9.0 Project Follow-Up Measures and Monitoring

This section details the follow-up measures and monitoring program that the Kruger and/or the Construction Contractor will carry out in relation to the Project. The monitoring program has been designed to ensure the continued compliance of the Project with the environmental requirements set out in this document and applicable legislation during construction and operation. Additional monitoring may be identified as part of the permits and applications which will be obtained for the Project prior to construction.

9.1 MONITORING PLAN STRUCTURE

9.1.1 Methodology

Monitoring is fundamental to confirming the predictions of the significance of net effects and the success of protection and mitigation measures. The monitoring plan for the Project has been designed to:

- monitor the effectiveness of the proposed protection and mitigation measures
- verify compliance of the Project with applicable municipal, provincial, and federal standards and guidelines
- optimize environmental management with the goal of continuous improvement.

Environmental monitoring, which started with the collection of primary background data will continue with appropriate follow-up activities during the construction and operation phases of the Project. Monitoring will provide data on key environmental, health, and safety aspects and on the effectiveness of management measures implemented as part of this Project. The monitoring procedures noted herein directly link to the potential effects and protection and mitigation measures discussed in Section 7.

9.1.2 Goals and Objectives

Following are the goals of the monitoring plan:

- minimizing environmental and social effects within the Project’s area of influence
- minimizing conflicts in the communities affected by the execution of the works according to legal terms and to the proponent’s policies
- minimizing accidents and malfunctions
- avoid levies or sanctions from the relevant government agencies for negligent environmental performance.

The monitoring plan is designed to achieve the following objectives:

- reduce the environmental effects associated with construction works on agricultural lands
- reduce the environmental effects on natural habitats, flora, and fauna
establish measures that enhance occupational safety to protect the physical and psychological integrity of people linked to these activities

- minimize social impacts to the community in terms of effects identified during the development of the wind turbines and ancillary facilities
- comply with environmental quality standards set by law.

9.1.3 Guiding Principles

The following principles were used to guide the preparation of the monitoring plan:

- focus upon environmental, health, and safety risk prevention
- conformance to relevant standards, codes, and practices considered in the application of safe technologies
- all activities will be performed in a safe and effective manner by trained personnel
- all equipment will be maintained in good operating condition for protection of property, conservation of the environment, and protection of worker health and safety
- all necessary precautions to control, remove, or otherwise correct any health and safety hazards will be implemented
- construction and operation of the Project will meet relevant municipal, provincial, and federal standards that collectively ensure sufficient technical levels of safety.

Building upon the above methodology, goals and objectives, and guiding principles, the monitoring plan is composed of three components: environmental management systems; programs, plans, and procedures; and monitoring requirements. Each component is discussed below.

9.2 ENVIRONMENTAL MANAGEMENT SYSTEMS

As part of the environmental monitoring objectives outlined above, several programs, plans, and procedures will be developed by Kruger and/or the Construction Contractor as outlined below. They will guide all stages of construction, operation, and repowering/decommissioning so that the environmental performance of the Project is optimized. However, for the programs, plans, and procedures to be effective, appropriate management structures and contract documents must be firmly established.

9.2.1 Management Structures

Kruger, the Construction Contractor, and subcontractors will take steps to ensure that they have appropriately skilled personnel to carry out the environmental responsibilities as defined in this ESR/EIS. All organizations associated with Project development activities will develop responsive reporting systems that clearly assign responsibility and accountability for development actions. As appropriate, Kruger will review these reporting documents.
9.2.2 Contract Documents

Kruger is committed to constructing, operating, and repowering/decommissioning the Project in an environmentally responsible manner and in compliance with all applicable environmental laws, regulations, and guidelines. All of Kruger’s contractors and subcontractors will be accountable for actions that have an adverse effect on the natural and socio-economic environment. As such, relevant contract documents executed by Kruger will incorporate appropriate provisions from the ESR/EIS.

Additionally, all contractors, subcontractors, and other associates of the Project will endeavour to follow the guiding principles of the monitoring program. These organizations will also comply with all relevant municipal, provincial, and federal legislation.

9.2.3 Change Management

During the implementation of the Project, changes to design plans may be required to address unforeseen or unexpected conditions or situations. Kruger, Siemens, and the Construction Contractor will be responsible for ensuring environmental and safety issues are addressed for any such changes. Kruger will effect any significant changes to Project programs, procedures, and plans throughout the life of the Project with the goal of avoiding or minimizing environmental and social effects.

9.3 PROGRAMS, PLANS, AND PROCEDURES

As appropriate, Kruger, and/or the Construction Contractor will implement the programs, plans, and procedures discussed below.

9.3.1 Construction Program

The Construction Contractor, with oversight from Kruger, will prepare a Project CEMP prior to the initiation of any substantive on-site works. This CEMP will be the controlling plan for all construction activities specifying the “way of working” for each key project component. The CEMP will be comprised of a series of plans and procedures covering all critical construction and environmental management tasks.

The Project CEMP will include procedures and plans based on regulatory requirements and accepted good site practices and as appropriate will include the following plans:

- traffic management plan: the Construction Contractor and/or Siemens will develop and implement this plan, which will contain strategies governing movement of materials and personnel to, from, and within the workspace areas; management of connection points between site access roads and public roads; transport of abnormal loads; control of any upgrading/modification roadworks; and/or dust and vehicle emission controls.

- waste management plan: developed by the Construction Contractor, with input from Kruger, will specify provisions for the reuse, recycling, and/or disposal of solid waste, hazardous waste, and sanitary waste.
• **health and safety plan:** Siemens and/or the Construction Contractor will consider both public and occupational health and safety issues. This may include protecting the public from equipment and construction areas including haul routes by posting warning signs, use of personal protective equipment, accident reporting, equipment operation, and confined space entry.

• **emergency response plan:** the Construction Contractor and/or Kruger will include a plan for the proper handling of material spills and the associated procedures to be undertaken during a spill event. The plan will also specify containment and clean-up materials and their storage locations. As appropriate, the plan may cover response actions to high winds, fire preparedness, evacuation procedures, and medical emergencies. This plan will be developed in consultation with MCK to determine the extent of emergency response resources and response actions of those involved.

• **training plan:** as appropriate, this will involve the training/informing of construction personnel on the unique features of the above plans prior to construction.

Kruger or the construction contractor will provide overall directions and assume responsibility for the development and implementation of these plans.

### 9.3.2 Operation and Maintenance Program

During pre-operational mobilization, Kruger will develop an operation and maintenance program. The program will be designed to ensure compliance with any applicable municipal, provincial, and/or federal requirements.

As appropriate the program will cover predictive/preventive maintenance, routine maintenance, annual overhauling, inspection of equipment and components, the procurement of spare parts, and maintenance of optimum inventory levels in order to reduce inventory carrying costs and working capital costs. It will also include a schedule for regular inspections of the turbines and ancillary facilities.

The regular maintenance that will occur through the operation and maintenance program will optimize the operating condition of equipment. Where necessary, Kruger will incorporate the corresponding elements of the monitoring program as documented in the following subsections.

### 9.3.2.1 Environmental Procedures

Kruger will be responsible for implementing environmental procedures during the operation phase of the Project. Individual employee responsibilities will be assigned as necessary to support the full and effective implementation of the environmental procedures. As appropriate the environmental procedures will address the following issues to prevent environmental contamination and injury to personnel:

• **environmental calendar:** to establish the specific dates and times for environmental inspections.

• **spills and releases:** to identify the specific procedures for the prevention, response, and notification of spills. In addition it will establish the general procedures for spill clean-up, personnel training, and material handling and storage to prevent spills.
• **hazardous waste management**: to outline the procedures for the proper identification of hazardous waste and its proper storage, handling, transport, and disposal. In addition, the procedures will outline specific requirements for personnel training, emergency response, product review and approval, and record keeping.

• **solid waste management**: to establish alternative procedures for the management and disposal of used lubricants, used drums, and general office waste.

These procedures will ensure internal and external risks are fully evaluated and the information communicated to personnel in advance of any accident or malfunction.

### 9.3.2.2 Occupational Health and Safety Procedures

Kruger will undertake the following measures to ensure employee health and safety is maintained throughout their employment term:

- sanitary facilities will be well equipped
- ventilation systems will be used to control work area temperatures and humidity and where work is required in hot and/or humid places employees will be encouraged to take breaks away from these areas.

Kruger will also implement the following safety procedures and protocols as appropriate in an effort to ensure employee safety is addressed throughout operation and maintenance activities:

- personal protective equipment (“PPE”), including non-slip footwear, eye protection, clothing, and hardhats, will be worn by operations and maintenance personnel when on duty
- elevated platforms, walkways, and ladders will be equipped with handrails, toeboards, and non-slip surfaces
- electrical equipment will be insulated and grounded in compliance with the appropriate electrical code.

Incidents in the work place have the potential to cause personal injury and property damage. As appropriate, Kruger will maintain a master Incident Report that documents illnesses and accidents. The Incident Report should document all activities resulting in incapacity to work for at least one full workday beyond the day on which the illness or accident occurred. As required, records will also be maintained noting the total number of days of absence from work as a direct result of the illness or accident.

### 9.3.2.3 Training Program

As appropriate Kruger will develop an operations training program to ensure personnel receive appropriate training in relation to operation and maintenance programs, environmental, health, and safety procedures, and the emergency response plan. Training may cover the following issues:

- **Facility Safety**
  - accident reporting
  - chemical and hazardous materials handling
• fall and arrest protection
• eye, ears, head, hands, feet, and body protective equipment
• first aid training and equipment
• equipment operation and hazards
• fire prevention and response
• lockout and tag out procedures
• scaffolds and ladders

Emergency Preparedness
• fire preparedness and response
• natural disasters (i.e., extreme weather events)
• hazardous materials and spill response
• medical emergencies
• rescue procedures.

Training will begin as the initial staff complement is hired during the pre-operational mobilization period. There will also be on-going training for employees as well as specific training sessions for new hires. Graduated testing and certification by supervisors and the operation managers will ensure that all trainees perform at an acceptable level prior to being assigned a full position.

9.3.2.4 Emergency Response Plan

As noted in Section 9.3.2 during pre-operational mobilization, Kruger will finalize an emergency response plan for the operational activities.

9.3.2.5 Information Disclosure

Kruger will continue its contact with stakeholders during the initial period of operation and for as long as this remains an effective two-way channel for communication. To this end, as appropriate, Kruger will maintain appropriate means of communication through the project website to convey information about the Project, Kruger’s involvement in the community, and to provide notice of unique maintenance events.

9.3.3 Decommissioning Program

No definitive decommissioning plan has been finalized at this stage in the planning process (i.e., before the approvals have been granted). The design life of the wind turbines is estimated to be approximately 25 years, but it is possible that the turbines could continue to operate at the same location after the design life. Alternatively, newer turbine components could replace old and/or worn ones enabling Kruger to continue to provide electricity to the provincial grid.
Should decommissioning become necessary, Kruger would follow the standard industry accepted practices in effect at that time. Such practices presently include the removal of facilities, recycling of suitable materials (e.g., metal and parts), reuse of components and equipment in other facilities, conversion of buildings to other uses, and/or rehabilitation of the site areas. Additional information on Project decommissioning is provided in Section 2.3.7.

9.3.4 Measurement of Performance

Once performance standards have been established and personnel have been trained (and are functional in procedural operations), the next step is to monitor the performance of individuals relative to the performance standards and programs.

Specific internal audits (e.g., management team and/or process team), and external audits against the plans, safety and environmental procedures, and other policies and procedures are all part of establishing performance standards necessary to minimize risks on a continuing basis.

As appropriate a formal audit program for the Project, with regard to loss control programs (i.e., health, safety, environment, and security) will be performed regularly.

9.4 MONITORING REQUIREMENTS

9.4.1 Construction Phase

The Construction Contractor will be the primary party responsible for the implementation of construction monitoring measures. Implementation of these measures will be undertaken in a manner that is consistent with Kruger’s standard environmental and engineering practices and in compliance with applicable municipal, provincial, and federal standards and guidelines. The following subsections outline the key monitoring activities to be implemented; other standard industry monitoring practices are discussed in Section 7.

9.4.1.1 Terrestrial Habitats

Construction activities that have the potential to affect terrestrial flora and fauna include equipment operation, vegetation clearing and disturbance, accidental spills and/or leaks, and waste disposal. Stringent monitoring of these activities is necessary to ensure terrestrial flora and fauna are protected.

As appropriate records of vehicle maintenance will be retained and be available for periodic review by the Construction Contractor. All vehicles involved in construction activities must be maintained in good operating condition and gas powered vehicles be fitted with catalytic converters as required; all vehicles identified through the monitoring program that fail to meet the minimum emission standards will be repaired immediately or removed from the construction area.

Vegetation clearing activities will be conducted under constant observation and monitoring. Monitoring of vegetation clearing will ensure that vegetation is cleared only from designated areas. Areas outside the designated construction sites shall not be disturbed. The siting of Project elements has been undertaken to avoid core natural habitat areas such as woodlands.
and wetlands, as well as other natural habitats, including those containing rare plant species. Project elements have also been located outside hedgerows and riparian areas to the extent possible. In areas where affected hedgerows have the potential to provide habitat for significant species or a significant corridor function, a site-specific assessment will be completed to identify and mitigate any adverse impact.

Monitoring will be required following the unlikely event of contamination from an accidental spill or leak. Contaminated soils will be removed and replaced as appropriate.

As appropriate, records of waste generation and disposal will be maintained. Where waste disposal monitoring is undertaken it will include a periodic review of all waste records, visual inspection of waste storage areas for effectiveness, and inspection of waste receiving facilities. The purpose of the inspection is to ensure that wastes are properly recycled and/or disposed of, consistent with provincial standards and good industry practices. Where a third party’s activities are identified as non-compliant or insufficient, the Construction Contractor will seek out an alternative recycling or disposal solution.

9.4.1.2 Aquatic Habitats

Construction activities that have the potential to affect aquatic habitats and watercourses include equipment operation, vegetation clearing and disturbance and accidental spills and/or leaks associated with the construction of the access road and collector line watercourse crossings. Stringent monitoring of these activities is necessary to ensure aquatic flora and fauna are protected.

As appropriate, a Construction Contractor representative will be on-site during installation of watercourse crossings to ensure compliance with specifications, site plans and permits. In particular, the Construction Contractor will ensure that pre-construction preparation is completed prior to commencement of in-stream work and that bank, bed, and floodplain conditions are restored to pre-construction conditions following completion of the construction activities.

Where required the Construction Contractor will ensure that detailed pre-construction profiles of the slopes, banks, and bed are determined prior to installation of the access roads and collector lines. The Construction Contractor will monitor weather forecasts prior to the installation of the crossings, particularly before crossings of watercourses with year-round flow.

In conjunction with the general pre- and post-construction monitoring activities, the Construction Contractor may also conduct random water quality monitoring of standard parameters that could be affected by construction activities (e.g. for turbidity and total suspended solids) in the vicinity of the watercourse crossings.

Environmental inspection following spring run-off the year after construction may be considered to review the effectiveness of the bank and slope re-vegetation, to check bank and slope stability, and to ensure surface drainage has been maintained. Appropriate remedial measures will be completed as necessary and additional follow-up monitoring conducted as appropriate.
9.4.1.3 Agricultural Soils

Work on agricultural lands will be required for construction of the turbines, access roads, collector lines, and other ancillary facilities. In areas where activity on agricultural land will be for the duration of the construction only, the Construction Contractor will monitor topsoil stripping to ensure that the correct depth of topsoil is removed and stockpiled in a manner that avoids mixing with subsoil material.

As appropriate, to determine the success of soil mitigative measures, soil characteristics will be monitored during and following construction. This may include appropriate relative soil compaction measurements, on and off site, on agricultural lands after topsoil replacement to identify any areas that might require additional chisel ploughing and/or subsoiling during final clean-up operations.

Potential soil problem areas, including subsidence over collector line trenches, soil erosion, and stoniness, will be recorded by the Construction Contractor at the end of the construction period and after one winter. A list of outstanding areas that may require additional clean-up and/or additional monitoring will also be compiled.

If extensive soil mixing is known to have occurred during construction, soil characteristics, including depth to carbonates and percent organic matter, will be randomly analyzed on the temporary disturbance area and in an adjacent non impacted area after final clean-up to identify the relative degree of topsoil/subsoil mixing so appropriate mitigation can be developed.

As appropriate, the effects of construction on agricultural soils will be assessed through a post-construction monitoring program. After construction, an inspection will be made by the Construction Contractor to compile a list for year-after clean-up activities.

9.4.1.4 Artificial Tile Drainage

A licensed tiling contractor should be retained to advise on pre-construction activities necessary to protect artificial drainage as well as repairing the drainage system where necessary following construction. Since some artificial tile drains will be severed due to the installation of the underground collector lines and turbine tower foundation excavations, and there is additional potential for damage during construction, their operation will be monitored during the construction phase, immediately after final clean up, and after the spring thaw the following year. Landowners will be consulted and given the opportunity to inspect artificial drainage designs and repairs with the licensed tiling contractor before backfilling. As part of the on-going monitoring activities a visual inspection of fields adjacent to the construction footprint will be undertaken to identify the presence of standing water that may be an indication that artificial drainage has been improperly repaired, has been crushed, or is blocked.

Should a persistent drainage problem be identified on or adjacent to the construction footprint and the problem is determined to be a result of construction activity, a licensed drainage specialist should identify drainage solutions. To ensure the success of measures recommended by the drainage specialist all persistent drainage problem sites will be monitored for one year after repair.
9.4.1.5 Public Roads

Where required, municipal and county roads will be restored to their pre-construction conditions to the satisfaction of local authorities. For a period of one year after construction, roads will be monitored following a heavy rain event and following spring runoff, to ensure no erosion, bank slumping, road subsidence or major rutting has occurred as a result of construction activities. As appropriate, affected roadside ditches and drains will be monitored to ensure that they are functioning properly.

9.4.1.6 Air Quality & Environmental Noise

Air quality and environmental noise effects due to construction typically relate to the generation of noise and emissions from construction equipment; specifically construction vehicles, generators, and power tools. The Construction Contractor will ensure that all equipment and vehicles brought onto the work sites are in proper working order with functioning mufflers and emission control systems.

High winds during a dry summer may erode and disperse loose soil material, including topsoil, away from the construction area. Wind erosion results in permanent loss of topsoil and creates excessive dust, which is a nuisance to residential and agricultural properties located in close proximity to the construction sites.

Erosion associated with high winds, resulting soil loss, and nuisance dust can be reduced or eliminated by stabilizing topsoil storage piles with straw mulch or other appropriate means. Applying a low energy water spray or dust suppressors to the construction sites and any gravel access roads used for equipment transfer can also temporarily control nuisance dust.

9.4.1.7 Stakeholder Relations

Kruger will continue its pre-construction contact with project stakeholders during construction and through the initial period of operation as long as this seems an effective two-way channel for communication. Kruger and/or the Construction Contractor will have a designated representative to maintain good community relations throughout construction. The Project representative will address concerns expressed by stakeholders during construction in an expeditious and courteous manner. All efforts will be made to respond to those inquiries as soon as is reasonably possible. As appropriate, and prior to the start of construction, contact points for the Project representative will be provided to MCK.

9.4.1.8 Local Expenditures

Where practical, the Construction Contractor will encourage the hiring of local manpower and subcontractors to conduct non-specialized aspects of the Project construction. This may include tree and brush clearing, topsoil removal and site grading, construction of access roads, and construction and servicing of maintenance buildings and other structures. Where practical, the Construction Contractor will also encourage the use and procurement of local goods and services where they are available in sufficient quality and quantity and at competitive prices.
9.4.2 Operation Phase

Building upon the environmental management measures recommended to minimize potentially adverse effects, while enhancing the positive effects associated with the operation of the Project (Section 7), the following operations monitoring program has been developed. As with the construction phase, the monitoring program is designed to allow Kruger to monitor and assess the effectiveness of the proposed management measures and to verify compliance of the Project with applicable municipal, provincial, and federal legislation and guidelines.

Kruger will be the primary organization responsible for the implementation of the operational monitoring measures. Implementation of the measures will be undertaken consistent with Kruger's standard environmental and engineering practices.

9.4.2.1 Birds and Bats

Kruger is committed to monitor the presence of bird and bat carcasses at the base of the turbines for one year after the turbines become operational (additional monitoring will be done if required in consultation with MNR and EC/CWS). The specific monitoring periods and methodology will be developed in collaboration with EC/CWS and MNR to determine a practical, yet satisfactory approach for Kruger, EC/CWS, and MNR. The protocols will incorporate recommendations from EC’s “Recommended Protocols for Monitoring Impacts of Wind Turbines on Birds” (2007) and MNR’s “Guideline to Assist in the Review of Wind Power Proposals: Potential Impacts to Bats and Bat Habitats” (2007), and will include searcher efficiency and scavenger trials. A Post-construction Avian and Bat Monitoring Program Agreement will also be created in conjunction with EC/CWS and in consultation with MNR.

Kruger will maintain records of bird and bat mortality and will provide a post-construction monitoring report to the MNR and EC/CWS, as well as NRCan, in the context of the ecoENERGY Program.

9.4.2.2 Environmental Noise

The Environmental Protection Act requires that noise emissions for any new project must not have adverse effects on the natural environment. The C of A (Air) process is the mechanism through which the controls are administered under the EPA. A typical condition of a C of A (Air) is for the project proponent to complete an acoustic audit of the project, once it is operational, to ensure that the noise emissions meet the requirements of the MOE noise guidelines; in this case those guidelines are specified in the Interpretation For Applying MOE NPC Technical Publications to Wind Turbine Generators (2008). These are the same guidelines that have been used to assess the potential environmental noise effect during the design phase (Appendix E), and for the assessment report supporting the C of A (Air) application.
9.4.2.3 Stakeholder Relations

Kruger will continue its contact with Project stakeholders during the initial operation of the Project for as long as this seems an effective two-way channel of communication. As a long-term presence in the community, Kruger will continue to develop contacts and to develop local relationships and channels of communication, which could benefit the local area.

Ongoing stakeholder communication will allow Kruger to receive and respond to community issues on an ongoing basis. Kruger strives to be a good corporate citizen, protect the environment, and enhance the quality of life in the communities in which they operate.

9.4.2.4 Local Expenditures

As was the case during the construction phase, Kruger will continue to encourage the use and procurement of local goods and services where they are available in sufficient quantities and qualities and at competitive pricing.

9.5 SUMMARY OF ENVIRONMENTAL MONITORING

A summary of the environmental monitoring commitments during the construction and operation phases of the Project is provided in Table 9.1.
### Table 9.1 Summary of Environmental Monitoring Commitments

<table>
<thead>
<tr>
<th>Project Phase</th>
<th>Monitoring Aspect</th>
<th>Parameter(s) to be Monitored</th>
<th>Details</th>
<th>Responsible Party</th>
<th>Duration and Frequency of Monitoring</th>
</tr>
</thead>
<tbody>
<tr>
<td>Construction</td>
<td>Terrestrial habitats</td>
<td>Vegetation clearing</td>
<td>Ensure clearing only in designated areas and procedures for rehabilitation/reinstatement of temporary disturbance areas</td>
<td>Construction Manager</td>
<td>Throughout the duration of clearing activities</td>
</tr>
<tr>
<td>Construction</td>
<td>Terrestrial habitats</td>
<td>Contamination from accidental spills or leaks</td>
<td>Removal of contaminated soils and replacement as appropriate Implementation of an Emergency Management Plan when appropriate</td>
<td>Construction Manager</td>
<td>Throughout construction period</td>
</tr>
<tr>
<td>Construction</td>
<td>Terrestrial habitats</td>
<td>Waste disposal</td>
<td>Ensure Project waste is deposited and contained in designated areas until shipment to a licensed disposal facility</td>
<td>Construction Manager</td>
<td>Throughout construction period</td>
</tr>
<tr>
<td>Construction</td>
<td>Aquatic habitats</td>
<td>Installation of watercourse crossings</td>
<td>Ensure compliance with specifications and/or site plans. Ensure that pre-construction preparation is completed prior to commencement of in-stream work and that bank, bed, and floodplain conditions are restored following completion of the construction activities</td>
<td>Construction Manager</td>
<td>Throughout installation of each watercourse crossing</td>
</tr>
<tr>
<td>Construction</td>
<td>Public roads</td>
<td>Road conditions</td>
<td>Ensure no erosion, bank slumpage, road subsidence, failures, or major rutting has occurred as a result of construction activities Manage construction traffic, including, volumes, frequencies, and haul routes (haul routes should minimize impacts on existing services / infrastructure and local residents)</td>
<td>Construction Manager</td>
<td>Throughout construction phase</td>
</tr>
<tr>
<td>Construction</td>
<td>Air quality and environmental noise</td>
<td>Noise and emissions from construction equipment</td>
<td>Ensure all equipment and vehicles brought onto the work sites are in proper working order with functioning mufflers and emission control systems. As appropriate, maintenance records to ensure emission levels meet minimum standards</td>
<td>Construction Manager</td>
<td>Throughout construction phase</td>
</tr>
</tbody>
</table>
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</tr>
</thead>
<tbody>
<tr>
<td>Operation</td>
<td>Birds and Bats</td>
<td>Bird and bat usage and collision rates</td>
<td>Surveys, with methodology developed in consultation with EC/CWS and MNR. Other local organizations may also be involved in program development</td>
<td>Kruger</td>
<td>To be determined in conjunction with MNR and EC/CWS – monitoring program reassessed at the end of the first monitoring year</td>
</tr>
<tr>
<td>Operation</td>
<td>Environmental Noise</td>
<td>Noise emissions from the Project</td>
<td>Complete an acoustic audit of the Project to ensure the noise emissions meet the requirements of the MOR noise guidelines</td>
<td>Kruger</td>
<td>To be determined as part of the CofA(Air)</td>
</tr>
<tr>
<td>Operation</td>
<td>Stakeholder Relations</td>
<td>Concerns from the public</td>
<td>Develop and implement a Complaint Response Protocol for the operations phase to address any reasonable concern from the public (if applicable) Implement safety protocols to reduce risks associated with ice throw and blade/turbine failure Implementation of an Emergency Management Plan when appropriate</td>
<td>Kruger</td>
<td>Ongoing during operation phase</td>
</tr>
</tbody>
</table>