

# DRAFT NATURAL HERITAGE ASSESSMENT & ENVIRONMENTAL IMPACT STUDY DRAFT ANNOTATED REPORT

## EXECUTIVE SUMMARY

### Missing Information / Reports

- The Species at Risk report mentioned in the Natural Heritage Assessment and Environmental Impact Study is not provided.

Within the context of O. Reg 359/09, endangered and threatened species are addressed as part of MNR's *Approval and Permitting Requirements Document for Renewable Energy Projects (APRD)* requirements. Information required as part of these requirements is being submitted to MNR as part of the Amherst Island APRD Report (separate cover). Where this information indicates that approvals or permits are required, these will be addressed separately through the applicable statute and its permitting process

- Per the report "A summary of the methods and the criteria used to evaluate the significance of each component of candidate significant wildlife habitat are provided below. The approved workplan submitted to the MNR in 2011 is included in Appendix G. Full detailed methods are also provided in Appendix G." appendix G is not attached.
- Site Investigation Report, providing rationale for "Alternative Investigation" is not attached.
- A written Comment from the MRN required for inclusion into the REA application had not been received for addendum and was therefore not included in the documents released to general public. This written comment was received by Algonquin towards the end of Dec and could easily have been posted to the Project web-site.
- Although not legally mandated, there was no consideration of cumulative effects with the surrounding proposed wind turbine factories.
- Although not legally mandated, there was no consideration of bat migratory stopover areas.

### Omissions / mistakes in field studies

- The maps in Appendix A clearly indicate that the area on either side of the roads proposed to be used by Algonquin were included in the "area of study". However, it does not appear that the fields 120 meters on either side of the roads to be used by Algonquin for the construction phase were included in the field studies.
- Inaccuracies and omissions in Table 3B / Potential Species of Conservation Concern Occurring within the Study Area are carried forward throughout the report as this is table where Stantec specifies what species natural habitat will be studied.

- A review of the OWES documents for wetland 6 reveals many issues of grave concern.
- We have presented an argument as to why deer winter congregation areas / deer yarding areas should be studied
  - Following from the above, Animal movement corridors must be studied
- According to table 4B the first ELC and preliminary botanical inventories of vegetation communities occurred on July 26 – 29 of 2011. However many of the Site Surveys occurred prior to this date. How then were the sites to be surveyed selected? Below is a list of the field studies that occurred prior to ELC studies.
  - Waterfowl Stopover and Staging Area (Terrestrial and Aquatic)
  - Waterfowl Nesting Area
  - Amphibian Breeding Wetland and Woodland
- Following from above, the amphibian movement corridors must be re-evaluated. The movement corridors have not been studied yet – but the potential movement corridors are much further afield than those suggested by Stantec.
- Per the Draft Significant Wildlife Habitat Ecoregion 6E Criterion Schedule (MNR 2012) All Ecosites associated with these ELC Community Series; Swamp (SW), Marsh (MA) and Open Water (OA). Shallow water (SA), Open Fen (FEO) and Open Bog (BOO). are considered candidate Significant Wildlife Habitat for Turtle Wintering Areas - there is no indication that other SW, MA habitat within the project area (including fields as the sides of roads to be used during construction) were surveyed.
- Why are the Bobolink, Barn Swallow and Eastern Meadowlark not included in Table 3.7: Summary of Site Investigation Results for Habitat for Species of Conservation Concern as they are present in Project Location. Appendix K of the Natural Heritage Assessment and Environmental Impact Study contains numerous references to sightings of these species at risk.

#### Insufficient Survey time:

- Amphibian breeding surveys occurred in ABW01, ABW02, ABW03, ABWE1 and ABWE2 (provincially designated swamp) The surveys occurred April 19 / 20 and 26, May 17, and June 18 and 19 for a **total of 14.5 hours**
- Spring migratory shorebird surveys (May 2011) – **9.5 hours**
- Fall migratory butterfly surveys (September 2011) – **0 hours**
  - Table 4 B indicates two migratory butterfly surveys occurred ,August 16 and 26 of 2011. These occurred in conjunction with Staging Swallow Surveys at the wrong time of the year to survey migrating butterflies on Amherst Island.
- Spring waterfowl nesting surveys (May-July 2011);

- Table 4B indicates 2 waterfowl nesting surveys , one on June 7, 2011 and the other on June 5, 2011. **A total of 1 hour was spent on both surveys.**
- Summer woodland raptor nesting surveys (May-July 2011);
  - There are no Site Investigations for summer woodland raptor nesting listed in table 4B

Following you will find the annotated report. Reviewer comments are prefaced with either Note or Comment. Sections of the report which did not require comment were redacted.