

**NaiKun Offshore Wind Energy Project – Screening Evaluation Table**

| <b>Section in ATOR</b> | <b>Application Terms of Reference Requirement</b> | <b>Additional information or clarification required in Application</b>  |
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|                        | <i>Table of Concordance</i>                       | Numerous inaccuracies in the Table of Concordance were encountered by reviewers. Ensure that the Table of Concordance accurately directs reviewers to the required information.   |
| 2.1                    | <i>Background</i>                                 | CEAA requires the discussion of accidents and malfunctions to include a more detailed analysis of environmental effects – magnitude, extent, duration, etc.   |
| 2.4                    | <i>Project Design</i>                             | Section indicates that the scope of the project for the HaidaLink does not include the overhead transmission line or new substation. 3.1 of the Section 11 Order, includes the overhead line in the project scope. See Section 4.1 below for further clarification of requirement.  |
| 2.5.1                  | <i>Current Uses</i>                               | The following information is required:<br><br>The discussion of impacts needs to be provided by individual First Nations and current use of land and resources needs to be discussed in the context of traditional purposes for each First Nation.  |
| 2.5.4                  | <i>Aquatic Ecology</i>                            | The transmission cable corridor is not part of marine ecology field studies as it is required to be by ATOR.  |
| 2.5.7                  | <i>Social and Economic Setting</i>                | Section 2.5 does not describe the social and economic setting to the level of detail specified. EAO requires the estimated revenues to be broken out annually, by level of government, and specific source (e.g. property taxes, land tenure fees etc.).<br><br>A discussion of country food harvesting of non-Aboriginal population and its economic impact in the region is required.<br><br>Analysis of other fisheries is required including the potential impacts to trawl, longline fisheries in the vicinity of the wind farm and transmission corridor. |
| 2.6.2                  | <i>First Nations Participants</i>                 | Consultation program is required to be specific to individual First Nations (e.g. issues of concern raised by individual First Nations and how they are being addressed). The EAO, CEAA and federal agencies require issues by  |

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|       |   | individual First Nations.   |
| 3.0   | <i>Environmental Impact Assessment</i>                | <p>The EAO requires a table of the consolidated list of higher level commitments.</p> <p>CEAA requires information on how effects of the environment on the project could lead to additional environmental effects.</p> <p>CEAA requires further analysis and discussion of environmental effects within the section pertaining to accidents and malfunctions including magnitude, extent, duration, etc.</p> <p>CEAA requires information on habitat compensation.</p>   |
| 3.3.7 | <i>Mitigation/Impact Management/ Monitoring Plans</i> | <p>Specific environmental management plans (EMPs) are required to be provided prior to start of construction and operations. The EMPs referenced in Sections 3.3.7 and 4.10 of the ATOR are required to be provided (complete or outlines of), and identified specifically (i.e. soil erosion and control plans etc.) in the Application in addition to an environmental audit program for project operation (identified in Section 3.3.7 of the ATOR).</p> <p>DFO requires consideration in compensation plans to mitigate turbine footprint, scour and cable (including landfill locations).</p> <p>DFO requires monitoring of the cable after installation for potential impacts to marine ecology to be included in the proposed programs (Sec 18) or a justification for not conducting this monitoring. E.g. There are recommendations within the Application that sensitive habitats be avoided (sponge reefs and complexes, and areas within Ede Pass (sea pens,) be monitored however no mention in Sec 18).</p> <p>DFO recommends the cable is monitored after installation to ensure sensitive habitats have been successfully avoided. Consideration for ongoing monitoring to ensure no ongoing impacts from temperature increases and EMF impacts to benthic ecology should be included or justification for exclusion given.</p> |

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| <p>3.6.1<br/>3.6.2<br/>3.6.3</p> | <p><i>Physical Hypotheses</i><br/><i>Biological Hypotheses</i><br/><i>Socioeconomic Hypotheses</i></p> | <p>Physical hypotheses 10- 12 and 16- 18; Biological hypotheses 5-9; and Socioeconomic hypotheses 16-18 are listed in Section 4 (Table 4-1 and 4-2), but not identified anywhere else in the Application (effects assessments). A master table with all hypotheses and their discussion in the Application is required.</p> <p>Additional data and information on the benthic habitat and biota along the mainland cable route and the HaidaLink cable route needs to be provided and assessed in order to address biological hypotheses 1, 2 and 3 in the ATOR.</p>  |
| <p>4.1</p>                       | <p><i>Overview Description of Project</i></p>  | <p>The Section 11 order includes: “a transmission line (sea and <u>overhead</u>) from the wind farm to Graham Island; “temporary facilities”; and, “offsite facilities or offsite activities related to the Project”. Section 4.1 of the ToR states: “the transmission route to Graham Island will come onshore and connect to a substation in the Tlell area; and, “the Project will include...delivery of electricity to the BC Hydro grid via underwater cable and overhead transmission”. Section 4.5 of the ToR states: “Details of this (HaidaLink) connection will be provided in Volume 2 of the Application.” The Application (Volume 1, p2-12; Volume 2, p2-36) indicates that the scope of the project and the assessment does not include the overhead transmission line or new substation for the HaidaLink, and two possible areas for the landfall site have been identified near Tlell. This discrepancy needs to be addressed in the Application.</p> <p>Operational permits (if any) need to be identified.</p> |
| <p>4.3</p>                       | <p><i>Meteorological Tower</i></p>   | <p>The ATOR states the Application will include meteorological data collected from the tower. The Application does not appear to include the meteorological data collected, other than the wind rose showing dominant winds and wind speed in Sections 2 and 9. More detailed data is required.</p>   |
| <p>4.6</p>                       | <p><i>Staging Activities</i></p>   | <p>Table 2.9 does not indicate which permits may be needed for the staging activities at Fairview Terminals. Information including figures and maps of</p>  |

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|      |   | Fairview Terminals, or details of activities to be completed there is required.   |
| 4.7  | <i>Construction</i>                             | These sections do not appear to include all the information listed in the ATOR, such as: Contingency scheduling for potential delays; Temporary housing for workers; Use of temporary onsite power generation; and, Land-based clearing for onshore control room (Haida Gwaii) and connection to BC Hydro transmission corridor. Detailed descriptions are not provided for some information, such as for waste disposal.   |
| 4.10 | Environmental Management and Risk Assessment    | Specific environmental management plans (EMPs) referenced in Sections 3.3.7 and 4.10 of the ATOR have not been provided (complete or outlines of), or identified specifically (i.e. soil erosion and control plans etc.) in the Application. An environmental audit program for Project operation (identified in Section 3.3.7 of the ATOR) does not appear to be described or discussed. This information is required.   |
| 5.4  | Proposed Fieldwork                              | Surveys for alternative routes (transmission cable corridor and landfalls) are not present. Survey techniques that may be used in post-construction monitoring also are required. A geotechnical sampling verification program is to be conducted from July-October 2009, but it is not clear from the ATOR whether this is information that was to be included in the Application. Further clarification is required.  |
| 6.0  | Marine Aquatic Ecology                          | DFO requires a table detailing what assessments are outstanding and proposed timelines in order to determine what studies will still be conducted and if this ATOR section is adequately captured within the Application.   |
| 6.4  | Data Review and Collection: Wind Farm Grid Area | DFO requires further clarification and information regarding the field studies that were undertaken and the outstanding surveys required that are described in different areas of the Application in order to determine if this ATOR section is adequately captured within the Application:<br>Examples: <ul style="list-style-type: none"> <li>○ Field studies on the Ridley Island landfill are not fully representative of the new proposed Mainland cable route, as the route was changed.</li> <li>○ Directed field studies such as abalone surveys have not been</li> </ul> |

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|       |                               | <p>completed. This is a recommendation within the Application.</p> <ul style="list-style-type: none"> <li>○ The requirement for a ROV survey and analysis through Edge Passage in order to avoid sensitive features is recommended within the Application.</li> <li>○ The final site of the landfill area in Tlell has not yet been defined in the Application. Only one subtidal survey was conducted and it is uncertain if this is representative of the final location and habitat value. Further assessment will be required.</li> </ul>   |
| 6.4.2 | Cable Corridor                | <p>DFO requires clarification of detailed ROV analysis: Within various sections and Volumes of the Application, detailed ROV analysis is recommended to avoid important and or sensitive habitats (abalone, green sea urchin, sponge, etc). It does not appear that this work has been done.</p> <ul style="list-style-type: none"> <li>○ Example: The requirement for a ROV survey and analysis through Edge Passage in order to avoid sensitive features was recommended within the Application.</li> </ul>   |
| 6.4.2 | Nearshore Cable Landfalls     | <p>DFO requires further information based on the following:</p> <ul style="list-style-type: none"> <li>○ The location of the cable transmission line to Ridley has changed. As a result, the subtidal and intertidal surveys are only representative of a small portion of the proposed mainland cable route along Ridley Island foreshore. As a result further information regarding relevant recommendations on avoiding site-specific habitat features is required.</li> <li>○ Compensation measures need to be identified for the cable, cable infill areas, turbine footprint and scour measures.</li> <li>○ Provide details and timelines of the further assessments including ROV and Scuba surveys and abalone survey recommended in the Application.</li> <li>○ Provide calculation of net habitat gain/loss given the requirement and recommendation for follow-up assessments to reflect the final cable route, abalone surveys, lack of compensation options, and final Tlell landfall location.</li> </ul> |
| 10.0  | Traditional Use and Knowledge | <p>Publicly available information is required on the traditional use of the Project area by each of the individual First Nations.</p>   |

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