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July 27th, 2026

Derrick Chow
Director of Operations
Nordspace Atlantic Corporation
Via email: derrick@nordspace.com

Re: Environmental Services (Vegetation Survey),
Atlantic Spaceport Complex (Access Road), St. Lawrence, NL

Strum Consulting (Strum) has been retained by NordSpace Atlantic Corporation (NordSpace) to support its Atlantic Spaceport Complex (the Project) located near St. Lawrence, Newfoundland and Labrador (NL). Rare plant surveys were required as per the registration document and Environmental Assessment approval conditions. Strum was engaged to conduct these surveys along the proposed access road (Project Area) prior to construction.

METHODOLOGY

Based on the geographic location of the Project Area potential Species at risk (SAR)/Species of Conservation Concern (SOCC) identified to occur was the rare flora *Crassula aquatica* (Water pigmyweed), a small succulent annual plant which is known to occur in coastal areas of the Avalon and burin peninsula. This flora species grows in habitats such as coastal wetlands, sandy pod edges and disturbed sites. Water pigmyweed is listed as vulnerable in Newfoundland and Labrador (*Water Pigmyweed Management Plan*, 2001).

A GIS-based screening exercise was completed to identify areas requiring survey for water pygmyweed within the proposed road corridor. Spatial datasets used in the analysis included the CanVec 1:50,000 watercourse layer, the CanVec 1:50,000 waterbody layer, and the 1:50,000 saturated soils layer. In accordance with regulatory requirements, each of these features was buffered by 30 m to delineate the area within which water pygmyweed surveys were required. The proposed road centerline was buffered by 6 m on either side to represent the anticipated 12 m road right-of-way (ROW). Areas where the 30 m wetland, waterbody, or watercourse buffers intersected the buffered ROW were identified as the primary survey area and targeted for field investigation.

Field surveys were conducted within all identified survey areas (Attachment A) to determine the presence or absence of water pygmyweed. Given the coarse scale and limited positional accuracy of the 1:50,000 CanVec datasets, additional reconnaissance was undertaken along the entire length of the proposed road alignment. The survey biologist walked the full extent of the corridor and visually assessed all wetlands, pond margins, saturated soils, drainage features, and other potentially suitable habitats encountered within or adjacent to the proposed ROW. This approach ensured that both mapped and unmapped wet habitats with the potential to support water pygmyweed were examined during the survey.

RESULTS

Surveys were conducted July 9th, 2026 with no SAR/SOCC identified. Photos of site conditions and vegetation identified are located in Attachment B.

CLOSURE

This report was prepared by Diedre Park, Senior Environmental Scientist, and reviewed by Nicole Thomas, Manager, Environmental Assessments and Approvals. 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.

If you have any questions, please contact Nicole Thomas, nthomas@strum.com.

Thank you,

Nicole Thomas
Manager, Environmental Assessments and approvals

REFERENCES

Wildlife Division. 2021. Management Plan for the Water Pygmyweed (Tillaea aquatica) in Newfoundland and Labrador. Department of Fisheries, Forestry and Agriculture, Government of Newfoundland and Labrador, Corner Brook. Canada. iii + 15 pp.

STATEMENT OF QUALIFICATIONS AND LIMITATIONS

This Report (the "Report") has been prepared by Strum Consulting ("Consultant") for the benefit of Nordspace Atlantic Corporation ("Client") in accordance with the agreement between Consultant and Client, 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 Consultant's professional judgement in light of the Limitations and industry standards for the preparation of similar reports
- may be based on information provided to Consultant 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

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ATTACHMENT A
DRAWING

Atlantic Spaceport Complex

Water Pygmyweed Survey

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Locations On Access Road Within 30m Of A Waterbody, Watercourse Or Wetland

Water Pygmyweed Survey Tracks

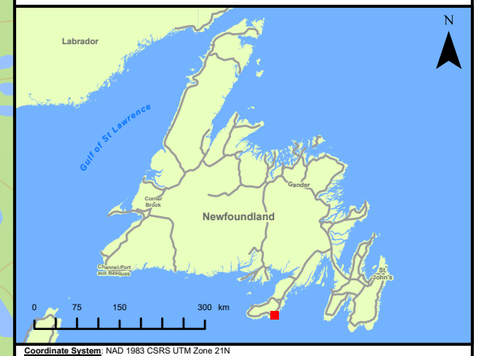
Highway

Watercourse (1:50,000 CanVec)

Wetland (1:50,000 CanVec)

Waterbody (1:50,000 CanVec)

Nordspace Access Road (12m ROW)



Coordinate System: NAD 1983 CSRS UTM Zone 21N
Sources: , GeoNOVA, SNSIS, NSNRR, ACCDC, IBA Canada, CNWI, HERE, Garmin, USGS

Date: 2026-07-13	Project #: 26-13053
Scale: 1:12,000	Drawing #: 1
Drawn By: B. Spencer	
Checked By: D. Park	

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0 250 500 750 m

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ATTACHMENT B
PHOTOS

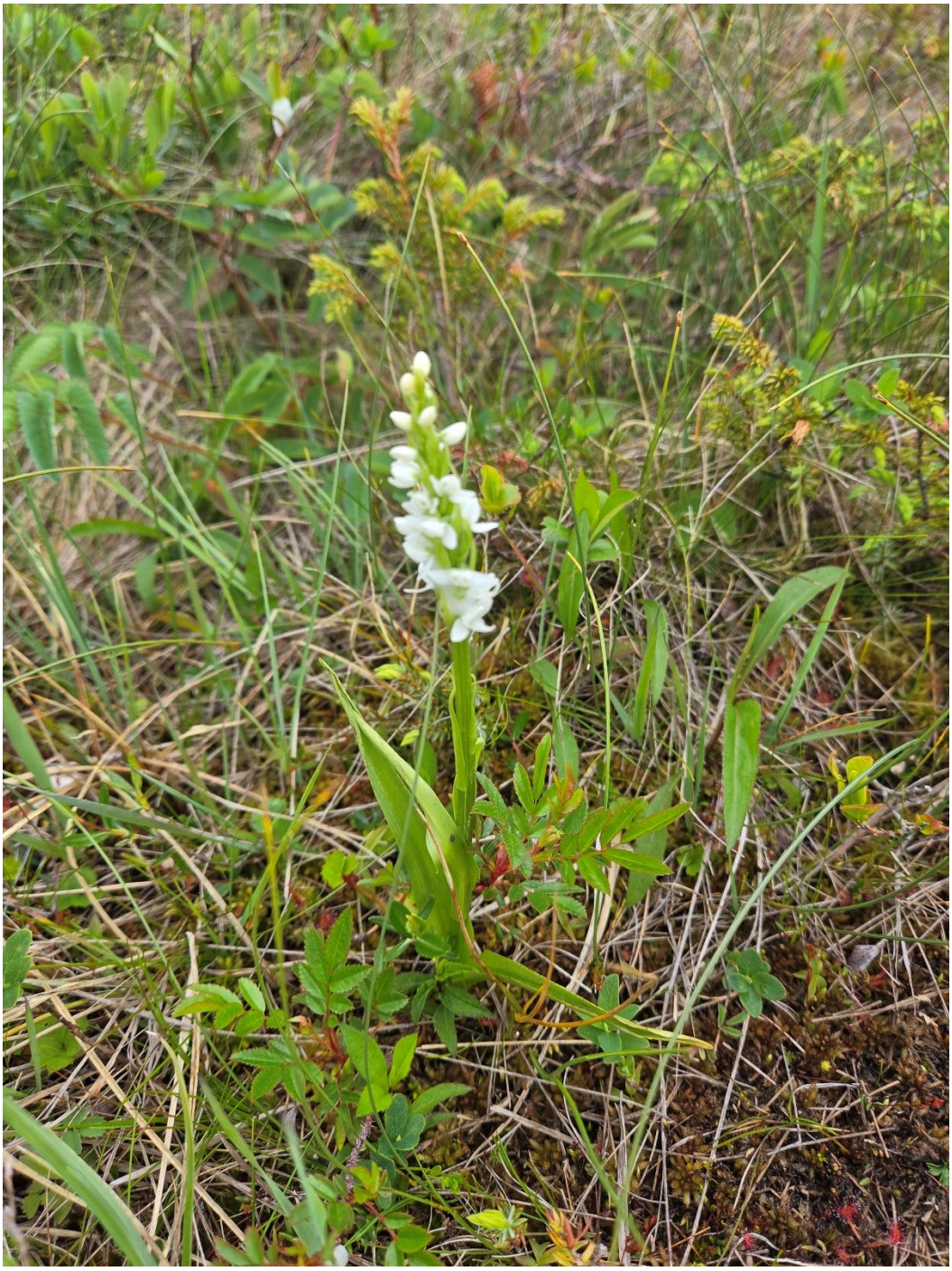

Figure 1: White bog orchid (Platanthera dilatata)

Figure 2: Cloudberry (Rubus chamaemorus)

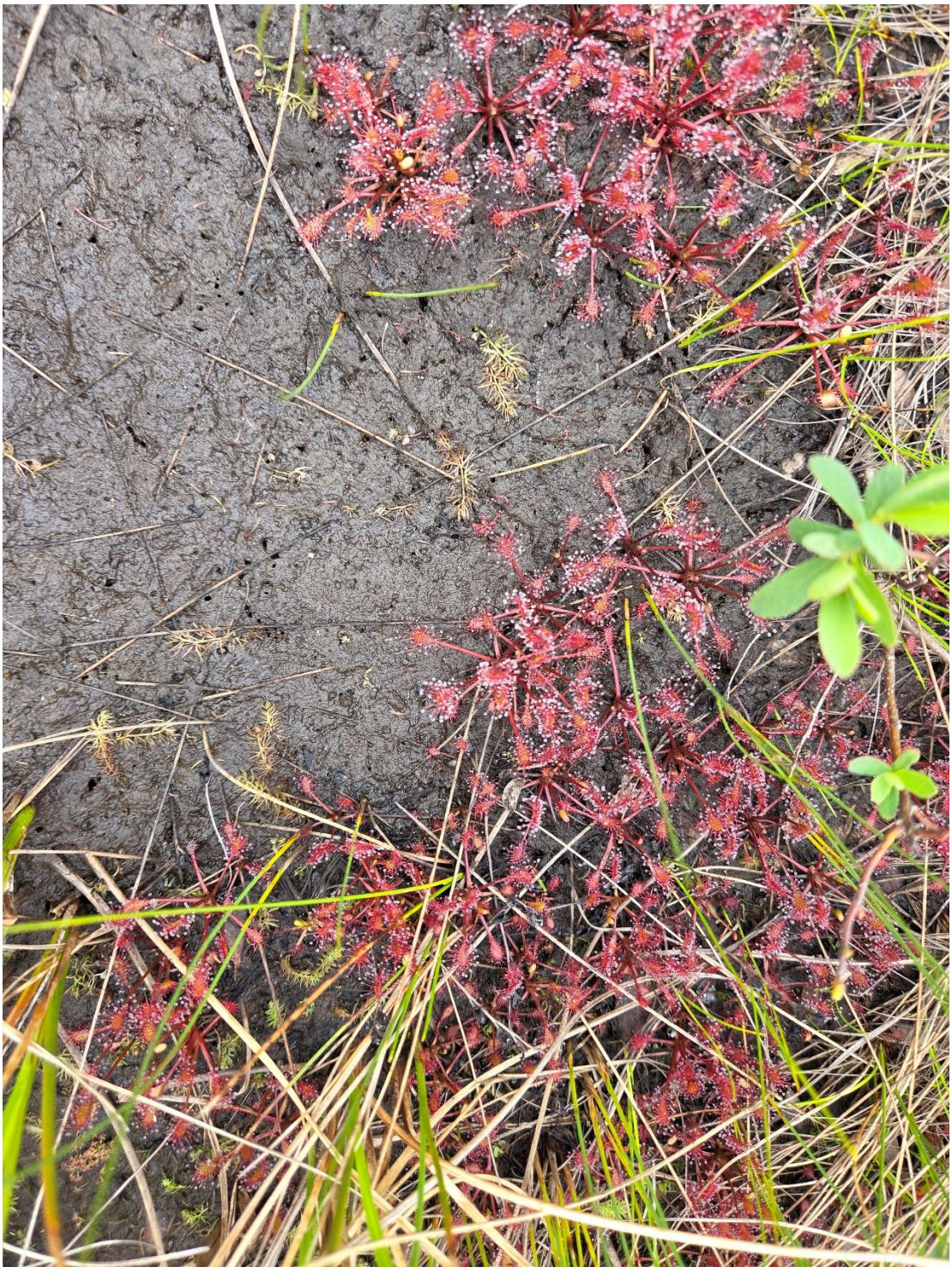

Figure 3: Spoonleaf sundew (Drosera intermedia)

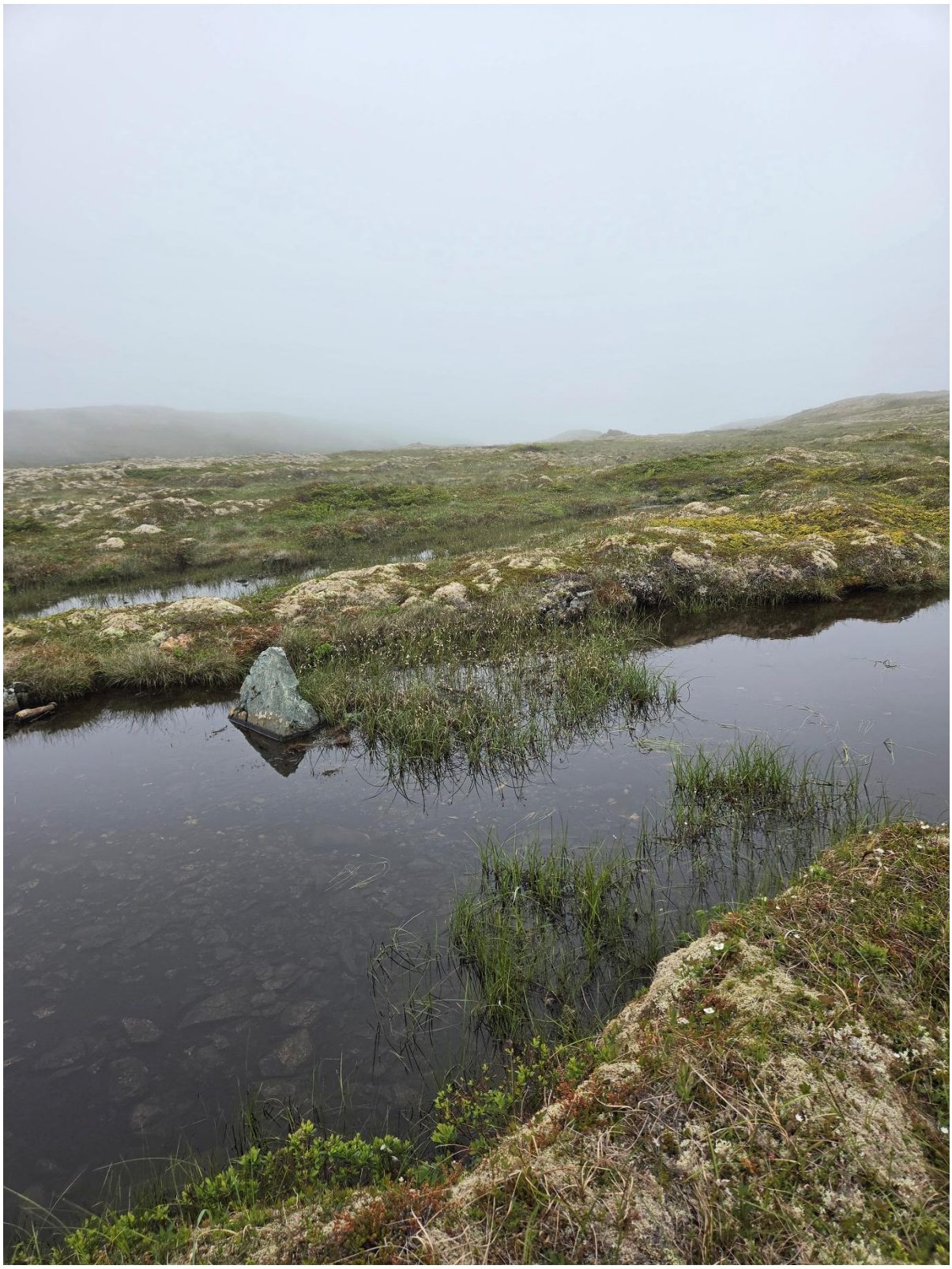

Figure 4: Site conditions

Figure 5: Vegetation on pond edge