts on migratory birds species that use these habitats, taking into account cumulative losses.	The map and subsequent analysis are included in this Addendum.	3.1.1.1 Desktop Habitat Assessment 3.1.5.1 Desktop Forest Habitat Assessment

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	<p>Delineated wetlands (17 totaling ~ 2.5ha) were identified, including treed and shrub swamps with lesser areas of bogs, fens and wet meadows. Potential indirect effects of wetlands are anticipated within 30 m of delineated wetlands boundaries and direct effects to Wetland 14 (shrub swamp) identified due to proposed access road construction to T1 and T2. The environmental assessment registration document (EARD) (section 7.2.3 Wetlands - Potential Interactions and Mitigation) should clarify how field surveys informed plans to avoid effects (indirect and direct) to wetlands, including wetlands used by bird SAR, such as Canada Warbler, Olive-sided Flycatcher and Rusty Blackbird identified through desktop and field surveys. Where effects to wetland habitat are deemed unavoidable, ECCC-CWS recommends including a discussion of why avoidance is not possible, as well as, a wetland compensation plan, which considers conservation allowances for the loss of wetland habitat used by bird SAR.</p>	<p>Further wetland delineation was conducted in 2022. Functional assessments were also conducted for all wetlands in the study area. These assessments were complemented with bird field assessment data to determine the appropriate mitigation measures for bird SAR.</p>	<p>3.1.3.2 Wetland Delineation 3.1.3.3 Wetland Functional Assessment 3.1.7.5 Bird SAR and SoCC Assessment 3.2.4 Wetlands 3.2.6 Bird and Bird Habitat 3.2.8 Species at Risk</p>
	<p>Bird Surveys (Appendix H): The proponent should clarify rationale for not including surveys in the southern portion of the local assessment area around turbine 10 and southwest area around turbine 13 including the road extension.</p>	<p>Further studies were conducted undertaken in 2022 to adequately cover all Project locations.</p>	<p>3.1.5.2 Field Assessments and Radar and Acoustic Monitoring Appendix G - Bird Assessment</p>
	<p>Also, clarification of survey methodology is required. Based on the results, it appears that point counts referred to as "transects" during spring, summer, and fall surveys were actually groups of point count locations conducted in a line, and not an actual transect count surveys (i.e. counting all birds heard along a trajectory while walking a consistent speed). Winter surveys however appear to be actual transect survey counts because there are no point count stations identified; if this is the case, either the average walking speed while surveying or the amount of time taken for each transect should be included so the count data can be standardized.</p>	<p>Further clarification on bird surveying methodologies have been included in the Addendum. A detailed description has also been included in Appendix G.</p>	<p>3.1.5.2 Field Assessments and Radar and Acoustic Monitoring Appendix G - Bird Assessment</p>
	<p>As discussed in the Radar &amp; Acoustic Monitoring Report (Appendix I), without knowing what is occurring during migration in other areas of NS, it is difficult to determine whether the project area supports a high volume of migration relative to other parts of the province</p>	<p>Further analysis on potential migration trends and patterns is presented in the Addendum.</p>	<p>3.1.5.2 Field Assessments and Radar and Acoustic Monitoring Appendix I - Radar and Acoustic Monitoring</p>
	<p>EARD Section 6.2.4.5 Nocturnal Avian Migration (page 84) states, quote: "While some level of migration was observed on most nights, a large proportion of the migratory activity observed in each season was limited to a few nights. Also, most activity was observed when favourable tailwinds were present, which are from the southwest in the spring and from the northwest in the fall. These findings are typical to other radar and acoustic studies completed in Nova Scotia (e.g., Peckford and Taylor 2008). Targets were detected at heights above ground level throughout the area sampled (i.e., between 70m and approximately 400). It was also observed that on nights when large numbers of targets were detected during the beginning and middle of the night there tended to be fewer of those targets at lower altitudes (i.e., below 200m).</p> <p>During the spring season, when examining nights when large numbers of targets were detected (i.e., when most of the migration occurred) there appeared to be nights when there was relatively higher densities of migration within the rotor swept area (RSA) and others when the relative density of migration was greater above the RSA. This pattern was also observed during the fall, but at somewhat lesser extent/frequency".</p> <p>The relatively higher densities of migration within the RSA during some nights indicates some level of risk at this site although unquantifiable at this time. Nevertheless, the proponent concludes, quote: "With proposed mitigation, the residual interactions of the Project with nocturnal migrating birds are not anticipated to be substantive" (page 155).</p> <p>Based on these unknowns, the risks should be addressed through further monitoring and mitigation plans. Variables associated with higher migration counts such as dominant wind direction and time of night for spring and fall migration could be used to predict peak migration nights in the future and develop mitigation measures (e.g. turn-off problem turbines during peak winds and time of year).</p>	<p>Acknowledged, mitigation measures have been updated and detailed in the Addendum and Appendix H.</p>	<p>3.1.5.2 Field Assessments and Radar and Acoustic Monitoring 3.2.6 Birds and Bird Habitat Appendix I - Radar and Acoustic Monitoring</p>
	<p>As previously discussed with the proponent during baseline planning meeting on April 26, 2021, ECCC-CWS recommends a minimum of two years consecutive baseline data be collected in order to understand variance in flight height (i.e., bird movements) in relation to weather conditions. ECCC-CWS recommends that monitoring be conducted early and pre-construction to quantify risk and inform the EIA. However, if provincial EIA processes don't require this level of baseline prior to decision, year 2 pre-construction monitoring could be started during the construction year to determine the need for additional mitigation measures and inform post-construction monitoring and adaptive management plans.</p>	<p>Acknowledged. An additional year of surveys was conducted in 2022 to fulfill the requirement of two years of pre-construction monitoring.</p>	<p>3.1.5.2 Field Assessments and Radar and Acoustic Monitoring</p>
	<p>Environmental Management &amp; Protection Plan (EMPP)(Appendix O) - Wildlife Interaction (Section 2.8-2.9) states, quote: "Mitigation that may be implemented could include the following..."; "The proponent will endeavor to conduct construction activities such as clearing and grubbing during a time period that does not coincide with the time period in which migratory and breeding birds would be in the area" (page 17). "Efforts will be made to maintain mature vegetation along the edges of the development area, particularly in riparian areas" (page 20).</p> <p>ECCC-CWS recommends clarifying commitments to mitigation measures identified in Table 43 of the EARD and the EMMP to avoid effects on migratory birds, including species at risk and species of conservation concern.</p>	<p>Acknowledged, mitigation measures have been updated and detailed in the Addendum and Appendix O.</p>	<p>Appendix O - Environmental Management and Protection Plan</p>

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	ECCC-CWS recommends scheduling vegetation clearing outside of the bird breeding season to avoid disturbing migratory birds and bird SAR. ECCC does not recommend nest searches or sweeps in vegetation prior to clearing during the breeding season.	Acknowledged, mitigation measures have been updated and detailed in the Addendum and Appendix O.	3.2.6 Bird and Bird Habitat Appendix O – Environmental Management and Protection Plan
	Bat SAR critical habitat is located approximately 10km away to the southeast of the project. Hibernating bats are known to travel several hundreds of kilometres between overwintering and breeding locations. However, there were little to no detections of SARA-listed bats during the breeding season, which could indicate maternity roosts are unlikely. The majority of detections were late summer/fall as bats move towards swarming and overwintering sites. It should be noted that all three migratory bat SoCC currently undergoing assessment by COSEWIC were detected at the site.	Acknowledged.	3.1.6.3 Field Assessment
	In analysing acoustic data, ECCC-CWS recommends the analysis of Tricolored Bat calls separately from Myotis. The echolocation calls for Tricolored Bat can overlap with the frequencies of the two Myotis species, however calls in low clutter habitat can be otherwise distinguished. According to placement descriptions of acoustic units, these would be considered low clutter habitats. Note: Since acoustic units were placed in low clutter habitats, it is unlikely to pick up Northern Myotis, which are forest interior species.	Surveys were modified accordingly for 2022, and results are presented in the Addendum.	3.1.6.3 Field Assessment
	During the 2021 field season, the Eastern waterfan ( <i>Peltigera hydrothyria</i> ) - an aquatic lichen listed on Schedule 1 of SARA as Threatened, was identified incidentally within Gleason Brook. ECCC-CWS is concerned with proposed project clearing activities negatively affecting Eastern Waterfan, which are very sensitive to siltation/sedimentation. The 200m buffer suggested as mitigation is likely inadequate to protect this SAR; ECCC-CWS recommends 50m riparian (streamside) buffer of the occupied stream (including streams running into the occupied stream) for 1000m radius around occurrences of Eastern Waterfan. Monitoring and adaptive management plans should include monitoring effects on SAR lichen identified at the site.	Targeted surveys for lichens were carried out in 2022. Results, analysis and mitigation measures are included in the Addendum.	3.1.1.3 Lichen Field Assessment 3.1.7.1 Vegetation SAR and SoCC Assessment 3.2.2 Terrestrial Habitats and Vegetation 3.2.8 Species at Risk
	Critical Habitat for the Wood Turtle listed Threatened (SARA Schedule 1 and NS Endangered Species Act) is present with the West Branch of the Wallace River, beginning ~ 3km from the nearest proposed WTG location and there is potential for individuals to be found on-site; however, no mitigation was identified in the EARD or EMPP. Wood Turtles can be active from April through October and can travel hundreds of meters from their rivers as they move from their overwintering habitats to their nesting and foraging/thermoregulation habitats.	Specific mitigations for Wood Turtle have been included in in the Addendum and the EMPP in Appendix O.	3.1.7.4 Herptile SAR and SoCC Assessment 3.2.5.2 – Turtles and Turtle Habitat Appendix O – Environmental Management and Protection Plan
	The Recovery Strategy lists accidental mortality (roads) as threats that could impact individual wood turtles, which are vulnerable given their slow travel speed and how far they range from aquatic habitats in summer. ECCC-CWS recommends the development of mitigation measures to avoid effects on individuals potentially found nesting, and/or travelling to nesting, foraging areas in the forest and overwintering habitats encountered during vegetation clearing activities and operations.	EMPP has been updated accordingly and is included with the Addendum.	Appendix O – Environmental Management and Protection Plan
	ECCC-CWS recommends that the provincial department responsible for SAR be contacted for technical expertise and advice on non-migratory bird SAR under their jurisdiction and responsibility (e.g. birds that are not protected by the MBCA such as raptors, bats, reptiles, amphibians, land-mammals, insects, plants and lichen).	Acknowledged, this recommendation has been included as a mitigation measure.	3.2.8 Species at Risk
	EARD Part 7, section 7.2.4 (page 151), indicates that Evening Grosbeak suitable breeding habitat exists in the “non-forested land in the PDA”; it should be clarified that this species is a forest-associated bird and nest in trees.	Acknowledged, text has been modified accordingly.	3.1.5 Birds and Bird Habitat
	SAR observations should be submitted to the Atlantic Canada Conservation Data Centre, directions on how to contribute data can be found at:	The proponent will submit data to the ACCDC database. This has been included as a mitigation measure	3.2.8 Species at Risk
	Proponents are also requested to make available data to the Canadian Wind Energy Association (CanWEA) database at: <a href="https://canwea.ca/">https://canwea.ca/</a>	The proponent will submit data to the CanWEA database. This has been included as a mitigation measure.	3.2.8 Species at Risk
<b>Water Resources Management Unit – Nova Scotia Environment and Climate Change</b>	Identify the location, size, boundary and class of any wetland -It is unclear how many wetlands are in the LAA and how many will be directly impacted by the project. The EARD states, “Additional field assessments are planned for 2022 for wetlands that have not been field-truthed as part of the 2021 preliminary wetland assessment.” Clarify the exact number of wetlands within the LAA and which ones will be impacted by the Project. This should be presented in a table. A pre-liminary assessment is not sufficient. All wetlands that have the potential to be impacted (direct or indirect) should be included in the EARD.	Further wetland delineation was conducted in 2022. Functional assessments were also conducted for all wetlands in the study area. The results of these studies have been included with the Addendum.	3.1.3.2 Wetland Delineation 3.1.3.3 Wetland Functional Assessment
	Functional Assessment information -To predict whether adverse environmental effects on wetland function will occur, wetland functional assessments should be completed for all wetlands that could be impacted by the project. Furthermore, functional assessments (WESP- AC) can determine whether wetlands are Wetlands of Special Significance (WSS) based on the wetland function using the WESP-AC interpretation tool. There was no mention of WSS based on function in the EARD.	Further wetland delineation was conducted in 2022. Functional assessments were also conducted for all wetlands in the study area. The results of these studies have been included with the Addendum.	3.1.3.2 Wetland Delineation 3.1.3.3 Wetland Functional Assessment

Regulator	Regulator's Comment	Proponent's Response	Addendum Section
	<p>Maps and photos clearly indicating the locations of the project in relation to the wetland and other natural features</p> <p>-The wetland shape files do not have all the wetland ID's matching the figures that were provided in the report and wetland class in the attribute table.</p> <p>-Other natural features (i.e., watercourses, fish habitat, SAR/SOCC) were not included in the wetland figures.</p> <p>-Figures should include potential wetland alterations; it was unclear if the project development area intersections are the proposed wetland alteration areas.</p>	<p>Maps and photos have been updated accordingly in the Addendum.</p>	<p>3.1.3.2 Wetland Delineation 3.1.3.3 Wetland Functional Assessment Appendix D - Wetlands</p>
	<p>Nature of the proposed alteration</p> <p>-It is unclear which wetlands will be altered by new roads, road upgrades and transmission line installation. Proposed wetland alterations should be provided including direct and indirect alteration areas (in a table and shown on figures). In the EARD, impacts to wetland 1, 3, 14 and two unassessed wetlands (unclear on their location, size, boundary, and class) are only mentioned, however in the figure it appears that more will be impacted.</p> <p>-What wetland avoidance measures will be taken along the access roads?</p>	<p>Further wetland delineation was conducted in 2022. Functional assessments were also conducted for all wetlands in the study area. The results of these studies have been included with the Addendum.</p>	<p>3.1.3.2 Wetland Delineation 3.1.3.3 Wetland Functional Assessment 3.2.4 Wetlands</p>
	<p>All identifiable impacts to the wetland (e.g., percent of wetland to be altered, species at risk present and/or species of conservation concern, terrestrial &amp; aquatic flora, and fauna species to be affected)</p> <p>-The percent of each wetland proposed to be altered (relative to the wetlands total area, including estimated areas outside of LAA) should be provided in a table.</p> <p>-Not all the SAR/SOCC species identified in the EARD in or near wetlands were mentioned in the wetland section of the report. It is important to include any wetlands that are known to support at-risk species. It is unclear if Common Nighthawk, Evening Grosbeak and Canada Warbler were identified in any of the wetlands since it was not shown on the figures or mentioned in the report. The EARD only mentions that Point Count 1, 2, 12 and 16 were located within wetland habitat (Table 14) but does not specify which wetlands. Clarify the presence of SAR/ SOCC within or near wetlands and include detailed information on the habitat and habitat usage.</p>	<p>Further wetland delineation was conducted in 2022. Functional assessments were also conducted for all wetlands in the study area. The results were complemented with other field assessments to determine which areas were being used as habitats.</p>	<p>3.1.3.2 Wetland Delineation 3.1.3.3 Wetland Functional Assessment 3.1.5.2 Field Assessments and Radar and Acoustic Monitoring 3.2.4 Wetlands 3.2.8 Species at Risk</p>
	<p>The NS Wetland Conservation Policy identifies WSS as wetlands known to support at-risk species as designated under the federal Species At Risk Act or the Nova Scotia Endangered Species Act (2011), among others (see policy). Government will not support or approve alterations proposed for a WSS or any alterations that pose a substantial risk to a WSS except alterations that are required to maintain, restore, or enhance a WSS. Or alterations deemed to provide necessary public function, based on an Environmental Assessment (if required) with public review or other approvals (e.g., Wetland Alteration Approval) as appropriate.</p> <p>-Wetland 17 would be considered a Wetland of Special Significance due to the presence of Eastern Waterfowl.</p> <p>-Identify which other wetlands would be considered WSS. (See note above on SAR/SOCC birds)</p>	<p>Further wetland delineation was conducted in 2022. Functional assessments were also conducted for all wetlands in the study area and potential wetlands of special significance were identified.</p>	<p>3.1.3.2 Wetland Delineation 3.1.3.3 Wetland Functional Assessment Appendix D - Wetlands</p>
	<p>Opportunities for mitigation of impacts and/or compensation. The EARD states: "Due to locations of wetlands in proximity to site infrastructure, as well as avoidance of impact to wetlands with infrastructure no further monitoring will be recommended during operations". The duration of monitoring is dependant on the Wetland Alteration Approval Terms and Conditions. Monitoring may be required during operations.</p>	<p>Adequate mitigation measures have been incorporated and addressed in the Addendum.</p>	<p>3.2.4 Wetlands</p>
	<p>No mitigation or monitoring was mentioned for wetlands that will be altered by the project. This should be included.</p>	<p>Adequate mitigation measures have been incorporated and addressed in the Addendum.</p>	<p>3.2.4 Wetlands</p>

Regulator	Regulator's Comment	Proponent's Response	Addendum Section
	<p>Wetland Compensation was not mentioned in the EARD. If a wetland is altered compensation would be a requirement of the Wetland Alteration Approval Application.</p>	<p>Adequate mitigation measures have been incorporated and addressed in the Addendum.</p>	<p>3.2.4 Wetlands</p>
	<p>In Appendix G, Section 2.2, it states that "a two-parameter system was established at representative locations within the field identified wetlands based on the presence of hydrophytic vegetation and wetland hydrology". For wetland alteration permit applications hydric soils should be assessed in the field.</p>	<p>Hydric soils are incorporated into the assessment approach. The field studies and methodologies are included in the Addendum.</p>	<p>3.1.3.2 Wetland Delineation 3.1.3.3 Wetland Functional Assessment Appendix D - Wetlands</p>
<p><b>Impact Assessment Specialist – Health Canada</b></p>	<p>Health Canada recommends that the proponent address the following comment in a revised project document:</p> <p>The 28 proposed turbines are each intended to be 5.5 megawatt (MW). It is unclear if the existing modelling software (e.g. windPRO 3.5.552) is appropriate for wind turbines of this capacity. Previous projects reviewed by Health Canada that have used this software have been based on wind turbines with a maximum power output up to approximately 3.5 MW.</p> <p>Rationale be included to support whether this software is appropriate to adequately model wind turbines of this size.</p>	<p>Rationale and supporting information on the use of WindPRO is included in the Addendum.</p>	<p>4.1.2 Operational Sound Assessment</p>
	<p>Health Canada recommends that the proponent address the following comment in a revised project document:</p> <p>The document indicates that the proponent has assumed that sound levels in soft environments attenuate at a rate of 7.5 A-weighted decibels (dBA) per doubling of distance.</p> <p>In general and under ideal conditions, for point sources, sound levels drop approximately 6 decibels (dB) for every doubling of distance from the source. For line sources, sound levels drop by approximately 3 dB per doubling of distance (because sound will create a cylindrical spreading). It is unclear why 7.5 dBA was selected to represent sound reduction from operational turbines, particularly given that they are in close proximity and may act more as a line source than a point source.</p> <p>Rationale be provided to support the attenuation rates used in Table 3 (7.5 dBA per doubling of distance). In addition, with respect to low frequency noise (LFN), sound level reduction is even lower over distance (see comment HC-06 for additional information on sound propagation with respect to LFN).</p>	<p>Rationale and supporting information on the noise modelling methodology included in the Addendum and further detailed in Appendix L.</p>	<p>4.1.2 Operational Sound Assessment Appendix L – Sound level assessment</p>
	<p>Health Canada recommends that the proponent address the following comment in a revised project document:</p> <p>Health Canada (2017)<sup>1</sup> provides guidance related to short-term construction noise (&lt; 1 year) and calculations for deriving long-term high annoyance from long-term construction noise (&gt;1 year) which is based on ISO:1996-1 (2016)<sup>2</sup> and ANSI (2005)<sup>3</sup>.</p> <p>In quiet rural areas, Health Canada suggests that during construction, the long-term average day-night sound level (Ldn) be below 57 adjusted dBA at residences. An Ldn of 57 dBA is expected to be the threshold for widespread complaints for construction noise (United States Environmental Protection Agency or US EPA, 1974)<sup>4</sup>. If noise levels at residences are expected to exceed the acceptable level, it is suggested that the report include a discussion about proposed mitigation measures. See Appendix H of Health Canada (2017)<sup>1</sup> for suggested construction noise mitigation measures.</p> <p>If an Ldn of 57 dBA at receptors cannot be obtained with the use of quieter technology, Health Canada suggests that community consultation be undertaken to determine work schedules and to inform the public of the times and durations of noisy activities (including blasting if applicable). In general, Health Canada suggests that impulsive sources (e.g. hammering, pile driving) be avoided at night and in the early morning. Further, Health Canada suggests that noise management and noise monitoring plans, including complaint resolution, as appropriate, be included as part of an Environmental Management Plan.</p>	<p>Recommendations have been included as mitigation measures and as part of the EMPP in Appendix O.</p>	<p>4.2 Potential interactions and mitigations Appendix O – Environmental Management and Protection Plan</p>



Regulator	Regulator's Comment	Proponent's Response	Addendum Section
	<p>Health Canada recommends that the proponent address the following comment in a revised project document:</p> <p>Health Canada notes that vegetative shields such as trees, hedges and vines generally do not absorb significant amounts of sound (ISO 9613-2:1996)<sup>5</sup>. As noted in Section 3.1, no attenuation was considered from topographical shielding for objects (such as barns, trees, buildings, etc.) located between the turbines and receptors. Health Canada suggests to consider addressing this contradiction and consider removing the statement that vegetative cover will aid in making construction noise less noticeable.</p> <p>In addition, according to Section 6.2.1 of Health Canada (2017)<sup>1</sup>, any baseline measurements should not contain non-anthropogenic sounds. Not removing these sources may result in an overestimation of baseline sound pressure levels and impact baseline and future changes in percent highly annoyed (%HA) calculations. Health Canada suggests to consider ensuring any baseline noise measurements do not include any non-anthropogenic sounds.</p>	<p>The sound model ran in 2022 took into consideration ambient noise and was based on a realistic-case scenario for a representative 12 turbine layout.</p>	<p>4.1.2 Operational Sound Assessment Appendix L – Sound level assessment</p>
	<p>Health Canada recommends that the proponent address the following comment in a revised project document:</p> <p>This statement would imply that all of the receptors are located upwind, which is unlikely the case and therefore may be subject to downwind conditions, which has been modelled. Health Canada suggests that the conclusion that the assessment is overly conservative with respect to calculating sound levels by assuming downwind propagation be re-evaluated, particularly for any downwind receptors, as not all receptors will be upwind from the turbines.</p>	<p>The sound model ran in 2022 took into consideration ambient noise and was based on a realistic-case scenario for a representative 12 turbine layout.</p>	<p>4.1.2 Operational Sound Assessment Appendix L – Sound level assessment</p>
	<p>Health Canada recommends that the proponent address the following comment in a revised project document:</p> <p>Wind turbines create modulation noise due to the fact that they rotate, and given the size of these proposed turbines (5.5 MW each), the expectation is that they will rotate slower than smaller wind turbines, hence modulation sounds could be more prevalent and annoying to nearby residents. Health Canada suggests to consider evaluating these sounds in any noise assessment with respect to this project.</p>	<p>The sound model ran in 2022 took into consideration ambient noise and was based on a realistic-case scenario for a representative 12 turbine layout.</p>	<p>4.1.2 Operational Sound Assessment Appendix L – Sound level assessment</p>
	<p>Health Canada recommends that the proponent address the following comment in a revised project document:</p> <p>Modern industrial scale wind turbines produce LFN and this is an important component of the total noise levels experienced by receptors near large wind turbines. In addition to evaluating infrasound, Health Canada suggests to consider completing an assessment of LFN (typically between 20-100 Hz).</p> <p>According to Moller and Pederson (2011)<sup>6</sup>, who evaluated LFN from large wind turbines, “the relative amount of low-frequency noise is higher for large turbines (2.3-3.6 MW) than for smaller turbines, and the result is statistically significant for the one-third-octave bands in the frequency range 63-250 Hz...it is thus beyond any doubt that the low-frequency part of the spectrum plays an important role in the noise at the neighbors”.</p> <p>LFN is not generally well perceived by the human ear. However, it may induce vibrations in lightweight structures in residences or sleeping quarters that may be perceptible or cause a “rattle.” The properties of LFN allow it to travel farther distances with less atmospheric attenuation than higher frequencies. Shepherd and Hubbard (1991)<sup>7</sup> indicate that low frequencies (below 100 Hz) are only attenuated by 3 dB per doubling of distance downwind of turbines for distances of 0.3 to 20 km, and attenuated by 6 dB per doubling of distance upwind of turbines from 0.4 to 3 km.</p>	<p>The proponent conducted a Low Frequency Sound Assessment using the Finland Low Frequency module of windPRO 3.5. Low frequency was further described in the Addendum, and the low frequency sound model was run in 2022.</p>	<p>4.1.2 Operational Sound Assessment Appendix L – Sound Level Assessment</p>
	<p>LFN is also less susceptible to conditions that mitigate the transfer of noise from outdoors to indoors including structural barriers, environmental conditions, and topography. Research indicates that annoyance related to noise is greater when LFN is present (ISO 1996-1:2003)<sup>8</sup> and one of the main reasons is the annoyance caused by rattles (Schomer and Neathammer, 1987<sup>9</sup>; Schomer and Averbuch, 1989<sup>10</sup>). In addition, very little change in the sound pressure level at lower frequencies is needed to have a disproportionate increase in subjective loudness. This annoyance may result in increased complaints from nearby residents.</p> <p>The American National Standards Institutes (ANSI S12.9-2005)<sup>3</sup> indicates that there is evidence that noise-induced rattles are very annoying, and this annoyance may be independent of the number or duration of events. To prevent rattles from LFN and the associated annoyance from this effect, the ANSI indicates that the (energy) sum of the sound levels in the 16-, 31.5- and 63-Hz octave bands be less than 70 dB. Additionally, ANSI<sup>3</sup> provides a more sophisticated mathematical procedure for assessing % HA when LFN is present. Health Canada recommends using the ANSI procedure when the C-weighted Ldn exceeds the A-weighted Ldn by more than 10 dB. The procedure is further outlined in Appendix D of ANSI S12.9-2005<sup>3</sup>.</p> <p>Based on current research, large wind turbines produce LFN, modeling may underestimate LFN levels during turbine operation, and annoyance is greater when LFN is present. If the sum of sound levels in the 16-, 31.5- and 63 Hz octave bands exceeds 70 dB, Health Canada recommends that additional mitigation be implemented in order to protect nearby residents from LFN. If the C-weighted Ldn exceeds the A-weighted Ldn by more than 10 dB, the percentage highly annoyed can be calculated using ANSI S12.9-2005<sup>3</sup>.</p>	<p>The proponent conducted a Low Frequency Sound Assessment using the Finland Low Frequency module of windPRO 3.5. Low frequency was further described in the Addendum, and the low frequency sound model was run in 2022.</p>	<p>4.1.2 Operational Sound Assessment Appendix L – Sound Level Assessment</p>

Regulator	Regulator's Comment	Proponent's Response	Addendum Section
	<p>Health Canada recommends that the proponent address the following comment in a revised project document:</p> <p>The limited effectiveness of vegetation as a noise mitigation measure has been noted above (see HC-04). In addition, there are no specific mitigation measures described for the operation phase. Health Canada suggests to consider ensuring that the “appropriate technology” referred to in Section 5 of the Appendix C be defined and elucidated.</p> <p>Additionally, Health Canada suggests to consider implementing a formalized complaint-response protocol (i.e. a formalized means of receiving and responding to complaints in a timely fashion) with additional monitoring and mitigation measures defined, particularly in the event of public complaints.</p>	Specific mitigation measures for the construction and operation phases have been developed.	4.2 Potential interactions and mitigations
<b>Environmental Services – Nova Scotia Department of Public Works</b>	Any work zones created on provincially owned roads require compliance with the appropriate section of the Nova Scotia Temporary Workplace Traffic Control Manual (available online at Temporary Workplace Traffic Control Manual   novascotia.ca).	Acknowledged.	
	2. The Proponent has indicated a possible requirement for speed limit signs, warning signs, detour signs in addition to traffic control. This requires approval of the District Traffic Authority to erect these signs, with an appropriate and approved signage plan.	Acknowledged.	
	3. A reference was made to contacting local officials to determine if a Transportation Study is required. This information is critical so that a proper highway and structural analysis of the delivery route can be completed (clearance on underpasses, weight on overpasses, turning radii for large trucks, spring weight restrictions, etc.).	Acknowledged.	
	4. A reference was made to avoid delivery during peak travel hours. This should be adhered to as much as possible.	Acknowledged.	
	1. The proponent has indicated modifications required for intersections of provincially owned roads at Westchester Road and Wentworth Collingwood Road. This will require a Working Within Highway Right of Way Permit (available from the local Area Manager). This permit must be included in the list of provincial permits required in Table 57, Page 181 of the report. This table also references the former name of the Department and must be corrected.	Acknowledged.	
<b>Protected Areas and Ecosystem Branch – Nova Scotia Environment and Climate Change</b>	<p>The registration document does not address how the project would affect landscape-scale ecological connectivity through cumulative impacts of additional and more permanent landscape fragmentation, or how such impacts will be mitigated.</p> <p>This is a significant information gap as negative impacts can be expected given the project's broad spatial extent, including road construction and expansion requirements, in a location between large concentrations of relatively intact habitat (much of it designated wilderness area and/or with high habitat suitability for endangered mainland moose).</p> <p>While much of the project site itself is ecologically degraded from past conversion to blueberry fields and more recent clearcutting and forestry roads, its connectivity and biodiversity value is held somewhat intact by the lack of human settlement and permanent built infrastructure, and the presence of remnant natural forest patches. These factors, coupled with the project site's location, give it value for sustaining regional ecological connectivity through the Cobequids, including protected areas in the region.</p>	An ecological connectivity assessment was developed in consultation with the Protected Areas branch	5. Biodiversity values and ecological connectivity
	<p>Long form of AIR: In conjunction with NSECC Protected Areas and Ecosystems Branch, the proponent provide an analysis of potential landscape-scale biodiversity and ecological connectivity impacts and prepare a strategy to mitigate such impacts. Mitigation measures to be considered should include those aimed at (i) reducing road density within the project site, (ii) retaining and restoring remnant natural forest patches, (iii) limiting impacts of public vehicle use, and (iv) acquiring land for protection to support regional ecological connectivity</p>	An ecological connectivity assessment was developed in consultation with the Protected Areas branch	5. Biodiversity values and ecological connectivity