

Comment Index

Aulds Cove Wind Project, Guysborough County

Publication Date: February 13, 2026

Government

Number	Source	Date Received
1	Nova Scotia Department of Environment and Climate Change – Protected Areas Branch	December 17, 2025
2	Impact Assessment Agency of Canada	December 23, 2025
3	Nova Scotia Department of Municipal Affairs	January 9, 2026
4	Nova Scotia Department of Environment and Climate Change - Inspection, Compliance and Enforcement Division	January 12, 2026
5	Transport Canada	January 14, 2026
6	Nova Scotia Department of Agriculture	January 15, 2026
7	Nova Scotia Department of Environment and Climate Change – Climate Change Division	January 16, 2026
8	Fisheries and Oceans Canada	January 16, 2026
9	Nova Scotia Department of Communities, Culture, Tourism and Heritage	January 19, 2026
10	Nova Scotia Department of Fisheries & Aquaculture	January 19, 2026
11	Nova Scotia Department of Environment and Climate Change - Sustainability and Applied Science Division, Air Quality Unit	January 19, 2026
12	Nova Scotia Department of Environment and Climate Change - Sustainability and Applied Science Division, Water Resources Management Branch	January 19, 2026
13	Nova Scotia Department of Public Works	January 19, 2026
14	Health Canada	January 19, 2026
15	Nova Scotia Department of Natural Resources and Department of Energy	January 19, 2026
16	Environment and Climate Change Canada	January 19, 2026
17	Nova Scotia Department of Environment and Climate Change - Sustainability and Applied Science Division, Environmental Health & Food Safety	January 20, 2026

Nova Scotia Mi'kmaq

Number	Source	Date Received
1	Kwilmu'kw Maw-Klusuaqn (KMK)	February 6, 2026

Public

Number	Source	Date Received
1	2 Anonymous Public Comments	December 18, 2025, to February 6, 2026
2	Maritime Aboriginal Aquatic Resources Secretariate (MAARS) / Native Council of Nova Scotia (NCNS)	February 6, 2026

Date: December 17, 2025

To: Mark McInnis, Environmental Assessment Officer

From: Protected Areas Branch Substantiability and Applied Science Division-Janet MacKinnon Executive Director

Subject: **Aulds Cove Wind Project, Guysborough County, Nova Scotia**

Scope of review:

This review focuses on the following mandate: Protected areas

List of Documents Reviewed: Wilderness Areas Protection Act- online mapping

Details of Technical Review: No Protected areas in vicinity

Key Considerations:

No further comments



Suite 200
1801 Hollis Street
Halifax NS B3J 3N4

Bureau 200
1801 rue Hollis
Halifax, NE B3J 3N4

December 23, 2025

Mark McInnis
Environmental Assessment Officer
Policy Division, EA Branch
Nova Scotia Department of Environment and Climate Change
Mark.McInnis@novascotia.ca

SUBJECT: Aulds Cove Wind Project - Guysborough County

Dear Mark McInnis:

Thank you for the opportunity to review the registration document for the Aulds Cove Wind Project (the Project), received on December 11, 2025.

The federal environmental assessment process is set out in the [Impact Assessment Act](#) (the IAA). The [Physical Activities Regulations](#) (the Regulations) set out a list of physical activities considered to be “designated projects” under the IAA.

While it is the responsibility of proponents to determine whether their proposed project includes physical activities described in the Regulations of the IAA, based on the information submitted to the Province of Nova Scotia on the proposed Project, the Impact Assessment Agency of Canada (IAAC) is of the opinion that, as proposed, the project does not appear to be described in the Regulations. As such, the proponent would not be expected to submit an Initial Project Description of a designated project. If the project changes from what has been described in its provincial registration, the proponent is advised to contact IAAC if, in their view, any proposed project activities may be described in the Regulations.

The proponent is advised that under section 9(1) of the IAA, the Minister may, on request or on the Minister’s own initiative, by order, designate a physical activity that is not prescribed by regulations made under the Regulations if, in the Minister’s opinion, the carrying out of that physical activity may cause adverse effects within federal jurisdiction or direct or incidental adverse effects. Should IAAC receive a request for a project to be designated, IAAC would contact the proponent with further information.

Please note that for physical activities not described in the Regulations, should the project be carried out in whole or in part on federal lands, section 82 of the IAA would apply if any federal authority is required to exercise a power, duty or function under an Act other than IAA in order for the project to proceed, or if a federal authority is providing financial assistance for the purpose of enabling the project to be carried out. In that case, that federal authority must ensure that any project assessment requirements under the applicable sections of the IAA are satisfied.

We also note that in proceeding with the project, the proponent may still be required to obtain or seek amendment to other federal regulatory permits, authorizations and/or licences.

The proponent is encouraged to contact IAAC at (902) 426-0564 if it has additional information that may be relevant to IAAC or if it has any questions or concerns related to the above matters.

Erin Norton

A/ Project Manager, Atlantic Regional Office
Impact Assessment Agency of Canada / Government of Canada

Gestionnaire de projet p.i., bureau de l'atlantique
Agence d'évaluation d'impact du Canada / Gouvernement du Canada

(EA #25-11)

DATE: January 7, 2026
TO: Mark McInnis, Environmental Assessment Officer
FROM: Dawn Sutherland, Provincial Director of Planning
SUBJECT: AULDS COVE WIND PROJECT, MUNICIPALITY OF DISTRICT OF GUYSBOROUGH

Scope of Review: This review focuses on the following Department of Municipal Affairs (DMA) mandates: Statements of Provincial Interest and engagement with municipalities.

Document Reviewed: Environmental Assessment Registration Document - Aulds Cove Wind Project

Details of Technical Review: The Proponent engaged with the Municipality of the District of Guysborough (MODG) and have listed the required permitting and applicable by-laws in section 2.3.3 of the EA Document. The Project Team has engaged with the MODG municipal planner, economic development staff, councillors and the Warden throughout the development of the Project. The Proponent has committed to ongoing engagement with municipal staff, councillors and other elected officials about the Project through the production of a Development Agreement for the Project. The Development Agreement will establish Project-specific rules and guidelines regarding setbacks, various emissions limits and restrictions, and more, following the EA process.

Statements of Provincial Interest:

- **Drinking Water:** Reasonably consistent. Although there will be no direct Project-waterbody interactions, approximately 14% of the Mulgrave Municipal Water Supply Area overlaps the Project Area. Although the Town's water supply is well established, it is not designated as a Protected Water Area under the *Environment Act*. Conversations with municipal officials and staff indicated that development within the Water Supply Area will be reviewed as part of municipal Development Agreement processes.
- **Agricultural Land:** No anticipated impact. No agriculture has been identified in the Project area.
- **Flood Risk:** No anticipated impact. No flood areas are identified in the Project area. The Project's Study Area is at an elevation and distance from the coast that infrastructure is unlikely to be directly impacted by coastal flooding.
- **Infrastructure:** No anticipated impact. No identified impact on municipal infrastructure as defined by the provisions of the SPI.
- **Housing:** No anticipated impact. No identified impact on housing as defined by the provisions of the SPI.

Key Considerations: The Proponent should continue to engage with the Municipality of the District of Guysborough through the Development Agreement process and respond to concerns raised by the Town of Mulgrave.

Date: January 12, 2026

To: Mark McInnis, Environmental Assessment Officer

From: NSECC, Inspection Compliance & Enforcement (ICE)

Subject: **Aulds Cove Wind Project, Guysborough County, Nova Scotia**

Scope of review:

This review focuses on the following mandate: general overview and technical considerations

List of Documents Reviewed:

- Environmental Assessment Registration Document (EARD): Aulds Cove Wind Project

Details of Technical Review:

- Table 2.2 lists “Notification of blasting (if required)”; however, if blasting is required a pre-blast survey and blasting plan are needed. Pre-blast surveys are noted later in Table 6.4, and again in Section 7.2.5 (for all well users within 800 m of any blasting). The need for a blasting plan is also identified later in the EARD.
- Blasting, if required, should be a setback category in Table 3.3. Blasting setback distances are included in Section IV(2) of the Nova Scotia Pit and Quarry Guidelines.
- Water for the Town of Mulgrave is withdrawn from Grants Lake, which is within 30 m of the Study Area. Planning will include specific consideration of the protection of the Mulgrave Municipal Water Supply Area in consultation with the Town of Mulgrave Water Utility.
- Site preparation and construction is expected to start in Q2 2026 and take approximately 15 months. During site preparation and construction erosion and sedimentation control measures will be installed.
- A Vegetation Management Plan will be initiated to ensure that access roads and turbine locations remain clear of vegetation (as required for safe operation). Proponent should note, an approval is required prior to herbicide use.
- The operations and maintenance phase is expected to start around Q3 2027 and last 25 years. Maintenance will conform to manufacturer equipment specifications, industry best management practices (BMPs), and standard operating procedures.
- Decommissioning is expected to take less than a year at the project end of life. Prior to decommissioning, NSECC and MODG will be provided with decommissioning plans for review and compliance with the Project’s EA conditions. Construction and demolition waste will be recovered and recycled, where possible.
- GCRED will implement a Complaint Resolution Plan to investigate and mitigate (if required) noise-related complaints.

- Impacts to watercourses/waterbodies have been reduced by minimizing watercourse crossings and maintaining setbacks where possible. Additional permitting will be required to support watercourse crossings and BMPs will be followed during culvert installations, and any work conducted within the bed of a watercourse will be between June 1 and September 30 to avoid sensitive periods in the life cycles of fish, to better control water flow, and to allow for a faster vegetation period.
- GCRED has also committed to the development and implementation of a Terrestrial Habitat and Wildlife, Management Plan, Erosion and Sediment Control Plan, Surface Water Management Plan, Contingency Plan, and Complaint Resolution Plan.
- Measures to minimize and mitigate the creation and emission of pollutants, including fugitive dust and exhaust emissions, will be implemented for the Project (particularly for the construction phase).
- Water or other approved dust suppressant technologies will be used to minimize airborne emissions.
- Impacts to wetlands will be avoided to the extent possible. Where wetland impacts are unavoidable, wetland alterations will be completed.
- Public engagement will likely be largely facilitated through the CLC, which will be established to provide members of the public with the opportunity to meet at regular intervals throughout the Project's lifespan and discuss its effects.
- A Groundwater Management Plan may be needed if construction of structures go below the seasonal water table.

Key Considerations: (provide in non-technical language)

- Plans and mitigation measures, as noted above, should be developed and implemented.
- Additional NSECC notifications/approvals may include: wetland alterations, watercourse alterations, on-site sewage disposal system, and herbicide use.



Date: January 14, 2026

To: Mark McInnis, Environmental Assessment Officer

From: Sylvie Poirier, Regional Environmental Advisor, Transport Canada

Subject: **Aulds Cove Wind Project, Guysborough County, Nova Scotia**

Scope of review:

This review focuses on the following mandate: Transport Canada

List of Documents Reviewed:

EA Registration Document

Details of Technical Review:

Transport Canada (TC) has reviewed the Environmental Assessment Registration Document (EARD) and is providing the specialist advice/information below in areas related to its mandate and responsibilities. Our advice is meant to inform the recommendation that Nova Scotia Environment and Climate Change (NSECC) will make.

Key Considerations: (provide in non-technical language)

Impact Assessment

As the proposed project will not occur wholly or partially on federal lands, TC does not require an environmental review under Section 82 of the *Impact Assessment Act* (IAA).

Civil Aviation

The Proponent will need to complete an Aeronautical Assessment Form (AAF) for the wind turbines to assess marking and lighting requirements as per [Standard 621 of the Canadian Aviation Regulations \(CARs\)](#) - Obstruction Marking and Lighting.

Further information regarding the AAF and how to submit it can be found at:

<https://tc.canada.ca/en/aviation/general-operating-flight-rules/marking-lighting-obstacles-air-navigation>

Navigation Protection Program

The Project consists of components that may implicate navigable waters including: access road and transmission lines.

The proposed access roads, and transmission lines appear to potentially involve non-scheduled waterways under the *Canadian Navigable Waters Act* (CNWA), and the proponent will need to consider the following:



These proposed project components may require a CNWA approval.

Access Roads – watercourse crossings:

****Note, that any bridges with piers placed below the high water mark of a watercourse always require an approval as outlined in the Major Works Order. (and an application for approval would be required)**

Major Works Order

<https://laws-lois.justice.gc.ca/eng/regulations/SOR-2019-320/index.html>

If the bridge is not a Major Work, the proponent can assess any individual access road watercourse crossings (culverts and bridges etc against the criteria in the **Minor Works Order** (Section 34 – Watercourse Crossings):

Minor Works Order

<https://laws.justice.gc.ca/eng/regulations/SOR-2021-170/index.html>

Transmission Lines:

The proponent can assess the transmission lines against the criteria in the **Minor Works Order** (Section 16– Aerial Cables):

Minor Works Order

<https://laws-lois.justice.gc.ca/eng/regulations/SOR-2021-170/index.html>

IF a specific watercourse crossing or transmission line crossing meets ALL the criteria in the respective section of the Minor Works Order, they are considered Minor Works and do not require a CNWA approval and would only be required to follow the Deposit and Publication requirements in sections 3(2), 3(3) and 4 of the Minor Works Order.

IF a specific watercourse crossing or transmission line crossing does NOT meet ALL the criteria, the proponent may be required to submit an application for approval.

Under the CNWA, owners of works – (other than a minor work or a major work) – including culverts, bridges and watercourse crossings - that are located on navigable waterways not listed in the schedule, have the option to:

1. either apply to the Minister of Transport for an approval; (approval review process and advertising and 30 day registry public review)
- or**
2. seek authorization through the public resolution process, and deposit specific information regarding their work on the new Common Project Search (online registry) inviting any interested party to comment. (Public Resolution Notification)

The application process, the public resolution process and process for publishing a notification of a Minor Work can be accessed at the following link:

[External Submission Site for the Navigation Protection Program](#)

(create an account first if needed)



Additional guidance information and links for the NPP regulatory process can be found here:

Canadian Navigable Waters Act (CNWA)

<https://www.tc.gc.ca/eng/programs-632.html>

<https://www.tc.gc.ca/eng/canadian-navigable-waters-act.html>

Navigation Protection Program, Transport Canada

<http://www.tc.gc.ca/eng/programs-621.html>

NPP Contact Coordinates:

Navigation Protection Program | Programme de protection de la navigation

Transport Canada - Atlantic Region / Heritage Court, 6th Floor, 95 Foundry Street, Moncton, N.B. E1C 5H7 |

Transports Canada - Région de l'Atlantique / Place Héritage, 6^e étage - 95 rue Foundry, Moncton, N.-B. E1C 5H7

Tel | Tél. : 506-851-3113 / Fax | Téléc. : 506-851-7542

Email / Courriel : NPPATL-PPNATL@tc.gc.ca



Transport Canada has introduced new fees for services, under the *Canadian Navigable Waters Act*, as part of the Fee Modernization initiative. Find out more at: [Canada Gazette, Part 2, Volume 158, Number 14: Canadian Navigable Waters Act Fees Regulations](#)

Transports Canada introduit une nouvelle structure de redevances, en vertu de la *Loi sur les eaux navigables canadiennes*, dans le cadre de l'initiative de modernisation des frais. Plus d'informations ici: [La Gazette du Canada, Partie 2, volume 158, numéro 14 : Règlement sur les droits relatifs à la Loi sur les eaux navigables canadiennes](#)

Agriculture

Date: Jan 13, 2026

To: Mark McInnis, Environmental Assessment Officer

From: Heather Hughes, Executive Director, Policy and Corporate Services,
Nova Scotia Department of Agriculture

Subject: Aulds Cove Wind Project
Guysborough County, Nova Scotia

Thank you for the opportunity to review the documents for the above-noted project.

No agricultural impacts are anticipated given that:

- There are no agricultural lands within the project area.
- There is limited potential for agriculture within a 2km boundary around the project site. Lands within the boundary are classified as 12.6% Class 4 and 87.4% Class 7 (Canadian Land Inventory). Class 4 has “severe limitations” and Class 7 has “no capability of arable culture or permanent pasture”.
- Within the boundary there are 2 acres of rotational crops and 50 acres of long-term (blueberry) crops all situated at least 1km from the project. These fields are not expected to be impacted.
- The nearest registered farm is 1.8 km outside the 2km buffer with the Strait of Canso running between the farm and the boundary.

Date: **January 16, 2026**

To: **Mark McInnis, Environmental Assessment Officer**

From: **Climate Change Division – Lori Skaine, Executive Director**

Subject: **Aulds Cove Wind Project, Guysborough County, Nova Scotia**

Scope of review:

This review focuses on the following mandate: Climate Change Adaptation and Mitigation

List of Documents Reviewed: Environmental Assessment Registration Document

Details of Technical Review:

Adaptation

- The Aulds Cove Wind Project Registration document recognizes that climate change is important for long-term infrastructure performance and reliable operations.
- The proponent reviewed 30 years of historical climate data (1995 - 2024) from three Port Hawkesbury weather stations located close to the area. The assessment also reviewed future climate projections generated from ClimateData.ca using multiple emissions scenarios and long-term climate trends from NOAA covering 1895 - 2021 across Nova Scotia.
- Three main climate drivers were identified: rising air temperatures, changes in precipitation, and sea level rise. The proponent has provided an appropriate overview of operational risks associated with the climate drivers identified, including: worker heat stress, increased tick exposure, extreme rainfall, overland flooding, drainage system exceedance, and potential disruptions to nearby coastal and regional access routes due to coastal and overland flooding. The assessment also identifies other climate-related natural hazards, including severe weather, wildfire, and turbine icing, and proposes mitigation measures to manage these risks.

Mitigation:

- The primary sources of greenhouse gas (GHG) emissions associated with the project as described in section 7.1.2.4 of the EA registration document are associated with the construction phase of the project. These include turbine production, cement production, transportation of cement and turbine components, fuel combustion from heavy machinery, light-duty vehicles, other equipment, and land clearing.

- Per Table 7.13 of the EA registration document, the total expected GHG emissions from the construction phase amount to 53,600.52 tCO_{2e}, while the operational phase of the project is expected to produce 993.93 tCO_{2e} of emissions.
- The proponent estimates annual generation of 608,417,040 kWh/year of electricity. Using a Nova Scotia grid mix comparison, they estimate that producing the same electricity from the grid would result in 293,910.71 tCO_{2e} for the 2025 year.

Key Considerations: (provide in non-technical language)

Adaptation

- As the proponent identified the potential for flood susceptibility along nearby access routes, the proponent may wish to consider specific mitigation measures to support operational continuity and worker safety during flooding events.
- The proponent may wish to consider using climate data in the design and planning stages to guide operational thresholds for long-term project sustainability.

Mitigation:

- The proposed mitigation steps identified in Section 7.1.2.5 of the EA registration document are appropriate and include use of locally sourced materials, utilization, where possible, of the shortest construction and transport routes, reduction of double handling of materials, regular maintenance, personnel training, and the disposal of hazardous materials in compliance with local requirements.
- The proponent notes that the 2025 grid comparison approach is indicative and acknowledges that grid emissions intensity is expected to decline over time. We suggest the proponent present avoided emissions as a range using a small set of transparent scenarios (e.g., 2025 intensity held constant, declining intensity aligned with legislated policies, and a faster decarbonization scenario).
- The proponent's construction phase emissions are primarily driven by steel and concrete. Where feasible and particularly in cases where procurement choices may reduce embodied emissions, we suggest the proponent complement their quantified life cycle GHG estimates with procurement information showing (i) whether major suppliers are subject to carbon constraint requirements (e.g., output based pricing systems/emissions trading systems or equivalent), and (ii) any supplier-specific verified embodied carbon documentation (e.g., environmental product declarations) used to inform procurement decisions.



Fisheries and Oceans
Canada

Pêches et Océans
Canada

Bedford Institute of Oceanography
1 Challenger Drive
P.O. Box 1006, Station P500
Dartmouth, Nova Scotia B2Y 4A2

Date: January 16, 2026

To: Mark McInnis, Environmental Assessment Officer

From: Tiffany MacAulay, Linear Development, Regulatory Review Biologist, Fish and Fish Habitat Protection Program

Subject: **Aulds Cove Wind Project, Guysborough County, Nova Scotia**

Scope of review:

Fisheries and Oceans Canada (DFO) is responsible for administering the fish and fish habitat protection provisions of the *Fisheries Act* (FA), the *Species at Risk Act* (SARA), and the *Aquatic Invasive Species Regulations*.

DFO's review focused on the impacts of the works outlined in the Environmental Assessment Registration Document for the Aulds Cove Wind Project to potentially result in:

- the death of fish by means other than fishing and the harmful alteration, disruption or destruction of fish habitat, which are prohibited under subsections 34.4(1) and 35(1) of the *Fisheries Act*,
- effects to listed aquatic species at risk, any part of their critical habitat or the residences of their individuals in a manner which is prohibited under sections 32, 33 and subsection 58(1) of the *Species at Risk Act*; and,
- The introduction of aquatic species into regions or bodies of water frequented by fish where they are not indigenous, which is prohibited under section 10 of the *Aquatic Invasive Species Regulations*.

List of Documents Reviewed:

- Environmental Assessment Registration Document - Aulds Cove Wind Project.pdf
- 24-10440_GreenCurrent_Drawings2.1-4.1.pdf
- 24-10440_GreenCurrent_Drawings7.1-7.8.pdf
- 24-10440_GreenCurrent_Drawings7.9-7.17A.pdf
- 24-10440_GreenCurrent_Drawings7.17B-7.17I.pdf
- 24-10440_GreenCurrent_Drawings7.18-7.20F.pdf
- 24-10440_GreenCurrent_Drawings7.20G-7.25.pdf
- 24-10440_GreenCurrent_Drawings7.26-7.32C.pdf
- 24-10440_GreenCurrent_Drawings7.32D-13.1.pdf

Details of Technical Review:

Risk Assessment: Site Preparation and Construction Schedule	
Identify Gap/Risk	<p>In Section 3.4.1, a timeline is not provided for when site preparation works (e.g., tree clearing/vegetation removal, access road construction, culvert installations) may be conducted prior to the construction phase.</p> <p>Site preparation in advance of the works, undertakings, and/or activities (WUAs) may result in harmful impacts to fish and fish habitat.</p>
Can it be addressed in another permit/approval or with a T&C?	<p>The identified gap can be addressed during the NSECC watercourse and/or wetland alteration approval process(es) and DFO regulatory review process. WUAs associated with this project in or near water that may result in potential harmful impacts on fish or fish habitat will require DFO regulatory review to avoid, mitigate or offset those impacts.</p>
Define/provide detail	<p>For WUAs that may result in potential harmful impacts on fish or fish habitat, additional information will be required as part of the DFO regulatory review process, including detailed information on the proposed WUAs, a detailed description of the fish and fish habitat found at the location of the proposed WUAs, a detailed description on the likely effects of the proposed WUAs on fish and fish habitat, and a detailed description of the measures and standards that will be implemented to avoid and mitigate potential harmful impacts on fish and fish habitat.</p>
Risk Assessment: Wetland Assessment	
Identify Gap/Risk	<p>Impacts to fish and fish habitat from wetland alterations are not clearly outlined, including both direct and indirect impacts.</p> <p>For example, in Section 7.3.2.6, Table 7.42 identifies the estimated area of potential impact for each wetland. However there is no clarification within the report about which wetlands, if any, provide direct and/or indirect habitat for fish, or the estimated area of impact within those wetlands on fish and fish habitat (both direct and indirect impacts should be considered).</p> <p>Furthermore, only a summary of the WESP-AC assessments (Table 7.40) is included in the report. Detailed WESP-AC forms/assessments should be provided to support the analysis of potential impacts to fish and fish habitat.</p>
Can it be addressed in another	<p>The identified gap can be addressed during the NSECC watercourse and/or wetland alteration approval process(es) and DFO regulatory review process. WUAs associated with this project in or near water</p>

permit/approval or with a T&C?	that may result in potential harmful impacts on fish or fish habitat will require DFO regulatory review to avoid, mitigate or offset those impacts.
Define/provide detail	For WUAs that may result in potential harmful impacts on fish or fish habitat, additional information will be required as part of the DFO regulatory review process, including detailed information on the proposed WUAs, a detailed description of the fish and fish habitat found at the location of the proposed WUAs (including direct and indirect habitat that wetlands within the project area provide for fish), a detailed description on the likely effects of the proposed WUAs on fish and fish habitat, and a detailed description of the measures and standards that will be implemented to avoid and mitigate potential harmful impacts on fish and fish habitat.
Risk Assessment: Watercourse Crossing Designs	
Identify Gap/Risk	Table 7.35, Section 7.3.1.6, of the report identifies the potential alterations at 10 proposed watercourse crossings, however specific information related to the designs for each crossing is not provided.
Can it be addressed in another permit/approval or with a T&C?	The identified gap can be addressed during the NSECC watercourse and/or wetland alteration approval process(es) and DFO regulatory review process. WUAs associated with this project in or near water that may result in potential harmful impacts on fish or fish habitat will require DFO regulatory review to avoid, mitigate or offset those impacts.
Define/provide detail	For WUAs that may result in potential harmful impacts on fish or fish habitat, additional information will be required as part of the DFO regulatory review process, including detailed information on the proposed WUAs, a detailed description of the fish and fish habitat found at the location of the proposed WUAs, a detailed description on the likely effects of the proposed WUAs on fish and fish habitat, and a detailed description of the measures and standards that will be implemented to avoid and mitigate potential harmful impacts on fish and fish habitat.
Layout Changes	
Identify Gap/Risk	Section 4.1.4 indicates that minor layout modifications were made to the Project following the 2025 field season, thus there are areas that have yet to be assessed. Updated information is required on the potential impacts to fish and fish habitat within these areas.
Can it be addressed in another	The identified gap can be addressed during the NSECC watercourse and/or wetland alteration approval process(es) and DFO regulatory review process. WUAs associated with this project in or near water

permit/approval or with a T&C?	that may result in potential harmful impacts on fish or fish habitat will require DFO regulatory review to avoid, mitigate or offset those impacts.
Define/provide detail	For WUAs that may result in potential harmful impacts on fish or fish habitat, additional information will be required as part of the DFO regulatory review process, including detailed information on the proposed WUAs, a detailed description of the fish and fish habitat found at the location of the proposed WUAs, a detailed description on the likely effects of the proposed WUAs on fish and fish habitat, and a detailed description of the measures and standards that will be implemented to avoid and mitigate potential harmful impacts on fish and fish habitat.

Key Recommendations: (provide in non-technical language)

DFO recommends the proponent:

- Submit detailed information on the proposed watercourse crossing designs and watercourse and wetland alterations, detailed descriptions of the fish and fish habitat found at the location of the proposed WUAs (including direct and indirect fish habitat for impacted wetlands within the project area), detailed descriptions on the likely effects of the proposed WUAs on fish and fish habitat (including local and cumulative impacts, potential impacts on species at risk, and direct and indirect impacts on fish habitat), and detailed descriptions of the measures and standards that will be implemented to avoid and mitigate potential harmful impacts on fish and fish habitat during all project phases.
- Consider open-bottom structures, such as clear-span bridges and open-bottom arch culverts for fish bearing watercourse crossings rather than closed bottom structures, where possible; and,
- Refer to DFO's website, <https://www.dfo-mpo.gc.ca/pnw-ppe/index-eng.html>, for further information on DFO's regulatory review process and for further measures to protect fish and fish habitat.

This information can be provided through the NSECC watercourse and/or wetland alteration approval process(es) and/or through submission of a DFO Request for Review application directly to DFO. It is recommended that all works, undertakings or activities in or near water associated with the Aulds Cove Wind Project be submitted as one application and include a summary table describing all works, undertakings or activities in or near water. DFO will then conduct a regulatory review of the proposed project under the *Fisheries Act*, *Species at Risk Act*, and Aquatic Invasive Species Regulations to determine if an authorization under the *Fisheries Act* and/or a *Species at Risk* permit is required. It is further recommended that the proponent contact DFO at ReferralsMaritimes@dfo-mpo.gc.ca prior to the submission of applications for preliminary



discussions on regulatory information requirements under of the *Fisheries Act* and *Species at Risk Act*.

Date: January 19, 2025
To: Mark McInnis, Environmental Assessment Officer
From: Beth Lewis, Director of Special Places Protection
Subject: **Aulds Cove Wind Project, Guysborough County**

Scope of review:

This review focuses on the following mandate: ***Archaeology and Geology***

List of Documents Reviewed:

EA Document Section 9.0.

Final Report for Heritage Research Permit (HRP) A2025NS124 – Auld’s Cove (Green Current) Wind Farm

Report Approval Letter from CCTH to Davis MacIntyre & Associates

Details of Technical Review (Archaeology):

Two (2) areas of high archaeological potential were identified within the assessment area (HP01 and HP02). No other areas of moderate to high archaeological potential, significant archaeological features, or cultural materials were identified during the assessment, and the remainder of the proposed development area was ascribed low potential for encountering protected archaeological resources.

Section 9.4 of the EA Document indicates that the two areas of elevated archaeological potential will be avoided, and this aligns with the recommendations of the ARIA Report. If avoidance proves to not be feasible, subsurface testing must be completed.

Key Considerations: (provide in non-technical language):

We have no concerns. CCTH reviewed the ARIA report and accepted and approved the report with the recommendation for avoidance. If avoidance cannot occur, then shovel testing must take place. CCTH also approved this recommendation. Please append the report approval letter from CCTH to the EA document.

Details of Technical Review (Geology):

The bedrock geology of this site is mapped as Lower Carboniferous Horton Group. There is the possibility of encountering plant fossils and rare vertebrate fossils if the area was going have extensive bedrock excavation. However, the area is covered with glacial surficial geology with enough depth that bedrock is not likely to be encountered.

Key Considerations: (provide in non-technical language):

Significant palaeontology resources are not expected to be encountered at this site.

Fisheries and Aquaculture

Date: January 19, 2026

To: Mark McInnis

From: Lesley O'Brien-Latham, Executive Director, Policy and Strategic Advisory Services

Subject: Aulds Cove Wind Project, Guysborough County

Scope of review:

The scope of this review follows the Department of Fisheries and Aquaculture's (NSDFA) legislated mandate to develop, promote and support fishing, aquaculture, seafood processing and sportfishing in Nova Scotia.

List of Documents Reviewed:

- Environmental Assessment Registration Document (EARD) – Aulds Cove Wind Project.pdf
- 24-10440_GreenCurrent_Drawings2.1-4.1.pdf
- 24-10440_GreenCurrent_Drawings7.9-7.17A.pdf
- 24-10440_GreenCurrent_Drawings7.17B-7.17I
- EARD - Aulds Cove Wind Project - Appendix B-K.pdf
- Drawings 2.1-4.1

Details of Technical Review:Aquaculture:

NSDFA's Aquaculture Division's mandate includes the regulation, development, promotion and support of aquaculture and rockweed industries in Nova Scotia. The project was reviewed in four key areas which could affect the aquaculture and rockweed harvesting industries. These areas are sediment creation, power outages, water withdrawal, and water discharge.

There are nine (9) aquaculture sites within 25km of the proposed project. Of these, eight (8) are marine shellfish sites, and one (1) is a marine finfish site.

Sediment is likely to be generated during the road construction and site preparation phases. There may also be minor sediment dispersal during the site's operation. Sediment can cause turbidity in the water column, which can affect the ability of marine plants to obtain adequate sunlight for growth, reducing oxygen levels for both fin and shellfish. Settling sediment can obstruct feeding and destroy habitat by covering benthic substrates, smothering the benthic habitat, and impacting the nutrients available to shellfish bottom cultures. High turbidity levels can also affect the ability of fish gills to absorb dissolved oxygen. Sediment can house pathogens and undesired microorganisms, increasing the risk of disease outbreaks among aquatic species. The results can range from reduced growth to morbidity. The EARD states that mitigation measures will be implemented, which should help to ensure a low risk to aquaculture sites, if applied appropriately. Mitigation measures should be monitored to ensure efficacy, which the EARD indicates is not a planned activity. The applicant should be made aware of the aquaculture operations within the area and ensure mitigations are implemented appropriately.

There is no mention of power supply disruption in the EARD.

The impacts of the project on water are related to removal of plants and watercourse changes (via activities such as culvert installation), rather than water discharge or water withdrawal. Changes in water quality or quantity may be due to activities during road construction (sedimentation, vegetation removal, and water redirection). Mitigation measures have been included within the EARD that plan to avoid and mitigate any potential effects on watercourses, and the subsequent surface water quantity and quality. The mitigations provided should result in reduced risk to aquaculture sites from these activities, if applied appropriately.

Marine Fisheries:

NSDFA's Marine Fisheries Division's mandate includes Nova Scotia's commercial Marine Fisheries, and the processing, and buying of marine seafood products.

The most important commercial fisheries which takes place in the waters adjacent to the proposed development sites, is Lobster. These fisheries are conducted in the Spring in both waters North of the Canso Causeway (Frankville) in Lobster Fishing Area (LFA 26b) and in waters South of the causeway (Mulgrave and Grosvenore) in LFA 29. First Nations Bands conduct commercial livelihood fisheries and Food, Social and Ceremonial purposes for lobster in both LFAs.

There are no commercial fish processing operations in the areas proposed for this development. There is one major lobster buying station located at a private wharf in Aulds Cove, operated by a private company BST Lobster Ltd. There is also a Federal Government wharf located in Aulds Cove, used by Canadian Coast Guard and Transport Canada. Mulgrave wharf facility is operated by the Mulgrave Port Authority. Clearwater uses this facility to conduct unloading and maintenance on their offshore clam vessel.

Inland Fisheries:

NSDFA's Inland Fisheries Division's mandate is managing Nova Scotia's recreational sportfishery.

The EARD identified watercourses/waterbodies and used a variety of sampling methods to get a snapshot of species present, which included Brook Trout and Atlantic Salmon. The Proponent reported effort and species caught per site. When species were absent in surveys, but previously identified within watershed, they assumed their presence.

The risks identified in the EARD include, habitat loss, altered hydrology, erosion and sedimentation, and fish injury or mortality. The Proponent indicated that mitigation measures will be in place to reduce potential impacts on watercourses. All work will have to be done in accordance with NSECC's *Watercourse Alterations Standards*, by certified Installer/Sizer and require the appropriate permitting. The Proponent also indicated they will develop and implement NSECC's mandated: *Surface Water Management Plan*, *Erosion and Sediment Control Plan*, and *Contingency Plan*. This project could facilitate access for recreational anglers to several watercourses within the study area, which would be a potential benefit to sportfishing.

Key Considerations: (provide in non-technical language)

Risks to aquaculture sites from sediments need to be monitored and mitigated appropriately. The applicant should be made aware of the aquaculture operations within the area and ensure mitigations are implemented appropriately.

The proposed project has no marine activity. As long as the suggested mitigation measures are in place, the project poses negligible impacts to the commercial fishing activity and operations at the either wharf in Aulds Cove or the Mulgrave Port Authority facility.

If the Proponent adheres to all identified mitigation measures in the EARD, the impacts to sportfishing will be negligible, if the provided road system remains open for public access.

Project proponent should also be made aware of:

- the [Fisheries and Coastal Resources Act](#),
- Provincial [Aquaculture License and Lease Regulations](#),
- Provincial [Aquaculture Management Regulations](#),
- the [Nova Scotia Rock Weed Harvesting Regulations](#), and
- the Department's [Site Mapping Tool](#) for information on the location of sites and leases in the area of their proposed project.

Date: January 12, 2026

To: Mark McInnis, Environmental Assessment Officer

From: Air Quality Unit

Subject: **Aulds Cove Wind Project, Guysborough County, Nova Scotia**

Scope of review:

This review focuses on the following mandate: Air Quality

List of Documents Reviewed:

- *Aulds Cove Wind Project EA Registration Document*
- *Drawings 7.1-7.8*

Details of Technical Review:

The purpose of the proposed undertaking is to construct and operate a 147-megawatt (MW) wind power project with up to 21 turbines and associated infrastructure (i.e., access roads, substation, interconnection to the power grid, buildings, etc.) that will generate renewable electricity for use on the Nova Scotia power grid and support the province's transition to renewable energy. The Project intends to begin construction in 2026 and is expected to be operational for at least 25 years.

No baseline monitoring was undertaken, instead the baseline review relied on data from the National Air Pollution Surveillance (NAPS) monitoring station in Port Hawkesbury, approximately 5.1 km southeast of the Project, from 2020-2024.

Project activities will primarily interact with the atmospheric environment through fugitive dust and exhaust emissions. The Project area is vegetated, which may help to reduce the travel distance of fugitive dust emissions from the Project. The closest receptor without an agreement with the EA applicant ("non-participating" receptor) is 673 m from the Project footprint and one participating receptor is located within the Project footprint, approximately 90 m from a proposed turbine location. It is not anticipated that the fugitive dust and exhaust emissions would impact the closest non-participating receptors or impact baseline air quality conditions beyond the local assessment area. The Proponent states they will implement mitigation measures to minimize potential air quality impacts for the participating receptor. Overall, fugitive dust and exhaust emissions are considered intermittent and short-term (construction phase only).

The EARD provides a list of proposed mitigations that could be used on site. These mitigations are appropriate and would reduce impacts if they are employed.

Key Considerations: (provide in non-technical language)

- It is unclear how effective dust management will be in the absence of a dust management plan with a clear chain of responsibility for actions, including timely complaint resolution.

Operational noise levels were assessed using the WindPRO noise model. The assessment included a baseline noise level of 35 dBA, which is based on Health Canada guidance, and a ground attenuation factor of 0.7. The use of this ground attenuation factor is a less conservative approach than would be recommended, which may lead to an underestimation of impacts on receptors. Three of the 19 receptors modelled had a predicted impact of 39 dBA and above, with the highest predicted cumulative impact reported to be 39.9 dBA. When rounding to the nearest decibel (which is standard practice), two receptors are predicted to experience noise at the 40 dBA limit. The modelling results were achieved with all turbines using serrated trailing edge (STE) blades to reduce the noise levels in the Study Area and at receptors.

The study included an assessment of low frequency noise, using the Finland low frequency model in WindPRO – no low frequency tonal components were identified.

The applicant commits to developing a complaints resolution plan as part of their measures to mitigate potential negative effects.

Key Considerations: (provide in non-technical language)

The Air Quality Unit notes the following key considerations:

- If the baseline noise level exceeds 35 dBA, it is possible that cumulative noise levels could exceed the 40 dBA noise limit at receptor locations once the windfarm is operational. Recording baseline noise levels prior to construction can be used as evidence by the proponent in the event that the Department requests monitoring as part of complaints investigations in the future if they were to occur.
- The noise assessment was completed using a less conservative ground attenuation factor than would be recommended. Consequently, the noise impact at a number of receptors may be underestimated.
- Modelling was completed with all of the turbines using STE blades. It is possible noise levels could exceed the 40 dBA noise limit at receptor locations if a different blade type is used.

Date: January 19, 2026

To: Mark McInnis, Environmental Assessment Officer

From: Water Resources Management Branch, Sustainability and Applied Science Division

Subject: **Aulds Cove Wind Project, Guysborough County, Nova Scotia**

Scope of review:

This review focuses on the following mandates: Groundwater quality and quantity, surface water quality and quantity, and wetlands.

List of Documents Reviewed:

EARD; Drawings; Appendices; GIS files

Details of Technical Review:

Groundwater:

The Aulds Cove Wind Power Project proposal consists of up to 21 turbines and associated infrastructure, including access roads, electrical collection system, substation, operations and maintenance (O&M) building, and a construction laydown area.

As identified in the EARD, the project is in an area of high elevation known as the Mulgrave Plateau. The bedrock in this area, and in which the majority of local drilled wells are likely completed, is sedimentary. The plateau rises about 160 m above sea level and is significantly higher than the coastline along the Strait of Canso and Highway 344, which runs between Mulgrave and Aulds Cove (near Highway 104). A steep gradient separates the plateau from the coast.

An operating quarry, Porcupine Mountain Aggregate Quarry, is located to the north between the Study Area and the coast.

Drainage and Groundwater

Drainage on the plateau generally follows surface topography. The EARD describes moderate elevation changes within the center of the Study Area, forming a watershed divide that directs water north and south out of the Study Area. As in other parts of Nova Scotia, groundwater flow is strongly influenced by surface topography and is expected to move regionally northeast toward the coast. However, shallow groundwater flow may be locally affected by watershed divides and terrain. The Mulgrave Plateau likely acts as a groundwater recharge area for fractured bedrock aquifers (mainly sedimentary) and as a source of shallow groundwater discharge to local watercourses, lakes and wetlands.

Water Wells

The EARD identified 92 water wells within 2 km of the Study Area using the NSECC Well Logs Database. Most wells are located along Highway 344, Marine Drive, with some likely along local roads on the plateau. Four (4) drilled wells are reportedly within 800 metres of the Assessment Area. The EARD notes that field verification will be required to confirm accuracy of the desktop review.

Municipal Water Supply

The southern portion of the study area overlaps with the Town of Mulgrave's municipal drinking water watershed. area. This supply is sourced from the Grant Lake reservoir which has connections to Summers Lake and Matties Lake. The degree of groundwater recharge from the Study Area/Project Area to these lakes is unknown.

Monitoring and Blasting

Monitoring and sampling of water wells within 800 m of the Assessment area is proposed if blasting occurs. The need for blasting and pre-blast surveys would be confirmed and assessed further during geotechnical investigations and during detailed engineering design.

Surface Water:

The project outlines 11.9 km of new access roads and 2.7 km of existing roads, 100 metres of transmission lines, a maintenance building, a substation, and 21 turbine pads. The EARD identified 15 watercourses within the project assessment area, defining 8 as intermittent, 2 as ephemeral, and 5 as perennial watercourses. Twelve of these watercourses will be directly affected, requiring nine new crossings and upgrades to three existing ones. The EARD anticipates a minor loss of fish habitat and has proposed mitigation measures.

The EARD provides sufficient details on the assessment of impact and mitigation measures. The proponent committed to reducing the impact on watercourses and waterbodies by minimizing watercourse crossings and maintaining setbacks where possible. The proponent committed to following Best Management Practices during culvert installations, submit watercourse alteration notification and/or apply for watercourse alteration approvals where necessary.

The project's permanent footprint is estimated at 64 hectares, but approximately 96 hectares of vegetation will be removed during construction, which could increase runoff, erosion, and sedimentation, potentially affecting nearby watercourses and water bodies. Road construction may alter natural drainage patterns in the project area during the construction phase. Regular monitoring of the water management systems, such as storm water retention ponds, as part of the surface water management plan proposed in the EARD will identify effectiveness of mitigations. The EARD outlines activities that may produce erosion and sedimentation during all project phases. The proponent committed to developing a site-specific Erosion and Sediment Control Plan to mitigate this effect.

The proponent committed to developing a water quality and water quantity monitoring plan for the impacted watercourses as part of the approval process, and surface water management plan to support appropriate drainage and mitigate the risk of flooding and drought.

The proponent committed to developing a contingency plan which will be used to prevent and manage hazardous spills during construction and operation and to mitigate erosion and sediment control failures that may occur during construction.

Wetlands:

The EARD identified 87 field-delineated wetlands, either partially or fully within the Assessment Area and a total of 17 wetlands that were identified as potential Wetlands of Special Significance (WSS). Of these, 52 wetlands have the potential for direct or indirect alteration, including 11 WSS. WSS were identified based on the presence of avifauna (Canada warbler and olive-sided flycatcher) and black ash. Vegetation clearing is expected within 2 black ash wetlands to facilitate the installation of collector lines, but the poles are expected to be placed outside of the wetlands, and no impacts are anticipated. Proposed alterations within the other WSS include road upgrades and new road and/or turbine placement. Micro-siting during detailed design should be conducted to avoid WSS and consultation with DNRR should be undertaken on setbacks for species at risk.

The EARD states that during detailed design, efforts will be made to microsite turbines and collector line infrastructure further away from wetlands to avoid impacts. The proponent has considered impacts to wetlands and avoided wetlands where practicable. The EARD provides a thorough and comprehensive overview of wetland mitigations that will be deployed during the construction and monitoring phases of the Project.

Key Considerations: (provide in non-technical language)

Groundwater:

There is potential for private water wells near the proposed project to be affected by changes to groundwater quantity or quality as a result of construction and operational activities. Given the size of the Project Area and proposed infrastructure with (over 21 turbines transmission line corridors and connecting roads) the groundwater recharge of this area has the potential to be impacted.

The Town of Mulgrave surface water supply, sourced from the Grant Lake reservoir and its connected lakes, may have some interaction with groundwater recharge and surface water recharge originating from the Project Area. According to the EARD, the proponent intends to seek permission to construct within the Municipal Water Supply Area of the Town of Mulgrave in consultation with the Town of Mulgrave Water Utility.

To assess potential impacts from the groundwater recharge area on nearby private wells, a baseline Water Well Survey should be conducted for the identified wells. This survey would provide initial data to evaluate changes in groundwater chemistry and quantity over time. The EARD notes the potential for conducting a 'pre-blast survey' of all wells within 800 m prior to construction (four wells have been preliminarily identified) as the basis for well surveying and sampling. The EARD approach relies solely on whether blasting occurs, making blasting the only proposed trigger for conducting a well water survey. However, there are other potential effects to groundwater from the activity for which a water well survey should be conducted in general.

Surface Water:

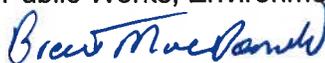
Mitigative measures proposed in the EARD to mitigate the impact on watercourses and fish habitat should reduce risks to surface water posed by the project. To further reduce potential project impact on nearby watercourses, the proponent should include details on how on-site runoff will be managed and how water management systems will be monitored in their Surface Water Management Plan.

Wetlands:

Additional micro-siting should be completed to reduce and avoid additional wetland alteration, to the extent possible, during the detailed design phase. If the project is approved, Wetland Alteration Approval(s) will be required for any wetlands proposed to be directly or indirectly altered along with any necessary compensation and monitoring plans. The proponent should utilize Nova Scotia's Wetland Alteration Application's Guided Template for the permit applications. Flagging of the wetland boundaries adjacent the construction areas should occur to prevent un-intended wetland alterations.

Date: January 14, 2026

To: Mark McInnis, Environmental Assessment Officer

From: Department of Public Works, Environmental Services – Brent MacDonald, P.Eng.,
Manager 

Subject: **Aulds Cove Wind Project, Guysborough County, Nova Scotia**

Scope of review:

This review focuses on the following mandate: Traffic Engineering and Road Safety_____

List of Documents Reviewed:

Green Current Renewable Energy Development Inc. Aulds Cove Wind Project

Details of Technical Review:

The Proponent is proposing to construct and operate a wind farm project of up to 21 wind turbines, in addition to building some access roads and other supporting infrastructure near Aulds Cove in Guysborough County.

The majority of the project development is occurring on privately owned land parcels. The main Departmental concerns are the accesses from provincially owned roads to the project area, as well as any required upgrades or modifications to these roads in support of the project. This also includes the transportation of turbine components using provincial road infrastructure to get to access the project area.

The Nova Scotia Department of Public Works provides the following comments on this EA Registration Document:

1. Provincial Regulatory Requirements are identified in Table 2.2 on page 4 of the registration document. Possible blasting is identified as well as the requirement for the Special Moves Permit and the Working Within Highway Right of Way (WWHROW) Permit. The requirement to comply with the Nova Scotia Temporary Workplace Traffic Control Manual (NSTWTCM) is also identified. Additional items are identified on page 16, regarding spring weight restrictions and potential access point modifications. These are all appropriate and inclusive.
2. On page 32, a meeting with NSDPW on October 14th, 2025 is mentioned where the proponent was instructed to “submit a Traffic Plan for component delivery and Working Within the Right of Way Application for collector system in right of way driveways” after EA approval. Additionally, on page 34, a general comment across

all regulators “highlighted the importance of sharing Project information early and in as much detail as possible.” These commitments must be adhered to and be followed up with as soon as practicable upon EA approval.

3. There are turbine components specifications that are identified on page 11 and throughout the report. This will need to be identified as part of the completion of the Special Moves Permit process, which also includes the transportation route for the turbine components. This is referenced in more detail on page 16 where it is stated “the transportation route is subject to the final turbine technology provider, who will undertake a comprehensive logistical study to determine the transportation route from the receiving and unloading port.” The Proponent will need to reach out to our Department Contacts for Special Moves, Darcey MacBain, and Devon Pinks, to identify next steps and requirements in the process. They can be reached at Darcey.MacBain@novascotia.ca and Devon.Pinks@novascotia.ca.
4. Construction of access roads for the project are identified on page 12 and 14. Potential modifications for existing roads are identified on page 16 and 17. Any new accesses off provincially owned roads (as identified on page 15 – Highway 344, Old Mulgrave Road, Havre Boucher Road), or any proposed road modification activities (as identified on page 16 and 17), will need to be approved through the local Area Manager through the Working Within Highway Right of Way Permit.
5. Traffic control measures are referenced on page 13 regarding transportation of turbine components. This would also apply to any temporary workplaces created as a result of any of the above-mentioned road modifications. These will need to comply with the appropriate section of the NSTWTCM. All Traffic Control Plans will need to be prepared by the proponent and will need to be approved through the local Area Manager’s office.
6. Setback and separation distances from all Public Roads in Table 3.3 include NSDPW and MODG are appropriate and inclusive.
7. Any blasting plans that may be required will need to be completed in conjunction with the local Area Manager’s office to evaluate and minimize its impact to traffic on any provincially owned roads.
8. With regards to Transportation related incidents, the mitigation measures identified on pages 275 and 276 are appropriate and inclusive.

Key Considerations: (provide in non-technical language)

1. Upon EA approval, the Proponent must provide a Traffic Plan and a Working Within the Right of Way Application for collector system in ROW driveways.
2. Turbine components must be identified in the Special Moves Permit. The Proponent is responsible for reaching out to the Department Contacts.

3. The Proponent must communicate with the local Area Manager regarding blasting activities, modifications to provincially owned roads and comply with the NSTWTCM.

From: [Allain, Jérémie \(HC/SC\)](#) on behalf of [IA-ATL / EI-ATL \(HC/SC\)](#)
To: [McInnis, Mark](#)
Cc: [Maclean, Lachlan \(HC/SC\)](#)
Subject: RE: FINAL REMINDER EA COMMENTS - Aulds Cove Wind Project, Guysborough County
Date: January 19, 2026 12:30:48 PM
Attachments: [image001.jpg](#)
[Human Health Considerations in IA.pdf](#)
[Generic noise advice for wind farm projects EN.pdf](#)

**** EXTERNAL EMAIL / COURRIEL EXTERNE ****

Exercice caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

Unclassified / Non classifié

Hello Mark,

As per your email below regarding Aulds Cove Wind Project, please identify any project-related human health impacts to which you require advice and guidance from Health Canada.

HC's role in Impact/Environmental Assessment is founded in statutory obligations under the Canadian Impact Assessment Act, and its knowledge and expertise can be called upon by reviewing bodies (e.g., Impact Assessment Agency of Canada, review panels, Indigenous groups and/or other jurisdictions). In the absence of such a request from one of the above noted groups, HC is unable to carry out a comprehensive review of the project. **However, HC can accommodate specific requests for human health advice and guidance related to provincial environmental assessments within a reasonable timeframe.**

Health Canada currently possesses expertise in the following areas related to human health:

- air quality;
- recreational and drinking water quality;
- traditional foods (country foods);
- noise; and
- methodological expertise in conducting human health risk assessments.

To help with your review of human health impacts, I have attached a document of common human health considerations in project reviews including links to Health Canada's guidance documents and generic noise advice for wind farm projects.

Regards,

Jérémie Allain, M.Sc
(il | he)

Spécialiste en évaluation d'impact – Région de l'Atlantique / DGORAL-Direction générale des opérations réglementaires et de l'application de la loi
Santé Canada / Gouvernement du Canada
jeremie.allain@hc-sc.gc.ca / Tél.: 514-213-1846

Impact Assessment Specialist – Atlantic Region / ROEB-Regulatory Operations and Enforcement Branch
Health Canada / Government of Canada
jeremie.allain@hc-sc.gc.ca / Tel.: 514-213-1846

Human Health Considerations in Impact Assessment

Health Canada (HC) provides the following generic considerations for evaluating human health impacts in environmental/impact assessment (EA/IA). Please note that this is not an exhaustive list of human health concerns that may result from projects, and that issues will vary based on project specifics. Please also note that HC does not approve or issue licenses, permits, or authorizations in relation to the IA. HC's role in Impact Assessment is founded in statutory obligations under the Canadian Impact Assessment Act, and its knowledge and expertise can be called upon by reviewing bodies (e.g., Impact Assessment Agency of Canada, review panels, Indigenous groups and/or other jurisdictions). In the absence of such a request from one of the above noted groups, HC is unable to carry out a comprehensive review of the project. However, HC is able to accommodate specific requests for human health advice and guidance related to provincial environmental assessments within a reasonable timeframe.

HC currently possesses expertise in the following areas related to human health: air quality, recreational and drinking water quality, traditional foods (country foods), noise, and methodological expertise in conducting human health risk assessment. Based on Health Canada's "Guidance for Evaluating Human Health Impacts in Environmental Assessment", please consider the following information on these topics to assist in your review.

	Consideration	Reference Document
Receptor Location(s)		
Please ensure the registration document clearly identifies the locations of all receptors that may be impacted by the proposed project, including any receptors located along the transportation route, if applicable.	<ul style="list-style-type: none"> It is important to clearly describe the location and distance from the proposed site(s) to all potential human receptors (permanent, seasonal or temporary), taking into consideration the different types of land uses (e.g. residential, recreational, industrial, etc.), and identifying all vulnerable populations (e.g. in schools, hospitals, retirement or assisted living communities). Note that the types of residents and visitors in a particular area will depend on land use, and may include members of the general public and/or members of specific population subgroups (Indigenous peoples, campers, hunters, etc.) If there is the potential that project-related activities could affect human receptors, impacts to human health should be considered. 	<p><i>Health Canada. 2023. Guidance for Evaluating Human Health Effects in Impact Assessment: Human Health Risk Assessment. Healthy Environments and Consumer Safety Branch, Health Canada, Ottawa, Ontario.</i></p> <p>https://publications.gc.ca/collections/collection_2024/sc-hc/H129-54-6-2023-eng.pdf</p>

Atmospheric Environment		
<p>Project impacts to the atmospheric environment include changes to air quality and noise, and can occur in both the construction, operation and decommissioning phases of the project. Project impacts to air quality are commonly caused by emissions from equipment or vehicles as well as by dust. Noise impacts are commonly caused by equipment as well as by activities such as blasting.</p>	<ul style="list-style-type: none"> • If there are receptors that could be affected by project-related activities, impacts to the atmospheric environment should be considered. Changes to the atmospheric environment that may impact human health include: <ul style="list-style-type: none"> ○ impacts to air quality (dust or fumes including PM_{2.5}, NO_x, SO_x, PAHs) ○ increased noise from construction or operations 	<p><i>Health Canada. 2023. Guidance for Evaluating Human Health Impacts in Impact Assessment: Noise. Healthy Environments and Consumer Safety Branch, Health Canada, Ottawa, Ontario</i></p> <p>https://publications.gc.ca/collections/collection_2024/sc-hc/H129-54-3-2023-eng.pdf</p>
	<ul style="list-style-type: none"> • If there are receptors who could be impacted by project-related noise, it may be necessary to inform receptors prior to loud activities, such as blasting. 	<p><i>Health Canada. 2023. Guidance for Evaluating Human Health Effects in Impact Assessment: Air Quality. Healthy Environments and Consumer Safety Branch, Health Canada, Ottawa, Ontario.</i></p> <p>https://publications.gc.ca/collections/collection_2024/sc-hc/H129-54-1-2023-eng.pdf</p>
	<ul style="list-style-type: none"> • If there is the potential for impacts to human receptors from noise and/or air quality changes from the project, the proponent should consider establishing mitigation measures. If complaints are received additional mitigation measures may be required. 	
Recreational and Drinking Water Quality		
<p>The proponent should consider whether any nearby waterbodies are used for recreational (i.e. swimming, boating, or fishing) or drinking water purposes, as well as whether there are any drinking water wells in the area potentially impacted by the project. Nearby drinking and/or recreational water quality may be impacted by</p>	<ul style="list-style-type: none"> • If there is the potential for impacts to drinking and/or recreational water quality from the project site, the proponent should consider establishing mitigation measures. If complaints are received additional mitigation measures may be required. 	<p><i>Health Canada. 2023. Guidance for Evaluating Human Health Effects in Impact Assessment: Drinking and Recreational Water Quality. Healthy Environments and Consumer Safety Branch, Health Canada, Ottawa, Ontario.</i></p> <p>https://publications.gc.ca/collections/collection_2024/sc-hc/H129-54-2-2023-eng.pdf</p>

<p>accidents or malfunctions, such as a fuel spill; by dust and increased sediment runoff; and by other chemical discharges to the environment. Additionally, wells in the area potentially impacted by the project may be impacted by activities such as blasting.</p>	<ul style="list-style-type: none"> • The proponent should consider preparing a response plan in the event of an accident or malfunction with the potential to impact drinking and/or recreational water quality. Response plans should include a spill response kit, adequate spill response training, and a communication plan to notify all recreational and drinking water users in the impacted area as well as all relevant authorities. • In some cases, for projects that are likely to have an impact on drinking and/or recreational water quality, the proponent should consider conducting water monitoring prior to the start of the project (to establish a baseline). Monitoring would continue throughout the construction, operation and decommissioning phases of the project (as applicable) to monitor for any changes in water quality or quantity. 	
Country Foods		
<p>If there are plants or animals present in the area potentially impacted by the project that are consumed by humans, there may be potential for impacts to country foods. The proponent should consider all country foods that are hunted, harvested or fished from the area potentially impacted by the project. Impacts to country foods may occur from the release of contaminants into soil or water (including from an accident or spill) or from deposition of air borne contaminants.</p>	<ul style="list-style-type: none"> • If there is the potential for impacts to country foods from the proposed project, the proponent should consider establishing mitigation measures. If complaints are received additional mitigation measures may be required. • The proponent should consider preparing a response plan in the event of an accident or malfunction with the potential to impact country foods. Response plans should include a spill response kit, adequate spill response training, and a communication plan to notify all potential consumers of country foods in the impacted area as well as all relevant authorities. 	<p><i>Health Canada. 2023. Guidance for Evaluating Human Health Effects in Impact Assessment: Country Foods. Healthy Environments and Consumer Safety Branch, Health Canada, Ottawa, Ontario.</i> https://publications.gc.ca/collections/collection_2024/sc-hc/H129-54-5-2023-eng.pdf</p>

For more information on HC's guidelines for evaluating human health impacts in environmental assessments, please see:

*Health Canada. 2023. Guidance for Evaluating Human Health Impacts in Impact Assessment: **Noise**. Healthy Environments and Consumer Safety Branch, Health Canada, Ottawa, Ontario*
https://publications.gc.ca/collections/collection_2024/sc-hc/H129-54-3-2023-eng.pdf

Appendix B of this guidance document provides a checklist that may be beneficial in verifying that the main components of a noise environmental assessment are completed.

*Health Canada. 2023. Guidance for Evaluating Human Health Effects in Impact Assessment: **Air Quality**. Healthy Environments and Consumer Safety Branch, Health Canada, Ottawa, Ontario.*
https://publications.gc.ca/collections/collection_2024/sc-hc/H129-54-1-2023-eng.pdf

Appendix A of this guidance document provides a checklist that may be beneficial in verifying that the main components of an air quality environmental assessment are completed.

*Health Canada. 2023. Guidance for Evaluating Human Health Effects in Impact Assessment: **Drinking and Recreational Water Quality**. Healthy Environments and Consumer Safety Branch, Health Canada, Ottawa, Ontario.*
https://publications.gc.ca/collections/collection_2024/sc-hc/H129-54-2-2023-eng.pdf

Appendix A of this guidance document provides a checklist that may be beneficial in verifying that the main components of a water quality environmental assessment are completed.

*Health Canada. 2023. Guidance for Evaluating Human Health Effects in Impact Assessment: **Country Foods**. Healthy Environments and Consumer Safety Branch, Health Canada, Ottawa, Ontario.*
https://publications.gc.ca/collections/collection_2024/sc-hc/H129-54-5-2023-eng.pdf

Appendix A of this guidance document provides a checklist that may be beneficial in verifying that the main components of a country foods environmental assessment are completed.

*Health Canada. 2023. Guidance for Evaluating Human Health Effects in Impact Assessment: **Human Health Risk Assessment**. Healthy Environments and Consumer Safety Branch, Health Canada, Ottawa, Ontario.*
https://publications.gc.ca/collections/collection_2024/sc-hc/H129-54-6-2023-eng.pdf

Appendix B of this guidance document provides a checklist that may be beneficial in verifying that the main components of a human health risk assessment are completed.

Human Health Considerations when Assessing Noise Impacts Related to Wind Turbine Projects¹

Last updated: March 20, 2024

Health Canada (HC) provides the following general considerations for evaluating human health impacts of noise from wind turbine project-related activities. This is not an exhaustive list of human health concerns related to wind turbine projects, and issues will vary based on individual aspects of each project. Further HC guidance on other areas of expertise (i.e., air quality, recreational and drinking water quality, traditional/country foods, and methodological expertise in conducting human health risk assessment and health impact assessment) is available and referenced at the end of this document*.

Please note that HC does not approve or issue licenses, permits, or authorizations in relation to environmental/impact assessment (EA/IA). HC's role in EA/IA is founded in statutory obligations under the *Impact Assessment Act*, and its knowledge and expertise can be called upon by reviewing bodies (e.g., Impact Assessment Agency of Canada, review panels, Indigenous groups and/or other jurisdictions). In the absence of such a request from one of the above noted groups, HC is unable to carry out a comprehensive review of the project. However, whenever feasible, HC is able to accommodate requests for specific human health advice and guidance related to provincial EAs within a reasonable timeframe.

HC advises that an assessment of noise exposure for human receptors located near the project site consider the following:

	Consideration	Reference Document
Receptor Location		
It is important to identify and describe all existing and reasonably foreseeable human receptors (i.e., permanent, seasonal, or temporary) in the area that may be influenced by project-related noise—including a description of how the receptors were identified (e.g., recent land-use maps, verification in person).	<ul style="list-style-type: none"> HC prefers that noise assessments identify and describe any particular receptors that may have a heightened sensitivity to noise exposure (e.g., locations where Indigenous peoples' cultural or religious ceremonies occur, schools, childcare centres, hospitals). 	Appendix G of HC's noise guidance ² provides a list of commonly encountered receptors and related characteristics. Section 6.1 of HC's noise guidance contains additional information regarding identification of human receptors in a project area.
	<ul style="list-style-type: none"> It may also be useful to include map(s) illustrating modelled noise levels from the project at receptor locations in the study area. 	

¹ This document includes general advice on wind turbine noise and health. It should not be interpreted as formal Department guidance.

² Health Canada. 2023. *Guidance for Evaluating Human Health Impacts in Impact Assessment: Noise*. Healthy Environments and Consumer Safety Branch, Health Canada, Ottawa, Ontario. <https://publications.gc.ca/site/eng/9.930338/publication.html>

Last updated: March 20, 2024

Health Impacts Associated with Noise		
<p>In reviewing an EA/IA, HC focuses on noise exposure levels that have the potential for adverse human health effects. Wind turbine noise can be generated through modulation noise (caused by rotation), low frequency noise (rattle), or transformer noise. There may also be construction-related noise (e.g., heavy machinery). These noises may adversely impact human health predominately through sleep disturbance, decreased speech comprehension, and/or high levels of annoyance. Impacts may vary depending on the project phase (e.g.: impulsive noise events during the construction phase and continuous noise sources during the operational phase), sensitivity of nearby receptors, and duration and frequency of noise exposure.</p>	<ul style="list-style-type: none"> • Sleep disturbance encompasses the following: difficulty falling asleep; awakenings; curtailed sleep duration; alterations of sleep stages or depth; and increased body movements during sleep. The short-term effects of sleep disturbance have been shown to include, but are not limited to: increased fatigue; irritability; and decreased concentration and performance. The guidelines and recommendations of the World Health Organization (WHO)^{3,4} regarding sleep disturbance can be considered in the EA/IA. 	<p>For more information on noise-induced sleep disturbance, please see Section 5.2 of HC’s noise guidance².</p>
	<ul style="list-style-type: none"> • The WHO’s Guidelines for Community Noise (1999)³ report a threshold for sleep disturbance as being an indoor sound level of no more than 30 A-weighted decibels (dBA) equivalent continuous sound level (LAeq) for continuous noise, during the sleep period. <ul style="list-style-type: none"> ○ The WHO has published night-time noise guidelines that are intended to protect the public, including the most vulnerable groups, from adverse health effects associated with sleep disturbance due to night-time noise. The recommended annual average is 40 dBA night-time sound level (Ln) outdoors (WHO 2009)⁴. 	

³ World Health Organization (WHO). 1999. Guidelines for Community Noise. Berglund, B., Lindvall, T. and Schwela, D.H (Eds.). Available online at: www.who.int/docstore/peh/noise/guidelines2.html

⁴ World Health Organization (WHO). 2009. Night Noise Guidelines for Europe. Hurtley, C. (Ed). Available online at: www.euro.who.int/en/health-topics/environment-and-health/noise/publications/2009/night-noise-guidelines-for-europe

	<ul style="list-style-type: none"> • For individual noise events, the WHO³ has stated: “<i>For a good sleep, it is believed that indoor sound pressure levels should not exceed approximately 45 dBA LAmax (maximum A-weighted sound level) more than 10–15 times per night...</i>” <ul style="list-style-type: none"> ○ As people may keep windows partially open at night, HC uses an outdoor-to-indoor transmission loss of 15 dBA for windows at least partially open. Fully closed windows are assumed to reduce outdoor sound levels by approximately 27 dBA. 	
	<ul style="list-style-type: none"> • To sustain adequate speech comprehension, HC holds the view that background noise levels (i.e., noise due to project activities as measured indoors) be maintained below 40 dBA. <ul style="list-style-type: none"> ○ When a school is identified as a potentially impacted receptor, the WHO recommends an ideal background noise level of 35 dBA in the classroom (WHO 1999)³. 	Please see Section 5.3 of HC’s noise guidance ² for more information on interference with speech comprehension.
	<ul style="list-style-type: none"> • In quiet rural areas, HC suggests that during construction, the short-term average day-night sound level (Ldn) be below 47 adjusted dBA at residences, as this is expected to be the threshold for widespread complaints for construction noise, and mitigation measures be considered if predicted noise levels are above this threshold. 	Section 6.3.1 of HC’s noise guidance ² provides advice related to short-term construction noise (< 1 year).
	<ul style="list-style-type: none"> • Community annoyance due to noise, measured as the Percent Highly Annoyed (%HA), can be thought of as an aggregate indicator of assorted noise effects that are creating a negative effect on the community. HC uses the change in %HA as an appropriate indicator of noise-induced human health effects from exposure to long-term construction noise and project operational noise. 	Sections 6.3.1 and 6.3.2 of HC’s noise guidance ² provides advice related to long-term construction noise (≥ 1 year)

	<ul style="list-style-type: none"> ○ To assess the impacts of noise from projects using this indicator, the project-related change in the sound environment and the related increase in %HA are evaluated. ○ Noise mitigation measures should be considered when a change in the calculated %HA at any given receptor location exceeds 6.5%. 	Appendix F in HC’s noise guidance ² presents the %HA equations as well as the methodology for obtaining variables used in the equations.
Low Frequency Noise (LFN) and Infrasound		
<p>Low frequency noise (LFN) (typically 20-100 Hertz (Hz); whereas infrasound is typically defined as being below 20 Hz) may result from wind turbines, particularly from larger turbines (>2.3 Megawatts (MW)(Moller, H and C.S. Pederson, 2010)⁵). LFN is an important component of the total noise levels experienced by receptors near large wind turbines.</p>	<ul style="list-style-type: none"> ● LFN is not generally well perceived by the human ear; however, it may induce vibrations in lightweight structures in residences or sleeping quarters that may be perceptible or cause a “rattle.” Research indicates that annoyance related to noise is greater when LFN is present (ISO 1996-1:2003)⁶ and one of the main reasons is the annoyance caused by rattles. <ul style="list-style-type: none"> ○ The indoor environment can also be evaluated in the assessment; however, this should be addressed on a case-by-case basis given the uncertainty associated with specific resonances indoors that may affect the audibility of tones indoors. Due to the potential for masking by certain octave bands indoors, it is possible that certain tones may be audible indoors but not outdoors and vice versa. 	Please see Appendix C.2 of HC ² for more information on LFN.

⁵ Moller, H. and C. S. Pederson. 2010. Low-frequency noise from large wind turbines. J. Acoust. Soc. Am. 129(6), June 2011. Available at : <https://pubs.aip.org/asa/jasa/article/139/3/1431/910721/Wind-turbine-sound-power-measurements>

⁶ International Organization for Standardization (ISO). 2003. ISO 1996-1:2003 Acoustics – Description, measurement and assessment of environmental noise – Part 1: Basic quantities and assessment procedures. www.iso.org/iso/catalogue_detail?csnumber=28633

Last updated: March 20, 2024

	<ul style="list-style-type: none"> • As sound environments are usually characterized using A-weighted decibel levels (dBA) that reflect the frequencies most audible to the human ear, the impacts of low-frequency noise may need to be assessed separately. <ul style="list-style-type: none"> ○ To prevent rattles from low-frequency noise and the associated annoyance from this effect, American National Standards Institute ANSI indicates that the (energy) sum of the sound levels in the 16-, 31.5- and 63-Hz octave bands be less than 70 Z-weighted decibels (dBZ). If this 70-dBZ “rattle criterion” is exceeded, HC suggests the implementation of feasible mitigation measures. ○ Additionally, ANSI 2005⁷ provides a more sophisticated mathematical procedure for assessing %HA when low-frequency noise is present. HC prefers using this procedure when the C-weighted Ldn exceeds the A-weighted Ldn by more than 10 dB. ○ Broner (2011)⁸ has provided simplified outdoor dBC LFN criteria based on the type of receptor (i.e., residential and commercial) and time of day. Based on these criteria, LFN does not generally require further consideration if outdoor Ld is \leq 60 dBC, and $L_n \leq 55$ dBC. At 10 Hz, 60 dBC is approximately 69 dBZ. 	<p>The ANSI standard on environmental sound regarding noise assessment and the related prediction of long-term community response (2005)⁷ provides guidance for low-frequency sound (or infrasound) in the 16-63 Hz octave bands.</p> <p>Appendix D of ANSI 2005⁷ further outlines the procedure for assessing %HA when low-frequency noise is present.</p>
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⁷ American National Standards Institute (ANSI). 2005. Quantities and Procedures for Description and Measurement of Environmental Sound Part 4: Noise Assessment and Prediction of Long-Term Community Response (ANSI S12.9-2005/Part 4). Standards Secretariat Acoustical Society of America.

⁸ Broner, N. 2011. A Simple Outdoor Criterion for Assessment of Low Frequency Noise Emission. Acoustics Australia: 39:1–7. Available at: https://www.acoustics.asn.au/journal/2011/2011_39_1_Broner.pdf

Noise Modelling, Mitigation and Monitoring		
<p>Assessing potential impacts to human health from project-related noise, including calculating %HA, may require measuring baseline noise levels, modelling predicted project-related noise levels, and monitoring noise levels during project’s construction and operational phases to verify model predictions.</p>	<ul style="list-style-type: none"> • When baseline measurement is conducted, HC prefers that the measurement be completed in accordance with the International Organization for Standardization (ISO) 1996-2:2007⁹ at each representative receptor (existing and reasonably foreseeable), and that the reports include the dates and hours used to characterize these measurements. <ul style="list-style-type: none"> ○ HC recommends adjustments to baseline noise levels in certain settings, for example, baseline levels in quiet rural areas are adjusted by adding 10 decibels (dB). This 10 dB adjustment also applies to the predicted project noise levels in determining %HA, resulting in a greater change in %HA than would occur with unadjusted noise levels. ○ In addition, HC recommends that non-anthropogenic sounds (e.g. ocean, wind, and animal noises) be removed from baseline measurements. Not removing them may result in an overestimation of baseline sound pressure levels and impact baseline and future changes in %HA calculations. ○ HC recommends use of an appropriate windscreen must always be used and sound is not to be measured in the presence of precipitation or when wind speeds exceed 14 km/hr (3.9 m/s) unless these effects can be shown to be negligible (ISO 1996–2:2007)⁹. The specific windscreen required will be dependent on atmospheric conditions including wind speed and air turbulence (Van den Berg, 2006)¹⁰. For wind speeds below 14 km/hr, outdoor measurements always require a minimum 70 mm 	<p>For more information on adjustments, please see Section 6.1 of HC’s noise guidance².</p>
		<p>Please see Section 6.2.1 of HC’s noise guidance² for more information on removing non-anthropogenic sounds.</p>

⁹ International Organization for Standardization (ISO). 2007. ISO 1996-2:2007 Acoustics – Description, measurement and assessment of environmental noise – Part 2: Determination of environmental noise levels. www.iso.org/iso/iso_catalogue/catalogue_tc/catalogue_detail.htm?csnumber=41860

¹⁰ Van den Berg, G. P. 2006. Wind-induced noise in a screened microphone. J. Acoust. Soc. Am; 119:824-833. <https://doi.org/10.1121/1.2146085>

	<p>diameter windscreen. For other conditions, including evaluating low frequency sounds (e.g., C-weighted decibels or dBC), larger windscreens may be required.</p>	
	<ul style="list-style-type: none"> • It is important that the predicted operational noise levels for both daytime (Ld) and night-time (Ln) at all representative receptor locations should be reported in the EA/IA. To permit a proper comparison of noise levels, the units, averaging times and other measurement parameters (including the uncertainty associated with any of the measurements) should be the same as those used in establishing the baseline. <ul style="list-style-type: none"> ○ The assessment should clearly identify the model(s) used and justify their suitability. Specific models may be selected on a site-by-site basis and different modelling software may be appropriate depending on the size of the turbine(s). HC prefers that any assumptions used are conservative (i.e., reasonable worst-case scenarios, including for wind speed and ground attenuation) and be adequately described in the assessment. ○ It is recommended that the EA/IA indicate whether or not there will be a transformer located adjacent to each wind turbine. If individual transformers are present, it is recommended that this additional noise source be included in any operational noise modeling. 	<p>Please see Section 6.3.2 of HC’s noise guidance² for more information on modelling project operational noise.</p>
	<ul style="list-style-type: none"> • While modelling software can be useful in predicting wind turbine noise at nearby receptors, actual noise levels may differ from predicted levels due to uncertainties in model predictions. <ul style="list-style-type: none"> ○ If there are uncertainties in the noise modelling, consider monitoring noise levels, particularly in the event of public complaints. 	<p>Section 6.4 of HC’s noise guidance² provides additional information on noise management and noise monitoring plans.</p>

	<ul style="list-style-type: none"> • If Ldn levels from table 6.2 in HC Noise guidance for short-term construction noise cannot be obtained or if 6.5 % of HA is attained for long-term construction and operational noise with the use of quieter technology during construction, HC suggests that community consultation be undertaken to determine work schedules and to inform the public of the times and duration of noisy activities (including blasting if applicable). In general, HC suggests that impulsive sources (e.g., hammering, pile driving) be avoided at night and in the early morning. • If noise levels are predicted or measured to exceed acceptable levels at the exterior of any nearby receptor location (during construction or operation), the implementation of additional mitigation should be considered. 	<p>Sections 6.4.1 and 6.4.2 of HC’s noise guidance² provide advice on appropriate mitigation noise levels.</p> <p>Please see Appendix H of HC² for suggested construction noise mitigation measures.</p> <hr/> <p>Section 6.4 of HC’s noise guidance² provides additional information about mitigation.</p>
<p>Developing a community consultation plan may be helpful for wind turbine projects. Community reaction to noise impacts following community consultation is more likely to be understanding and accepting of noise, and more likely to make appropriate adjustments to limit noise exposure.</p> <p>Meaningful community consultation and engagement throughout the lifespan of the project can be an effective way to identify and mitigate project-related noise concerns.</p>	<ul style="list-style-type: none"> • It is recommended that the EA/IA should specify whether community consultation with respect to noise has occurred, and whether any human health concerns have been expressed by potentially impacted receptors. • Consider implementing a formalized complaint-response protocol (i.e., a formalized means of receiving and responding to complaints in a timely fashion) with additional monitoring and mitigation measures defined, particularly in the event of public complaints. <ul style="list-style-type: none"> ○ Noise management and noise monitoring plans, including complaint resolution plans, are often incorporated as part of the EA/IA’s Environmental Management Plan. 	<p>Section 6.4.1 of HC’s noise guidance² provides additional information on community consultation as it relates to noise.</p>

For more information on HC's guidelines relating to project noise and the use of these guidelines, please see:

Health Canada. 2023. Guidance for Evaluating Human Health Effects in Impact Assessment: NOISE. Healthy Environments and Consumer Safety Branch, Health Canada, Ottawa, Ontario. <https://publications.gc.ca/site/eng/9.930338/publication.html>

- Appendix B of this guidance document provides a checklist that may be beneficial in verifying that the main components of a noise impact assessment are completed.

Please also refer to HC's other guidance documents for evaluating human health impacts in environmental/impact assessments:

Health Canada. 2023. Guidance for Evaluating Human Health Impacts in Impact Assessment: Air. Healthy Environments and Consumer Safety Branch, Health Canada, Ottawa, Ontario. <https://publications.gc.ca/site/eng/9.902734/publication.html>

Health Canada. 2023. Guidance for Evaluating Human Health Impacts in Impact Assessment: Water Quality. Healthy Environments and Consumer Safety Branch, Health Canada, Ottawa, Ontario. <https://publications.gc.ca/site/eng/9.902736/publication.html>

Health Canada. 2023. Guidance for Evaluating Human Health Impacts in Impact Assessment: Country Foods. Healthy Environments and Consumer Safety Branch, Health Canada, Ottawa, Ontario. <https://publications.gc.ca/site/eng/9.930343/publication.html>

Health Canada. 2023. Guidance for Evaluating Human Health Impacts in Impact Assessment: Human Health Risk Assessment. Healthy Environments and Consumer Safety Branch, Health Canada, Ottawa, Ontario. <https://publications.gc.ca/site/eng/9.930345/publication.html>

*For consideration of other human health impacts (i.e., other than noise; including atmospheric impacts during construction, run-off to recreational water, etc.) related to EA/IA, please find the attached document entitled *Human Health Considerations in IA*. Additionally, please contact HC if you are interested in the draft *Interim Guidance on Health Impact Assessment of Designated Projects Under the Impact Assessment Act*, which focuses on a determinants of health approach.

Date: January 19, 2026
To: Mark McInnis, Environmental Assessment Officer
From: Department of Natural Resources and Department of Energy
Subject: **Aulds Cove Wind Project, Guysborough County, Nova Scotia**

Scope of review:

This review focuses on the following mandate: Authorities and approvals required from the Land Services Branch (The review does not include research or assessments, including existing uses and encumbrances, which will be required as part of the application processes for authorities and approvals required from DNR), Species at Risk recovery and Wildlife species and habitat conservation, geoscience health and safety, mineral exploration, mineral development, abandoned mine openings, clean electricity.

List of Documents Reviewed:

Land Services Branch:

- Environmental Assessment Registration Document
- Appendices A to O
- Drawings 2.1 to 3.1E
- GIS shapefiles

Wildlife Division:

- Environmental assessment registration document

Geoscience and Mines Branch:

- Environmental Assessment Registration Document – Aulds Cove Wind Project – 21 wind turbines, 12 km of new roads, substation, accessory buildings. Capacity to power 50,000 homes.
- Drawings 7.1 through 7.8
- Nova Scotia's Registry of Claims (NovaROC)
- Mineral Occurrence Database
- Open File Map ME 2017-009, Bedrock geology map of the Port Hawkesbury area, NTS 11F/11, Antigonish, Guysborough, Inverness, and Richmond Counties, Nova Scotia; NSDNR, GMB, scale 1:50,000.

Details of Technical Review:

Land Services Branch:

Based on the information provided, the project is located on both private and Crown lands. The Proponent will require authorizations (such as a lease, license, letter of authority, or easement) from Department of Natural Resources (DNR) for any activity on Crown lands including:

- erecting, operating, maintaining, and decommissioning wind turbines and related infrastructure;
- temporary use and access of the land, such as requests to temporarily use existing Crown owned roads, install meteorological (MET) towers or LiDAR units, or to conduct geotechnical investigations;
- installing and maintaining overhead/underground transmission wires and collector lines, including for submerged Crown lands;
- requests to construct and use new access roads, or to widen or otherwise modify existing Crown roads;

Note: requests to use existing NSPI or Bell owned infrastructure located on Crown lands must be directed to the owner of the utility infrastructure.

Wildlife Division:

Lichens:

Blue Felt lichen requires mature forest with high humidity and several successional stages. One blue felt lichen was found in the study area and the SMP has been applied with a 100 m buffer.

Frosted Glass Whiskers: One occurrence was found and the 100 m buffer from the SMP applied.

Nova Scotia Department of Natural Resources requires that lichen surveys be conducted by a qualified lichenologist approved by NSDNR. It is unclear whether a lichenologist from this list was used to complete surveys.

Black Ash:

23 Black Ash trees were found in the assessment area, spanning 7 wetlands. There are two wetlands that contain Black Ash that may require vegetation clearing. The Recovery Plan for Black Ash suggests that a 200m buffer around trees is required to reduce the risk of disturbance to the trees. Presence of Black Ash in a wetland also triggers the Provincial Wetlands of Special Significance Policy; consultation with the Department of Environment and Climate Change should be undertaken.

Moose:

While the closest recorded occurrence of Moose is 11 km from the assessment area, the project does overlap with moose core habitat under the *NS Endangered Species Act*. It is estimated that approximately 11.9 km of new road will be created for this project. Moose are free ranging ungulates and are sensitive to disturbance; loss of habitat and habitat fragmentation are threats to mainland moose recovery. Creation of roads will fragment the habitat, allow increased access from moose competitors and predators, and increases the risk of human disturbance. The Mainland Moose special management practice speaks to the importance of reducing road creation and decommissioning roads that are no longer needed. When planning roads, consideration should be given to the amount and location of roads. Mitigations should be developed and applied to reduce disturbance to moose, including for minimizing road construction and road decommissioning.

Bats:

Several bat species were detected in the assessment area during the first year of pre-construction surveys, with the most prevalent species being *Myotis* Species (Endangered) and Migratory species, Hoary bat. Two bat roost sites were detected within 1 km of the site; further investigation would be required to determine if these roost sites are active. Mitigations to minimize impacts to bats are required, for example, retaining snag trees in various states of decay for bat habitat. The proponent has committed to completing a second year of pre-construction surveys as per Provincial policy. The proponent will also complete a post construction management plan that will be shared with NSDNR. While some mitigations have been put forth by the proponent an additional mitigation to be considered is curtailment during high-risk periods such as migration and peak nighttime activity. Because most bat activity occurs at low winds, Quebec now enforces a minimum cut out speed of 5.5 m/s which can reduce bat mortality up to 90%.

Avifauna:

Five bird species listed under the *NS Endangered Species Act* were identified during the first year of pre-construction bird surveys: Canada Warbler (Endangered), Olive-sided Flycatcher (Threatened), Common Nighthawk (Threatened), Barn Swallow (Endangered) and Harlequin Duck (Endangered). The proponent has committed to a second year of pre-construction bird surveys as per Provincial policy. The proponent will create and share with NSDNR a post construction Terrestrial Habitat and Wildlife Management Plan. Consideration could be given to mitigations to reduce bird mortality that are supported by research, including painting turbine blades to increase visual disruption.

Herptofauna:

While no species at risk turtles were found in the study area, mitigations to avoid attracting nesting turtles to disturbed areas from road construction and to reduce the risk of vehicle collisions during nesting season should be developed.

Geoscience and Mines Branch:

A preliminary review of the Aulds Cove Wind Project has been conducted. It is noted that the geological characterization of the proposed site is appropriate. The Project Area is primarily underlain by the Lincolnville and Halfmoon Lake Members of the Horton Group. Proposed mitigation measures should geohazards be encountered for ARD, karst and erosion and sedimentation are in place. Geological maps included in application display relative location to planned project footprint.

It is recommended that Proponent refer to 1:50,000 scale bedrock geology maps where available for use in site planning as the provincial scale map is too coarse for project specific land-use planning.

Herein, they list the underlying geology and indicate a low potential for acid rock drainage, medium risk for karst topography. The Proponent outlines both details of erosion and sedimentation control plans and a plan to deal with sulphide bearing materials and acid drainage should they be encountered.

Mineral Occurrences

The proposed project area is ranked low for mineral potential and moderate to high for aggregate potential with established quarries within 1.5 km of the Project Area. Minor overlap exists in the southwest extent of the Project Area with exploration license 56959. The proposed development is not anticipated to negatively affect exploration and mineral development activities.

Key Considerations: (provide in non-technical language)

Clean Energy Branch:

While the Auld's Cove project is not currently part of any government procurement, the EA indicates that the project is intended to be used in service of Nova Scotia's Clean Power Plan. Provided this is the case this wind energy project would help Nova Scotia transition its electricity system from the use of coal-fired generation that has direct negative impacts, including air pollution and greenhouse gas emissions.

The transition of our electricity system to renewable energy is part of the province's plans and commitments to climate change mitigation.

Wind energy is the lowest cost of energy world-wide and local deployment of wind energy is anticipated to save rate payers of Nova Scotia millions of dollars over the lifetime of their operation while also reducing the emissions and pollution intensity of the electricity system.

Wind energy will help the electricity system avoid output-based price compliance for greenhouse gas emissions in Nova Scotia resulting in less upward pressure on rate payers through fuel.

Transitioning the electricity system to renewable energy is the most cost effective and significant action the province can undertake to reduce its greenhouse gas emissions in the near term.

Renewable energy projects such as wind projects will assist the province in achieving its goals in the *Electricity Act*, DNR mandate letter and business plan. It will also support Environment and Climate Change's *Environmental Goals and Climate Change Reduction Act* (EGCCRA), and the Climate Change Plan for Clean Growth (CCPCG).

Land Services Branch:

No further comments.

Wildlife Division:

- Obtain all permits necessary to undertake the project as required under legislation related to wildlife, species at risk, watercourses and wildlife habitat alterations, including the Provincial Wetlands of Special Significance Policy.
- Protection of Species at Risk under the *NS Endangered Species Act* and protection of den sites, and bird and turtle nests under the *NS Wildlife Act* apply to both private and Crown lands.
- Provide digital way points and/or shapefiles for all flora and fauna surveys and incidental observations, including for all observations of Species at Risk and Species of Conservation Concern to NSDNR (those species listed and/or assessed as at risk under the *Species at Risk Act*, *Endangered Species Act*, COSEWIC, as well as all S1, S2 and S3 species). Data should adhere to the format prescribed in the NSDNR Template for Species Submissions for EAs and is to be provided within two months of collection.
- Ensure lichen surveys were conducted by a NSDNR-approved lichenologist. A list of approved lichenologists is available from biodiversity@novascotia.ca.
- Maintain a 200-m no-disturbance buffer around all Black Ash trees.
- Develop mitigations for road construction and road decommissioning to minimize disturbance to mainland moose.
- Additional surveys are required to determine whether the identified bat roosting sites are active, and if they are active, mitigations must be identified to ensure they are not disturbed or destroyed.
- Additional mitigations to minimize impacts to birds and bats should be considered. For example, Quebec now enforces a minimum cut out speed of 5.5 m/s which can reduce bat mortality up to 90%. Painting turbine blades has been shown to reduce bird mortality.
- During the construction of roads, mitigations should be applied to avoid attracting nesting turtles to disturbed areas and to reduce the risk of vehicle-turtle collisions.

Geoscience and Mines Branch:

No further comments.

From: [Fazeli, Maryam \(elle | she, her\) \(ECCC\)](#)
To: [McInnis, Mark](#)
Cc: [Chen, Letitia \(elle | she, her\) \(ECCC\)](#)
Subject: ECCC Comments: 25-NS-018 Aulds Cove Wind Project, Guysborough, NS
Date: January 19, 2026 1:34:31 PM

**** EXTERNAL EMAIL / COURRIEL EXTERNE ****

Exercice caution when opening attachments or clicking on links / Faites preuve de prudence si vous ouvrez une pièce jointe ou cliquez sur un lien

Hello Mark,

Environment and Climate Change Canada (ECCC) has reviewed the Environmental Assessment Registration Document (EARD) for the Aulds Cove Wind Project (25-NS-018), located in Guysborough, Nova Scotia, and we offer the following comments.

Attachments and References

- ECCC 2025. *Nesting Periods*. <https://www.canada.ca/en/environment-climate-change/services/avoiding-harm-migratory-birds/general-nesting-periods/nesting-periods.html>
- EC 2007a. *Recommended Protocols for Monitoring Impacts of Wind Turbines on Birds*. https://publications.gc.ca/collections/collection_2013/ec/CW66-364-2007-eng.pdf
- EC 2007b. *Wind Turbines and Birds A Guidance Document for Environmental Assessment*. https://publications.gc.ca/collections/collection_2013/ec/CW66-363-2007-eng.pdf
- RGI [Renewables Grid Initiative] 2024a. *Avian-Power Line Collision: Overview of Risk Factors & Effectiveness of Wire Markers [Brochure]*. https://renewables-grid.eu/fileadmin/user_upload/Nature/Wire_Marker_Brochure_Digital.pdf
- RGI [Renewables Grid Initiative] 2024b. *Avian-Power Line Collision: Overview of Risk Factors & Effectiveness of Wire Markers [Methodology Report]*. https://renewables-grid.eu/fileadmin/user_upload/Nature/Wire_Marker_Brochure_Digital.pdf
- Calvert et al. 2013. *A synthesis of human-related avian mortality in Canada*. *Avian Conservation and Ecology* 8(2): 11. <https://ace-eco.org/vol8/iss2/art11/>
- Rioux et al. 2013. *Avian mortalities due to transmission line collisions: a review of current estimates and field methods with an emphasis on applications to the Canadian electric network*. *Avian Conservation and Ecology* 8(2): 7. <https://ace-eco.org/vol8/iss2/art7/>

General Comments

1. Given that the project is registered under Nova Scotia's (NS) Environmental Assessment

Regulations, it remains the discretion of the province whether sufficient information has been provided to assess the potential effects of the Project under their jurisdiction and responsibility. ECCC does not have any permits (or authorizations) or approvals in relation to the proposed project. Any advice provided by ECCC is intended to support Nova Scotia Environment and Climate Change (NS ECC) Environmental Assessment review process. The Proponent is responsible for identifying measures which ensure their compliance with the federal Migratory Birds Convention Act (MBCA) and the Species at Risk Act (SARA).

2. ECCC notes that the Province of NS's Department of Natural Resources (NS NR) holds technical expertise, jurisdiction, and management authority for birds not protected by the MBCA (e.g., raptors) and terrestrial species at risk (SAR) including bats, reptiles, amphibians, land-mammals, insects, plants, and lichen. ECCC advice on these species is derived from federal recovery strategies produced as per the SARA and are focused on species recovery. SAR are a shared responsibility between the federal government and the provinces and ECCC comments reflect this.
3. The EARD includes hedging and ambiguous wording, such as, "*where possible*" and "*to the extent possible*" when describing mitigation measures.

ECCC recommends removing ambiguous wording from the EA and associated plans. The EIA should clearly describe commitments to mitigation measures to avoid/minimize potential effects of the Project on migratory birds and species at risk (SAR), and where effects cannot be avoided/minimized, a proposed plan to mitigate residual impacts should be described (e.g., monitoring plan, scheduling, buffers, offsetting measures, etc.). Contingency plans identifying mitigation measures should be prepared to address all scenarios that may impact migratory birds and SAR during all of times of the year and all project phases.

4. The proponent should retain raw survey data (e.g., radar, breeding bird surveys) until appropriate data standards have been developed. Proponents are encouraged to share and store data with:
 - The ECCC's Canadian Wildlife Service (SAR observations; scf-atldonneesei-cws-atliadata@ec.gc.ca)
 - The Atlantic Canada Conservation Data Center (SAR/SOCC observations; <http://accdc.com/en/contribute.html>)
 - NA Bat (acoustic bat data; <https://www.nabatmonitoring.org/upload-data>)
 - The Wind Energy Bird and Bat Monitoring Database (bird and bat data; [NatureCounts - Wind Energy Bird & Bat Monitoring Database](#))

5. If considering wildlife protection, mitigation, monitoring and adaptive management plans as part of potential approval conditions related to avifauna and/or migratory bird SAR, ECCC recommends clarifying what elements are expected to be included, and that the consultation process is clear for all parties.

ECCC's preference is that any documents and requests for advice from the proponent be submitted and coordinated through NS ECC as part of their EA process via the ECCC-EA window (FRC_Tracker@ec.gc.ca).

Specific Comments

Migratory Birds

6. ECCC notes that the project area provides potential breeding habitat for several waterfowl species and serves as an important migration and staging area for waterfowl. Although ECCC does not have breeding waterfowl data within the project area, we have an Eastern Waterfowl Survey plot ~25 km to the west in similar habitat. Based on these data, it is expected that the following species will be breeding in the project area: American Black Duck, Canada Goose, Mallard, Ring-necked Duck, American Green-winged Teal, Common Merganser, Hooded Merganser, Wood Duck. Other non-waterfowl species such as Common Loon, Spotted Sandpiper, and yellowlegs species (Greater and Lesser) likely breed in the area. Lakes in the proposed study area and those immediately outside of it (Tracadie Lake, Summers Lake, Mary Lake, Matties Lake, Grant Lake, Morrison Lake) are large enough and have islands that may host breeding gulls and terns. Satellite telemetry data shows use of the Strait by migrating waterfowl (particularly sea ducks like eiders and scoters) during the spring and fall. Canada Geese and American Black Ducks are also known to migrate through this corridor.

Waterfowl are known to exhibit avoidance behaviour around wind turbines, resulting in functional habitat loss. Disturbance effects should be considered within a 1 km radius of each proposed turbine. Accordingly, all wetland habitat within 1 km of each turbine should be interpreted as unavailable to waterfowl. Preliminary mapping suggests that while coastal habitats are likely unaffected by this buffer, most wetland habitat within and adjacent to the project area would be effectively removed for waterfowl use.

Additionally, potential impacts to migratory sea ducks moving through the Strait of Canso should be considered given the proximity of turbines to coastal environments. Although the loss of this habitat alone may not result in population-level effects, cumulative impacts should be assessed in relation to other existing and proposed wind projects in the region, as well as ongoing provincial wetland loss. In particular, cumulative effects associated with the nearby Goose Harbour Wind Project,

Setapuktuk Wind Project, and other developments should be evaluated.

The timing and methods of the baseline avian surveys likely did not adequately characterize waterfowl use of the study area, given that waterfowl generally breed earlier than passerines and use wetland habitats not well represented by standard point count surveys.

7. ECCC offers the following general recommendations regarding Pileated Woodpecker nesting cavities, which are protected year-round under Schedule 1 of the *Migratory Birds Regulations*:

- Review and understand proponents' responsibilities under the amended *Migratory Bird Regulations* (MBR 2022).
- Conduct a survey to identify suitable nesting habitat within the area planned for vegetation clearing.
- Inspect identified suitable nesting trees for any Pileated Woodpecker cavities and determine occupancy; Note: In the Maritimes, ECCC recommends surveying during the second half of June to confirm nesting. By that time, the nestlings are large and loud and may be heard before the cavity can be seen.
- Notify the ECCC Minister through the Abandoned Nest Registry if any abandoned cavities are found on trees that require removal.
- Monitor occupancy of cavity(ies) over the next 36 months prior to removal and establish a vegetated buffer around the tree. Note: it is important that the nest itself remains intact, and we strongly encourage the Proponent to maintain as much surrounding vegetation as possible to preserve the woodpecker's habitat. If the construction activities are expected to extend during the breeding season, then actions must be taken to ensure that the nesting woodpecker is not disturbed by the construction activities.

For more information on the amended nest protections under the MBR 2022, frequently asked questions on how these protections apply to migratory birds, including Pileated Woodpecker, and your responsibilities for reporting abandoned nests, please visit the following:

- Nest Protection Fact Sheet: <https://www.canada.ca/en/environment-climate-change/services/avoiding-harm-migratory-birds/fact-sheet-nest-protection-under-mbr-2022.html>
- MBR 2022 FAQ: <https://www.canada.ca/en/environment-climate-change/services/migratory-bird-permits/faq-migratory-birds-regulations-2022.html>.

8. Quote (pg. 235): "A detailed post-construction avian monitoring plan will be developed

and submitted to NSECC and NSNR for review.”

ECCC notes that post-construction monitoring for migratory birds requires a *Migratory Birds Regulations* (MBR 2022) permit. Under the MBR 2022, a scientific permit is required to possess and handle any dead migratory birds used for observer efficiency or scavenging trials (ECCC, s.10.4 2007) and is recommended for the collection of a migratory bird (dead or alive), feathers, or part of a migratory bird (as defined in the *Migratory Birds Convention Act* [MBCA]) found during post-construction monitoring activities (e.g., carcass searches). To apply for an MBR permit, proponents should contact the ECCC-CWS permitting office at: SCF-ATLPermis-CWS-ATLPermits@ec.gc.ca.

EC 2007a and EC 2007b include guidance for developing post-construction monitoring programs for wind energy development projects in Canada.

9. The following mitigation measure regarding clearing activities is listed on page 233: “*Adhere to ECCC guidelines on clearing windows for nesting migratory birds (i.e., outside of the April 15 to August 31 nesting window), where possible. If vegetation and tree clearing activities during the nesting/breeding season cannot be avoided, nest sweeps will be conducted.*”

Nests in complex habitats (e.g., forests, wetlands) are difficult to locate, and adult birds avoid approaching their nests in a manner that would attract predators to their eggs or young. In many circumstances, disturbance and/or harm to migratory birds is still likely to occur even when nest sweeps are conducted prior to vegetation clearing activities.

Therefore, ECCC does not recommend nest sweeps in vegetation prior to clearing or land disturbance activities during the breeding season. Rather, to promote compliance with the *Migratory Birds Convention Act* (MBCA) and its regulations and the *Species at Risk Act* (SARA), ECCC recommends that activities that may result in incidental take of nests or eggs, such as vegetation clearing and maintenance, occur outside the migratory bird nesting period (**mid-April to late-August** in this region; nesting zone “C3”, ECCC 2025).

For additional information, see “Vegetation Clearing” standard recommendations below.

10. ECCC notes that the avian effects assessment in Section 7.4.4.10 (pg. 223-236) does not sufficiently address the effects of transmission and collector (“power”) lines on migratory birds.

Power lines have the potential to harm, injure, or kill migratory birds due to collision and electrocution. In Canada, collisions with power lines are estimated to be one of the top sources of human-related mortality in birds (Calvert et al. 2013), with estimated mortality ranging from 2.5 million to 25.6 million birds killed per year (Roux et al. 2013).

The proposed placement of above-ground power lines should consider areas used as flight paths by migratory birds during migration, near shorebird staging and foraging involving overland daily movements, or while travelling from nesting to foraging areas, and/or along streams used by waterfowl.

ECCC recommends the following general beneficial management practices to avoid potential harm to migratory birds associated with power lines:

- Avoid building transmission, collection, or distribution lines over, adjacent, or near areas where birds are known to congregate or move, including:
 - Important breeding, staging, moulting areas;
 - Breeding colonies; and
 - Between breeding and foraging areas.
- Consider installing underground power lines in high-risk areas for bird collisions.
- Design “avian-safe” configurations to reduce the risk of electrocutions, including:
 - Providing sufficient separation between energized phase conductors and between phases and grounded hardware;
 - Insulating exposed surfaces in high-risk areas;
 - Installing perch-management (e.g., perch guard) devices on poles; and
 - Removing or minimizing vegetation around poles and lines.
- Install measures on lines that reduce the risk of collisions:
 - Provide minimal vertical separation between lines;
 - Use self-supporting structures to reduce the number of guy wires;
 - Use line-marking devices to increase the visibility of the lines; and
 - Consider illuminating lines and towers with ultraviolet (UV) lighting to increase the visibility of lines in high-risk areas.

ECCC recommends that the Proponent refer to Avian Power Line Interaction Committee (www.aplic.org) for an understanding of avian risks from powerlines and guidance. For information on avian line marker (“bird diverter”) use and optimal design, ECCC recommends referencing guidance from the Renewables Grid Initiative (RGI 2024a, RGI 2024b).

11. Generally, ECCC recommends that the proponent follow the precautionary principle and identify operational mitigation measures for the project impacts as part of the EA commitments and implement them such that impacts to migratory birds and bats will

be avoided *before* they occur. Additionally, ECCC recommends that the proponent develop adaptive management plan(s) and undertake post-construction monitoring to monitor residual effects (EC 2007a, EC 2007b).

12. If the proposed project is approved, Adaptive Management and Post-construction Monitoring Plans should consider the potential for cumulative impacts of multiple wind energy and other development projects in the area on migratory birds. Where possible, post-construction mortality monitoring reporting should consider post-construction monitoring results from nearby sites (e.g., Goose Harbour Lake Wind Project, Setapuktuk Wind Project).

Species at Risk

13. ECCC notes that avian SAR listed under the *Species at Risk Act* (SARA) may occur in the Project area, including but not limited to:

- **Barn Swallow** (SARA-listed Threatened)
- **Bobolink** (SARA-listed Threatened)
- **Canada Warbler** (SARA-listed Threatened)
- **Common Nighthawk** (SARA-listed Threatened)
- **Eastern Wood-pewee** (SARA-listed Special Concern)
- **Evening Grosbeak** (SARA-listed Special Concern)
- **Harlequin Duck, Eastern population** (SARA-listed Special Concern)
- **Horned Grebe** (SARA-listed Species Concern)
- **Olive-sided Flycatcher** (SARA-listed Threatened)
- **Rusty Blackbird** (SARA-listed Special Concern)

Additionally, non-avian SAR may occur in the Project Area, including but not limited to: Little Brown Myotis (SARA-listed Endangered), Northern Myotis (SARA-listed Endangered), Tri-colored Bat (SARA-listed Endangered), Silver-haired bat (COSEWIC-Endangered), Eastern Red Bat (COSEWIC-listed Endangered), Hoary Bat (COSEWIC-listed Endangered), Yellow-banded Bumble Bee (SARA-listed Special Concern), Blue Felt Lichen (SARA-listed Special Concern), and Frosted Glass-whiskers – Atlantic Population (SARA-listed Special Concern), Snapping Turtle (SARA-listed Special Concern), Wood Turtle (SARA-listed Threatened).

For projects undergoing environmental assessment, ECCC recommends that adverse effects of the project on SAR and their Critical Habitat are identified, and, if the project is carried out, that mitigation measures are taken to avoid or lessen those effects. We recommend that mitigation measures:

- Be consistent with best available information including any Recovery Strategy, Action Plan or Management Plan in a final or proposed version; and
- Respect the terms and conditions of the *Species at Risk*

Act (SARA) regarding protection of individuals, residences, and critical habitat of Extirpated, Endangered, or Threatened species.

ECCC also recommends follow-up monitoring to verify impact predictions, and adequacy of mitigation measures, and adaptive management in the event that SAR or their critical habitat are adversely affected by the project.

14. ECCC notes in Table 7.54 (pg. 162), Snapping Turtle (SARA-listed Special Concern) and Wood Turtle (SARA-listed Threatened) have been recorded within 5km of the study area.

ECCC offers the following general recommendations for the proponent regarding SAR turtles:

- The proponent should identify potential impacts on nesting habitat for SAR turtles.
- The proponent should identify measures to avoid and minimize impacts on SAR turtle individuals during sensitive periods, including measures to protect individuals travelling to nesting and overwintering habitats. If dewatering an area, mitigation measures should also be considered for turtles found in dewatered areas.
- September is the pre-overwintering period when some SAR turtles are in the forest. Hatchlings can emerge from nests in early September to early October. If SAR turtles are present at this site, clearing should occur no earlier than mid-October to avoid risk of destruction of individuals.

ECCC recommends reviewing the following assessment and recovery documents to inform development of monitoring and mitigation measures for federally listed freshwater turtle SAR:

- *Recovery Strategy for the Wood Turtle (*Glyptemys insculpta*) in Canada* (2020): <https://www.canada.ca/en/environment-climate-change/services/species-risk-public-registry/recovery-strategies/wood-turtle-2020.html>
- *Management Plan for the Snapping Turtle (*Chelydra serpentina*) in Canada* (2020): https://species-registry.canada.ca/index-en.html#/species/1033-710#management_plans.

15. ECCC notes that the following lichen SAR were observed in the study area (Table 7.48, pg. 146): Blue Felt Lichen (SARA-listed Special Concern) and Frosted Glass-whiskers (SARA-listed Special Concern).

ECCC offers the following recommendations for avoiding/minimizing project impacts to Blue Felt Lichen and Frosted Glass-whiskers in Nova Scotia:

- Implement a minimum 100 m habitat management buffer zone for all individuals of Frosted Glass-whiskers observed in the Assessment Area. For any individuals where the buffer zone would not be implemented, the proponent should identify measures to avoid/minimize the effects. Management within this zone should follow the Nova Scotia SMP, including:
 - Prohibiting clearing, removal, or disturbance of trees, soil, or wetlands; and
 - Prohibiting new road or trail construction within the zone unless exceptional circumstances apply and are approved through the provincial variance process.
 - Provide a lichen SAR monitoring program including all sites where lichen SAR have been detected in the Assessment Area, and proposed monitoring and adaptive management measures in the event that adverse effects to lichen SAR are detected.
 - Consult recovery documents to inform development of mitigation strategies to avoid direct and indirect impacts:
 - The Management Plan for Blue Felt Lichen (*Degelia plumbea*) in Canada [Final] (2022): <https://species-registry.canada.ca/index-en.html#/consultations/3645>
 - The Management Plan for the Frosted Glass-whiskers (*Sclerophora peronella*), Nova Scotia Population, in Canada [Final] (2011): https://species-registry.canada.ca/index-en.html#/species/739-578#management_plans
 - Mitigation strategies and plans should be provided for review as part of the EA and support significance conclusions.

16. ECCC notes that the following SAR/SOCC bat species/groups were detected during baseline monitoring: Myotis species (i.e., Little brown myotis and/or Northern myotis; SARA-listed Endangered), Hoary bat (COSEWIC-assessed Endangered), Silver-haired bat (COSEWIC-assessed Endangered), Eastern red bat (COSEWIC-assessed Endangered), and unknown bats (including low-frequency and high-frequency bats).

The populations of the three SARA-listed bat species (Little Brown Myotis, Northern Myotis, and Tricolored Bat) are highly depressed in NS, primarily due to introduction of White-nosed Syndrome (WNS), and therefore few acoustic detections are expected.

Any additional loss of SAR bat individuals, maternity roosts, or and/or hibernacula remaining on the landscape can be biologically significant for these long-lived, k-selected species, and affect their recovery. Additionally, the three “migratory” bats, which have been assessed by COSEWIC as Endangered, are highly vulnerable to mortality due to wind turbines.

ECCC recommends that monitoring, mitigation measures, and adaptive management plans consider the COSEWIC-assessed migratory bat species as though they are SARA-listed SAR, in the event that they become listed during the lifetime of the Project.

Additionally, ECCC notes that the mitigation measures provided on page 238 do not include operational mitigations to prevent bat-turbine collisions. ECCC recommends including EA commitments to mitigation measures for minimizing potential impacts to SARA and COSEWIC-listed Endangered bat SAR during the project’s operational phase *before* impacts occur, such as increasing cut-in speeds or altering the pitch/feathering the blades during high-risk collision periods (e.g., during migration or swarming or when wind velocity is low).

ECCC notes that site selection is the most important component of a successful mitigation strategy for bats with respect to wind power development, with turbines and other project infrastructure located as far away as possible from important bat habitat features (hibernacula, potential maternity roosts, migration pathways).

17. ECCC notes that Common Nighthawk were observed in breeding bird surveys with confirmed breeding evidence (Section 7.4.4.5, pg. 210).

Common Nighthawk and other ground or burrow-nesting migratory birds may be attracted to stockpiles or exposed areas for nesting, particularly if there is a delay between clearing activities and subsequent construction activities.

Additionally, Common Nighthawk may have a higher collision risk with turbines/blades than other bird SAR recorded during the breeding period, as this species is an aerial insectivore known to occupy open habitat areas and flying at various heights in search of insects. They also defend their territories by aerial displays (wing booms) that might make them more susceptible to collisions if they choose to nest close to turbines.

ECCC offers the following recommendations:

- Undertake a habitat suitability assessment for this species and clarify whether areas with suitable breeding habitat will be avoided during micro-siting of turbines.
- Develop measures to deter birds from nesting in work areas, such as covering

exposed areas or stockpiles when not in use and minimizing the delay between clearing and subsequent construction activities.

- Identify other targeted mitigation measures to avoid and minimize impacts on Common Nighthawk and its habitat;
- Develop a monitoring plan that includes:
 - Post-construction nightjar surveys (dusk and dawn);
 - Post-construction mortality monitoring to evaluate bird strikes; and
 - Adaptive management measures to be implemented should adverse effects be detected.
- Reference the *Recovery Strategy for the Common Nighthawk (Chordeiles minor) in Canada [Final] (2016)* to inform the development of mitigation measures for this species: https://species-registry.canada.ca/index-en.html#/species/986-668#recovery_strategies

Wetlands

18. ECCC advocates for the conservation of wetlands, especially in areas where wetland losses have already reached critical levels (e.g., NB, NS, PEI, southern Ontario, Prairies), regionally important wetlands, and wetlands used by avian SAR and SOCC as part of their lifecycle (e.g., Canada Warbler, Chimney Swift, Olive-sided Flycatcher Common Nighthawk, Lesser Yellowlegs, Greater Yellowlegs, Spotted Sandpiper, Upland Sandpiper, etc.).

ECCC advocates for planning, siting and designing a project in a manner that considers wetland mitigation options in a hierarchical sequence – avoidance, minimization, and as a last resort, compensation.

In assessing potential for avoidance and minimization impacts to wetlands and avian SAR and SOCC that use wetlands, ECCC recommends that the proponent consider implementing a 30-m buffer around wetlands for all project infrastructure (e.g., turbine pads, access roads, transmission corridors, substation). Any vegetation clearing (even if temporary) should be considered an alteration requiring compensation or other measures to ensure wet soils and wetland functions are maintained for migratory birds and species at risk.

ECCC also recommends the following general measures:

- Developments on wetlands should be avoided;
- Hydrological function of the wetland should be maintained;
- Runoff from development should be directed away from wetlands;
- A 30-metre buffer from the high-water mark of any water body (1:100 Flood Zone) should be maintained in order to retain movement corridors for migratory birds.

Please see <https://www.canada.ca/en/environment-climate-change/services/avoiding-harm-migratory-birds/reduce-risk-migratory-birds.html> for further information concerning buffer zones.

Applicable Legislation and Standard Advice

Fisheries Act

Pollution prevention and control provisions of the Fisheries Act are administered and enforced by ECCC. Subsection 36(3) of the Fisheries Act prohibits “anyone from depositing or permitting the deposit of a deleterious substance of any type in water frequented by fish, or in any place under any conditions where the deleterious substance, or any other deleterious substance that results from the deposit of the deleterious substance, may enter such water”.

It is the responsibility of the proponent to ensure that activities are managed so as to prevent the release of substances deleterious to fish. In general, compliance is determined at the last point of control of the substance before it enters waters frequented by fish, or, in any place under any conditions where a substance may enter such waters. Additional information on what constitutes a deposit under the Fisheries Act can be found here: [Frequently asked questions: Fisheries Act pollution prevention provisions - Canada.ca](#)

Migratory Birds Convention Act

The federal [Migratory Birds Convention Act](#) (MBCA) and its [regulations](#) protect migratory birds and their eggs and prohibit the disturbance, damage, destruction or removal of migratory bird nests that contain a live bird or a viable egg. Migratory birds are protected at all times; all migratory bird nests are protected when they contain a live bird or viable egg; and the nests of 18 species listed in [Schedule 1 of the MBR 2022](#) are protected year-round. These general prohibitions apply to all lands and waters in Canada, regardless of ownership. For more information, please visit: <https://www.canada.ca/en/environment-climate-change/services/avoiding-harm-migratory-birds/reduce-risk-migratory-birds.html>.

For migratory birds that are listed as Endangered, Threatened or Extirpated on Schedule 1 of the *Species at Risk Act* S.32 (protection of individuals) and S.33 (protection of residences) apply to all land tenure types in Canada. For some migratory bird species listed under the *Species at Risk Act* (SARA), the residence prohibition will protect nests that are not active but are re-used in subsequent years (please note that the residence of a migratory bird may not necessarily be limited to their nest).

Section 5.1 of the MBCA describes prohibitions related to depositing substances harmful to migratory birds:

“5.1 (1) No person or vessel shall deposit a substance that is harmful to migratory birds, or permit such a substance to be deposited, in waters or an area frequented by migratory birds or in a place from which the substance may enter such waters or such an area.

(2) No person or vessel shall deposit a substance to be deposited in any place if the substance, in combination with one or more substances, result in a substance – in waters or

an area frequented by migratory birds or in a place from which it may enter such waters or such an area – that is harmful to migratory birds.”

The proponent is responsible for ensuring that activities are managed to ensure compliance with the MBCA and associated regulations.

Species at Risk Act

The Species at Risk Act (SARA) “General prohibitions” apply to this project. In applying the general prohibitions, the proponent, staff and contractors, should be aware that no person shall:

- kill, harm, harass, capture or take an individual;
- possess, collect, buy, sell or trade an individual, or any part or derivative;
- damage or destroy the residence of one or more individuals.

General prohibitions only apply automatically:

- on all federal lands in a province,
- to aquatic species anywhere they occur,
- to migratory birds protected under the Migratory Birds Convention Act (MBCA) 1994 anywhere they occur.

Section 33 of SARA prohibits damaging or destroying the residence of a listed threatened, endangered, or extirpated species. For migratory bird species at risk (SAR), this prohibition immediately applies on all lands or waters (federal, provincial, territorial and private) in which the species occurs.

For project assessments, SARA requires:

79 (1) Every person who is required by or under an Act of Parliament to ensure that an assessment of the environmental effects of a project is conducted, and every authority who makes a determination under paragraph 82(a) or (b) of the *Impact Assessment Act* in relation to a project, must, without delay, notify the competent minister or ministers in writing of the project if it is likely to affect a listed wildlife species or its critical habitat.

(2) The person must identify the adverse effects of the project on the listed wildlife species and its critical habitat and, if the project is carried out, must ensure that measures are taken to avoid or lessen those effects and to monitor them. The measures must be taken in a way that is consistent with any applicable recovery strategy and action plans.

ECCC notes that all comments it provides concerning species at risk that are not migratory birds derive from federal recovery/management plans as posted on the Species at Risk Registry (<https://www.canada.ca/en/environment-climate-change/services/species-risk-public-registry.html>), and thus comments may not be comprehensive to the body of knowledge for the species.

For species which are not listed under SARA but are listed under provincial legislation only or that have been assessed and designated by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC), it is best practice to consider these species in EA as though they were listed under SARA.

Vegetation Clearing

Clearing vegetation may cause disturbance to migratory birds and inadvertently destroy their nests and eggs. Many species use trees, as well as brush, deadfalls and other low-lying vegetation for nesting, feeding, shelter and cover. This would apply to songbirds throughout the region and waterfowl in wetland areas. Disturbance of this nature would be most critical during the key breeding period (mid-April to late-August in this region), however some species protected under the MBCA do nest outside of this time period. Please see the webpage “Nesting Periods” (<https://www.canada.ca/en/environment-climate-change/services/avoiding-harm-migratory-birds/general-nesting-periods/nesting-periods.html>) for more specific information concerning the breeding times of migratory birds. This project falls within zone “C3”.

ECCC provides the following recommendations:

- Avoid certain activities, such as clearing, during the regional nesting period for migratory birds. The breeding season for most birds within the project area occurs between **mid-April and late-August** in this region (see above website for more specific time periods by zone).
- Active nests can be discovered during project activities outside of the regional nesting period. To reduce the risk of impacting nests or birds caring for pre-fledged chicks at those times, ECCC recommends implementation of measures such as the establishment of vegetated buffer zones around nests, and minimization of activities, in the immediate area until nesting is complete, and chicks have naturally migrated from the area. It is incumbent on the proponent to identify the best approach, based on the circumstances, to comply with the MBCA.
- Be cognizant that while most migratory bird species construct nests in trees (sometimes in tree cavities) and shrubs, mitigations should be appropriate for migratory birds with different strategies. For example, several species nest at ground level (e.g. Common Nighthawk, Killdeer, sandpipers), in hay fields, pastures or in burrows. Some bird species may nest on cliffs or in stockpiles of overburden material from mines or the banks of quarries. Some migratory birds (including certain waterfowl species) may nest in head ponds created by beaver dams. Some migratory birds (e.g. Barn Swallow, Cliff Swallow, Eastern Phoebe) may build their nests on structures such as bridges, ledges, or gutters.
- Develop and implement a management plan that includes appropriate preventative measures to minimize the risk of impacts on migratory birds (Please see

‘Guidelines to reduce risk to migratory birds’

at <https://www.canada.ca/en/environment-climate-change/services/avoiding-harm-migratory-birds/reduce-risk-migratory-birds.html>). For beneficial management

practices regarding how to avoid the incidental take of migratory bird nests and eggs, please refer to the Avoidance Guidelines

(Website: <https://www.canada.ca/en/environment-climate-change/services/avoiding-harm-migratory-birds/guidelines.html>). The management plan should include

processes to follow should an active nest be found at any time of the year.

Lighting

Attraction of migratory birds and SAR to light at night or in poor visibility conditions during the day may result in collision with lit structures, their support structures, or with other migratory birds. Disoriented migratory birds are prone to circling light sources and may deplete their energy reserves and either die of exhaustion or be forced to land where they are at risk of depredation.

To reduce the risk of disturbance to migratory birds related to human-induced light, ECCC-CWS recommends implementation of the following beneficial management practices:

- The fewest number of site-illuminating light possible should be used in the project area. Only strobe lights should be used at night, at the lowest intensity and smallest number of flashes per minute allowable by Transport Canada.
- Lighting for the safety of the employees should be shielded down and only to where it is needed.
- LED lights should be used instead of other types of light where possible. LED light fixtures are less prone to light trespass (i.e., are better at directing light where it needs to be, and do not bleed light into the surrounding area), and this property reduces the incidence of migratory bird attraction.

Fuel Leaks

The proponent must ensure that all precautions are taken by the contractors to prevent fuel leaks from equipment, and that a contingency plan in case of oil spills is prepared.

Furthermore, the proponent should ensure that contractors are aware that under the MBCA, “no person shall deposit or permit to be deposited oil, oil wastes or any substance harmful to migratory birds in any waters or any area frequented by migratory birds.” Biodegradable alternatives to petroleum-based chainsaw bar oil and hydraulic for heavy machinery are commonly available from major manufacturers. Such biodegradable fluids should be considered for use in place of petroleum products whenever possible, as a standard for best practices. Fueling and servicing of equipment should not take place within 30 meters of environmentally sensitive areas, including shorelines and wetlands.

ECCC recommend incorporating a Wildlife Emergency Response Plan into emergency

response contingency plans for scenarios that may impact avifauna directly (injury or mortality e.g. polluting incident) or indirectly (collisions causing mortality, stranding due to light attraction).

For consideration in emergency response and contingency planning related to accidents and malfunctions, ECCC has prepared *Guidelines for Effective Wildlife Response Plans* (ECCC 2022) available online

at: <https://www.canada.ca/en/services/environment/wildlife-plants-species/national-wildlife-emergency-framework.html>. Plans should include:

- Measures to deter migratory birds from coming into contact with the oil or polluting substance;
- Measures undertaken if individuals of migratory birds and/or sensitive habitat become contaminated; and,
- The type, extent of monitoring, and reporting in relation to various spill events.

The proponent is responsible for ensuring that all precautions are taken by the contractors to prevent fuel leaks from equipment, and that a contingency plan is prepared in the case of spills. Furthermore, the proponent should ensure that contractors are aware of s.5.1 MBCA prohibitions.

Events involving a polluting substance should be reported to the 24-hour environmental emergencies reporting system: **1-800-565-1633**.

Bird mortality incidents of 10 or more birds in a single event, or an individual species at risk, should be reported via ECCC-CWS Main Office **(506) 364-5044** or via email to SCFATLEvaluationImpact-CWSATLImpactAssessment@ec.gc.ca.

Stockpiles

Certain species of migratory birds (e.g., Bank Swallows) may nest in large piles of soil left unattended/ unvegetated during the most critical period of breeding season (mid-April through late August). To discourage this, the proponent should consider measures to cover or to deter birds from these large piles of unattended soil during the breeding season. If migratory birds take up occupancy of these piles, any industrial activities (including hydroseeding) will cause disturbance to these migratory birds and inadvertently cause the destruction of nests and eggs. Alternate measures will then need to be taken to reduce potential erosion, and to ensure that nests are protected until chicks have fledged and left the area. For a species such as Bank Swallow, the period when the nests would be considered active would include not only the time when birds are incubating eggs or taking care of flightless chicks, but also a period of time after chicks have learned to fly, because Bank Swallows return to their colony to roost.

For additional information on designing mitigation measures for Bank Swallow, refer to the following guidance: <https://www.canada.ca/en/environment-climate->

[change/services/species-risk-public-registry/related-information/bank-swallow-sandpits-quarries.html](https://www.ec.gc.ca/esp/14983104-8094-4980-9004-956161111111/change/services/species-risk-public-registry/related-information/bank-swallow-sandpits-quarries.html).

Invasive Species

Measures to diminish the risk of introducing invasive species should be developed and implemented during all project phases. These measures could include:

- Cleaning and inspecting construction equipment before transport from elsewhere to ensure that no vegetative matter is attached to the machinery (e.g., use of pressure water hose to clean vehicles before transport).
- Regularly inspecting equipment prior to, during and immediately following construction in areas found to support Purple Loosestrife or other invasive species to ensure that vegetative matter is not transported from one construction area to another.

Noise Disturbance

Anthropogenic noise produced by construction and human activity can have multiple impacts on birds, including causing stress responses, avoidance of certain important habitats, changes in foraging behavior and reproductive success, and interference with songs, calls, and communication. Activities that introduce loud and/or random noise into habitats with previously no to little levels of anthropogenic noise are particularly disruptive.

ECCC recommends the following best management practices:

- Develop mitigations for programs that introduce very loud and random noise disturbance (e.g., blasting programs) during the migratory bird breeding season for their region.
- Prioritize construction works in areas away from natural vegetation while working during the migratory bird breeding season. Conducting loud construction works adjacent to natural vegetation should be completed outside the migratory bird breeding season.
- Keep all construction equipment and vehicles in good working order and loud machinery should be muffled.

Please let me know if you have any questions regarding the above advice.

Regards,

Maryam Fazeli

Coordinator, Environmental Assessment, Environmental Protection Operations Directorate - Atlantic Environment and Climate Change Canada / Government of Canada

maryam.fazeli@ec.gc.ca

Coordinatrice, Évaluation environnementale, Direction des activités de protection de l'environnement

Environnement et Changement climatique Canada / Gouvernement du Canada

maryam.fazeli@ec.gc.ca

Date: December 19, 2025

To: Mark McInnis, Environmental Assessment Officer

From: Environmental Health – Sustainability and Applied Sciences Division

Subject: **Aulds Cove Wind Project, Guysborough County, Nova Scotia**

Scope of review:

This review focuses on the following mandate: Environmental Health

List of Documents Reviewed:

Aulds Cove Wind Project EARD

Details of Technical Review:

The project proposal, Green Current Renewable Energy Development Inc., proposes to construct and operate the Aulds Cove Wind Project, an up to 147-megawatt (MW) wind development located near the communities of Aulds Cove, Mulgrave, Grosvenor, and Frankville. The Project is entirely located within the Municipality of the District of Guysborough, in Guysborough County, Nova Scotia. The Project will consist of up to 21 wind turbines along with associated infrastructure, including access roads, substation, and interconnection lines.

Based upon the review to the documents noted above, and in particular potential for health effects from shadow flicker, sound, and ice throw, there are no additional Environmental Health Concerns that lie outside of the current assessment of impact, mitigation measures, or existing legislative requirements.

Key Considerations:

Environmental Health concerns are either addressed within the provided documents, assessed for and deemed to have no negative effect, or are already covered withing existing legislative requirements. There are no additional unaddressed health related considerations based upon the information provided for this project.



February 5, 2026

Mark McInnis
Environmental Assessment Officer
Nova Scotia Environment and Climate Change, EA Branch

**Re: Consultation with the Mi'kmaq of Nova Scotia on the Aulds Cove Wind Project,
Guysborough County, NS**

Mr. McInnis,

I write in response to your letter dated December 17, 2025, with respect to consultation under the *Terms of Reference for a Mi'kmaq-Nova Scotia-Canada Consultation Process (ToR)* as ratified on August 31, 2010, on the above noted project. We wish to proceed with Consultation.

The Kwilmu'kw Maw-Klusuaqn (KMK) would like to highlight that the Environmental Assessment Registration Document (EARD) identifies several species such as Atlantic Salmon, American Eel and Mainland Moose which are all species found in the project area and all significant to the Mi'kmaq. It is KMK's expectation that Nova Scotia Environment and Climate Change (NS-ECC) will ensure these species will not be impacted by this proposed project and the Mi'kmaq of Nova Scotia will continue to be able to hunt and harvest these species.

With the EARD stating that "portions of the Assessment Area and Study Area intersect with core habitat identified for the species. Based on these factors, it is reasonable to assume that mainland moose may use available habitat within the Assessment Area.", it must be noted that Mainland moose populations are declining at an alarming rate and are subject to the cumulative impacts of many developments being proposed in Mainland Nova Scotia. With the moratorium on harvesting moose remaining in place in the Cape Breton Highlands, sustained efforts are needed to protect the remaining population in Mainland Nova Scotia for the next seven generations of harvesters and beyond.

While it is encouraging that "Additional meetings are planned in the future with Paq'tnekek and We'koqma'q First Nations to further discuss potential investment or partnership opportunities once the Project's funding model is more complete.", it is imperative that the proponent highlight environmental impacts that may result from the proposed project as well as the partnership opportunities.

KMK's Archaeology and Research Division (ARD) has reviewed the Archaeological Resource Impact Assessment (ARIA), HRP A2025NS124, prepared by Davis MacIntyre and Associates, as well as Section 9 of the EARD prepared by Strum Consulting. Based on this review, we support the recommendations and proposed next steps at this time. However, KMK's ARD does not support archaeological clearance without the completion of subsurface testing. Mi'kmaq archaeological sites have developed since time immemorial and may not be identified from the surface character of the current landscape, one cannot conclusively eliminate potential for Mi'kmaq archaeological heritage, without subsurface testing.

The Assembly of Nova Scotia Mi'kmaq Chiefs expects a high level of archaeological diligence, with evidence-based decisions grounded in an understanding of the subsurface environmental data. The Maw-lukutijik Saqmaq (Assembly of Nova Scotia Mi'kmaq Chiefs) expects subsurface data, adequate to eliminate concern for presence, protection, and management of Mi'kmaq archaeological and cultural heritage as part of assessment of potential in advance of any development.

KMK does not represent the communities of Millbrook and Sipekne'katik First Nations. Please contact Patrick Butler, Senior Mi'kmaq Energy & Mines Advisor at KMK, with any questions.

Yours in Recognition of Mi'kmaq Rights and Title,

Director of Consultation
Kwilmu'kw Maw-Klusuaqn

C.C.:

Kwilmu'kw Maw-klusuaqn
Kwilmu'kw Maw-klusuaqn

Candace Quinn, Nova Scotia Office of L'nu Affairs
Doreen Mackley, Nova Scotia Environment and Climate Change, ICE Division
Marc Theriault, Nova Scotia Environment and Climate Change, ICE Division
Sarah Jadot, Nova Scotia Environment and Climate Change, ICE Division
Matt Schumacher, Nova Scotia Environment and Climate Change, ICE Division
Megan Lesko, Nova Scotia Environment and Climate Change, ICE Division
Cynthia Steele, Nova Scotia Department of Natural Resources



Environmental Assessment - Project Comments

Submission ID

c11dcbef

Submission date

18/12/2025 21:48

Submission status

PROCESSED



All comments received from the public consultation will be posted on the department's website for public viewing, following the necessary redactions of personal information in accordance with the Freedom of Information and Protection of Privacy Act. **By submitting your comments to the Department, you are consenting to the posting of your comments on the department's website.**

The name, email address, and contact information of people who submit comments on behalf of an organization, such as a community group, business, or non-government organization (NGO) will be included with their comment posted on the website.

The name, email address, and contact information of individuals will be removed before their comments are posted on the website.

Privacy Notice

Your personal information submitted as comments on an Environmental Assessment Project is collected in accordance with the Nova Scotia Environment Act, Environmental Assessment Regulations, and the Nova Scotia Freedom of Information and Protection of Privacy Act.

We collect and use your personal information to administer the environmental assessment review process, to verify comments, and to assess the project's proximity to you.

We may only use or disclose your personal information for another purpose if we are authorized by law to do so, or if we obtain your consent.

By submitting your personal information to us, you acknowledge that the information provided to us is correct and accurate, and you understand that any personal information you provide is collected, used, and disclosed for the purpose of administering the review process.

To read more about how government respects your privacy when interacting with us, review our full [privacy statement \(https://beta.novascotia.ca/privacy\)](https://beta.novascotia.ca/privacy). For questions about how your personal information is handled by the program, you may contact us at 902-424-3600 or [ea@novascotia.ca \(mailto:ea@novascotia.ca\)](mailto:ea@novascotia.ca).

Select a Project:

Aulds Cove Wind Project

Comments:

The lack of public consultation and publicly available information is a poor look for the proponent. There is no website and no easy way to access information about the proponent, their history and their projects. I believe this devalues the engagement of other projects, and NSECC should consider their lack of public consultation.

Name:

Email:

department's website.

Please note:

By submitting your comments, you are consenting to the posting of your comments on the

City/Town

Postal Code Attachment(s):

Drag & drop or [choose file](#) to upload

Maximum file size per file: 10 MB

Accepted file types: doc, docx, jpg, jpeg, pdf, png, xls,
xlsx

Maximum number of files allowed: 10

Yes, I agree (must be selected to proceed)

Uploaded document(s)

No documents to display.



Environmental Assessment - Project Comments

Submission ID

81a7d41a

Submission date

07/01/2026 11:14

Submission status

PROCESSED



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Select a Project:

Aulds Cove Wind Project



Please note:

By submitting your comments, you are consenting to the posting of your comments on the department's website.

Comments:

I do not support investment in wind power generation. Wind power is expensive, intermittent, and unreliable. These wind projects are expensive virtue-signalling projects that require a large upfront investment, are proven to be harmful to birds, and will drive up the average cost of electricity in NS. The hype around harms from carbon emissions is largely unfounded and unproven. If man-made carbon emissions were ever proven to have any material effect on climate, the small amount emitting from NS would have no material effect on the planet. It makes no sense to burden NS taxpayers with expensive energy production to satisfy the climate catastrophe naysayers.

Name:

Email:

City/Town

Nictaux

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B0S 1P0

Drag & drop or [choose file](#) to upload

Maximum file size per file: 10 MB

Accepted file types: doc, docx, jpg, jpeg, pdf, png, xls, xlsx

Maximum number of files allowed: 10

Yes, I agree (must be selected to proceed)

Uploaded document(s)

No documents to display.

Maritime Aboriginal Peoples Council



The Maritime Regional Aboriginal Leaders
Intergovernmental Council of Aboriginal Peoples
Continuing to Reside on Traditional Ancestral Homelands

Forums

- Leaders Congress
- MAPC Commissions/Projects
- MAARS Secretariate
- MAPC Administration

MAPC Regional
Administrative Office
80 Walker St. Unit 3
Truro, N.S., B2N 4A7

Tel: 902-895-2982
Fax: 902-895-3844
Toll Free: 1-855-858-7240
Email: frontdesk@mapcorg.ca

Native Council of Nova Scotia
P.O. Box 1320
Truro, N.S., B2N 5N2

Tel: 902-895-1523
Fax: 902-895-0024
Email: chiefaugustine@ncns.ca

Native Council of
Prince Edward Island
6 F.J. McAuley Court
Charlottetown, P.E.I., C1A 9M7

Tel: 902-892-5314
Fax: 902-368-7464
Email: chief@ncpei.com

New Brunswick Aboriginal
Peoples Council
320 St. Mary's Street
Fredericton, N.B., E3A 2S4

Tel: 506-458-8422
Fax: 506-451-6130
Email: chiefdiotte@nbapc.org

Newfoundland Indigenous
Peoples Alliance
212 Main St., Box 203
Port Saunders, NL A0K 4H0

Tel: 709-861-9101/9102
Email: newfoundlandindigenous@gmail.com

February 6th, 2026

Green Current Renewable Energy Development Inc

10442 Route 19
SW Mabou, Nova Scotia
B0E 1X0

RE: Aulds Cove Wind Project

To Whom It May Concern,

On behalf of the Native Council of Nova Scotia (NCNS), and the Maritime Aboriginal Aquatic Resources Secretariate (MAARS), we would like to thank Green Current Renewable Energy Development Inc. and Strum Consulting for taking the time to discuss this project with us on February 3rd, 2026. We would like to summarize and expand upon the discussion to ensure our comments are captured for the Environmental Assessment Review.

When discussing the potential impacts of this project on Wetlands (Section 7.3.2.6), there were a total of 52 potential wetland-project interactions, nine of which were noted as potential Wetlands of Special Significance (WSS), and a total of 6.3 hectares of wetland habitat to be directly impacted by this potential development. Of this impacted area, two of the areas noted to be a potential WSS observed a Canada Warbler (*Cardellina canadensis*) breeding pair and are expected to be altered for new road construction. Wetland habitats are known to provide important ecosystem functions, as well as habitat for numerous aquatic, terrestrial, and plant species. As such, any impact to the functions of these habitats can have significant effects on the ecosystem. Given the importance of these habitats and direct impacts of 6.3 hectares of wetland habitat, MAARS requests to review the wetland compensation plans when they are available.

As it relates to aquatic habitat, we raised concerns over the presence of potential Atlantic Salmon habitat noted in the electrofishing results for Wrights River. While the Nova Scotia Southern Upland Atlantic Salmon population is not currently

listed under SARA, the population has been assessed as Endangered by COSEWIC. MAARS would request that should the project layout be modified in relation to areas of Atlantic Salmon detection, additional field surveys be conducted to confirm that any critical habitat is not adversely affected. If impacts to Atlantic Salmon or its critical habitat are identified, appropriate additional mitigation measures should be applied.

In Section 7.4.3.6, when discussing the mitigation measures to reduce effects on bats, it is unclear whether the proponent has incorporated specific mitigation measures during the post-construction/operational phase of this project. These mitigation measures can be critical to ensuring the safety of birds and bats, and particularly those species which are migratory. The EARD highlighted the presence of three migratory bat species (Hoary Bat, Eastern Red Bat, and Silver-haired Bat), which have all recently been assessed by COSEWIC as endangered. One of the key threats identified in COSEWIC's assessment report was wind energy development, classifying wind energy as having a high to very high impact on this species and other migratory bat species, even acknowledging that the current projections of fatality rates by wind farms are likely gross underestimates. COSEWIC identifies turbine curtailment during key periods as an important mitigation measure, with the potential to reduce fatalities by up to 50%.

MAARS would recommend that the proponent, in collaboration with ECCC's Canadian Wildlife Service, develop mitigation measures and curtailment protocols for migratory bats to ensure the protection of these at-risk species. Additionally, we recommend that mitigation measures for all avifauna (birds and bats) also include consideration of the timing of vegetation management and herbicide spraying, which are key factors in protecting migratory bats, and these activities, as well as removals of potential roosting habitat, must be done outside the key season for these species.

As noted in our discussion, we have significant concerns over the potential cumulative effects that would be associated with approval of this proposed project, given the proximity to two existing large onshore wind farms (Goose Harbour Lake Wind Project and Setapuktuk Wind Project) and the EverWind Transmission Line. While this project alone does not encompass a large footprint, the footprint of existing undertakings and potential for future works will only compound the existing impacts to several species mentioned above. This includes continued shrinking of Mainland Moose habitat, increased impacts to migratory birds and bats, destruction of habitat for lichen SAR, and additional potential impacts to wetlands, including WSS, and/or watercourses. When considered only in conjunction with the adjacent Goose Harbour Lake Wind Farm Project, Setapuktuk Wind Project, and the EverWind Transmission Line, the total area encompassed covers more than 1,000 hectares and is directly impacting over 25 hectares of wetland habitat.

For contextual purposes

We would like to take this opportunity to reiterate that it is important for all proponents of projects to understand that the Off-Reserve Aboriginal Community represented by the NCNS is included within the definition of the word "Indian" of Section 91(24) of the *Constitution Act*, 1982. The Supreme Court of Canada in a landmark decision in *Daniels v. Canada (Indian Affairs and Northern Development)*, 2016 SCC 12, declared that "the exclusive Legislative Authority of the Parliament of Canada extends to all Indians, and Lands reserved for the Indians" and that the word

“Indians” in s.91(24) includes the Métis and non-Status Indians¹. Since 2004, in multiple decisions passed by the Supreme Court of Canada: *Haida Nation*², *Taku River Tlingit First Nation*³, and *Mikisew Cree First Nation*⁴, has established that,

“Where accommodation is required in decision making that may adversely affect as yet unproven Aboriginal Rights and title claims, the Crown must balance Aboriginal concerns reasonably with the potential impact of the decision on the asserted right or title and with other societal interests.”

Further, both the Government of Nova Scotia and the Government of Canada are aware that the “Made in Nova Scotia Process” and the *Mi’kmaq-Nova Scotia-Canada Consultation Terms of Reference* does not circumvent the Provincial Government’s responsibility to hold consultations with other organizations in Nova Scotia that represent Indigenous Peoples of Nova Scotia. While the proponent may have to engage with the thirteen Mi’kmaq First Nations through the Assembly of Nova Scotia Mi’kmaq Chiefs, represented by the Kwilmu’kw Maw-klusuaqn Negotiation Office (KMKNO), the KMKNO does not represent the Off-Reserve Aboriginal Community who have elected to be represented by the NCNS since 1974.

We assert that the Off-Reserve Aboriginal Communities, as 91(24) Indians, are undeniably heirs to Treaty Rights and beneficiaries of Aboriginal Rights as substantiated by Canada’s own Supreme Court jurisprudence. As such, there is absolutely an obligation to consult with the Off-Reserve Community through their elected representative body of the NCNS. The Crown’s duty is to consult with all Indians, not only the Indian Act Bands.

For over forty years, the three Native Council partners of the Maritime Aboriginal People’s Council (MAPC) have continued to be the Aboriginal Peoples Representative Organizations representing and advocating for the Rights and issues of the Mi’kmaq/Wolastoqiyik/Peskotomuhkati/Section 91 (24) Indians, both Status and non-Status, continuing to reside on their unceded Traditional Ancestral Homelands. In the early 1970s, the communities recognized the need for representation and advocacy for the Rights and Interests of the off-Reserve community of Aboriginal Peoples, “the forgotten Indian”. Women and men self-organized themselves to be the “voice to the councils of government” for tens of thousands of community members left unrepresented by Indian Act-created Band Councils and Chiefs. Based on the Aboriginal Identity question, Statistics Canada (2021 Census - 25% sample) enumerate 25,415 off-Reserve Aboriginal Persons in New Brunswick, 42,580 in Nova Scotia, and 2,865 in Prince Edward Island.

Each Native Council in their respective province asserts Treaty Rights, Aboriginal Rights, with Interest in Other Rights confirmed in court decisions, recognized as existing Aboriginal and Treaty Rights of the Aboriginal Peoples of Canada in Part II of the Constitution Act of Canada, 1982. Each Native Council has established and maintains Natural Harvesting Regimes, and each have a co-management arrangement with DFO for Food, Social, and Ceremonial use of aquatic species,

¹ Daniels v. Canada (Indian Affairs and Northern Development), 2016 SCC 12, [2016] 1 S.C.R. 99

² Haida Nation v. British Columbia (Minister of Forests), (2004), 2 S.C.R. 511

³ Taku River Tlingit First Nation v. British Columbia (Project Assessment Director), (2004), 3 S.C.R. 550

⁴ Mikisew Cree First Nations v. Canada (Minister of Canadian Heritage), (2005), 3 S.C.R. 388

through the: Najiwsgetaq Nomehs (NBAPC), the Netukulimkewe'l Commission (NCNS), and the Kelewatl Commission (NCPEI).

The Native Council of Nova Scotia was organized in 1974 and represents the interests, needs, and rights of Off-Reserve Status and Non-Status Section 91(24) Indians/Mi'kmaq/Aboriginal Peoples continuing to live on our Traditional Ancestral Homelands throughout Nova Scotia as Heirs to Treaty Rights, Beneficiaries of Aboriginal Rights, with Interests to Other Rights, including Land Claim Rights.

The Native Council of Nova Scotia (NCNS) Community of Off-Reserve Status and Non-Status Indians/Mi'kmaq/Aboriginal Peoples supports projects, works, activities and undertakings which do not significantly alter, destroy, impact, or affect the sustainable natural life ecosystems or natural eco-scapes formed as hills, mountains, wetlands, meadows, woodlands, shores, beaches, coasts, brooks, streams, rivers, lakes, bays, inland waters, and the near-shore, mid-shore and off-shore waters, to list a few, with their multitude of in-situ biodiversity. Our NCNS Community has continued to access and use the natural life within those ecosystems and eco-scapes where the equitable sharing of benefits arising from projects and undertakings serve a beneficial purpose towards progress in general and demonstrate the sustainable use of the natural wealth of Mother Earth, with respect for the Constitutional Treaty Rights, Aboriginal Rights, and Other Rights of the Native Council of Nova Scotia Community continuing throughout our Traditional Ancestral Homeland in the part of Mi'kma'ki now known as Nova Scotia.

We appreciate the opportunity to engage on the Aulds Cove Wind project directly with the proponent, Green Current Renewable Energy Development Inc. We respectfully request that these concerns be addressed in full and that further engagement with the Native Council of Nova Scotia and local communities be prioritized as this project moves forward. We look forward to further dialogue as we continue to advocate for the rights of Off-Reserve Status and Section 91(24) Indians/Mi'kmaq/Aboriginal Peoples of Nova Scotia. To continue to represent the interests and needs of the off-Reserve Aboriginal Community in Nova Scotia, we would like to request the opportunity to participate in early engagement in future Environmental Assessment Reviews.

Advancing Aboriginal Fisheries and Oceans Entities
Best Practices, Management, and Decision-making

Habitat Impact Advisor, MAARS

Executive Director, MAARS & MAPC Projects

CC: _____, Chief & President, NCNS
_____, Commissioner, Netukulimkewe'l Commission, NCNS