



Environmental Protection Operations Division -Ontario  
Environmental Assessment Unit  
Environment Canada  
P.O. Box 5050, 867 Lakeshore Rd.  
Burlington, Ontario L7R 4A6

File No.: 2006-140

June 12, 2007

Carolyn Walmsley  
Terrestrial and Wetland Biologist  
Natural Resource Solutions Inc.  
50 Westmount Rd. N. Unit 230  
Waterloo, ON N2L 2R5

Dear Ms. Walmsley,

**Re: EC Comments on the Natural Environment Workplan for the proposed Skyway 8 Wind Power Project**

This letter contains our comments on the natural environment work program for the proposed Skyway 8 Wind Power Project that you submitted for our review via email on March 8, 2007. We appreciate the opportunity to review the workplan and trust that our comments and recommendations will be useful as you implement the plan.

**Additional Information**

- A map outlining the Study Area relative to nearby towns and villages would be useful for reviewers in locating the project, as no clear directions were given in the documentation.
- A 'Level of Concern' ranking was not contained in the workplan and should be provided for the project. We suggest that you calculate the ranking for the project based on the matrix assessment of "site sensitivity" and "project size" provided in "Wind Turbines and Birds: A Guidance Document for Environmental Assessment" (Environment Canada 2007a). As you are aware, the focus of and level of effort that should be applied to your baseline avian surveys is derived from the calculated ranking.

**Details of the Project Area**

According to the Notice of Commencement the project will be located "... on 200 acres of agricultural land ..." (i.e. approximately 80 ha) and the work program describes the "total project area" as almost six times larger at 462.5 ha. The size of the Study Area that you delineate has implications on the number of point count stations that may be required. If all of the turbines will be located on 80 ha of land that is mostly active cropland, then perhaps point count stations, or detailed vegetation community mapping, are not needed. In this case, an area search supported by a recent aerial photo would be all that is required. Based on our review of the workplan, we understand you have identified a larger study area that surrounds the project footprint in order to identify natural environment features that require consideration in subsequent project phases. Please provide us with information to clarify the size of the Project Area in comparison to the Study Area as well as the size and extent of subsequent project phases.

It is noted in the "Birds" section of the work program that the project area (462.5 ha) "... contains a low diversity of habitat types (the total area of each habitat type is too small to support 20 stations)". Please provide details about the locations of these habitat types, and if hayfields, forests, wetlands, etc, are present, the sizes of these areas and the percentage of the Study Area they occupy should be noted. If 200 acres (80 ha) are "agricultural land" the primary land uses should also be identified (e.g. intensive cultivation by % crop type, % hay).



In addition, some of the information that has been provided about the habitats should be clarified. For example, the work program states that Keldon Swamp is "within 1 km of the study area.". This distance could be anywhere between 1 and 1000 m, and it is not clear whether other wetlands are located nearby. Please provide more detailed information about the distance of the study area from wetland features in the area. Further, if there are wetlands close to the project, their importance to waterfowl and the potential impacts of the proposed project on waterfowl using them should be assessed.

### **Spring/Summer Breeding Birds**

As indicated above, if the area where the turbines will be located is small (i.e. 200 acres), is under intense cultivation (i.e. all cropland), and is not close to any sensitive natural features, an area search is all that would be required. But if there is a mix of natural habitat within the 460 ha Study Area, despite it being described as having "a low diversity of habitat types", then we would recommend 7-10 point counts. We believe that the 30 point counts proposed in the workplan are likely more than is necessary in light of the size of the Study Area.

The Study Area is not known to be on a raptor migration corridor. As a result, we feel the "Soaring Bird Behaviour" studies are unnecessary. This information could be collected incidentally during the area searches.

### **Winter Bird Surveys**

The Work Program does not mention winter bird surveys, and they may not be needed. The site is very small, and perhaps it is not known to support significant wintering raptor populations. Nevertheless, some explanation is needed for dispensing with winter surveys. If a rationale cannot be provided, we recommend that two winter surveys be conducted.

### **Summary**

I trust that these comments and recommendations will be of assistance to you as you develop your workplans for the proposed Skyway 8 Wind Power Project. Thank you for your patience in awaiting our comments on the workplan. If you wish to discuss any matters related to this response, please contact me at (905) 336-4954 or by email at [Rob.Read@ec.gc.ca](mailto:Rob.Read@ec.gc.ca).

Sincerely,



Rob Read  
Environmental Assessment Officer

cc: S. Allan, EC  
J. Fischer, CWS  
L. Friesen, CWS  
J. Nicholson, EBS