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PRELIMINARY WETLAND COMPENSATION PLAN
Black Point Quarry and Marine Terminal
Guysborough, NS

October 17, 2024

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October 17, 2024

Black Point Aggregates Inc.

Re: Preliminary Wetland Compensation Plan
Black Point Quarry and Marine Terminal

Attached is the Preliminary Wetland Compensation Plan prepared for the Black Point Quarry and Marine Terminal project.

We trust this to be satisfactory at this time. Once you have had an opportunity to review this correspondence, please contact us to address any questions you may have.

Thank you,

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EXECUTIVE SUMMARY

Black Point Aggregates Inc. (BPAI) will operate the Black Point Quarry Project (the "Project"), located in Chedabucto Bay, Nova Scotia. A Project Area (PA) was defined as the footprint of Project related infrastructure and includes two parcels of land (PID 35212521 & 35092063). The Project will produce aggregate from granite (drilling, blasting, processing, and stockpiling) and involve the construction and operation of a marine shipping terminal.

Through the Environmental Impact Statement (EIS) and Environmental Assessment Registration Document (EARD) process, the Project has been designed to avoid wetland habitat wherever possible. Once all avoidance, minimization, and mitigation techniques were considered, BPAI acknowledges a residual loss of wetland habitat and function as a result of the Project. This Preliminary Wetland Compensation Plan has been prepared to provide a conceptual approach to wetland compensation to offset the predicted wetland impacts as a result of the Project.

Approximately 24.5121 ha of wetland area is expected to be altered by the Project through direct impacts, which will require compensation. None of the wetlands proposed for alteration exist as potential Wetlands of Special Significance (WSS). In consideration of industry standards and previously applied compensation ratios (i.e., 2:1 for non-WSS), it is expected that the Project will result in approximately 49.0242 ha of wetland compensation requirements.

BPAI has begun preliminary identification of Primary and Secondary options for wetland compensation. Project identification, design, monitoring, and reporting requirements are outlined herein, as well as potential compensation options based on past compensation experiences, NS Environment and Climate Change (NSECC) consultation, and known opportunities in NS.

Conceptual opportunities discussed herein will be further defined and reviewed with NS Environment and Climate Change (NSECC) prior to wetland alteration.

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1.0 INTRODUCTION

Black Point Aggregates Inc. (BPAI) will operate the Black Point Quarry Project (the "Project"), located in Chedabucto Bay, Nova Scotia (NS). A Project Area (PA) was defined as the footprint of Project related infrastructure and includes two parcels of land (PID 35212521 & 35092063). The Project will produce aggregate from granite (drilling, blasting, processing, and stockpiling) and involve the construction and operation of a marine shipping terminal.

BPAI received Environmental Assessment (EA) Approval with Conditions from the Minister of Environment and Climate Change Canada (ECCC) and the provincial Minister of Environment on April 26, 2016. Per Terms and Conditions 3.4 and 3.5 of the EA Approval from Nova Scotia Environment [now Nova Scotia Environment and Climate Change (NSECC)] and 4.3 of the EA Approval from the *Canadian Environmental Assessment Act*, 2012 [now the Impact Assessment Agency of Canada (IAAC)], BPAI is required to develop and adhere to a Wetland Compensation Plan as part of their application for wetland alteration approval.

Through the Environmental Impact Statement (EIS) and EA Registration Document (EARD) process, the Project has been designed to avoid wetland habitat wherever possible. Where wetlands could not be avoided, minimization of impacts and mitigation measures were prioritized. Once all avoidance, minimization, and mitigation techniques were considered, BPAI acknowledges a residual loss of wetland habitat and function as a result of the Project.

This Preliminary Wetland Compensation Plan has been prepared to provide a conceptual approach to wetland compensation to offset the predicted, unavoidable wetland impacts as a result of the Project. Approximately 24.5121 ha of wetland area is expected to be altered by the Project through direct impacts, which will require compensation (Table 1.1). None of the wetlands proposed for alteration exist as potential Wetlands of Special Significance (WSS). In consideration of industry standards and previously applied compensation ratios (i.e., 2:1 for non-WSS), it is expected that the Project will result in approximately 49.0242 ha of wetland compensation requirements (Table 1.1). The Project's proposed wetland monitoring program will track and define potential indirect effects to wetlands, which will be scoped into Project alteration areas and compensation requirements as needed. Conceptual opportunities discussed herein will be further defined and reviewed with NSECC prior to wetland alteration. Compensation plans and associated permitting will be prepared in consultation with NSECC.

Table 1.1: Project Wetland Impacts and Compensation Requirements

Wetland ID	Proposed Ratio	Estimated Direct Impact Area (m^2)	Compensation Area (m^2)	Alteration Type[1]
WL1	2:1	8915	17830	P
WL2	2:1	8630	17260	P
WL3	2:1	4622	9244	C
WL4	2:1	1854	3708	C
WL5	2:1	5064	10128	C
WL6	2:1	2643	5286	C
WL7	2:1	4793	9586	C
WL11	2:1	102370	204740	P
WL12	2:1	2063	4126	C
WL13	2:1	5698	11396	C
WL14	2:1	61645	123290	P
WL15	2:1	1096	2192	C
WL18	2:1	478	956	P
WL19	2:1	305	610	P
WL20	2:1	229	458	P
WL22	2:1	546	1092	C
WL23	2:1	1636	3272	C
WL24	2:1	894	1788	C
WL25	2:1	3448	6896	C
WL26	2:1	679	1358	C
WL27	2:1	1854	3708	C
WL29	2:1	2190	4380	C
WL30	2:1	654	1308	C
WL31	2:1	416	832	C
WL32	2:1	816	1632	C
WL33	2:1	1451	2902	C
WL35	2:1	2109	4218	C
WL36	2:1	570	1140	P
WL37	2:1	1077	2154	C
WL38	2:1	6006	12012	C
WL39	2:1	8956	17912	C
WL43	2:1	854	1708	C
WL45	2:1	560	1120	C
Totals		**245,121**	**490,242**	

[1] P – Partial wetland alteration, C – Complete wetland alteration

1.1 Regulatory Context

BPAI is committed to the implementation of wetland compensation project(s) to satisfy the Nova Scotia Wetland Conservation Policy's (NSECC, 2019)[1] objective of preventing no net loss of wetland area and/or function. BPAI acknowledges that NS Environment and Climate

[1] https://novascotia.ca/nse/wetland/docs/Nova.Scotia.Wetland.Conservation.Policy.pdf

Change (NSECC) considers restoration of wetland function as a key component of wetland compensation in NS, and as such, this objective will be considered, as is possible, in wetland compensation efforts associated with the Project.

BPAI understands that NSECC's preferred methods of compensation are:

- Restoration of degraded wetland habitats or wetlands previously lost to historic alterations
- Targeted compensation in proximity to the Project where wetland losses will occur (e.g., within the same or adjacent watersheds as is possible)
- Consideration of replacement of lost wetland type and function

Current compensation standards require at a minimum 2:1 ratio (compensation : alteration area) for most restoration projects, within higher ratios for WSS (none proposed for alteration). Furthermore, the province expects compensation projects to be implemented parallel to or directly following wetland alteration (e.g., within a few years) and expects the compensation project to be self-sustaining and permanent. BPAI will endeavour to ensure that these objectives are upheld as part of the wetland compensation project(s). In collaboration with Strum Consulting [Strum; an NSECC recognized Wetland Restoration Professional (WRP)], BPAI has undertaken the identification of preliminary compensation approaches to support the Project's wetland compensation requirements as described herein.

1.2 Wetland Compensation Type

BPAI, with support from Strum, has begun preliminary identification of Primary and Secondary options for wetland compensation. Primary and Secondary methods of wetland compensation can be implemented in combination with each other to meet the objectives for wetland compensation requirements associated with the Project.

Primary and Secondary methods of compensation are outlined below:

Primary Compensation

Physical, on the ground compensation via wetland restoration, creation, enhancement, or wetland expansion activities; and,

Secondary Compensation

Methods include those that NSECC regards as important tools in support and development of the Wetland Conservation Policy, i.e., scientific research studies, watershed studies, wetland education (trails, signage, interpretive endeavors), and others. BPAI understands that secondary methods require consultation and negotiation with NSECC, and the scope of what classifies as a secondary option is continually evolving.

2.0 WETLAND COMPENSATION PROCESS

The preliminary wetland compensation plan aims to identify compensation options prior to Project construction. Strum will further investigate conceptual opportunities discussed herein. Compensation plans and associated permitting will be prepared in consultation with NSECC.

There are several steps involved in the selection of a Primary or Secondary wetland compensation project including engagement with the Mi'kmaq of Nova Scotia and key stakeholders, site identification, study concept development, project design, reporting, permitting (as required), and identification of monitoring commitments.

2.1 Engagement

As part of the Project's permitting process, BPAI have and will continue to engage early with key Rightsholders (Mi'kmaq of Nova Scotia) and stakeholders, including regulatory agencies, to ensure a variety of possible avenues for wetland compensation have been explored. Engagement allows BPAI to understand what opportunities there may be in proximity to the Project, and allows an opportunity to learn from communities and interest groups who may have concepts and objectives related to wetland compensation. Engagement will involve, but is not limited to, the following types of groups and organizations:

- NSECC
- Nova Scotia Natural Resources and Renewables (NSNRR)
- Environment and Climate Change Canada (ECCC)
- Mi'kmaq of Nova Scotia communities and organizations (e.g., KMKNO, UINR)
- Private Forestry Lands Groups and Co-operatives
- Local Municipalities
- Non-Governmental Organizations such as:
    - Local watershed associations (e.g., Shubenacadie Watershed Environmental Protection Society)
    - Nova Scotia Nature Trust
    - Nature Conservancy of Canada
    - Ecology Action Centre
    - Others as determined through engagement efforts

2.2 Compensation Project Identification Process

The process to identify suitable wetland compensation projects will continue through the alteration permitting process and detailed Project design. For Primary compensation projects, with the support of a WRP, BPAI will complete feasibility studies and preliminary design concepts to determine the scope of work and specific compensation objectives. For Secondary compensation projects, BPAI and the WRP will work with NSECC to identify potential opportunities for projects (i.e., studies, research, education etc.) that directly support the NSECC wetland program.

An evaluation of the value of the compensation project will be determined by comparing the proposed outcomes of the compensation project to the broader objectives of the Nova Scotia Wetland Conservation Policy (NSECC, 2011), as well as local watershed benefits, potential SAR benefits and support of any initiatives that the compensation project would provide to the Mi'kmaq of Nova Scotia, stakeholders, and local communities.

Parallel to the definition of Primary compensation project concepts and objectives, collaboration and discussions with landowners of potential compensation sites will take place. This process is a critical step of determining the feasibility of a site for wetland compensation purposes. The process includes written agreements with landowners which outline compensation project goals and objectives, and in some cases, could include land purchase agreements.

BPAI will prioritize identification of wetland compensation projects within the surrounding Guysborough area and primary watershed(s), in which Project alterations will occur. However, the Guysborough Regional Municipality does not contain extensive development due to its geographic position in the province and distance from large population centers. While suitable wetland compensation project(s) may be identified within this area, compensation opportunities may need to be explored in adjacent municipalities and watersheds.

Ideally, wetland compensation would occur within the spatial boundaries of the Project. However, the life span of the Project (e.g. 70+ years) and nature of the wetland alterations within the PA (e.g. open pit and other quarry infrastructure) limits the overall opportunity for on-site compensation through site reclamation. Beyond the Project's compensation requirements, on-site options for wetland restoration may be considered during the reclamation process, and could include reclamation of partially impacted wetlands or riparian areas. Potential opportunities for on-site reclamation may be considered as part of the Project's Reclamation Plan, which will be iteratively updated through the life of the Project, in consultation with NSECC.

Section 3 describes conceptual compensation options to support the Project.

2.3 Compensation Project Design

Preliminary project design for Primary wetland compensation projects will be initiated during the site selection process concurrent with engagement activities. However, as discussions with landowners advance, and securing of land appears feasible to implement the compensation project, project design will advance into a more detailed stage.

For Secondary wetland compensation projects, BPAI will work with the WRP to define a scope of work and objectives for submission and review by the provincial wetland specialist at NSECC. In collaboration with the provincial Wetland Specialist(s), the WRP will refine and finalize the Secondary wetland compensation project including the wetland compensation credit value (i.e., comparative to on the ground area credit).

The following sections outline in detail the design process for Primary wetland compensation opportunities.

2.3.1 Preliminary Design

A desktop review process will be initiated on potential compensation sites to determine existing characteristics (i.e., level of historical disturbance), hydrological conditions (inflows and outflows of water and any alterations to flow), soil characteristics, and comparison to natural, undisturbed reference sites and historic, pre-disturbance imagery. The desktop review process will be followed by a field assessment and feasibility study to identify landscape characteristics, define the historic alterations, and refine the preliminary design and objectives. As well as evaluating the project site for characteristics discussed above, details relating to vegetative composition, habitat, species at risk presence, and potential fish habitat are also evaluated. In addition, information regarding adjacent land use and its potential interaction with a compensation project will be obtained.

Baseline monitoring is typically completed during the growing season to support the design process and understand detailed conditions about the site which can be compared to post project completion conditions to determine the success of project objectives. Baseline monitoring typically involves monitoring of baseline hydrology through installation of water data loggers and the completion of detailed vegetation and habitat assessments. A wetland functional assessment is also completed at this stage and later repeated post project completion to determine if functional characteristics have been modified to meet project objectives.

Having a proper understanding of site conditions and adjacent land uses is paramount to meeting the goals of the wetland compensation project. For example, if site conditions cannot support (at baseline or through restoration) a vegetative community or hydrological environment required to support wetland habitat, it may not be considered a viable option.

Based on these conditions, preliminary project design(s) can be prepared and reviewed with NSECC.

2.3.2 Detailed Design

Tasks completed as part of this process may include confirmation of water budget, site hydroperiods, seeding and planting techniques, management of herbivory or invasive species challenges, etc. These specific design considerations will be highly site dependent and will evolve through the design process. Site specific characteristics and design targets will support engineering and construction design, as well as monitoring requirements.

Detailed topographic surveys and associated hydrological modeling may be employed, depending on the site and specific objectives, to inform the detailed design process and expected compensation outcomes. Baseline hydrology data and modeling will aid the design process by facilitating the determination of available water to the compensation site, which should be managed to meet compensation objectives (i.e., pre-degraded or historic conditions).

Prior to implementation, specific details/drawings of the compensation project(s) will be developed and will be made available to NSECC through a preliminary Concept Plan, Compensation Plan, and/or other documentation to support any regulatory permitting that the compensation project may require (i.e., wetland or watercourse alteration application). Following implantation, NSECC will also be provided annual reports detailing site progress and monitoring results for review. The exact scope required for the detailed design process will be determined in consultation with NSECC.

2.4 Wetland Compensation Monitoring and Reporting

Wetland monitoring associated with Primary wetland compensation projects is defined on a project-specific basis through a dedicated Compensation Plan and associated approvals. Generally, monitoring includes visual surveys, hydrological monitoring wells, and vegetation plots. Monitoring will be completed to determine if wetland compensation objectives, as defined in the Compensation Plan, (i.e., restoration, enhancement or creation of wetland area and function) are being achieved.

The following subsections generally outline base monitoring methods. The final scope and scale (i.e., timing and number of surveys) of monitoring will be outlined in the project-specific Compensation Plan and based on defined performance indicators. Monitoring may be adjusted based on annual reporting and development of adaptive management strategies as needed.

2.4.1 Visual Surveys

General visual surveys will be conducted to determine the success of restoring or enhancing habitat to pre-defined objectives. The assessment will take place during a seasonally appropriate time (June-September). Visual surveys generally assess the following:

- Evidence of Primary and Secondary indicators of wetland hydrology (e.g., water marks, drainage channels)
- Evidence of adverse concerns to wetland health (e.g., siltation/sedimentation, ground disturbance, vegetation die-back, invasive/ exotic species)
- Documentation of transitions in habitat and general vegetative composition. This can be completed via visual evidence observations made during site assessments and aerially via the use of a drone.

2.4.2 Hydrology

Monitoring wells are installed strategically across the project site to document changes in wetland hydrology and hydroperiods, to evaluate and compare post construction hydrological conditions to baseline conditions. All or some may have continuously logging data loggers. Expert analysis of hydrological changes (e.g., seasonal fluctuations, flooding, wetting and drying periods) will be performed to determine if hydrological objectives for the compensation project are being met.

2.4.3 Vegetation Plots

Detailed vegetation plots are installed and assessed during baseline conditions to compare to post-construction monitoring to assess potential vegetative transitions, changes in general habitat characteristics, and support the determination of whether the compensation plan objectives have been met. Absolute percent cover estimates are generally completed within the vegetation plot for the herbaceous, shrub, and tree stratums. Photographs are taken to document vegetation cover in, and immediately around, the vegetation plot.

Additional vegetation surveys and analysis (e.g., presence absence surveys, invasive species surveys, drone imagery) may be added to meet site objectives.

2.4.4 Adaptive Management

Monitoring will support the determination of whether the wetland compensation project has met its objectives and performance criteria. Should results suggest that the compensation project is not functioning as it was predicted, monitoring results can be used to identify what modifications may be required within the compensation site to correct these issues.

2.4.5 Reporting

Reporting requirements and schedules to track Project's wetland alteration status and associated compensation needs will be defined through the permitting process. Annual reporting typically includes the following information:

- An annual survey of the Project to identify the exact alteration footprint as a result of Project related activities completed that year
- An updated schedule for the alteration areas expected for the forthcoming year
- Revisions, as needed, to the Wetland Compensation Plan, which exists as a living throughout the lifetime of the Project. The WCP will detail wetland compensation efforts completed to date (including Secondary projects) and continue to document progress made with site identification and project design.
- Compensation project monitoring reports to confirm and document objectives based on performance indicators as determined by project-specific Compensation Plans.

3.0 PRELIMINARY WETLAND COMPENSATION OPTIONS

The following sections outline potential compensation options based on Strum's past compensation experiences, NSECC consultation, and known opportunities in NS.

Strum will further investigate the conceptual opportunities discussed in the following sections at the time of detailed Project design and permitting.

3.1 Primary Wetland Compensation

3.1.1 Post-Farming Riparian Wetland Restoration

NS is 70% privately owned, of which much of that is farmland. Many farms exist within the floodplain of river systems and as a result are ditched to drain the land for farming activities.

These areas are commonly used for haying or livestock grazing as they flood periodically.

Ditching results in the dewatering of the natural floodplain, which is commonly treed or shrub swamp, or marshland (tidal ort freshwater). Natural wetland vegetation is subsequently removed, and the soil is altered through farming activities. Many of these areas may no longer present wetland conditions at all.

Strum has demonstrated experience in the restoration of a variety of these systems through hydrological engineering to rewet and detain water on-site, with the aim to promote historic, natural wetland hydrological conditions, vegetation, and at times, soil reestablishment. An example of this is the Otter Brook restoration project that Strum executed in 2022 shown in Figure 1 (pre-restoration) and Figure 2 (post -restoration) below. At the time of restoration design, Otter Brook no longer exhibited wetland conditions as a result of historic farming practices.

Figure 1: Otter Brook with active farming (2019)

Figure 2: Otter Brook post-restoration (2024) showing successful on-site water retention

3.1.2 Impounded Wetland Restoration

Impounded wetlands may appear to offer water storage solutions, however, many have lost their natural functions of slowing water movement and regulating flows, along with natural habitat provides for aquatic, semi-aquatic and avian species.

These alterations are primarily associated with old roads and forestry trails where there are issues with lateral drainage under the road and collapsed or improperly sized culverts. Extension beaver activity and dams may also result in significant impoundment and alteration of wetland habitat. Examples of these opportunities exist in the Project's watershed(s) and Guysborough area due to a history of forestry and resource development.

An example of one such project is the Gray Pond restoration project executed by McCallum Environmental Ltd. (now Strum) in 2022. Figures 3 and 4 below show a fen wetland before (Figure 3) and after (Figure 4) the impoundment was repaired (e.g., new culvert and road construction).

Figure 3: Gry Pond impounded fen wetland (2019)

Figure 4: Grey Pond post-restoration (2023) to restore natural fen function and historic watercourse alignment.

3.1.3 Harvested or Altered Peatlands

While the horticultural peat harvesting industry in NS is not large, the industry is active within the province. However, unlike other provinces where peat harvesting is more prominent (e.g., New Brunswick, Quebec, Manitoba), NS does not have peat harvesting specific restoration requirements at closure. Peatlands will not naturally regain their unique functions (e.g., peat forming species and accumulation, carbon sequestration) post-harvesting without specific, active restoration methods. As a result, many of these sites that are no longer viable for horticultural purposes may be left abandoned with limited restoration efforts. A limitation of these sites is the long-standing leases and a company's continued interest in retaining the rights to these properties.

An example of one such project is an abandoned harvesting operation on a bog near Kennetcook NS, shown in Figure 5 below.

Impacted peatland systems will be considered for restoration as is possible, given the impacts to WL11 (bog). Alternatively, protections of similar ecosystems may be pursued as noted in Section 3.1.4.

Figure 5: Harvested peat bog, Kennecook, NS.

3.1.4 Other Opportunities

Other primary wetland compensation opportunities may exist through:

- Invasive species management
- Waste dumping removal and clean up
- Riparian planting, enhancement, and/or stabilization
- Infill removal and regrading
- Interpretive facilities, trial construction or enhancement
- Engineered wetland creation
- Wetland protection under conservation easements (requires conservation group corporation)

Protections under conservation easements will be assessed as a potential opportunity for Secondary compensation (e.g., up to 50%, 1:1), paired with primary projects. Easement opportunities may target areas to support provincial land protection targets and desired habitats, wetland habitat altered by the Project, additions to existing local protected areas (e.g., Bonnet Lake Barrens and Canso Coastal Barrens Wilderness Areas), etc.

Conservation easements as a method of Secondary compensation is a novel approach to wetland compensation in Nova Scotia which NSECC is interested in further investigating. Strum will explore these opportunities in close consultation with NSECC and Protected Areas, as well as third-party conservation organizations able to protect land under the Conservation Easement Act (e.g., “Eligible Bodies”).

3.2 Secondary Wetland Compensation

Based on the predicted Project impacts, there is an opportunity for the Project to allocate up to 24.5121 ha of its total wetland compensation requirements (up to 50%) to Secondary compensation projects.

Strum has experience successfully scoping and collaborating on Secondary compensation research studies approved by NSECC. Strum will continue to explore Secondary compensation opportunities through engagement with other wetland compensation practitioners, research professionals, regulatory bodies, and local interest groups (e.g. watershed groups) to assess prospective research and study needs, in addition to conservation easement options described above. Strum will evaluate local Secondary opportunities through engagement with local community-based organizations, such as watershed groups. NSECC will be consulted on the scoping and development of any Secondary projects.

3.3 Wetland Compensation Summary

BPAI is committed to implementing valuable, and functionally significant wetland compensation opportunities which meet the Project’s compensation requirement (49.0242 ha) and the expectations of NSECC through the Wetland Conservation Policy. BPAI will secure viable wetland compensation project(s), which aim to replace wetland area and/or function or otherwise support the Wetland Conservation Policy (i.e., Secondary projects).

4.0 STATEMENT OF QUALIFICATIONS AND LIMITATIONS

This Report (the "Report") has been prepared by Strum Consulting ("Consultant") for the benefit of Black Point Aggregates Inc. in accordance with the agreement between Strum and BPAI, including the scope of work detailed therein (the "Agreement").

The information, data, recommendations, and conclusions contained in the Report (collectively, the "Information"):

- is subject to the scope, schedule, and other constraints and limitations in the Agreement and the qualifications contained in the Report (the "Limitations")
- represents Strum's professional judgement in light of the Limitations and industry standards for the preparation of similar reports
- may be based on information provided to Strum which has not been independently verified
- has not been updated since the date of issuance of the Report and its accuracy is limited to the time period and circumstances in which it was collected, processed, made or issued
- must be read as a whole and sections thereof should not be read out of such context
- was prepared for the specific purposes described in the Report and the Agreement
- in the case of subsurface, environmental, or geotechnical conditions, may be based on limited testing and on the assumption that such conditions are uniform and not variable either geographically or over time

Strum shall be entitled to rely upon the accuracy and completeness of information that was provided and has no obligation to update such information. Strum accepts no responsibility for any events or circumstances that may have occurred since the date on which the Report was prepared and, in the case of subsurface, environmental, or geotechnical conditions, is not responsible for any variability in such conditions, geographically or over time.

Strum agrees that the Report represents its professional judgement as described above and that the Information has been prepared for the specific purpose and use described in the Report and the Agreement, but Strum makes no other representations, or any guarantees or warranties whatsoever, whether express or implied, with respect to the Report, the Information or any part thereof.

The Report is to be treated as confidential and may not be used or relied upon by third parties, except:

- as agreed in writing by Strum and BPAI
- as required by law
- for use by governmental reviewing agencies

Strum accepts no responsibility, and denies any liability whatsoever, to parties other than Client who may obtain access to the Report or the Information for any injury, loss, or damage suffered by such parties arising from their use of, reliance upon, or decisions or actions based on the Report or any of the Information ("improper use of the Report"), except to the extent those parties have obtained the prior written consent of Consultant to use and rely upon the Report and the Information. Any damages arising from improper use of the Report or parts thereof shall be borne by the party making such use.

This Statement of Qualifications and Limitations forms part of the Report and any use of the Report is subject to the terms hereof.

Should additional information become available, Strum requests that this information be brought to our attention immediately so that we can re-assess the conclusions presented in this report. This report was prepared by Sarah Scarlett, M.Sc., Project Manager, Restoration Lead and was reviewed by Meghan Johnston, MES, Vice President, Environmental Assessment & Approvals.