

Comment Index

Eigg Mountain Wind Project, Antigonish County

Publication Date: April 9, 2026

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11	Municipality of the County of Antigonish District 1 Councillor	March 30, 2026

From: [Allain, Jérémie \(HC/SC\)](#) on behalf of [JA-ATL / EL-ATL \(HC/SC\)](#)
To: [McInnis, Mark](#)
Cc: [Maclean, Lachlan \(HC/SC\)](#)
Subject: RE: Environmental Assessment - Eigg Mountain Wind Project, Antigonish County
Date: February 24, 2026 12:55:52 PM
Attachments: [image001.jpg](#)
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**** 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 Eigg Mountain Wind Project, Antigonish County, 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)

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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.	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.)	<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> https://publications.gc.ca/collections/collection_2024/sc-hc/H129-54-6-2023-eng.pdf
	If there is the potential that project-related activities could affect human receptors, impacts to human health should be considered.	

Atmospheric Environment		
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.	• 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: ○ impacts to air quality (dust or fumes including PM_{2.5}, NO_x, SO_x, PAHs) ○ increased noise from construction or operations	<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> https://publications.gc.ca/collections/collection_2024/sc-hc/H129-54-3-2023-eng.pdf <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> https://publications.gc.ca/collections/collection_2024/sc-hc/H129-54-1-2023-eng.pdf
	• 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.	
	• 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		
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	• 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.	<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> https://publications.gc.ca/collections/collection_2024/sc-hc/H129-54-2-2023-eng.pdf

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.	• 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		
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.	• 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.	<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

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).	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.
	It may also be useful to include map(s) illustrating modelled noise levels from the project at receptor locations in the study area.	Section 6.1 of HC's noise guidance contains additional information regarding identification of human receptors in a project 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		
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.	• 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.	For more information on noise-induced sleep disturbance, please see Section 5.2 of HC's noise guidance².
	• 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. ○ 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

	- 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 L_{Amax} (maximum A-weighted sound level) more than 10–15 times per night....</i>” - 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.	
	- 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. - 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.
	In quiet rural areas, HC suggests that during construction, the short-term average day-night sound level (L_{dn}) 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).
	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)

	○ 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		
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.	• 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. ○ 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

	• 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. ○ 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 Ln $\leq$ 55 dBC. At 10 Hz, 60 dBC is approximately 69 dBZ.	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. Appendix D of ANSI 2005⁷ further outlines the procedure for assessing %HA when low-frequency noise is present.
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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

Last updated: March 20, 2024

Noise Modelling, Mitigation and Monitoring		
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.	• 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. ○ 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	For more information on adjustments, please see Section 6.1 of HC's noise guidance ² .
		Please see Section 6.2.1 of HC's noise guidance ² for more information on removing non-anthropogenic sounds.

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>

	diameter windscreen. For other conditions, including evaluating low frequency sounds (e.g., C-weighted decibels or dBC), larger windscreens may be required.	
	- 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. - 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.	Please see Section 6.3.2 of HC's noise guidance ² for more information on modelling project operational noise.
	- 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. - If there are uncertainties in the noise modelling, consider monitoring noise levels, particularly in the event of public complaints.	Section 6.4 of HC's noise guidance ² provides additional information on noise management and noise monitoring plans.

	• 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.	Sections 6.4.1 and 6.4.2 of HC's noise guidance² provide advice on appropriate mitigation noise levels. Please see Appendix H of HC² for suggested construction noise mitigation measures. Section 6.4 of HC's noise guidance² provides additional information about mitigation.
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. Meaningful community consultation and engagement throughout the lifespan of the project can be an effective way to identify and mitigate project-related noise concerns.	• 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. ○ Noise management and noise monitoring plans, including complaint resolution plans, are often incorporated as part of the EA/IA's Environmental Management Plan.	Section 6.4.1 of HC's noise guidance² provides additional information on community consultation as it relates to noise.

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: February 27, 2026

To: Mark McInnis, Environmental Assessment Officer

From: Melissa Ginn, Regional Environmental Advisor, Transport Canada

Subject: **Eigg Mountain Wind Project, Antigonish County, Nova Scotia**

Scope of review:

This review focuses on the following mandate: Navigation, aviation.

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/markings-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](#)



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: March 3, 2026

To: Mark McInnis, Environmental Assessment Officer

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

Subject: **Eigg Mountain Wind Project, Antigonish 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 Eigg Mountain 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 – 251600.00 Eigg Mtn Wind Project EA FINAL.pdf
- Appendices A-K, submitted as individual PDF documents

Details of Technical Review:

Risk Assessment: Wetland Assessment	
Identify Gap/Risk	Impacts to fish and fish habitat from wetland alterations are not clearly outlined, including both direct and indirect impacts. For example, in Section 9.3.1.1, Tables 9.7 and 9.8 identify the estimated areas of potential impact for each wetland, and Appendix H indicates which wetlands have fish presence. Further information is required to clarify if the impact areas within each wetland contains any direct and/or indirect habitat for fish, and the amount of fish habitat (m²) that will be impacted. Detailed WESP-AC forms, assessments, and photos should also be provided to support the analysis of potential impacts to fish and fish habitat.
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 (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	Details associated with watercourse crossings are unknown and therefore impacts to fish, fish habitat, and fish passage cannot be fully assessed at this time. For example, Section 2.5.2 (Access Road Construction and Modification) of the report states: <i>"Culverts and/or bridges will be installed at new watercourse crossings. For existing access roads within the PDA, culvert replacement will be undertaken where current structures do not meet design standards or are in poor condition. The final number and location of culvert replacements will be confirmed during detailed design."</i>
Can it be addressed in	The identified gap can be addressed during the NSECC watercourse and/or wetland alteration approval process(es) and DFO regulatory

another permit/approval or with a T&C?	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 (e.g., watercourse crossing designs), 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 Eigg Mountain 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: March 9, 2026

To: Mark McInnis, Environmental Assessment Officer

From: NSECC, Compliance Division

Subject: **Eigg Mountain Wind Project, Antigonish 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): Eigg Mountain Wind Project

Details of Technical Review:

- The Proponent has committed to the development and implementation of a Project specific Environmental Protection Plan (EPP), which will be developed before commencement of construction, and will contain information on: Erosion and Sediment Control (ESC), Blasting Management, Fire Prevention and Control, Surface Water Management, Waste Management, Dust Control, Wildlife Management, Vegetation Management, Soil and Stockpile Management, Hazardous Substances Management and Spill Prevention, Decommissioning and Site Reclamation, Environmental Emergency Response and Contingencies
- Site preparation and construction is expected to start in fall 2026 and take approximately 2 years. Site preparation will be restricted to the minimum practicable footprint to limit environmental effects while providing adequate space for construction activities. ESC measures and other mitigations will be implemented, and soil conservation practices will be applied consistent with regulatory requirements, engineering standards, and industry best practices
- Blasting is expected as part of access road construction or upgrades, as well as turbine foundations. A Blasting Management Plan will be developed while Pre-blasting well water surveys will be completed for those within 800 m of the activity (Section 6.3.1.2). Monitoring wells installed during geotechnical investigations will be used to detect changes in water quality.
- If shallow water tables are encountered during blasting and excavation at foundation locations, temporary dewatering would be needed to allow the curing of the concrete. A Groundwater Management Plan may be needed if construction of structures goes below the seasonal water table.
- The Project is scheduled to be commissioned in December 2028, and operation and maintenance will occur for up to 35 years. Maintenance will be conducted in accordance with manufacturer specifications, industry best practices, and internal procedures and standards.

- Vegetation control will be necessary to maintain the safety of the facility grounds and will include trimming and removal of vegetation to prevent damage or disrupt equipment. Management practices are stated to follow The Nova Scotia Industrial Vegetation Management Manual. Proponent should note, an approval is required prior to herbicide use.
- Two years prior to Project decommissioning, a Decommissioning and Site Reclamation Plan will be submitted to NSECC for review and approval. Construction and demolition waste will be recovered and recycled, where possible.
- A Complaint Resolution Plan will be developed and implemented to investigate and mitigate (if required) groundwater-related and other complaints.
- Watercourses along the proposed transmission line corridor will be avoided to the extent practicable through alignment refinement during detailed design. All culverts installed or upgraded for the access roads will meet provincial standards and DFO design criteria for fish passage where applicable. Watercourse crossings will be installed in compliance with the Nova Scotia Guide to Altering Watercourses.
- An Acid Rock Drainage (ARD) Management Plan will be developed, if required, to manage and mitigate any potential effects from ARD.
- Dust control measures (e.g., application of water) will be used during periods of significant dust generation. Use of petroleum product for dust control will be prohibited.
- The protected water area was considered during the development of the transmission line layout and is avoided entirely. Project infrastructure does not overlap with the James River Watershed Protected Water Area.

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, water withdrawal and herbicide use.

Date: March 9, 2026

To: Mark McInnis, Environmental Assessment Officer, ECC

From: Dawn Sutherland – Provincial Director of Planning

Subject: **Eigg Mountain Wind Project, Antigonish County, Nova Scotia**

Scope of Review:

This review focuses on the following mandates:

- Consultation with the Municipality;
- Municipal land use planning; and
- Consistency with the five Statements of Provincial Interest.

List of Documents Reviewed:

- Eigg Mountain Wind Project Final Submission Registration Document
- Appendix C – Summary of Consultation

Details of Technical Review:

1. Municipal Consultation

- The proponent has undertaken multiple consultations with local governments and planning authorities, including Members of Council, the Mayor/Warden, the CAOs and municipal staff from the Town and County of Antigonish, in addition to meeting with the Eastern District Planning Commission, which provides planning services to the Town and County of Antigonish.
- These engagements have focused on Project updates, by-law and zoning requirements, and overall Project siting, and have resulted in continued dialogue and a municipal letter of support for the Project.

2. Land Use Planning

- The proponent has actively engaged with the Municipality of Antigonish and the Eastern District Planning Commission to discuss zoning, land use by-laws, Project siting, and required updates to ensure alignment with both municipal regulations and evolving provincial standards.
- Municipal and EDPC efforts are underway to amend the Land Use By-law to bring it into compliance with Provincial Minimum Planning Regulations, with updates expected to be in place for the Project.

3. Statements of Provincial Interest

- **Drinking Water:** No anticipated impact. The two nearest public water supplies are the Antigonish Water Utility, which draws water from Rights River, and the Community of St. Joseph, which draws water from one municipal groundwater well. The Town of Antigonish draws water from Rights River, which originates from several streams in an upland area west of the PDA. The source water area is designated as a Protected Water Area under Section 106 of the *Environment Act*. The PDA is approximately 200m east of the boundary of the Protected Water Area and does not overlap any portion of the source water area of Rights River upstream of the dam.
- **Agricultural Land:** No anticipated impact. High capability agricultural soils are not adversely affected by the Project.
- **Flood Risk:** No anticipated impact. No areas at-risk from flooding are affected.
- **Infrastructure:** No anticipated impact. The Project area is unserved.
- **Housing:** No anticipated impact. The area is rural with sparse residential development. Residential development is a permitted use within the Project area.

Key Considerations:

All components considered under DMA's areas of mandate have been adequately addressed in the Registration Document.



Impact Assessment
Agency of Canada

Agence d'évaluation
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March 9, 2026

Mark McInnis
Environmental Assessment Officer
Policy Division, EA Branch
Mark.McInnis@novascotia.ca

SUBJECT : Eigg Mountain Wind Project

Dear Mark McInnis:

Thank you for the opportunity to review the registration document for the Eigg Mountain Wind Project (the project), received on February 12, 2026.

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 Eigg Mountain Wind 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.

Kevin Cassell

Policy Analyst, Newfoundland and Labrador Satellite Office
Impact Assessment Agency of Canada / Government of Canada
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Analyste de Politiques, Bureau satellite de Terre-Neuve-et-Labrador
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Gouvernement
du Canada

Government
of Canada

Canada

Date: March 09, 2026
To: Mark McInnis, Environmental Assessment Officer
From: Beth Lewis, Director of Special Places Protection
Subject: **Eigg Mountain Wind Project, Antigonish County**

Scope of review:

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

List of Documents Reviewed:

EA Document, Final ARIA report for Heritage Research Permit (HRP) A2025NS106
Eigg Mountain Wind Energy Project.

Details of Technical Review (Archaeology):

Section 14, Heritage & Cultural Resources, Page 239 details the archaeological resource impact assessment (ARIA) conducted under HRP A2025NS106 Eigg Mountain. The EA Document states that eleven (11) areas of elevated archaeological potential were identified within the proposed development area, and that there are areas – turbine locations - that are now within development boundaries that were not part of the project during the time of assessment, and that these areas have not yet been assessed for archaeological potential. The EA document also conveys that plans for the transmission line were not yet finalized during the assessment and will need future assessment before ground disturbance activities commence.

CCTH has not yet issued the report approval letter for HRP A2026NS106.

On Page 242, Section 14.2.1 Archaeological and Heritage Sites, the EA Document refers to a shell midden as an artifact. It is an archaeological feature.

On page 243, Paragraph 2, Section 14.2.1.2 Results of Archaeological Potential Model and Field Surveys, the EA Document states, “However, no archaeological features or areas of significant cultural modification were observed during the field reconnaissance surveys.” This statement is inaccurate. According to the report, archaeological features were identified within ten (10) of the eleven (11) HPAs.

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

The EA document states that there is remaining archaeological work that needs to be completed before the project can proceed. We look forward to reviewing the remaining archaeological assessment.

Details of Technical Review (Geology):

The bedrock geology in the project area is Neoproterozoic in age so is not expected to contain any significant fossil specimens if extensive bedrock excavation was carried out.

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

No Concerns.

Date: March 10, 2026

To: Mark McInnis, Environmental Assessment Officer

From: Water Resource Management Branch

Subject: **Eigg Mountain Wind Project, Antigonish County, Nova Scotia**

Scope of review:

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

List of Documents Reviewed:

Environmental Assessment Review Document, Appendices, Drawings, GIS Files
(Review all documents relevant to your mandate, listing which ones have been reviewed)

Details of Technical Review:**Surface Water**

Where possible, efforts were made to avoid impacts to surface waters by avoiding any disturbance within the James River Watershed Protected Water Area, maintaining provincial and municipal setbacks from surface water, and using existing roads where feasible. The baseline monitoring results showed that the water quality is good and generally supports suitable fish habitat. As baseline monitoring was completed during a historically dry year (2025), any observation of dry channels may need to be reassessed under more typical seasonal conditions during the detailed planning phase to appropriately identify risks to water resources from site activities.

Though construction activities and turbine operation can pose risks to surface water quality and quantity, the EARD committed to appropriate mitigation measures. These include site-specific erosion and sedimentation control planning, implementation and associated monitoring, the development of a stormwater management plan, appropriately sizing culverts, respecting setback distances with respect to disturbance, heavy equipment, and storage of materials, and the development of spill prevention and response protocols.

The alteration of wetlands may also negatively impact water quality in any downstream watercourse as wetlands can act like a filter and help dampen peak flows reducing turbidity/small particles. This was not considered in the aquatic environment section of the EARD. This risk could be avoided by avoiding wetland alterations where possible, especially upstream of those watercourses that are providing good fish habitat.

Though the EARD committed to appropriate mitigation measures on an alteration-by-alteration basis, the EARD did not detail the number of watercourse crossings that will need to be created or upgraded and so the overall level of disturbance and risk of impact to these watercourses was not assessed. This could be mitigated by considering the cumulative effects of these alterations during the development of the stormwater management plan and planning construction activities and sequences in a way that minimizes risks to aquatic habitat and organisms.

Groundwater

This Project is a proposed onshore wind farm consisting of 22 wind turbines that will include associated infrastructure such as a substation, an operation and maintenance building, a transmission line to the Nova Scotia Power Incorporated (NSPI) interconnection point, power collection systems, access roads, and temporary laydown areas.

A portion of the potential development area to the south was identified as an area with medium and high risk for karst conditions. These areas may be associated with subsidence or sinkholes where soluble evaporite or carbonate rocks can dissolve. According to the EARD, all turbine pads will be built in areas of low-risk karst; however, some sections of the proposed transmission lines are in areas of high-risk karst and existing access roads intersect areas of medium risk karst. Bedrock across most of the site is identified as low risk for arsenic and uranium. The potential development area crosses limited regions of medium risk arsenic.

Geotechnical borehole drilling identified shallow bedrock and water table depths, ranging from 0.6-8.3 meters and 0.3-6.5 meters below ground surface, respectively. Residences in the area are serviced by private water supply wells. Based on data from the well logs database, wells in the area are relatively shallow with low to moderate yields. The two wells closest to the proposed wind turbine locations are at distances of 350 m and 930 m.

According to the EARD, construction and decommissioning activities have the potential to impact both groundwater quantity and quality, primarily through blasting. Blasting is expected only in select locations, depending on final design, and it is anticipated that only a small fraction of wells, if any, will be within 800 m of a blast. If groundwater is encountered during blasting or excavation at foundation locations, temporary dewatering may be required. This may impact groundwater levels temporarily in the vicinity of the excavations. According to the EARD, the nearest well to any turbine foundation is 350 m, which is likely beyond the extent of any anticipated drawdown expected from shallow dewatering. Wells in this location are typically deeper, with the shallowest being 13.7 m deeper than the turbine foundations. Any impact from dewatering is expected to be temporary and minimal, and unlikely to affect private wells.

Measures to mitigate potential impacts to groundwater quantity and quality presented in the EARD will be further detailed in a project-specific EPP to be implemented prior to construction. As mentioned in the EARD, blasting will be avoided near residential areas

where possible; pre-blast well water surveys will be completed for wells within 800 m; and bedrock monitoring wells installed during geotechnical investigations will be used to detect changes in water quantity and quality. The EARD notes that an alternative water supply will be provided to any landowner if changes to groundwater quantity or quality are detected and a complaint resolution plan will be developed and implemented. The EARD also notes that a geotechnical investigation that includes sulphide analysis is underway and the proponent will follow the sulfide bearing material disposal regulations.

The EARD summarizes proposed monitoring, including having construction monitors report issues observed during earthworks; and operation and maintenance staff report signs of subsidence and erosion. Aside from the pre-blast survey, the proponent's plans regarding groundwater monitoring are unclear. On pages 78 and 79 of the EARD, it is stated that "bedrock monitoring wells installed during geotechnical investigations will be used to detect changes in water quantity (quality)"; however, on page 81 it is stated "there is no continuous groundwater monitoring proposed for this Project".

Wetlands

A total of 32 wetlands were identified within the Project Development Area (PDA). The PDA is divided into two components: the Northern PDA and the Transmission Line Options.

Northern PDA – This area includes the proposed access roads and turbine locations. Fourteen wetlands were identified within this portion of the PDA, consisting of treed swamps (3), shrub swamps (7), shrub fen (1), shrub bog (1), and wetland complexes (2).

Transmission Line Options – Two transmission line routes are proposed (Option A and Option B). Within these areas, 18 provincially mapped wetlands have been identified.

The proponent has identified WL01, WL04, WL06, and WL07 as a potential Wetland of Special Significance (WSS), all of which were triggered due to the presence of avifauna species.

In total, the Area of Disturbance (AOD) is expected to directly alter approximately 2.14 ha of wetlands, of which 1.89 ha may be considered Wetlands of Special Significance (WSS).

Detailed assessment of impacts to wetlands as well as a wetland monitoring program will be provided in the Wetland Alternation Application.

Key Considerations:

Surface Water

The EARD generally avoided and appropriately mitigated risks to surface water. However, it is noted that baseline monitoring occurred during a very dry year and so findings related to water quantity and may need to be confirmed during a more normal season when developing plans committed to in the EARD (ex. ESC, stormwater

management, watercourse alterations). A holistic view of the collective impact of multiple watercourse alterations on the same channel (or upstream tributaries) was not considered, nor was the risk to water quality due to wetland alterations. These risks should be considered and mitigated in the next stages of planning. The EARD committed to following the appropriate regulation, permitting requirements, and protocols in relation to surface water quantity and quality.

Groundwater

The EARD identifies the potential for impacts to groundwater quality and quantity associated with possible blasting and excavation dewatering. Mitigation measures are proposed, such as a pre-blast survey of private wells within 800 m of a blast and avoiding blasting near residential areas where possible. The information presented in the EARD regarding the presence of private wells appears to be based on the well logs database. The presence and location of private water supply wells should be verified in the field prior to planning and conducting pre-blast surveys.

The EARD references the availability of groundwater monitoring wells and use of those wells to detect changes in groundwater quality and quantity; however, the specifics are unclear. If continuous groundwater monitoring is not proposed for this project, it is suggested that baseline water level monitoring and groundwater quality sampling be completed at the monitoring wells. Having complete and reliable baseline data will allow the proponent to assess changes in groundwater quality and/or quantity that may be attributed to project activities, as referenced in the EARD.

Wetlands

The proponent should consider all opportunities to minimize the impacts to wetlands, including changes to the project footprint and mitigations to minimize indirect impacts, especially where WSS alterations are proposed. It is unclear to what extent wetlands will be altered indirectly because of hydrogeological changes. During the detailed design phase additional hydrological assessments (water balance study and updated groundwater model) should be completed to identify and assess indirect wetland alterations.

For direct and indirect alterations, the proponent is required to submit a Wetland Alteration Approval Application for review and approval and complete any necessary compensation and monitoring. The proponent should utilize Nova Scotia's Wetland Alteration Application's Guided Template for the permit applications.

Date: March 11, 2026

To: Mark McInnis, Environmental Assessment Officer

From: Air Quality Unit

Subject: **Eigg Mountain Wind Project, Antigonish County, Nova Scotia**

Scope of review:

This review focuses on the following mandate: Air Quality

List of Documents Reviewed:

- *Eigg Mountain Wind Project EA Registration Document*
- *Appendix D*

Details of Technical Review:

Eigg Mountain Wind Inc. (the Proponent) is proposing the construction and operation of the 22 turbine, 154 MW Eigg Mountain Wind Project (the Project). The Project will include associated infrastructure such as a substation, an operation and maintenance building, a transmission line to the Nova Scotia Power Incorporated (NSPI) interconnection point, power collection systems, access roads, and temporary laydown areas. The implementation of this Project will supply renewable energy for the province's Green Choice Program, which is designed to offer some of the Province's largest energy consumers with up to 100% renewable energy. The proponent intends to begin construction of the Project in late 2026 and it is expected to be operational for up to 35 years commencing in 2028.

No baseline monitoring was undertaken, instead the baseline review relied on data from the 2022 Nova Scotia Air Zone Report, which includes data from NSECC's Pictou monitoring station. The Nova Scotia Air Zone Report shows ambient air quality data calculated for comparison to the Canadian Ambient Air Quality Standards (CAAQS) and is therefore not comparable to the limits in Schedule A of the NS Air Quality Regulations. If approved, the Project would have to comply with the NS Air Quality Regulations, not CAAQS.

Project activities will primarily interact with the atmospheric environment through fugitive dust and exhaust emissions during the construction phase. The Project area is vegetated, which may help to reduce the travel distance of fugitive dust emissions from the Project. The registration document identifies 31 receptors within 2 km of the area of disturbance through satellite/aerial imagery and field verification. It is not anticipated that the fugitive dust and exhaust emissions would impact the closest 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 in the assessment

area. Overall, fugitive dust and exhaust emissions are considered intermittent and short-term (construction phase only).

The registration document provides a list of proposed mitigations that could be used on site. These mitigations are appropriate and would reduce impacts if they are employed. The proponent commits to developing an Environmental Protection Plan and a Complaints Resolution Plan prior to construction.

Key Considerations:

The Air Quality Unit notes the following key consideration:

- 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.

Date: March 11, 2026

To: Mark McInnis, Environmental Assessment Officer

From: Air Quality Unit

Subject: **Eigg Mountain Wind Project, Antigonish County, Nova Scotia**

Scope of review:

This review focuses on the following mandate: Noise

List of Documents Reviewed:

- *Eigg Mountain Wind Project EA Registration Document*
- *Appendix D*

Details of Technical Review:

Eigg Mountain Wind Inc. (the Proponent) is proposing the construction and operation of the 22 turbine, 154 MW Eigg Mountain Wind Project (the Project). The Project will include associated infrastructure such as a substation, an operation and maintenance building, a transmission line to the Nova Scotia Power Incorporated (NSPI) interconnection point, power collection systems, access roads, and temporary laydown areas. The implementation of this Project will supply renewable energy for the province's Green Choice Program, which is designed to offer some of the Province's largest energy consumers with up to 100% renewable energy. The proponent intends to begin construction of the Project in late 2026 and it is expected to be operational for up to 35 years commencing in 2028.

Noise impacts were assessed by Nortek Resource Solutions. Satellite/aerial imagery and field observations were used to identify nearby receptors. In total, 31 receptors were identified within 2 km of the proposed turbine locations. The proponent states that one unique receptor is located within the James River Wilderness Area (Appendix D, Figure 2) and was modelled separately.

The proponent states that project construction is not expected to result in unacceptable noise effects in the local or regional assessment area, however the registration document does not present any modelling or anticipated sound levels likely to be produced during the construction phase.

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. The one unique receptor was modelled with a

ground attenuation factor of 1 as the receptor is located within a wilderness area and surrounded by soft vegetated ground.

Six of the receptors modelled had a predicted impact of 38 dBA, with the one unique receptor 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.

Low frequency noise was not assessed in the model.

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

Key Considerations:

The Air Quality Unit notes the following key considerations:

- If the baseline noise level exceeds 35 dBA, it is possible that 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.
- 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.
- It is unclear what impact construction noise will have on nearby receptors.

Date: March 11, 2026

To: Mark McInnis, Environmental Assessment Officer, Environment & Climate Change

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

Subject: Eigg Mountain Wind Project, Antigonish 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:

- Eigg Mountain Wind Project Environmental Assessment
- Appendix A-A

Details of Technical Review:Aquaculture:

NSDFA's Aquaculture Division's mandate includes the development, regulation, 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 17 aquaculture sites within 25km of the proposed project. 14 are marine shellfish sites and three (3) are land-based aquaculture facilities.

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 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. 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 environmental assessment registration documents (EARD) state that erosion and sediment control (ESC) measures will be developed at a later date and implemented prior to construction and aimed at reducing the impact of sediment creation and erosion. The specific details concerning the ESC are not provided within the EARD. It is recommended the applicant be made aware of the aquaculture operations within the area to ensure the development of the ESC measures will include consideration of potential impacts to nearby aquaculture operations, and that mitigations are implemented appropriately to ensure the risk to aquaculture operations from sediment creation remains low. Please refer proponent to the site mapping tool to identify the sites and operators that are within proximity of the proposed project.

The use of existing road networks will contribute to minimizing the project's impact to the geologic environment. There could be potential impacts to the local groundwater if blasting is required. If blasting is necessary, then impacts are only projected as being possible for wells within an 800m radius of a blast. The four (4) land-based aquaculture operations are outside of that 800m range and should not be impacted as a result.

There is no mention of power supply disruption within the EARD. If a power disruption is required during this project, outages should be planned whenever possible and adequate notice should be given to aquaculture operators.

The impacts of the project on water are more 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 in the EARD 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.

There are five (5) licensed Nova Scotia commercial marine fisheries buyers/processors located within Antigonish County where the proposed wind project will be located. Arisaig Fisheries Company is located 32km North of the proposed site; L.A.K. Enterprises Inc. is located 39km East of the proposed site; North Bay Fishermen's Co-op is located 43km Northeast of the of proposed site and BST Lobster Sales Ltd. is located 72km East of the proposed site. The Marine Division advises, that, since the project is landlocked, with limited to no connectivity to the marine environment, there should be negligible impacts to the operations of the aforementioned local commercial marine fisheries businesses.

Regarding the local commercial marine harvesting sector, lobster is the most lucrative fishery near the proposed project site. The adjacent marine waters are known as Lobster Fishing Area (LFA) 26A2. Last season, in 2025, fishing occurred from April 26th for two (2) months and it is anticipated to occur the same time in 2026. Since there is limited to no connectivity between the project site and the marine environment, there should be negligible impacts to the local lobster and other commercial marine fisheries in the area.

With regards to impacts to Indigenous communities, there is communal-commercial, Food, Social, and Ceremonial (FSC), and livelihood fishing conducted within LFA 26A2 in the water within proximity to the proposed site. The Indigenous community, Paq'tnkek First Nation, located 44km East of the proposed site holds access to these licenses. The Marine Division advises that since there is limited to no connectivity to the marine environment, the wind project should pose negligible impacts to the lobster and other commercial marine fisheries, which are harvested by Paq'tnkek First Nation.

Inland Fisheries:

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

The project is located on the headwaters of Rights River, Knoydart Brook, and Doctors Brook. Five (5) main habitat types were assessed for presence and quality in each watercourse: rearing, spawning, migration, overwintering, and foraging, along with overall habitat quality.

12 watercourses were evaluated to have potential fish habitat year-round. Only one (1) large (greater than 5m) stream was found within the footprint of the proposed development.

Brook trout and brown trout were captured during electrofishing surveys on two (2) of the three (3) tributaries sampled. Electrofishing time was recorded and catch per unit effort was calculated in terms of the amount fish that were captured per second. Most of the trout captured were immature (except one female).

Disturbance to fish habitat may include activities associated with site preparation and stream crossing associated with access road construction. As stated in the EARD, the proponent will acquire provincial and federal approvals and permits for in-water works.

Key Considerations: (provide in non-technical language)

Risks to aquaculture sites from sediments should be monitored and mitigated appropriately. The applicant should be made aware of the aquaculture operations within the area and consider potential impacts when developing the mitigations, including the ESC measures. The applicant should ensure that mitigations are implemented appropriately. Please refer them to the site mapping tool below to identify the sites and operators within their area.

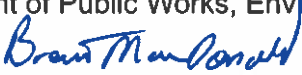
As stated in the submitted EARD, there appears to be no connectivity between the marine environment and the project area, and there should be negligible risk to the adjacent marine fisheries activities and NSDFA's interests.

The EARD did not propose any activities that would harm, alter, disrupt or destroy the local fish habitat contained within the project area. As long as the applicant installs any watercourse crossings in compliance with the *Nova Scotia Guide to Altering Watercourses*, impacts to local fish populations should be negligible.

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: 9 March 2026
To: Mark McInnis, Environmental Assessment Officer

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

Subject: **Eigg Mountain Wind Project, Antigonish County, Nova Scotia**

Scope of review:

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

List of Documents Reviewed:

*Renewable Energy Systems Canada (RES) company's Eigg Mountain Wind Project
Environmental Assessment*

Details of Technical Review:

1. There are multiple transportation sections that are in the report, each of them deals with slightly different items, with considerable overlap between them. It would be beneficial if all these were consolidated into one section and focused on the specific relevant transportation related items and requirements, and any necessary mitigating measures required. The most important item to come out of here is the Traffic Management Plan, specifically how it would deal with the projected increase in truck volumes during construction and its impacts (particularly on Route 245 and the proposed accesses), any mitigation measures required, how it could potentially distribute these truck volumes throughout the day and to different accesses as referenced in the report to minimize impacts on the local road network. Any traffic control measures that may be required to support this, as well as any access and signage requirements required should be identified. This information must be provided as soon as practicable so that it can be reviewed by our staff prior to construction.
2. Table 1.2 Summary of Regulatory Approvals (Pages 6-8) identifies the requirement for a Special Moves Permit and the Working Within Highway Right of Way Permit.
 - a. Regarding the Special Moves Permits, the proponent would need to contact our coordinators for Special Moves Permits, Darcey MacBain and Devon Pinks to identify requirements as soon as possible. They can be reached at Darcey.MacBain@novascotia.ca and Devon.Pinks@novascotia.ca.

- b. The Working Within Highway Right of Way (WWHROW) permit (obtained from the Area Manager) will be required as there are references to multiple access points associated with this project, as well as road widening and road design elements. This will need to be detailed in the WWHROW permit for any impacts on provincially owned roads.
- 3. Any temporary workplaces that are created on provincially owned as a result of these access points will need to comply with the relevant section of the Nova Scotia Temporary Workplace Traffic Control Manual. Any traffic control plans will need to be provided by the proponent and reviewed and approved by the Area Manager.
- 4. The requirement for blasting is referenced in the report. This will need to be communicated and coordinated with the Area Manager to ensure that impact is minimized on provincially owned roads.
- 5. Table 2.1 Setback Distances for Turbines has a reference for its distance from public highways as the Antigonish Land Use Bylaw: Wind Turbine Setback Amendment. This setback distance should be confirmed with the Area Manager.
- 6. There are some references to Road Maintenance in the report. This must be coordinated and approved through the Area Manager if there are impacts on any provincially owned roads.
- 7. There are references to possible disruption of some trails in the area. The proponent has identified this and should ensure proper communication with the local Trails group.
- 8. Mitigation measures for Transportation Related Accidents in Section 17.1 are appropriate. As indicated, these should be included in the Traffic Management Plan when it is completed.

Key Considerations: (provide in non-technical language)

- 1. Consolidate traffic sections for clarity and identify truck traffic, impacts and mitigation measures in the Traffic Management Plan.
- 2. The Proponent is to contact the Special Moves Permit coordinators.
- 3. The Proponent is to obtain a Working Within Highway Right of Way Permit from the Area Manager.
- 4. The Traffic Control Plan must be approved by the Area Manager.
- 5. Blasting activities must be communicated with the Area Manager.
The Proponent must confirm the setback distances for turbines with the Area Manager.
- 6. The Area Manager must be contacted regarding maintenance to provincially owned roads.
- 7. The Proponent must communicate trail use disruptions with the appropriate group(s).

From: [Fazeli, Maryam \(elle | she, her\) \(ECCC\)](#)
To: [Environment Assessment Web Account](#)
Cc: [Roberts, Sydney \(elle | she, her\) \(ECCC\)](#); [Aikens, Marley \(elle | she, her\) \(ECCC\)](#)
Subject: 25-NS-005 Eigg Mountain Wind Project, NS
Date: March 10, 2026 1:09:52 PM

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Non classifié | Unclassified

Hello there,

Environment and Climate Change Canada (ECCC) has reviewed the environmental assessment registration document for the Eigg Mountain Wind Project, submitted by Eigg Mountain Wind Inc., and offers the following recommendations.

References

- 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/>
- Whitby et al. 2021. *The State of Science on Operational Minimization to Reduce Bat Fatality at Wind Energy Facilities*. efsec.wa.gov/sites/default/files/2025-05/EXH-1049.pdf

General Comments

1. ECCC advises that the pre-EA correspondence provided in March 2025 on the pre-construction survey plans remains relevant to any future survey effort and project considerations.
2. Given that the project is registered under Nova Scotia (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).
3. ECCC advises that the Province of NS's Department of Natural Resources (NS DNR) 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-based 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.
4. ECCC advises that the Environment Assessment Registration Document (EARD) includes hedging and ambiguous wording, such as, "*where possible*" and "*to the extent possible*" when describing mitigation measures.

ECCC recommends removing any 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 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 impacts migratory birds and SAR during all times of year and for all project phases.

5. The proponent should retain raw survey data (e.g., radar, breeding bird surveys) until appropriate data standards have been developed. Proponents are 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](#))

6. ECCC notes that if NSECC is 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 NSECC as part of their EA process via the ECCC-EA window (FCR_tracker@ec.gc.ca).

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).

Specific Comments

Migratory Birds and Migratory Bird Species at Risk (SAR) and Species of Conservation Concern (SOCC)

7. Quote (page 13) *"The turbine model under consideration has an individual generating capacity of 7 MW and stands at 118 m in hub height – a total height of 199.5 m including an 81.5-m blade length"*

ECCC acknowledges that the total height of each turbine will be approximately 199.5 metres (m). Per ECCC's guidance *Wind Turbines and Birds: Guidance Document for Environmental Assessment* (ECCC 2007), onshore wind developments with turbines >150 m total height are considered to be Category 4 (i.e., "Very High site sensitivity") projects. ECCC advises that turbines >150m height pose higher risk to nocturnally migrating songbirds that typically fly at altitudes of 150-600 m during migration (Horton et al. 2016).

ECCC advises that there are many species of shorebirds (including Lesser Yellowlegs, Semipalmated Sandpiper, Semipalmated Plover, White-rumped Sandpiper, Sanderling, etc.) that have been observed during field surveys and are likely to be passing through the Project Area during migration (see [Atlantic Canada Shorebirds - Motus Project](#)

[Summary](#) and satellite tracking data publicly available on [Movebank](#)). Additionally, based on the radar findings, ECCC advises that shorebirds are likely to be detected (i.e., flying) within the blade height range and are vulnerable to potential collisions with turbines.

Additionally, ECCC advises that the project area may provide important breeding habitat for several waterfowl species, and ECCC's nearby waterfowl breeding survey data suggests that Canada Goose, American Black Duck, Green-winged Teal, Mallard, Ring-necked Duck, Wood Duck, Common Merganser, Hooded Merganser, etc. may be breeding in the area. ECCC advises that 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.

Based on the "Category 4" level of concern (ECCC 2007a), ECCC recommends that the proponent follow the precautionary principle and identify operational mitigation measures as part of the EA commitments and implement them such that impacts to migratory birds and species at risk 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, ECCC 2007b).

8. 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/cavities 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>.

9. Quote (page 205) *“A post-construction mortality monitoring program will be developed in consultation with ECCC-CWS and NSDNR and implemented for two years. Carcass searches will be conducted to target periods of increased activity (e.g, migration and breeding) and periods following unfavourable weather conditions (e.g., rain and headwinds).*

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

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.

0. ECCC advises that avian SAR listed under the *Species at Risk Act* (SARA) may occur in the Project area, including but not limited to:
- Piping Plover (SARA-listed Endangered)
 - Bank Swallow (SARA-listed Threatened)
 - Canada Warbler (SARA-listed Threatened)
 - Chimney Swift (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)
 - Olive-sided Flycatcher (SARA-listed Special Concern)

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 the 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.

We also recommend 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.

1. Quote (page 189) *“Two rounds of nightjar surveys were conducted 30 minutes before sunset and extended until approximately two hours after sunset to capture the Eastern Whippoorwill window.”*

Quote (page 199) *“The absence of Common Nighthawk detections suggests that the LAA does not fall into the migratory route for this species. However, the LAA is positioned on a migratory route for another SAR, the Canada Warbler.”*

Quote (page 200) *“A total of 28 species (70 individual observations) were recorded during nightjar surveys conducted in the LAA in 2025 (Table I2 in Appendix I). One SAR species, Common Nighthawk, was detected.”*

ECCC advises that Common Nighthawk migrates during both the day and the night, however most flights are observed during the early evening in the fall. As a result, it is possible that the timing of the nightjar surveys was not optimized to detect nighthawks, including Common Nighthawk, and this may explain the lack of detections.

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:
 - o Post-construction nightjar surveys (dusk and dawn);
 - o Post-construction mortality monitoring to evaluate bird strikes; and
 - o 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

2. Quote (page 204) *“Vegetation clearing will be completed outside of the general nesting period for migratory birds. If clearing activities occur during the nesting period, procedures outlined in the Wildlife Management Plan, will be implemented. Vegetated buffers around wetlands and watercourses will be maintained to support connectivity for wildlife wherever possible.*

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.

3. Quote (page 206) *“Overhead power line installation, operation and maintenance will follow, at minimum, the NSPI nesting birds and vegetation management protocols (NSPI, 2023); Vegetation around the transmission poles and lines will be managed to reduce the risk of electrocutions with birds and other wildlife; Transmission line visibility will be increased by*

bird flappers or other bird-flight diverters, as indicated by regulation.”

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 (Rioux 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:
 - o Important breeding, staging, moulting areas;
 - o Breeding colonies; and
 - o 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:
 - o Providing sufficient separation between energized phase conductors and between phases and grounded hardware;
 - o Insulating exposed surfaces in high-risk areas;
 - o Installing perch-management (e.g., perch guard) devices on poles; and
 - o Removing or minimizing vegetation around poles and lines.
- Install measures on lines that reduce the risk of collisions:
 - o Provide minimal vertical separation between lines;
 - o Use self-supporting structures to reduce the number of guy wires;
 - o Use line-marking devices to increase the visibility of the lines; and
 - o 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).

4. Quote (page 261-262) *“Through implementation of mitigation measures during Project activities, expected effects are expected to be minor to moderate.”*

ECCC disagrees with the proponent's conclusion that the cumulative effects on migratory birds and SAR would be "minor to moderate", given the amount of other existing anthropogenic disturbance in the area. ECCC acknowledges that there are a number of developments in proximity to the project area that will contribute to cumulative effects on migratory birds and SAR, including the Maryvale Wind Project (approximately 2.1 km from the nearest turbine), Glen Dhu Wind Project (approximately 1.9 km from the nearest turbine) and Fairmont Wind Project (approximately 8 km from the nearest turbine). It is important to consider that when migratory birds and species at risk are moving through the area, they may be disturbed or displaced along their path, which may bring them into more frequent contact with the project and result in additional interactions.

ECCC recommends that if the project is approved, the Adaptive Management and Post-construction Monitoring Plans should consider the potential for cumulative impacts of multiple wind energy and other developments in the area on migratory birds and species at risk. Where possible, post-construction mortality monitoring reporting should consider post-construction monitoring results from nearby sites (e.g., Maryvale Wind Project, Glen Dhu Wind Project and Fairmont Wind Project).

Terrestrial Species at Risk

*As noted above, ECCC's comments on terrestrial SAR are provided from a federal recovery perspective (linked to recovery strategies/management plans), with the understanding that species protected by the *Species at Risk Act* are a shared responsibility between the federal government and the provinces. However, ECCC advises that it remains the Province of Nova Scotia's discretion whether sufficient information has been provided to inform their environmental assessment decision.

ECCC advises that the following non-avian SAR listed under the *Species at Risk Act* (SARA) may occur in the Project Area, including but not limited to:

- Little Brown Myotis (SARA-listed Endangered)
- Northern Myotis (SARA-listed Endangered)
- Silver-haired Bat (COSEWIC-assessed Endangered)
- Hoary Bat (COSEWIC-assessed Endangered)
- Eastern Red Bat (COSEWIC-assessed Endangered)
- Wood Turtle (SARA-listed Threatened)
- Eastern Waterfan (SARA-listed Threatened)
- Black Ash (COSEWIC-assessed Threatened)
- Yellow-banded Bumble Bee (SARA-listed Special Concern)
- Monarch (SARA-listed Endangered)

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. ECCC recommends that mitigation measures:

- Be consistent with the 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.

We also recommend 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.

SARA-listed and COSEWIC-assessed Bats

5. Quote (page 168) *“Migratory bats and Myotis species were recorded in the LAA. There are low levels of bat activity in the LAA, with a total of 295 bat passes recorded between April 30 and November 5, 2023. The majority of bat passes are attributed to Myotis species (189 passes; 64 percent), with migratory bats contributing to the remaining 36 percent (nine passes classified as EPFULANO (Big Brown Bat/Silver-haired Bat), four as LowF, 91 as High F, and four as Hoary Bat).”*

ECCC acknowledges that the following SAR/SOCC bat species/groups were detected during baseline monitoring: Myotis species (Little Brown Myotis and/or Northern Myotis; SARA-listed Endangered), Hoary Bat (COSEWIC-assessed Endangered), Silver-haired Bat (COSEWIC-assessed Endangered), and Eastern Red Bat (COSEWIC-assessed Endangered), and unknown bats (including low-frequency and high-frequency bat calls).

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 the introduction of White-nose Syndrome (WNS), and therefore few acoustic detections are expected.

Any additional loss of SAR bat individuals, maternity roosts, 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” bat species, which have been assessed by COSEWIC as Endangered, are highly vulnerable to mortality due to wind turbines (see [COSEWIC Assessment and Status Report on the Hoary Bat \(*Lasiurus cinereus*\)](#), [Eastern Red Bat \(*Lasiurus borealis*\)](#), [Silver-haired Bat \(*Lasionycteris noctivagans*\) in Canada](#) for more information).

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

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

6. Quote (page 21) *“The wind turbines will operate automatically. A computerized system, or programmable logic control, will continuously monitor the operating parameters. When there is no wind, the turbines will remain idle until the cut-in speed is reached. At the cut-in speed, or minimum required wind speed of 3 m/s, the blades will begin rotating and electrical energy will be produced.”*

Quote (page 176) *“Guidance specific to minimizing impacts to bats will be provided in a Wildlife Management Plan. The plan will include guidelines to avoid harm to bats, actions/steps to take should a roosting bat be discovered, and appropriate buffers based on disturbance activities.”*

ECCC advises that the mitigation measures provided on page 176 do not include any operational mitigations to prevent bat-turbine collisions. ECCC recommends including EA commitments to mitigation measures to avoid/minimize potential impacts to SARA and COSEWIC-assessed 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 advises that the proposed manufacturers’ cut-in speed of 3.0 m/s is not an adequate mitigation measure to reduce bat mortality. ECCC-CWS notes that higher cut-in speeds are shown to reduce bat mortalities, given that bat activity is generally higher at lower wind speeds; studies suggest that there is a 33% reduction in mortalities for every 1 m/s increase in cut-in speed ([Whitby et al. 2021](#)). ECCC recommends a minimum cut-in speed of 5.0 m/s during the bat migration period in an effort to reduce bat-turbine collisions.

7. Quote (page 166) *“In Nova Scotia, three non-migratory bat species – Little Brown Myotis, Northern Myotis, and Tri-colored Bat – over-winter in caves and abandoned mines (Moseley, 2007). However, the Tri-colored Bat is primarily found in southern Nova Scotia and the Fundy coast of New Brunswick (Broders et al., 2003).”*

ECCC advises that the Tri-colored Bat has been observed in low numbers outside of southwest Nova Scotia in Antigonish County, with records showing their presence in both summer and winter months. ECCC recommends that the proponent include the Tri-colored Bat in their assessment and reminds the proponent that although a species may not be confirmed in an area, it does not necessarily mean that they do not occur

there, especially if habitat appropriate for the species is available.

8. ECCC acknowledges that the proponent's assessment of important bat habitat (hibernacula and maternity roosts) is focused on Little Brown Myotis and Northern Myotis but does not include much information related to the three COSEWIC-assessed migratory bat species, which were confirmed in the area through acoustic recording. ECCC recommends that the proponent include habitat features that would facilitate the movement/migration of the migratory bat species (i.e., ridges/valleys, coastlines, edges) and include this information when siting the project (see above).
9. Quote (page 167) *"The other four bat species known to occur in Nova Scotia are long-distance migratory species, three of which were assessed by COSEWIC in May 2023 as Endangered: Hoary Bat, Eastern Red Bat, and Silver-haired Bat. The fourth migratory species is Big Brown Bat."*

ECCC advises as a point of clarification that Big Brown Bat is not a migratory bat species and are instead considered year-round residents in Nova Scotia, "migrating" over short distances between hibernacula and maternity roosts. The migratory bat species (Hoary, Eastern Red and Silver-haired Bats) are migratory because they travel long distances to hibernate in warmer climates.

10. Quote (page 169) *"As stated by Broders and Henderson (2007), low bat activity levels were recorded at the site of another wind power project to the west of the PDA; Glen Dhu Wind Farm...no migratory bats were detected (Broders and Henderson, 2007). Broders and Henderson (2007) stated that results of studies conducted in 2007 and 2003 (Broders et al. 2003) suggested that there is likely no significant movements of migratory bat species through the region."*

ECCC advises that the incidence of migratory bat species in Nova Scotia (and the Atlantic Region as a whole) appears to have increased over the last two decades according to regional expertise, and ECCC is concerned that the proponent is using studies from over 20 years ago to support their conclusions, in particular given that migratory bat species were recorded during acoustic surveys.

11. Quote (page 170) *"The AOD contains a small amount of high-quality suitable maternity roosting habitat (74.6 ha; 24 percent), owing to the lack of mature forest stands that intersect with the AOD...Suitable bat maternity roost trees were recorded when observed in the LAA."*

Quote (page 172) *"The iterative Project design prioritized avoiding high-quality bat habitat. Careful site planning and refinement went into development of the AOD, where feasible, to*

avoid identified suitable maternity roost trees...”

ECCC acknowledges that the proponent states that they will avoid all identified suitable maternity roost trees. ECCC is concerned that this statement is misleading - given that the proponent did not systematically survey the entire 75 hectares of “high quality” habitat (and maternity roost trees were only recorded incidentally as they were recorded), it is likely that not all suitable maternity roost trees were identified. As a result, ECCC recommends that the proponent ensure that mitigation measures (i.e., timing of activities outside of the roosting season) are implemented to minimize potential impacts on bats. The proponent should also ensure that the proponent includes an element of adaptive management to their mitigation plan in case a suitable maternity roost tree is observed during the project activities.

- !2. Quote (page 171) *“Additionally, the AOD has been refined to minimize disturbances to bat habitat (e.g., foraging and roosting areas) wherever feasible, thereby reducing potential interactions between the Project and bats.”*

ECCC advises that bats are known to travel hundreds of kilometres from hibernacula to/from summer roosting areas, and maternity roost networks often span many kilometres as bats are known to exhibit “roost switching” behaviour among a number of maternity roost areas. As a result, ECCC agrees with the proponent’s statement that the siting of wind turbines away from important bat habitat features will minimize removal of bat habitat, however it is important to also consider that the noted behaviours displayed by bats will result in continued interactions between bats and the project. ECCC emphasizes the importance of including operational mitigation measures (e.g., curtailments), as noted in the above comments, to reduce potential impacts on bat species.

- !3. Quote (page 173-174) *“A recent study found that fewer Little Brown Myotis fatalities occurred at taller turbines than shorter (turbines ranged from 119 to 186 m (hub height plus blade length) but fatalities of migratory bats increased with increased turbine heights (Anderson et al. 2022). Given Myotis species accounted for the majority (64 percent) of bat passes in the LAA, this study suggests the proposed turbine height (hub height plus blade length = 199.5 m) may help to mitigate potential collisions with most bats that occur in the PDA, specifically Myotis species.”*

ECCC acknowledges that although the Myotis bat recordings did dominate the acoustic results, it is important to recognize that only one year of surveys were conducted, with only seven survey locations at approximately 2-3 m above ground height (approximately 1% of the PDA). Additionally, as noted in comment 20 above, ECCC cautions the proponent with relying on studies from over 20 years ago to conclude that migratory bat species are not using the project area.

Given that the proponent has chosen to use taller turbines in an effort to reduce *Myotis* bat mortalities, the migratory bat species are more likely to be impacted at these sites. ECCC advises that per the COSEWIC Assessment and Status Report for the three migratory bat species, currently assessed as “Endangered” by COSEWIC and under consultation for listing on Schedule 1 of the SARA, wind energy development is identified as a “High to Very High Impact” threat for these species. As a result, the proponent will need to implement appropriate monitoring, mitigation measures, and adaptive management measures to avoid and minimize potential impacts on the migratory bat species.

Herpetofauna

- !4. Quote (page 143) “*Targeted turtle habitat assessments and VES were designed based on survey protocols for Wood Turtle in Nova Scotia (NSDLF, 2021) but were adapted for all turtle species.... Turtle habitat assessments and VES were conducted over two days between April 29 and May 6, 2025.*”

ECCC notes that it is not clear from the references what protocol(s) was used for the turtle habitat assessment and Visual Encounter Survey (VES) (as this appears to be missing from the reference list).

ECCC advises that, in general, the best timing for observing turtles is in the late spring/early summer (e.g., late May to early-mid June) before vegetation cover becomes too dense and the ambient temperatures are suitable to promote basking. It is likely that the turtle surveys were conducted too early in the season to observe turtles and this, accompanied by the fact that turtles are elusive, could explain the lack of any observations.

Additionally, ECCC advises that with VES techniques, it is preferred that observers conduct repeat surveys to adequately assess the presence/apparent absence of turtles in a particular area. It is not clear from the information provided what habitat criteria were targeted during VES and whether these were appropriate for Wood Turtle. As a result, it is difficult to determine whether the VES was adequate.

ECCC defers to the Province of NS regarding the best timing for turtle surveys and whether the methods used were appropriate.

- !5. Quote (page 150) “*No VES surveys were conducted in the transmission line footprint, as the route was not finalized during the 2025 turtle survey period. Once the transmission line footprint is confirmed, VES will be carried out under appropriate conditions as required.*”

ECCC advises that a critical habitat (CH) data search request of the proposed transmission line routes conducted by CBCL in January 2026 indicated that these areas contained areas of habitat that are designated as critical habitat for Wood Turtle. ECCC notes that this is not included in the EARD as part of the effects assessment, and there is no information provided regarding mitigation measures, etc. that will be implemented to ensure that critical habitat is avoided and any potential residual impacts are minimized. ECCC recommends that this information be included as a consideration in the assessment.

Per section 7.3 and Table 7 of the *Recovery Strategy for the Wood Turtle (Glyptemys insculpta) in Canada*, construction of road infrastructure, and deforestation and forest alteration are listed as activities likely to result in destruction of critical habitat for the Wood Turtle. It should be noted that this list is not exhaustive, but rather some examples of activities that may require additional consideration and mitigation to avoid the destruction of CH.

ECCC-CWS advises that the damage and destruction of CH is prohibited by SARA and recommends that the proponent ensure that the project is sited to avoid impacts to CH.

- !6. ECCC advises that there are a number of protected areas near the Project Development Area, including the Eigg Mountain-James River Wilderness Area that likely provide quality habitat (wetlands, watercourses and foraging opportunities) for Wood Turtle and Snapping Turtle. ECCC notes that although there are few reptile observations for the Wilderness Area, turtles are elusive (cryptic) species and can be difficult to detect. ECCC reminds the proponent that although these species may not be confirmed in an area, it does not necessarily mean that they do not occur there, especially if habitat appropriate for the species is available.
- !7. ECCC advises that the risk of poaching on SAR turtle species, particularly Wood Turtle, is a concern that has not been included in the EARD. By constructing new road networks, transmission lines, etc., it is possible that poachers will have increased access to turtles that was not previously possible. ECCC recommends that the proponent ensure that Wood Turtle records remain confidential, and that measures are implemented to address potential poaching risk to SAR turtles.

SAR Plants and Lichen

- !8. Quote (page 108-109) “*The Nova Scotia location-sensitive species observation layer includes two Black Ash occurrences approximately 5 km east of the northern portion of the PDA closest to the turbine layout with additional Black Ash records present in the southernmost portions of the PDA, near Highway 104 (NSDNR, 2025)*”

ECCC notes that the proponent does not provide any specific mitigation measures to address potential impacts to Black Ash, which is a species that has been assessed as Threatened by the Committee on the Status of Endangered Wildlife in Canada. ECCC acknowledges that per the proponent, there is no Black Ash known to be present in the Area of Disturbance (AOD), but the proponent has not included any measures that will be undertaken if Black Ash is encountered during the project activities.

SAR Insects

9. Quote (page 150-151) “*Table 10.7 summarizes the six terrestrial invertebrate species observed within a 5 km radius of the LAA... Yellow-banded Bumble Bee... No incidental observations of SAR or SOCC terrestrial invertebrates were recorded during the field projects.*”

ECCC advises that incidental observations for SAR bumble bees, including the Yellow-banded Bumble Bee (listed on SARA as Special Concern) during other field programs are unlikely to reliably detect bumble bees. ECCC reminds the proponent that although these species may not be confirmed in an area, it does not necessarily mean that they do not occur there, especially if habitat appropriate for the species is available.

ECCC advises that SAR bumble bees are habitat generalists and disturbance associated with the Project may create open or edge habitat that could potentially increase the availability of floral resources (depending on post-construction vegetation management) that can support general foraging activity and increase the potential presence for SAR bumble bees in the Project Development Area.

Wetlands

10. 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. ECCC encourages the proponent to prioritize avoidance and minimization of disturbance to wetlands. Where avoidance is not possible, ECCC encourages a detailed description of potential direct and indirect impacts with a rationale on why avoidance and minimization of impacts were determined to be not possible, and prioritization of rehabilitation and restoration of wetlands impacted by the project.

In assessing potential for avoidance and minimization impacts to wetlands and avian SAR and SOCC that use wetlands (e.g., Canada Warbler, Olive-sided Flycatcher), 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.

1. Quote (page 120) “Wetlands were delineated only if their size was greater than 100 m² (i.e., the minimum size for regulated wetlands, according to NSECC regulations.”

ECCC acknowledges that the NSECC regulations limit wetland delineations to those greater than 100 m², although ECCC prefers that proponents consider direct and indirect impacts to wetlands, regardless of their size as wetlands are important habitat for many species of shorebirds, including snipe species, and other species of migratory birds and avian species at risk that use these habitats throughout their life cycles.

ECCC recommends that the proponent should not rely solely on desktop analyses and should aim to conduct ground truthing to the extent possible, to confirm the types of wetlands that will be impacted by the project, and provide clear information on how well their predictive modelling performed in comparison to those verified on-the-ground.

However, ECCC acknowledges that the jurisdiction for provincial wetlands rests with the Province of Nova Scotia and defers to their discretion on whether sufficient information has been provided.

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](https://www2.ec.gc.ca/info-fact/frequently-asked-questions-faq-fisheries-act-pollution-prevention-provisions-eng.html)

Migratory Birds Convention Act

The federal [Migratory Birds Convention Act](https://www2.ec.gc.ca/info-fact/migratory-birds-convention-act-eng.html) (MBCA) and its [regulations](https://www2.ec.gc.ca/info-fact/migratory-birds-convention-act-regulations-eng.html) 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](https://www2.ec.gc.ca/info-fact/migratory-birds-convention-act-schedule-1-eng.html) 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>.

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.

Thank you,

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: March 11, 2026

To: Mark McInnis, Environmental Assessment Officer

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

Subject: **Eigg Mountain Wind Project, Antigonish 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:

- Based on proposed operational activities, the Eigg Mountain Wind Project Registration document considers Climate as a Valued Environmental Component (VEC).
- The proponent reviewed 30 years of historical climate data (1991 - 2020) from the Collegeville Weather Station located approximately 22 km south of the nearest proposed turbine site and assessed emission scenarios under the Coupled Model Intercomparison Project Phase 6 (CMIP6) Global Climate Models (GCMs).
- The proponent stated that climate change is projected to increase the frequency and intensity of hurricanes, total precipitation, average wind and heat, potentially resulting in flooding (pluvial and fluvial), uncontrolled wildfire, and hazards for personnel, leading to higher operation and maintenance costs for the undertaking.
- To manage these risks, the proponent plans to incorporate climate considerations in project design and planning stages to guide operational thresholds for long-term project sustainability and has proposed adaptation strategies including integrating climate projections in infrastructure design and sizing, opting for modern infrastructure manufactured to withstand extreme weather conditions, and ensuring the adoption of continuous best asset management practices.

Mitigation:

- The primary sources of greenhouse gas (GHG) emissions for the project, as described in Section 2.7.3 of the EA registration document, occur during the construction phase and total 72,549.8 t CO₂e. These emissions are largely attributable to site development, concrete foundations, turbine manufacturing, and electrical infrastructure. In addition, land clearing is estimated to result in a loss of carbon sequestration of 310.6 t CO₂e per year.
- While the proponent notes in Section 2.7.4 that operation and maintenance emissions are projected to be 17 t CO₂e per year over the 35-year operational period—approximately equivalent to five days of electricity generation in Nova Scotia—there is an opportunity to demonstrate the project's climate benefits by providing an estimate of avoided greenhouse gas emissions relative to a no-project scenario.
- The proponent does not quantify decommissioning emissions, assuming that by 2060 most construction and heavy transport equipment will be zero-emissions.
- The project will have a total installed capacity of 154 MW, consisting of 22 turbines rated at 7 MW each.

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

- The proponent may wish to further consider monitoring the effectiveness of climate risk reduction measures in the planned project-specific Environmental Protection Plan (EPP) during construction, operation and maintenance phases, as the climate continues to change.
- As the proponent identified that risks associated with site flooding and heat are expected to increase over time, the proponent may wish to consider measures to support worker safety during these events for operational continuity.

Mitigation:

- The proposed mitigation steps identified in Section 2.7.1 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.
- For added GHG emissions offsetting, the proponent could explore possible technologies that allow CO₂ to be embedded into concrete, including biochar amendments or mineralization.
- The proponent's construction phase emissions are primarily driven by 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.

- The proponent could estimate avoided emissions by undertaking this project which could be presented as a range using a small set of transparent scenarios—for example, 2026 grid intensity held constant, applying legislated grid decarbonization, and using a faster-decarbonization scenario.

Agriculture

Date: March 11, 2026

To: Mark McInnis, Environmental Assessment Officer

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

Subject: Eigg Mountain Wind Project
Eigg Mountain & James River Wilderness Area, Antigonish County, Nova
Scotia

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

Minimal agriculture impacts are anticipated given that:

- Within a 2km boundary around the project site, Class 2 land occupies less than 1% of the area and Class 3 land occupies less than 16.4% of the area. Class 2 and 3 land are defined as having “moderate” and “severely moderate” limitations for agriculture (Canadian Land Inventory). The rest of the area is comprised of small pockets of Class 4, 5 and 6 land with ~76% of the area being Class 7, which has “no capacity for arable agriculture”. The total area within the boundary is 445 hectares.
- There are four registered farms within the boundary area, and several just outside. The four farms in the boundary are classed as custom work, dairy, egg and apiculture.
- According to Agriculture Land Inventory data, the area within the boundary has 19 ha of inactive agriculture, 144 ha of long-term crop (mostly blueberry) and 283 ha of rotational crop.
- Site visits were performed as part of the review and indicate impacts to agriculture in the area are anticipated to be low.
- One negative impact could be dust raised and settling on blueberry crops from increased road traffic. However, it was also noted that improved road infrastructure resulting from the project may benefit nearby agriculture.

Date: March 10, 2026

To: Mark McInnis, Environmental Assessment Officer

From: Protected Areas & Ecosystems - Janet MacKinnon

Subject: **Eigg Mountain Wind Project, Antigonish County, Nova Scotia**

Scope of review:

This review focuses on the following mandate: Protected Areas

List of Documents Reviewed:

[Project registration documents, including mapping; *Wilderness Areas Protection Act*.](#)

Details of Technical Review:**Proximity to Eigg Mountain - James River Wilderness Area**

The project is adjacent to Eigg Mountain – James River Wilderness Area. Some transmission line segments, access roads, and turbines— are located immediately adjacent to the wilderness area boundary. The wilderness area is not identified in the registration documents as a “valued environmental component” (VEC) and there is little or no direct acknowledgement of potential impact of the project on the adjacent wilderness area.

Impacts on Mainland Moose (Species at Risk)

Despite the fact that recent population estimate identified a total population of mainland moose at 250 animals or less, a remnant population of moose are known to inhabit the Eigg Mountain – James River Wilderness Area and surrounding landscape. Several individuals were recorded on camera traps by the proponent.

The EA indicates that the proponent has revised turbine and road layouts to reduce potential impacts on mainland moose, including avoiding certain core habitat areas and lowering fragmentation risks.

Impacts on Forested and Ecologically Sensitive Areas

The project has undergone layout modifications to reduce effects on sensitive ecosystems, including removal of some turbines from old-growth forest and mature intact forest. These measures do not fully eliminate fragmentation impacts associated with clearing of forested lands between sections of the Wilderness Area.

Cumulative Effects and Landscape Connectivity

The Eigg Mountain project is one of two wind projects proposed or operating in the vicinity of the Eigg Mountain - James River Wilderness area. The project layout is interspersed with the boundaries of the wilderness area. Impacts on wildlife—particularly species that move across the landscape, including between sections of the wilderness area and other local forested areas, is an important consideration. Increasing the density of wind development in the landscape may increase barriers for moose and other wide-ranging wildlife moving between portions of the wilderness area

Impacts on Recreation

The EA states that the operating turbines will produce noise but does not acknowledge this may affect recreation or recreational suitability within the adjacent Eigg Mountain-James River Wilderness Area. The absence of industrial or other human-caused sounds is appealing to recreational users of the wilderness area.

Overall Assessment

The EA provides limited information on the potential impacts on Eigg Mountain-James River Wilderness Area.

Available moose-movement data is limited, which may limit the accuracy of modelled or predicted impacts on mainland moose, including in Eigg Mountain-James River Wilderness Area.

Key Considerations: (provide in non-technical language)

The Eigg Mountain Wind Project EA demonstrates attempts to reduce ecological impacts, including those associated with the wilderness area. Mainland moose movements and connectivity between disjunct blocks of the Eigg Mountain–James River Wilderness Area and intervening forested area are key considerations relevant to long term health and integrity of the wilderness area.

Consideration should be given to:

- Forested buffers surrounding the wilderness area.

Date: March 9, 2026

To: Mark McInnis, Environmental Assessment Officer

From: Environmental Health, Sustainability and Applied Sciences Division

Subject: **Eigg Mountain Wind Project, Antigonish County, Nova Scotia**

Scope of review:

This review focuses on the following mandate: Environmental Health

List of Documents Reviewed: EARD**Details of Technical Review:**

The purpose of the proposed undertaking is to construct and operate a 22 turbine, 154 MW wind project. The wind turbines will be 199.5 m tall to the tip of the blade and individually have a nameplate capacity of 7.0 MW. The Project is situated on the ancestral and unceded territory of the Mi'kmaq people in Antigonish County. The project will also include a transmission line, electrical collector lines and substation, access roads, and temporary laydown areas. The proponent intends to begin construction of the Project in late 2026 and it is expected to be operational for up to 35 years commencing in 2028.

A review of the above noted documents was undertaken with a particular focus on the potential for health impacts related to

- air quality
- noise
- drinking water wells
- shadow flicker
- ice throw

Environmental Health impacts related to this project have been adequately assessed within the EARD and mitigation measures provided.

Key Considerations:

Any changes that might be made with respect to the siting of wind turbines subsequent to the preparation of the EARD may necessitate re-modelling work be undertaken to re-assess impacts related to shadow flicker and sound.

Date: March 11, 2026

To: Mark McInnis, Environmental Assessment Officer

From: Department of Natural Resources and Department of Energy

Subject: **Eigg Mountain Wind Project, Antigonish County, Nova Scotia**

Scope of review:

This review focuses on the following mandate: Authorities and approvals required from the Land Strategy and Planning Branch, Clean Energy/Electricity, geoscience health and safety, mineral exploration, mineral development, abandoned mine openings, Species at Risk recovery and Wildlife species and habitat conservation, Old Forest.

List of Documents Reviewed:

Land Strategy and Planning Branch:

- Environmental Assessment Registration Document, including Plain Language Summary
- Appendices A to K
- GIS shapefiles

Geoscience and Mines Branch:

- Environmental Assessment Registration Document – Eigg Mountain Wind Project
- Nova Scotia's Registry of Claims (NovaROC)
- Mineral Occurrence Database
- Open File Map ME 2018-001, Bedrock Geology Map of the Antigonish Highlands Area, Antigonish and Pictou Counties, Nova Scotia; NSDNR, GMB, scale 1:75,000, by C.E. White 2018

Details of Technical Review:

Clean Energy Branch:

Renewable energy projects such as wind projects will assist the province in achieving its goals in the Electricity Act and the Clean Power 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).

Electricity Act:

- 80% Renewable Electricity Standard by 2030;

NRR/Energy Mandate letter:

- Commit to 80% of Nova Scotia's electricity needs being supplied by renewable energy by 2030;

EGCCRA:

- 80% of electricity in the Province supplied by renewable energy by 2030;
- 53% emissions reduction targets from 2005 levels by 2030;
- Phase out of coal-fired electricity generation by 2030;
- Net-zero emissions by 2050;

CCPCG:

- 90% emissions reductions from the electricity sector by 2035;
- Green Choice Program (includes a subsequent renewable energy procurement) to be launched by 2023.
- 500 MW of new local renewable energy by 2026.

Clean Power Plan:

- 1000 MW of new onshore wind energy by 2030.

Land Strategy and Planning 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, licence, letter of authority, or easement) from 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.

Habitat, Flora and Fauna

Activities associated with the proposed wind development have the potential to increase access and fragmentation in moose habitat and cause direct and indirect impacts on birds and bat species through post-construction collision with turbines and transmission lines as well as loss of habitat and species disturbance during construction. The southern end of the proposed transmission corridor overlaps with core habitat for Black Ash, Wood Turtle and Monarch particularly where core habitat for all three species overlaps along

the West River.

Avoidance should be the primary form of mitigation implemented to alleviate these effects followed by additional mitigative measures to reduce residual impacts. Consultation with DNR and ECCC-CWS on effective forms of mitigation can identify options that work best for the situation including spacing of transmission lines to reduce risk of avian species electrocution, increasing turbine blade visibility and altering operations to consider higher cut-in speeds as well as high risk migration periods to minimize impacts association with bird and bat mortalities. Encouraging implementation of emerging innovation and technologies for avian detection and turbine blade feathering can also enable real-time response to reduce avian mortality risks associated with wind developments.

The proponent also acknowledges the potential for cumulative impacts of multiple wind power projects on wildlife and proposes collaborative mitigation and monitoring across projects at the regional level particularly for bats, birds and habitat connectivity for large mammals including moose.

Geoscience and Mines Branch:

A preliminary review of the Eigg Mountain Wind Project has been conducted. The review notes that the geological characterization of the proposed site is appropriate. The Project Area is primarily underlain by the Neoproterozoic deep-water sedimentary rocks of the James River Formation (Georgeville Group), with undivided clastic rocks of the Devonian-Carboniferous Horton Group and Carboniferous Windsor Group (primarily sedimentary rocks, gypsum with some evaporites) within the southern part of the area. 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, and low risk for karst topography except an area to the south overlaps high karst risk. 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. No known abandoned mine openings are located within 1 km of the proposed parcels. Report undocumented abandoned mine openings to the Mineral Management Division.

Mineral Occurrences

The proposed project area is ranked low to high for mineral potential. Few mineral occurrences are contained within the development area (Ag, barite, sand silica), while 2 are just outside the area (Cu, Fe, Hematite). The proposed area is also considered medium to high for aggregate potential with 2 established quarries within the area and another within 1.0 km of the Project Area. Southern portions of the potential development area overlap with a number of exploration licenses (EL-57357, EL-57358, EL-56337, EL-57373). One of two potential transmission corridors along the Southern development area also passes through a non-mineral registration (MP0008). The project description notes these interactions and states that only one transmission corridor will be constructed and will be selected upon further assessment.

Due to mineral occurrences in the area and mineral rights held close to the proposed area, consideration should be given to concurrent mineral exploration activities. Reach

out to mineral rights holder or mineral management division if further information is required. In addition, due to the nature and proximity of the Eigg Mountain-James River Wilderness Area, it is not anticipated that the proposed Project will negatively impact exploration activities in the area.

Key Considerations: (provide in non-technical language)

Clean Energy Branch:

- The proposed project was awarded through the Green Choice Program Request for Proposals.
- Wind energy projects such as the Eigg Mountain Wind Project help Nova Scotia transition its electricity system from the use of coal-fired generation that has direct negative environmental 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 one of the lowest costs 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.

Replacing coal-fired electricity generators with renewable energy such as onshore wind is the most cost-effective method and reduces the most greenhouse gases in Nova Scotia.

The Green Choice Program procurement is anticipated to reduce greenhouse gases by up to 2 million tonnes or 8.6% total reductions as we progress towards the 53% reduction by 2030.

Land Strategy and Planning Branch:

Habitat, Flora and Fauna:

The project will require additional wildlife surveys, planning, and mitigation measures to ensure impacts to species and habitats are minimized and that provincial and federal legislation is met.

Additional Surveys and Data

- Conduct another year of pre-construction surveys for moose, bats, and birds, and expand surveys to include the proposed transmission corridor.
- Ensure lichen surveys are completed by an approved specialist.

- Provide precise locations and data for all flora and fauna observations, particularly Species at Risk, to the Department of Natural Resources.
- Outcomes of survey or additional data or reports should be submitted to the department, including spatial data.

Wildlife Management Planning

- Develop a Wildlife Management Plan in consultation with DNR and Environment and Climate Change Canada.
- Include monitoring programs and response procedures if Species at Risk are encountered.
- Maintain buffers around sensitive species, including Black Ash and Eastern Waterfowl.
- Implement measures to reduce impacts to Mainland Moose, bats, birds, turtles, and other wildlife, including construction timing and road management practices.
- Consider additional mitigation options such as higher turbine cut-in speeds or blade painting to reduce bat & bird mortality.

Legal Requirements

Obtain all necessary permits as required under legislation related to wildlife and species at risk, watercourses and wildlife habitat alterations, including the Provincial Wetlands of Special Significance Policy.

It is the responsibility of the proponent to ensure compliance with federal and provincial legislation and regulations regarding resident migratory and at-risk species and their habitat.

Geoscience and Mines Branch:

Some areas of the project area ranked high for mineral and aggregate potential. Consider potential interactions with existing mineral and non-mineral rights holders as the project is further refined.



Kwilmu'kw Maw-klusuaqn Negotiation Office

Mi'kmaq Rights Initiative

Our Rights. Our Future.

75 Treaty Trail
Truro, NS B6L 1W3

Tel (902) 843 3880 **Fax** (902) 843 3882

Toll Free 1 888 803 3880

Email info@mikmaqrighs.com

www.mikmaqrighs.com

March 26, 2026

Mark McInnis
Environmental Assessment Officer
Nova Scotia Environment and Climate Change, EA Branch
E-mail : mark.mcinnis@novascotia.ca

Mr. McInnis

**Re: Consultation with the Mi'kmaq of Nova Scotia on the Eigg Mountain Wind Project,
Antigonish County, NS**

I write in response to your letter dated February 18, 2026, with respect to 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.

Mainland Moose populations continue to decline in Nova Scotia and the moratorium on moose hunting remains in the Cape Breton Highlands. The Kwilmu'kw Maw-klusuaqn (KMK) remain concerned of the continued development and fast-tracking approval of projects in Nova Scotia that could impact this endangered species. The project area contains wetlands and old-growth forest stands that are critical moose habitat. Construction of access roads, turbine pads and transmission lines fragments habitat and increases human access which could disrupt moose movement corridors, increase mortality rates and reduce hunting and harvesting opportunity for the Mi'kmaq of Nova Scotia and their inherent rights as protected under Section 35 of the *Constitution Act, 1982*. Moose population declines directly impact Mi'kmaq harvesting practices, food security and intergenerational knowledge sharing. Although the Environmental Assessment Registration Document commits avoiding wetlands "to the extent possible", the scale of the project means habitat disturbance is unavoidable and long-term.

Our office is requesting a follow up from Nova Scotia Environment and Climate Change (NS-ECC) on how on this project along with the other wind projects recently approved for Mainland Nova Scotia are going to impact these species that hold great importance to the Mi'kmaq of Nova Scotia. A cumulative impacts study to determine how Mainland Moose are being impacted by onshore wind developments is recommended and needs to be co-developed with our office.

The project footprint for this proposed wind project includes disturbance to water, wetlands and aquatic systems. There will be impacts to wetlands, water streams and watersheds. Road building and turbine construction will alter drainage patterns and reduce water quality. These bodies of water support habitats for American Eel and Atlantic Salmon, both species that are extremely

significant to the Mi'kmaq of Nova Scotia. Water is not only a harvesting resource, but also a sacred element of Mi'kmaq worldview. Indirect or incremental degradation undermines Mi'kmaq stewardship principles and limits the Mi'kmaq's abilities to utilize their inherent rights.

While it is encouraging that Renewable Energy Systems Canada Inc. (RES) has signed Memorandum of Understandings (MOUs) with various Mi'kmaw Communities, this does indicate free, prior, and informed consent of the Mi'kmaq of Nova Scotia as whole. It is our expectation that RES will continue to work with the Mi'kmaq to discuss project updates, advise on environmental concerns and inform communities of opportunities related to this and other renewable energy projects as they are presented. These community engagement efforts do not replace or satisfy the Crown's obligation to consult where rights may be adversely impacted.

KMK's Archaeology and Research Division (ARD) have reviewed Section 14 of the EARD, and previous letter provided by NS-ECC outlining the details and recommendations of the Archaeological Resources Impact Assessment (ARIA) HRP #A2025NS106 for the Eigg Mountain Wind Project, conducted by Boreas Heritage. At this time, we support the recommendations from Boreas Heritage as interpreted by CBCL and NS-ECC. Please provide the final permit report, A2025NS106, to our ARD team to review and provide additional feedback, if necessary.

The Assembly of Nova Scotia Mi'kmaw 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'kmaw Chiefs) expects subsurface data, adequate to eliminate concern for presence, protection, and management of Mi'kmaw archaeological and cultural heritage as part of assessment of potential in advance of any development.

The Mi'kmaq of Nova Scotia emphasize that reconciliation requires more than procedural consultation. It requires substantive protection of rights and respect for Mi'kmaq's inherent rights, knowledge, and responsibilities to the land. KMK does not represent the communities of Millbrook and Sipekne'katik First Nations.

Yours in Recognition of Mi'kmaw Rights and Title,

Director of Consultation
Kwilmu'kw Maw-Klusuaqn

C.C.:

Kwilmu'kw Maw-klusuaqn

Kwilmu'kw Maw-klusuaqn

Kendra Gorgeatt, Nova Scotia Office of L'nu Affairs

Marc Theriault, Nova Scotia Environment and Climate Change, Compliance Division

Megan Lesko, Nova Scotia Environment and Climate Change, Compliance Division

Oliver Maass, Nova Scotia Environment and Climate Change, Protected Areas & Wetlands

Cynthia Steele, Nova Scotia Department of Natural Resources

Environmental Assessment - Project Comments

Submission ID

23fe7705

Submission Date

18/02/2026 09:18

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.

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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>).

Select a Project:

Eigg Mountain Wind Project



Comments:

As a resident of the Municipality of hte County of Antigonish, I am excited to see Projects like the Eigg Mt. Wind Project move forward in our region. Renewable energy and the benefits it will bring to Nova Scotians should not be overlooked due to the minimal impacts of road widening and recreational disruption.

Name:

Email:

City/Town

Antigonish

Postal Code

B2G 2X3

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

Please note:

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



Yes, I agree (must be selected to proceed)

Uploaded document(s)

No documents to display.

Environmental Assessment - Project Comments

Submission ID

ae8893e9

Submission Date

18/02/2026 11:29

Submission status

PROCESSED



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Select a Project:

Eigg Mountain Wind Project



Comments:

Currently, there is an existing wind turbine site on Browns Mountain, another under construction on Weavers Mountain, and a new project proposed for Eigg Mountain. Together, these developments are rapidly transforming what has long been a largely intact forested wilderness into an industrialized landscape. The construction of large-scale wind turbines, access roads, blasting operations, transmission corridors, and year-round maintenance traffic is permanently altering the character of this region.

These projects fragment the land, disrupt established trail systems, restrict public access, and diminish the safety and enjoyment of recreational users who have relied on this area for decades.

I am also deeply concerned about the impacts on wildlife. The Eigg Mountain area, in particular, provides important habitat and movement corridors for many species, including birds, bats, and larger mammals. This region is also known to support species

at risk, and further industrial development threatens to degrade or eliminate critical habitat for endangered and vulnerable wildlife. Large-scale forest clearing, road construction, turbine operation, and increased human activity contribute to habitat fragmentation, increased collision risks, noise disturbance, and the displacement of wildlife. Once this damage is done, it cannot be undone.

These lands are valuable precisely because they remain largely intact. They support biodiversity, outdoor recreation, and the physical and mental well-being of people who depend on access to natural spaces. Placing industrial-scale energy projects in the middle of such an area is incompatible with its long-standing and existing use.

Name:

Email:

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

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☒ **Yes, I agree (must be selected to proceed)**

Uploaded document(s)

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Environmental Assessment - Project Comments

Submission ID

d9708737

Submission Date

18/02/2026 11:37

Submission status

PROCESSED



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Select a Project:

Eigg Mountain Wind Project



Comments:

Re: Opposition to Proposed Land-Based Wind Energy Development – Eigg Mountain, Nova Scotia

To: Environmental Assessment Administrator
Nova Scotia Environment and Climate Change
Halifax, Nova Scotia

Subject: Request for Non-Approval or Elevated Review of the Proposed Eigg Mountain Wind Project

Dear Environmental Assessment Administrator,

I am writing to formally submit my concerns regarding the proposed land-based wind energy development on Eigg Mountain, Nova Scotia. While renewable energy is an

important component of Nova Scotia's climate goals, industrial-scale wind development must be appropriately sited, technically justified, and subject to rigorous environmental and infrastructure review. In my view, the Eigg Mountain project presents significant technical, ecological, and land-use risks that warrant non-approval or, at minimum, a higher level of assessment and oversight.

Below I outline several key technical concerns that should be addressed before any approval is considered.

1. Grid Integration and Transmission Constraints

Rural and mountainous areas such as Eigg Mountain often lack the transmission capacity required to reliably integrate large-scale intermittent generation. Wind projects may require substantial upgrades to substations and distribution infrastructure. Without demonstrated grid readiness, there is a high risk of curtailment, where turbines are forced offline due to transmission limits or system oversupply. This reduces the real-world benefit of the project while leaving permanent land disturbance in place.

2. Intermittency and Lack of Firm Capacity

Wind energy is inherently variable and non-dispatchable. Output cannot be relied upon during periods of peak electricity demand or low-wind conditions. Without adequate long-duration storage or firm backup generation, wind projects do not provide dependable capacity and may increase reliance on fossil generation for balancing and reserve requirements.

The proponent should be required to demonstrate how the project will contribute to firm emissions reductions rather than simply adding variable generation to the grid.

3. Increased Need for Ancillary Grid Services

Wind integration increases demand for grid stabilization services, including frequency regulation, voltage support, and spinning reserve. These services are often supplied by conventional generation sources and introduce additional operational complexity and cost to the electricity system. These system-wide impacts should be fully accounted for in project evaluation.

4. Mountain Construction Footprint and Long-Term Land Disturbance

Industrial wind development on mountainous terrain requires extensive physical disturbance, including:

Wide access roads for heavy equipment

Blasting, grading, and soil removal

Large crane pads and concrete foundations

Permanent alteration of drainage patterns

The scale of disturbance extends far beyond the turbine footprint and creates long-term risks of erosion, habitat fragmentation, and ecosystem disruption. Once constructed, the industrial footprint cannot realistically be restored to its original condition.

5. Winter Icing, Safety, and Reduced Performance

Nova Scotia's winter climate introduces operational challenges including blade icing and

ice throw hazards. Icing events can require turbine shutdowns, reducing seasonal output and increasing safety setbacks. These cold-climate limitations must be transparently addressed through credible performance modelling.

6. Decommissioning and End-of-Life Uncertainty

Wind turbines have a lifespan of approximately 20–30 years. Decommissioning presents unresolved challenges, including:

Blade disposal (limited recycling options)

Concrete foundations often left in place

Uncertainty regarding full site reclamation

Approval should not proceed without enforceable financial securities (decommissioning bonds) to guarantee full restoration and prevent long-term liability from falling on the public.

7. Lack of Cumulative Impact and Strategic Land-Use Planning

Nova Scotia currently lacks comprehensive strategic land-use planning that clearly distinguishes appropriate industrial zones from high-value ecological and wilderness landscapes. Approving industrial wind development in an area like Eigg Mountain risks setting a precedent for further development in sensitive natural regions without adequate cumulative assessment.

Conclusion and Request

Given the concerns outlined above, I respectfully submit that the proposed Eigg Mountain wind project should not be approved in its current form. At minimum, Nova Scotia Environment and Climate Change should require:

A rigorous assessment of grid interconnection feasibility and curtailment risk

Full lifecycle emissions accounting and reliability evaluation

Strong decommissioning and reclamation guarantees

Comprehensive review of cumulative environmental and land-use impacts

Demonstration that lower-impact alternative sites have been considered

Renewable energy development must not come at the cost of inappropriate industrialization of ecologically significant landscapes, insufficient infrastructure planning, or long-term environmental degradation.

Thank you for considering this submission. I would welcome the opportunity to participate further in the review process.

Sincerely,

Name:

Email:

City/Town

Postal Code

Attachment(s):

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

Maximum number of files allowed: 10

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Yes, I agree (must be selected to proceed)

Uploaded document(s)

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Environmental Assessment - Project Comments

Submission ID

c5e535d4

Submission Date

18/02/2026 11:56

Submission status

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Select a Project:

Eigg Mountain Wind Project



Comments:

Environmental Assessment Comment – Eigg Mountain Wind Project

I am a resident of Antigonish County. I am submitting this comment as part of the Environmental Assessment for the Eigg Mountain Wind Project.

I have serious concerns that the Environmental Assessment Registration Document (EARD) underestimates the environmental and cumulative impacts of this project, particularly with respect to mainland moose, habitat fragmentation, water systems, and the scale of permanent infrastructure proposed adjacent to the Eigg Mountain-James River Wilderness Area.

Mainland Moose and Habitat Fragmentation

While the EARD references mainland moose, the assessment is limited primarily to

individual turbine sites and does not adequately consider landscape-scale impacts. Moose are highly sensitive to disturbance, particularly in winter, and rely on large, connected tracts of forest for movement, feeding, and bedding. The combined effects of new access roads, upgraded roads, turbine pads, and a long transmission corridor represent a significant source of habitat fragmentation that is not meaningfully addressed. Winter habitat use, moose bedding areas, and movement corridors are not sufficiently analyzed.

Cumulative Effects

The cumulative effects assessment treats project components in isolation rather than evaluating their combined impact. Roads, turbines, transmission corridors, forestry activity, and increased human access are discussed separately, despite their additive effects on wildlife displacement and habitat loss. This approach minimizes real ecological risk in an already pressured upland environment adjacent to a protected wilderness area.

Relationship to the Wilderness Area

While the Environmental Assessment states that turbines are not located within the legislated Wilderness Area, this framing is misleading in terms of real ecological impact. The project relies on existing access routes and rights-of-way that pass through or directly adjacent to the wilderness, which will be significantly widened, upgraded, and intensively used during construction and operation. Road upgrades, increased traffic, and transmission infrastructure will introduce disturbance, noise, and fragmentation throughout the wilderness landscape, not just at turbine sites. From a functional and ecological perspective, these impacts extend well beyond mapped boundaries and must be assessed as affecting the Wilderness Area as a whole.

Transmission Line Corridor Uncertainty

The proposed transmission line — approximately 20 km in length — represents one of the largest permanent impacts of the project, yet its routing remains undefined. Assessing impacts without a finalized corridor underestimates forest clearing, fragmentation, and long-term ecological change. Conclusions about limited impact are premature in the absence of a confirmed route.

Watercourses, Wetlands, and Headwaters

The EARD relies heavily on future permitting and an Environmental Protection Plan that has not yet been finalized. Multiple watercourse crossings, culvert installations, and ground disturbance in headwater areas present risks to surface water, wetlands, and groundwater systems connected to the James River watershed. These risks require avoidance-based assessment, not mitigation after disturbance occurs.

Road Infrastructure as a Primary Impact

Permanent road construction is widely recognized as one of the most disruptive forms of habitat fragmentation for large mammals. The scale of road development proposed — including new construction and major upgrades — is treated as secondary infrastructure rather than a central environmental impact, despite its long-term ecological consequences.

Conclusion

Given the unresolved uncertainties related to wildlife displacement, wilderness fragmentation, transmission routing, cumulative effects, and water impacts, the conclusion that the project will result in “no significant adverse residual effects” is not

adequately supported. I respectfully request that Nova Scotia Environment require further information, stronger avoidance measures, and a more robust cumulative effects assessment before any approval is considered.

Thank you for the opportunity to comment.

Antigonish County, Nova Scotia

Name:

Email:

City/Town

Postal Code

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

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Yes, I agree (must be selected to proceed)

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Environmental Assessment - Project Comments

Submission ID

c869c5f8

Submission Date

18/02/2026 12:06

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Select a Project:

Eigg Mountain Wind Project



Comments:

Additional EA Comment – Community Support

I would like to comment on statements in the Environmental Assessment Registration Document indicating that the project has community support or that concerns have been limited.

Based on my direct experience engaging with the community, this characterization does not fully reflect current public sentiment. In recent weeks, a community group titled Protect Eigg Mountain from Industrial Wind has formed on Facebook and currently has approximately 390 members. In addition, a public petition opposing the Eigg Mountain Wind Project has gathered over 300 signatures to date, and continues to grow.

These numbers indicate that a significant portion of the local community has concerns regarding the project's location and its impacts on wilderness, wildlife, and long-term

land use. While some individuals and organizations may support the project, it is clear that community opinion is not unanimous and that substantial opposition exists.

I respectfully request that Nova Scotia Environment consider this information when assessing claims of community support, and ensure that the Environmental Assessment process gives appropriate weight to the full range of public views, particularly those expressed through formal public submissions.

Name:

Email:

City/Town

Postal Code

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Environmental Assessment - Project Comments

Submission ID

4ff7fb60

Submission Date

18/02/2026 13:27

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Select a Project:

Eigg Mountain Wind Project



Comments:

I am not n agreement with this project , it is one thing to make a few roads to a project ,but not ok to clear cut and rape the land , which ruins all habitat for the Animals who have been on this land forever, not to mention the noise these turbines make, there will be no wildlife for miles around and the beauty of the forest will be gone forever, so take a hard look at what you are about to approve, I am a concerned citizen that uses this land for recreational us, Signed ,
Ns

Name:

Email:

City/Town

Antigonish

Postal Code

b2g 2k8

Attachment(s):

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Maximum file size per file: 10 MB

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Environmental Assessment - Project Comments

Submission ID

0f0ba9f3

Submission Date

18/02/2026 22:37

Submission status

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Select a Project:

Eigg Mountain Wind Project



Comments:

I strongly oppose approval of the Eigg Mountain Wind Project due to its location and permanent impacts. While turbines may not be placed within the wilderness boundary, the project relies on widened roads and transmission infrastructure that will fragment and industrialize a functioning wilderness landscape. These impacts are irreversible and incompatible with responsible land stewardship. Nova Scotia Environment should not approve industrial development that undermines a protected wilderness area when lower-impact alternatives exist.

Name:

Email:

City/Town

Barney River

Postal Code

B0k 1A0

Attachment(s):

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Environmental Assessment - Project Comments

Submission ID

c2303f36

Submission Date

19/02/2026 11:43

Submission status

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Select a Project:

Eigg Mountain Wind Project



Comments:

I for one am very unhappy that this project has been approved. The developers are ruining very critical moose habitats. The right ways for development are planning on cutting straight through waterways. Where the hell are the environmental impact studies on this fact? The developers are proceeding with this project because the government has tied the hands of the department of environment. Greasy politics are on full display with this project and most people don't even know what is happening. Did you idiots even know that chunks of ice that are approximately 5lbs in weight are being hurtled hundreds of feet from the windmills already standing?? When someone gets hit by one of these projectiles (when not if) they will more than likely loose their life. And that death is on the government for approval of these projects!! Some serious inquiries need to be addressed here!!!

Name:

Email:

City/Town

Postal Code

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Environmental Assessment - Project Comments

Submission ID

59044911

Submission Date

19/02/2026 14:27

Submission status

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Select a Project:

Eigg Mountain Wind Project



Comments:

Not sure how they sat it's good for the environment when what's goes into making a windmill farm as well as what is destroyed in the process .

A perfect mtn side destroyed for money . Shame !!!!

Name:

Email:

City/Town

Porters Lake

Postal Code

B3E 1H6

Attachment(s):

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Environmental Assessment - Project Comments

Submission ID

a0558f2c

Submission Date

19/02/2026 20:26

Submission status

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Select a Project:

Eigg Mountain Wind Project



Comments:

Eigg Mountain is one of the most beautiful areas in Antigonish county. There are lots of beautiful aged hardwood stands, wild life, and the best views around. Even a population of main land moose reside in this area!

It would be a shame to industrialize this beautiful area for only 35 years of "power".

I really wish Nova Scotia would look into smaller nuclear power plants which offer clean long term energy without disturbing very large protected habitats.

Why would we flatten thousands of acres of land, burn hundreds of thousands of litres of fuel in equipment to build roads, and have windmills shipped across the ocean, all to "reduce" our carbon footprint?

The math ain't mathing.

Name:

Email:

City/Town

Antigonish

Postal Code

B2G 0A9

Attachment(s):

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

Maximum file size per file: 10 MB

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No documents to display.

Environmental Assessment - Project Comments

Submission ID

2f0bd106

Submission Date

20/02/2026 12:00

Submission status

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Select a Project:

Eigg Mountain Wind Project



Comments:

I'm not against renewable energy — but this wind farm isn't the right solution for this area.

Wind turbines kill birds and bats, especially migratory species and birds of prey. Bats are critical for controlling insects, and large losses can damage local ecosystems. Building turbines also means clearing land, adding roads and transmission lines, and disrupting wildlife habitats.

Wind power is intermittent it only works when the wind blows within certain speeds. That means backup power often fossil fuels is still needed, raising costs and environmental impact.

We need smart energy solutions, but not at the expense of wildlife, habitat, and local communities. Location and long-term impact matter.

Name:

Email:

City/Town

Antigonish

Postal Code

B2G 0A3

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

Please note:

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☒ Yes, I agree (must be selected to proceed)

Uploaded document(s)

No documents to display.

From:
To: [Environment Assessment Web Account](#)
Subject: URGENT: Formal Objection to the Eigg Mountain Wind Project
Date: February 20, 2026 3:08:49 PM
Attachments: [Letter to Minister of Environment and Climate Change](#) .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

To: Environmental Assessment Branch, Nova Scotia Environment and Climate Change

Good afternoon,

Please see letter attached to **formally object** to the Eigg Mountain Wind Project (which is also copied below).

Thank you,

February 20, 2026

To: Environmental Assessment Branch, Nova Scotia Environment and Climate Change

Via Email: EA@novascotia.ca

Subject: URGENT: Formal Objection to the Eigg Mountain Wind Project

To the Minister of Environment and Climate Change,

I am writing to **formally object** to the Eigg Mountain Wind Project. As a property owner in the Antigonish Co, McArras Brook area. I believe this proposal represents an unacceptable industrialization of a sensitive wilderness area and poses a direct threat to our community's resources.

1. Critical Threat to the James River Watershed

The project sits directly adjacent to the Protected James River Watershed, a primary drinking water source for the Town of Antigonish. The construction of 150 km of access roads and turbine pads creates **an immediate risk of siltation and chemical contamination (such as hydraulic leaks) into our water supply**. Water security must be prioritized over industrial energy development. I request **Long-Term SWAT Hydrological Modeling, a Soil & Water Assessment Tool (SWAT) study for the James River Watershed**, along with **Siltation and runoff modelling** how the 31.8 km of roads will impact downstream water quality in the

Northumberland Strait potentially affecting local fisheries and marine life; and finally, **a Surface Water Monitoring program**. Provide a baseline and ongoing monitoring program for all brooks and wetlands within the proposed project footprint.

2. Violation of Coastal Protection Standards

While this is an onshore project, its location **just 10–15 km from the Northumberland Strait IGNORES** the Province's own recommendation **for a 25-km buffer** for offshore wind. Placing 200-metre turbines so close to the coast creates the exact visual and **ecological disruptions** that the offshore buffer was designed to prevent. This "near-shore" placement is an attempt to bypass coastal protections while industrializing the Highlands.

3. Irreversible Destruction of Endangered Moose Habitat

Eigg Mountain is a vital corridor for the endangered Mainland Moose. This project will fragment this wilderness, creating a physical "wall" that prevents moose from moving between the Eigg Mountain-James River Wilderness Area and Cape George. **I demand a multi-year, independent GPS study on moose migration before any approval is considered.**

4. Insufficient Noise and Residential Setbacks

The provincial 800-metre setback is fundamentally inadequate for the mountainous terrain of the Highlands. Standard noise models do not account for how sound carries in our specific topography, potentially subjecting residents to noise levels far exceeding the 40 dBA limit. I request a **Multi-Year Acoustic Propagation Study: Standard noise models often fail in mountainous terrain**. A **seasonal acoustic study** that measures how "natural silence" is affected by sound "bouncing" off the highlands, particularly during winter when there is less foliage to absorb noise is a clear issue. I also request **Infrasound & Low frequency Noise (LFN) Modeling** at all seasonal and permanent residences within 2 km and want to see a baseline **Rural Noise Monitoring baseline study** rather than using assumptions.

I demand a **Strategic Environmental Assessment (SEA)** that considers the total impact of *all* proposed wind projects in the Antigonish Highlands on wildlife corridors as well as a **Radar-Based Aerofauna Monitoring**-Beyond simple trail cameras a **24-month radar monitoring** for migratory birds and bats.

I have also read that this is a partnership with Paq'tnekek and Pictou Landing First Nations, therefore I request a **Mi'kmaq Ecological Knowledge (MEK) Study**: to ensure there is a comprehensive study is done with local First Nations regarding traditional land use, to reveal if any protected cultural or historical sites are currently not on government maps. Along with this an old-growth Forest and Rare Flora inventory for rare lichens and other

plants in the 312 hectares slated for clearing.

Finally, a cultural and socio-economic assessment must be done to assess how this proposed project would impact local hunting and fishing, hiking, and traditional snowmobile trails. There is a large community that seems to not be considered here.

I urge the Department to reject this Environmental Assessment on the grounds of water security, coastal protection, wildlife preservation and socio-economic and health preservation.

Sincerely,

CC: Mayor Sean Cameon (Chair of James River Stewardship)
Councillor Diane Roberts (James River Stewardship member)
Councillor Leon MacLellan
Warden Nicholas MacInnis (Antigonish County Council-Local Land Use
Representatives)
Councillor Mary MacLellan (District 1)
Councillor Adam Baden-Clay (District 2)

February 20, 2026

To: Environmental Assessment Branch, Nova Scotia Environment and Climate Change

Via Email: EA@novascotia.ca

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Sincerely,

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Councillor Leon MacLellan
Warden Nicholas MacInnis (Antigonish County Council-Local Land Use
Representatives)
Councillor Mary MacLellan (District 1)
Councillor Adam Baden-Clay (District 2)

Environmental Assessment - Project Comments

Submission ID

47e56918

Submission Date

25/02/2026 01:42

Submission status

PROCESSED



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Select a Project:

Eigg Mountain Wind Project



Comments:

I absolutely do NOT want this in the area near my parents place!!! This is extremely dangerous and I don't like anything about it!!! This will become my son's land to hunt and fish on in the upcoming years and I know that it's impact will highly devastate the environment. There is way too much at stake! My beloved nephews will also hunt here and my amazing niece and this is NOT anything that I care to have in our community! I have land here and I do not want anything to happen to me! There's already been enough happening on Eigg Mountain over the years! Way too many people have gotten sick or died of cancer... and this is yet another thing that will bring additional harm to people in the area! NO!!!! TO EIGG MOUNTAIN WIND!!!!!!

Name:

Email:

City/Town

New Glasgow

Postal Code

B2H 4C1

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

Please note:

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Yes, I agree (must be selected to proceed)

Uploaded document(s)

No documents to display.

Environmental Assessment - Project Comments

Submission ID

66482438

Submission Date

25/02/2026 20:02

Submission status

PROCESSED



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Select a Project:

Eigg Mountain Wind Project



Comments:

I live at the base of Eigg Mountain in Arisaig, I have grown up exploring, learning, and bonding with nature on Eigg Mountain.

It has always been a place I like to call home, but I am not the only one to consider the Mountain home. Over my years of traveling the trails of Eigg Mountain I've spotted moose a couple times a year, as well as many rabbits, Deer, fox, owls, otters, and the list goes on. To see a windmill project begin where we consider to be our home would be devastating to the landscape and habitat of the mountain.

Our community is hoping and praying that this project does not proceed! Please consider there are fewer and fewer natural habitats like Eigg Mountain. It is worth saving!

Name:

Email:

City/Town

Arisaig

Postal Code

B2G 2L1

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

 IMG_2116.jpeg 430.01 KB

Remaining No of Files : 9

Please note:

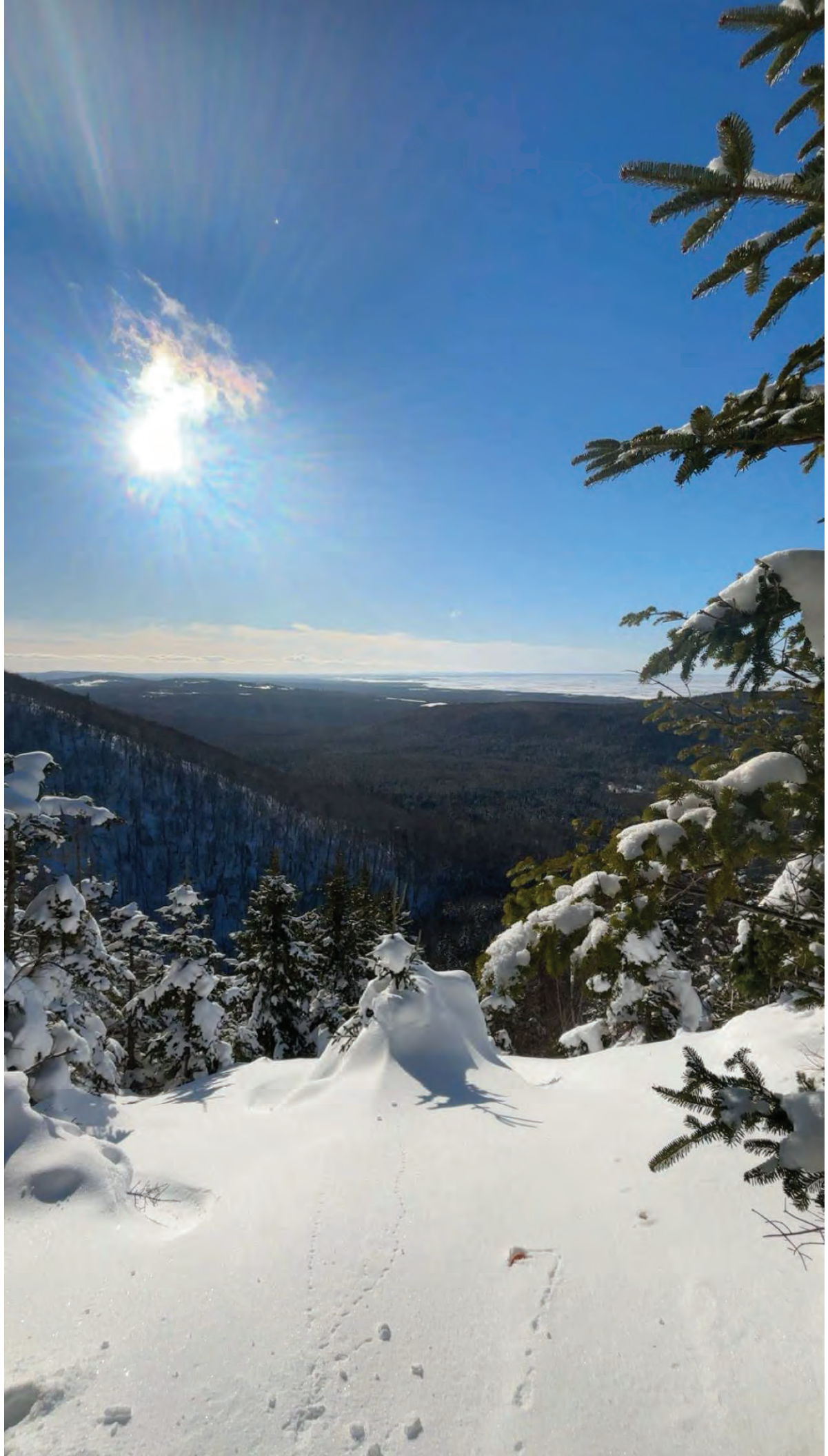
By submitting your comments, you are consenting to the posting of your comments on the department’s website.

☒ Yes, I agree (must be selected to proceed)

Uploaded document(s)

Total Documents: 1

[IMG_2116.jpeg \(/Admin/View-Documents/941013f0-4cc3-435c-867f-dc16b61c6e0e/f82faa06-95e0-4fc3-9545-6c765d7071d1\).](#)



Environmental Assessment - Project Comments

Submission ID

facafa81

Submission Date

25/02/2026 20:39

Submission status

PROCESSED



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Select a Project:

Eigg Mountain Wind Project



Comments:

We need to protect our old growth forest and large wildlife habitats like these.

Name:

Email:

City/Town

Brierly Brook

Postal Code

B2G 2K8

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

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Yes, I agree (must be selected to proceed)

Uploaded document(s)

No documents to display.

Environmental Assessment - Project Comments

Submission ID

011f61fb

Submission Date

25/02/2026 20:40

Submission status

PROCESSED



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Select a Project:

Eigg Mountain Wind Project



Comments:

This project puts unnecessary risk on the endangered species mainland moose. This area contains one of the most important populations on the mainland of NS. Our provincial government needs to do a better job protecting the environment as well as rare, endangered and unique species .

Name:

Email:

City/Town

Antigonish

Postal Code

B2G 3A3

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

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Yes, I agree (must be selected to proceed)

Uploaded document(s)

No documents to display.

Environmental Assessment - Project Comments

Submission ID

98311aeb

Submission Date

25/02/2026 22:48

Submission status

PROCESSED



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Select a Project:

Eigg Mountain Wind Project



Comments:

Why do we need these coming into a protected area with lots of water supply that will be ruined. Animals with no shelter plus our protected woods. Places like water shed area that we would be in trouble to be in. I worked in a couple different wind mill projects. Storas wind mills and another one in the valley. Benjamin Mills project. This area egg mountain can't handle this kind off construction. The land egg mountain is a different lay out. For god sakes the government put so much money into keeping this area safe and keeping the forest and land a water for the needs of people and animals that are trying to serve. Mainland, moose, which there is not a lot of so if this project goes ahead, you're destroying the things and the people that worked hard to make this positive solution. Keep these windmills out of here, please think of the animals and people and children to come still enjoy this land. Thanks

Name:

Email:

City/Town

Postal Code

Attachment(s):

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

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Maximum number of files allowed: 10

Please note:

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☒ Yes, I agree (must be selected to proceed)

Uploaded document(s)

No documents to display.

Environmental Assessment - Project Comments

Submission ID

afd7fe30

Submission Date

27/02/2026 18:47

Submission status

PROCESSED



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Select a Project:

Eigg Mountain Wind Project



Comments:

Renewable energy is great, its an excellent path forward, but not at the expense of a beautiful area like Eigg Mtn.

This area is truly special, so much diversity in wildlife and landscape. It truly is a mini cabot trail esque area. The mainland moose have been making a comeback in this area, showing how resilient and strong the forest is in this area.

Many groups and families use the trail systems on Eigg Mtn and this wind project will destroy these trail systems and decimate the wildlife populations.

The "small footprint" that these wind farms claim to make is undoubtedly the biggest false claim of all. Just take a look at the damage to the land and ecosystems that the wind farm in Maryvale has left.

Please for once in this lifetime let's not destroy a serene landscape forever to line the pockets of private investors and the government. Let's do a solid here for Nova Scotia and the environment and put a stop to this project before we all have to regret it.

There are plenty of other coastline mountainscapes that could host this wind farm. Many of which are mostly cleared from the hurricane. Let's not clear cut more land and kill more wildlife for this.

Thank you for your time and consideration.

Name:

Email:

City/Town

Postal Code

Attachment(s):

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

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

Maximum number of files allowed: 10

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☒

Yes, I agree (must be selected to proceed)

Uploaded document(s)

No documents to display.

Environmental Assessment - Project Comments

Submission ID

170c8af3

Submission Date

27/02/2026 19:01

Submission status

PROCESSED



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Select a Project:

Eigg Mountain Wind Project



Comments:

Concern for wildlife

Name:

Email:

City/Town

Antigonish

Postal Code

B2G 2M1

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

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Yes, I agree (must be selected to proceed)

Uploaded document(s)

No documents to display.

Environmental Assessment - Project Comments

Submission ID

1ae11305

Submission Date

27/02/2026 21:07

Submission status

PROCESSED



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Select a Project:

Eigg Mountain Wind Project



Comments:

Windmills destroy nature. The browns mountain wind farm has destroyed a large section of that mountain.

Name:

Email:

City/Town

St Andrews

Postal Code

B0H 1X0

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

Please note:

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Yes, I agree (must be selected to proceed)

Uploaded document(s)

No documents to display.

Environmental Assessment - Project Comments

Submission ID

84c34ef4

Submission Date

28/02/2026 08:31

Submission status

PROCESSED



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Select a Project:

Eigg Mountain Wind Project



Comments:

I am writing you today as a concerned citizen residing in Clydesdale, Antigonish Co to formally and unequivocally oppose the proposed Eigg Mountain Wind Project. While I wholeheartedly support clean energy initiatives I do so only when placement makes ecological sense. The Eigg Mountain Project does not make ecological sense at all. The risks outweigh the limited benefit.

The Eigg Mountain project placement will have dramatic negative impact on a unique old growth forest ecosystem, is smack dab in the middle of a growing endangered mainland moose population, has the potential to contaminate runoff that flows into the South Wrights River, and our ground water of many residents. Browns/Eigg/Clydesdale has a strong population of nesting raptors from the American Bald Eagle to several species of owl.

Recreational use, property value, location impacts aside, this development poses a clear and present danger to a highly diverse and unique ecosystem that, if allowed to continue, will have devastating effects that can never be reversed.

This project, as currently designed, represents an unacceptable risk to our fragile ecosystem, our community safety, and our property values. The risks far outweigh any projected benefits.

Eigg Mountain is not an industrial site. It is a wild, diverse, and ecologically significant mountain range that supports a complex and sensitive ecosystem. Downstream from the proposed development lies the South Wrights River, a watershed that supports a strong run of sea trout and the threatened Atlantic salmon population. Habitat disruption, sedimentation from road building, blasting, and altered drainage patterns are well-documented consequences of large-scale wind developments in mountainous terrain. Increased runoff and erosion during construction can degrade water quality, harm spawning beds, and introduce long-term stress to aquatic ecosystems. Once these habitats are compromised, restoration is extraordinarily difficult and often incomplete.

The mountain range also serves as critical habitat for mainland moose, a species recognized as endangered in Nova Scotia. It is home to black bear, white-tailed deer, and countless vertebrate and invertebrate species. Nesting grounds and migration corridors for bald eagles, owls, and other raptors exist throughout this landscape. Large wind turbines—particularly a 22-turbine installation with extensive road networks and transmission infrastructure—fragment habitat, disrupt migration patterns, and increase avian and bat mortality. Studies from wind farms across North America have documented raptor fatalities and displacement from traditional nesting territories. Habitat fragmentation alone can have cascading ecological consequences for decades.

Beyond wildlife impacts, the scale of this proposal is deeply troubling. Twenty-two industrial turbines, access roads spidering across the mountainside, blasting, clearing, and associated infrastructure will permanently alter the character of this landscape. The visual and acoustic footprint will be lasting and intrusive. Wind turbines of this magnitude generate low-frequency noise and shadow flicker effects that have been linked in multiple jurisdictions to sleep disturbance, stress, and reduced quality of life for nearby residents.

The preparation work to date has already demonstrated the disruptive nature of this development. Speeding log trucks descending the mountain and travelling our quiet rural roads have created a dangerous environment for residents, pedestrians, and motorists alike. The constant use of engine brakes has shattered the peace of our community. It is nothing short of fortunate that no one has been seriously injured or killed. This is not a hypothetical concern; it is an observable reality.

Property values in proximity to large-scale wind installations have historically shown vulnerability in comparable rural settings, particularly where projects are sited in close proximity to established communities and scenic landscapes. Numerous communities in Canada and the United States have reported diminished buyer interest, prolonged listing times, and downward pressure on rural property values where industrial wind facilities dominate the landscape. For many of us, our homes represent our life savings. Introducing a large industrial energy complex into this setting jeopardizes that investment and fundamentally alters the character of our community.

Furthermore, industrial wind facilities in remote and mountainous regions often require extensive tree clearing and blasting, which releases stored carbon from soils and biomass. In sensitive ecosystems, this can offset a portion of the projected emissions benefits. When factoring in habitat loss, watershed degradation, wildlife mortality, road construction, and long-term maintenance impacts, the true environmental cost becomes

far more complex than the simplified narrative of “green energy.”

Renewable energy development must be pursued responsibly and strategically. Not every location is appropriate for industrial-scale infrastructure. Eigg Mountain is a biologically rich, hydrologically significant, and culturally valued landscape. It is not an appropriate site for a 22-turbine industrial wind installation.

In addition to the environmental devastation and irreparable damage to the wildlife and water quality that will occur, the Eigg Mountain Area and the rest of Brown's Mountain have provided recreation to generations of families for over a hundred years. This way of life will be destroyed for all future generations if the project goes through.

Given the ecological sensitivity of this area, the documented disruption already occurring, the risks to wildlife, water systems, and residents, and the potential economic harm to property owners, and our ability to enjoy the land and our properties, I respectfully request:

An immediate halt to all further preparatory and construction activities via court Injunction.

I have little faith in comprehensive environmental assessments, most aren't worth the paper they are written on.

The only way to ensure the ecosystem stays safe from irreparable harm is to halt any further development indefinitely.

Immediate remediation and repatriation of any damaged ecosystems resulting from preparatory work already undertaken.

This project must not proceed. The long-term environmental, social, and economic risks to our community and our natural heritage far outweigh the projected benefits.

We do not want this development in our backyard, and we do not believe it belongs on Eigg Mountain.

This project must proceed no further. Enough damage and disruption to this point has been significant to the mountain.

We say no to Eigg Mountain.

Respectfully submitted,

Clydesdale, Nova Scotia

Name:

Email:

City/Town

Postal Code

B2G 2K9

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

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Yes, I agree (must be selected to proceed)

Uploaded document(s)

No documents to display.

Environmental Assessment - Project Comments

Submission ID

01f7df8e

Submission Date

28/02/2026 15:48

Submission status

PROCESSED



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Select a Project:

Eigg Mountain Wind Project



Comments:

As a biologist, I studied the moose here beginning in 1968. This project lies right in the middle of last area steadily frequented by mainland moose in the Cape George region. Moose here use Eigg Mountain through to Doctor's Brook Highfield) as territory. I mapped their presence in winter aerial surveys in the 1970's and early 80's as the regional biologist. Moose need aquatic vegetation as part of their diet. Vincents Lake will be surrounded by wind farms and too much human disturbance/activity.

I do not know but he is correct. Their intact habitat will be eliminated. The moose will be displaced, with no suitable alternative habitat nearby. Like Higgin's Mountain in Wentworth, the government will be approve this project anyway.

Name:

Email:

City/Town

Pomquet

Postal Code

B2G 2L4

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

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Yes, I agree (must be selected to proceed)

Uploaded document(s)

No documents to display.

Environmental Assessment - Project Comments

Submission ID

89898d3b

Submission Date

28/02/2026 23:05

Submission status

PROCESSED



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Select a Project:

Eigg Mountain Wind Project



Comments:

Do not destroy the habitat here

Name:

Email:

City/Town

New waterford

Postal Code

B1h 5j3

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

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Yes, I agree (must be selected to proceed)

Uploaded document(s)

No documents to display.

Environmental Assessment - Project Comments

Submission ID

7bb3d849

Submission Date

06/03/2026 09:43

Submission status

PROCESSED



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Select a Project:

Eigg Mountain Wind Project



Comments:

Good Afternoon,

I am writing in the hope that your organization can help bring public awareness to the ongoing and proposed wind turbine developments in the Marshy Hope region and the significant environmental impacts they are having on this area.

Currently, there is an existing wind turbine site on Browns Mountain, another under construction on Weavers Mountain, and a new project proposed for Eigg Mountain. Together, these developments are rapidly transforming what has long been a largely intact forested wilderness into an industrialized landscape. The construction of large-scale wind turbines, access roads, blasting operations, transmission corridors, and year-round maintenance traffic is permanently altering the character of this region.

These projects fragment the land, disrupt established trail systems, restrict public access,

and diminish the safety and enjoyment of recreational users who have relied on this area for decades.

I am also deeply concerned about the impacts on wildlife. The Eigg Mountain area, in particular, provides important habitat and movement corridors for many species, including birds, bats, and larger mammals. This region is also known to support species at risk, and further industrial development threatens to degrade or eliminate critical habitat for endangered and vulnerable wildlife. Large-scale forest clearing, road construction, turbine operation, and increased human activity contribute to habitat fragmentation, increased collision risks, noise disturbance, and the displacement of wildlife. Once this damage is done, it cannot be undone.

These lands are valuable precisely because they remain largely intact. They support biodiversity, outdoor recreation, and the physical and mental well-being of people who depend on access to natural spaces. Placing industrial-scale energy projects in the middle of such an area is incompatible with its long-standing and existing use.

I hope you guys will consider shining a light on what is happening in the Marshy Hope region and the long-term consequences these developments may have for the environment, wildlife, and local communities.

Thank you for your time and consideration. I'd be happy to send you guys some maps and pictures of the affected areas.

I hope to hear back from you.

Thanks,

Name:

Email:

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

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Yes, I agree (must be selected to proceed)

Uploaded document(s)

No documents to display.

Environmental Assessment - Project Comments

Submission ID

c3804f58

Submission Date

06/03/2026 12:56

Submission status

PROCESSED



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Select a Project:

Eigg Mountain Wind Project



Comments:

I strongly object to this project moving forward! We have had a residence in this area for many, many years. During that time we have seen this mountain used for many recreational activities such as biking, hiking and enjoying nature. It is our retreat from the day to day hustle of every day life. Not only that, but we have watched the moose population decrease and virtually disappear. For years, not a single moose was seen. Now, miraculously, this amazing species is making a comeback. We see them on trail cameras and in person. Nature is restoring herself slowly but surely. Then, enter humans, pushing for "green" energy! This project, in no way, prioritizes the environment! Any project willing to sacrifice the habitat and lives of any species, stands in direct conflict with green energy. Obliterating an entire ecosystem so humans can have cheaper electricity is not green, it's greed!!! This project will surely destroy this area and drive out any remaining wildlife, most importantly the moose! Moving forward on this project would only confirm for many, that you do not support green energy! True green energy helps the environment, it does not destroy it! Just because you want to hide the

destruction on a mountain and destroy those that cannot speak for themselves, does not mean that there are no repercussions, nor does it mean that people are unaware of what you are doing. People are watching very closely to see what decision you will come to. Approving this project would stand in direct opposition of what it is you claim to be trying to achieve. I understand you are desperate for windmills, and I understand the need to put them somewhere. But smack in the middle of a recovering moose population is absolutely not the place. This needs to seriously be reconsidered before irreparable damage is done. The fate of this beautiful species as well as numerous others is depending on you making an honest and fair assessment of the impact this project will have on them! It will destroy them and everyone knows it. To approve this project is to sign the extinction of this species in our area. I beg you not to approve this project!

Name:

Email:

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

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☒ **Yes, I agree (must be selected to proceed)**

Uploaded document(s)

No documents to display.

Environmental Assessment - Project Comments

Submission ID

3301d8e6

Submission Date

10/03/2026 23:46

Submission status

PROCESSED



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Select a Project:

Eigg Mountain Wind Project



Comments:

Why take more homes from innocent wild life. Your doing more harm then good.

Name:

Email:

City/Town

Antigonish

Postal Code

B0h 1r0

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

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Yes, I agree (must be selected to proceed)

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No documents to display.

Environmental Assessment - Project Comments

Submission ID

1e35a534

Submission Date

11/03/2026 12:29

Submission status

PROCESSED



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Select a Project:

Eigg Mountain Wind Project



Comments:

I believe it is a big mistake to grant approval for this project , you will be doing a Great injustice to the people this Mountain as a Recreational are for Fishing , Hiking , ATV ,s and Snowmobiling, and especially the wild life habitat that live here on this mountain ,There habitat will be destroyed , take a look at other projects and see all the destruction of the land and ruined habitat ,it will never be the same ,

Name:

Email:

City/Town

Cross Roads Ohio

Postal Code

B2G 2K8

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

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Yes, I agree (must be selected to proceed)

Uploaded document(s)

No documents to display.

Environmental Assessment - Project Comments

Submission ID

0766e2e5

Submission Date

11/03/2026 15:47

Submission status

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Select a Project:

Eigg Mountain Wind Project



Comments:

I work in public works, and its amazing to me that a few years ago we were ready to realign the twin highway from riverside raceway towards antigonish all because of the black ash was on the endangered species act!! Only to find out there was more black ash in the alternative route. At public works we were given a hand out that identified all endangered species, because we didn't do enough to protect them, the mainland moose was on that list. I have personally seen mainland moose in the area that is proposed for this wind project so wtf 🤔

Name:

Email:

City/Town

Antigonish

Postal Code

B2G 0B4

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

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☒

Yes, I agree (must be selected to proceed)

Uploaded document(s)

No documents to display.

Environmental Assessment - Project Comments

Submission ID

37e4a58b

Submission Date

12/03/2026 10:21

Submission status

PROCESSED



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Select a Project:

Eigg Mountain Wind Project



Comments:

Do not destroy the land. There is already a wind farm up that way. so i dont understand why the government thinks they need more and more before you know it there will be nothing left.

Name:

Email:

City/Town

Ardness

Postal Code

B0K 1G0

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

Please note:

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☒ Yes, I agree (must be selected to proceed)

Uploaded document(s)

No documents to display.

Environmental Assessment - Project Comments

Submission ID

719cb447

Submission Date

14/03/2026 23:37

Submission status

PROCESSED



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Select a Project:

Eigg Mountain Wind Project



Comments:

It should be heavily considered by this government that the proposed wind farm site area is in part of and vicinity to the largest contiguous, relatively undisturbed forest in northeastern Nova Scotia, primarily late successional tolerant hardwood forest containing various wetlands. All in which stands as essential habitat for a variety of threatened and endangered species primarily, but not exclusive to the mainland moose (*alces alces americana*) with the approval and development of this area would indicate that this government has zero interest in the recovery or preservation of the moose, initiating irreversible, habitat loss, fragmentation, and additional stress to a culturally significant keystone species within a part of their small remaining designated core habitat.

If the government opts to go through with approval of this project they should be also accepting sole responsibility for all negative effects that will impact the forest and wildlife that inhabit the area.

Name:

Email:

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

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☒

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Uploaded document(s)

No documents to display.

Environmental Assessment - Project Comments

Submission ID

8f169d47

Submission Date

15/03/2026 18:31

Submission status

PROCESSED



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Select a Project:

Eigg Mountain Wind Project



Comments:

how can this be approved with the population of mainland moose

Name:

Email:

City/Town

antigonish

Postal Code

B2G 2L4

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

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Yes, I agree (must be selected to proceed)

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Environmental Assessment - Project Comments

Submission ID

1729623d

Submission Date

16/03/2026 22:19

Submission status

PROCESSED



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Select a Project:

Eigg Mountain Wind Project



Comments:

Name:

Email:

City/Town

Antigonish

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

 [Eigg_Mountain_EA_CLC_Member_Comment_FINAL.pdf](#) 2.36 KB

Remaining No of Files : 9

Please note:

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☒ Yes, I agree (must be selected to proceed)

Uploaded document(s)

Total Documents: 2

- [CLC representation fla.pdf \(/Admin/View-Documents/941013f0-4cc3-435c-867f-dc16b61c6e0e/2756090d-09d2-4c04-9e21-3054a1004abf\)](#)
- [Eigg_Mountain_EA_CLC_Member_Comment_FINAL.pdf \(/Admin/View-Documents/941013f0-4cc3-435c-867f-dc16b61c6e0e/4f622a14-ea67-4a59-93c6-964477afb3b3\)](#)

Subject: Comment Regarding Representation of Community Support – Eigg Mountain Wind Project Environmental Assessment

As a member of the Community Liaison Committee (CLC) for the proposed Eigg Mountain Wind Project, and as someone with no financial gain associated with the project, I am submitting this comment as part of the Environmental Assessment review process.

It has been suggested through project materials and consultation processes that the project has broad community support. However, it is important to note that the CLC includes several individuals with direct relationships to the project, including landowners receiving lease payments and a municipal council member.

While these individuals have every right to participate in the consultation process, their involvement does not necessarily represent the broader views of the community.

Many residents who live, work, and recreate in the Eigg Mountain, James River, and Brierly Brook areas have expressed significant concerns regarding the project. For this reason, statements suggesting that consultation bodies such as the CLC represent general community support should be considered carefully within the Environmental Assessment review.

Sincerely,

Antigonish County, Nova Scotia

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Sincerely,

Antigonish County, Nova Scotia

Environmental Assessment - Project Comments

Submission ID

e794dcc9

Submission Date

16/03/2026 22:23

Submission status

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Select a Project:

Eigg Mountain Wind Project



Comments:

Eigg Mountain Wind Project Environmental Assessment (EA)
Response from the Moose Conservation Association of Nova Scotia
Submitted to Environmental Assessment- Project Comments

After a review of the Environmental Assessment (EA) document for the Eigg Mountain Project, the Moose Conservation Association of Nova Scotia (MCANS), is writing to express the extremely serious, irreversible, negative effects of the project on the resident moose population in the area should it be allowed to proceed. This includes its effects on the government of Nova Scotia's legislated requirement to protect and grow that population under the 2021- Recovery Plan for the Moose in Mainland Nova Scotia. That submission along with all EA's submitted for any area where there are known moose populations should be judged not only on their immediate effects on that current population but their effects on the potentially increased population envisioned in the

Recovery Plan and how it may prevent that recovery and expansion. It is a common sense approach that increased populations will result in elevated use of areas that are currently in use as well as movements into adjacent areas.

MCANS began engaging with the project's CBCL EA Practice Lead for Environmental Services, _____ undertaking the EA on behalf of the proponent, and the project's proponent Renewable Energy Services (RES) Engagement Manager, _____ at the open house information sessions in Maryvale on April 29/2025 and Arisag on April 30/2025. This was followed by numerous phone conversations, in person meetings and emails up to the release of EA on February 18/2026.

On numerous occasions MCANS expressed our concerns about the project's proposed location in the center of an extremely sensitive area with extensive wetlands and stands of old growth forest, both being vital to the survival of resident moose in the area.

In section 3.3.2 Special Interest Group Engagement on page 44 of the EA the following quote reports on some of those communications, "The Proponent, along with CBCL, met with MCANS on November 18, 2025 and exchanged email information during the course of the engagement period. MCANS raised concerns with respect to the loss of Mainland Moose habitat as a result of the Project, namely in proximity to a wetland located in the center of the Project Area. MCANS also requested to be informed of when the EA registration document would be available for review. The Proponent and CBCL provided environmental information on the site as well as outlined the key commitments to siting, such as avoiding watercourses and wetlands to the extent possible, minimizing the AOD for roads and turbine positions, and committing to avoid old growth forests. One turbine of concern for MCANS was an alternate turbine, i.e., a turbine that is not planned to be part of the 22-turbine Project unless major circumstances would remove one of the 22 main turbines."

The EA comments suggest that a representative of CBCL was present at the November 18/2025 meeting which is factually incorrect. That meeting included only two MCANS representatives _____ and _____ and a single RES representative, its Engagement Manager, _____. Further to this it is suggested in the quote from the EA on page 44 that there was "One turbine of concern" to MCANS and it was an alternative. This is also factually incorrect as MCANS contention, at the meeting and in numerous other communications, was that all the turbines and electrical and building structures in proximity to the wetlands and old growth forest stands were serious threats to the resident moose population. This includes a large number of the turbines making up the project. Even in the case of the one turbine mentioned in the quote there is a caveat that that turbine might still be erected. That caveat regarding the "one turbine" is repeated in a number of other places in the EA.

Attached is a diagram from RES reported in the EA, Figure 2.2 titled Turbine Layout and Turbine Siting Constraints, that demonstrates the wetlands and old growth forest at the center of the project, that the multiple turbines encircle. They are recorded in dark blue and red in the diagram. In addition to that in the same diagram the electrical substation shown in purple sits directly between the wetland and old growth forest stand. The importance of wetlands and old growth forest to the health of the resident moose population is referred to repeatedly in the EA.

The EA in Table 10.1 Camera Trap Deployment and Retrieval Dates Total Survey Days and Habitat, reports that 12 different trail cameras were deployed for different durations, with one reported as being set for 205 days. In Table 10.4 Summary of Terrestrial Wildlife Observations Via Camera Traps it is reported that there were a total of 7 moose observations across 12 different cameras. MCANS set 1 trail camera in May of 2025 and recorded 9 observations from that single camera in the approximately 2 month period from May 19th to July 11th of 2025. MCANS lead expert on the area _____ with

over 50 years of experience with the area identified important travel routes and moose usage areas for best camera setting options. The result is a testimony to the experience levels of the membership of MCANS in relation to moose, their movement patterns, and their utilization of varying habitat features. MCANS camera, located in the center of the proposed project, speaks to the use of the wetland area and the importance of maintaining it and its surroundings in their current state. Both those wetlands and their surroundings where the project is planned. In fact parts of the Eigg Mountain- James River Wilderness area are interwoven with the project area.

The EA's ambivalent contention is that the area can support the turbine project despite the towers being in the immediate proximity of the wetlands and old growth stands. That ambivalence is spelled out in numerous parts of the report. In Section 10.3.1 of the EA on page 151 it states, "The rise in Project-related vehicle traffic poses a risk of mortality and injury due to collisions. Additionally, sensory disturbance from light and noise during construction, operation and maintenance, and decommissioning could impact wildlife behaviour." Attached to the EA submission and this communication are the Predicted Sound Level, Sound Pressure Levels and Predicted Shadow Flicker diagrams of the project, with the wetlands and old growth stands in the center of the project turbines and the electrical substation and operation & maintenance building in the same vicinity. The levels of noise and light in the diagrams are considerably higher than human habitation tolerance levels and even more concerning for moose that are more sensitive to and intolerant of this type of activity. The proponent has been careful to ensure the project is a significant distance from human habitation to avoid these noise and light issues but dismissive of their effects on the resident moose population.

In Section 10 - Terrestrial Wildlife, on page 137 of the EA it states, "The Project has the potential to affect terrestrial wildlife through direct pathways, such as increased mortality risk from vehicle or equipment movement during construction, operation and maintenance, and decommissioning phases, and through indirect pathways, including habitat loss, fragmentation, and modification. Wildlife may also exhibit behavioural changes, either short- or long-term through avoidance of habitats subject to disturbance or noise, depending on species-specific tolerance to disturbance." The problem is expanded on in Section 10.3.1.1 Habitat Loss and Fragmentation, on page 153 of the EA it states, "While direct research on the effects of wind-farm clearing and activity on Moose is limited, studies on other large ungulates and on Moose in forestry-cleared areas provide insight into how Project-related habitat loss and fragmentation could influence the local Mainland Moose population. Habitat loss, conversion, degradation, and fragmentation from wind projects are known to present a threat to large terrestrial mammals in Europe (Tolvanen et al., 2023 and Schöll & Nopp-Mayr, 2021). For example, one literature review study found that 67 percent of papers reviewed on large terrestrial mammals reported a displacement". Given the location of important wetlands and old growth forest in the center of the project these effects should be expected to be profound. The proposed development is in an area where they cannot be displaced with any degree of certainty that they would survive that displacement. As page 5 of the EA on the project points out, "As is characteristic of upland ecodistricts, wetlands and lakes are relatively small and few;...". In Section 10.3.1.3 Disruption of Life History, on page 157 states, "During the Project construction period, disturbance levels are expected to be comparable to active forestry operations, but extended over a longer duration (excluding short-term, isolated activities like blasting). Wildlife may exhibit behavioural changes as a result of the Project and seek out alternate habitats outside of the LAA due to sensory disturbance and stress. In the operation and maintenance phase, sporadic increases in lighting, traffic, and human presence may occur, potentially prompting wildlife to avoid or abandon suitable habitats over the longer term. The greatest difference in the disturbance regime in the LAA as a result of the Project may arise from the noise (and possibly vibration) generated by the operating turbines." and, "The Mainland Moose Recovery Plan recognizes stress from renewable energy infrastructure, specifically citing artificial lighting sources and the flicker effect as a potential threat to the Mainland

Moose (NSDNR, 2021)". On page 64 of the EA Table 5.2 points out that there is a potential change in the acoustical environment through all three stages of the project, construction, operation and maintenance, and decommissioning with a change in ambient light over a similar time frame.

In Section 15.3.1.4 Terrestrial Wildlife (Mainland Moose) page 259 the EA states, "Areas of particularly high-quality habitat for moose were avoided wherever possible, such as avoiding mature forest and wetlands. Two proposed turbine locations with observed moose activity and likely in a Moose travel corridor as indicated through survey efforts and engagement with members of the public, A3 and A24 (Figure 1.1, Eigg Mountain Wind Project EA Registration Document 259 Appendix A), are considered alternative turbine locations as a contingency measure, in case one of the intended turbine locations is deemed to be unsuitable for environmental or structural reasons." Obviously surrounding these wetland and mature forest areas with wind turbines could hardly be called avoidance even without the two "contingency" turbines that may or may not be removed from the project. As previously stated MCANS informed RES and CBCL on a number of occasions that there were a significantly larger number of turbines that met the conditions of the two (that may or may not be erected) if the project proceeds.

Given the sensitive nature of the project's turbine placement area and its associated infrastructure and their location in the heart of the heaviest moose utilized localities in the general area, the proposed Eigg Mountain project is in the worst possible place. It would be difficult, if not impossible, to find an area in the province more suited for protected status. As that localized area is interwoven with existing sections of the Eigg Mountain- James River Wilderness area, it is a prime candidate for addition to that protected area, not an area suitable for this development.

In Section 10.3.1.1 Habitat Loss and Fragmentation, on page 153 of the EA it states, "The Project is located in the Pictou/Antigonish/Guysborough Mainland Moose subgroup concentration area, and the area is identified as Core Habitat by the Mainland Moose Recovery Plan (NSDNR, 2021). The Recovery Plan recognizes renewable energy projects and road construction as activities likely to cause adverse effects, including the destruction of important moose habitat, through habitat loss, conversion, degradation, and fragmentation." In Table 15.1 - Screening of Potential Cumulative Environmental Effect, on pages 255-257 of the EA under Degree of Cumulative Effects of all Projects, Undertakings and Activities in a listing of the potential negative effects low, moderate and high Moose are the only one listed as high out of twenty six separate rankings. Along with the existing Glen Dhu wind project approximately one kilometer from the proposed Eigg Mountain project there are 3 more across the Trans Canada highway southwest of Eigg Mountain. One the Weavers Mountain Project in the construction phase, one the Sugar Maple project in the public consultation phase and the third the Yellow Birch in the proposed stage. Adding to the problem, but not discussed in the Eigg Mountain EA, is the failure in the recent twinning of the Trans Canada Highway in the area to add road crossing aids for wildlife, making habitat connectivity in the region an even more serious concern.

While these projects are cumulatively recognized as highly rated threats in the EA, the self standing Eigg Mountain project is of particular importance due to its location in an extremely sensitive area surrounding combined wetlands and old growth forest stands and interwoven with areas already deemed necessary to protect in their inclusion in the Eigg Mountain- James River Wilderness area. It cannot be overstated, or repeated often enough, how important it is that the proposed Eigg Mountain turbine project area be considered for addition to that protected area. The erection of those proposed turbines on Eigg Mountain, will in effect, signal the abandonment of the legislated 2021 Recovery Plan for the Moose in Mainland Nova Scotia.

Name:

Moose Conservation Association Of Nova Scotia

Email:

mcaofns@gmail.com

City/Town

Plymouth, Pictou County, Nova Scotia

Postal Code

B2H 5C5

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

 **Moose1 (1).jpg** 445.81 KB

 **Moose5.jpg** 178.53 KB

 **Moose2.jpg** 325.13 KB

 **Moose4.jpg** 183.37 KB

Remaining No of Files : 6

Please note:

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☒ **Yes, I agree (must be selected to proceed)**

Uploaded document(s)

Total Documents: 4

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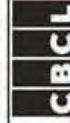
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KEY MAP



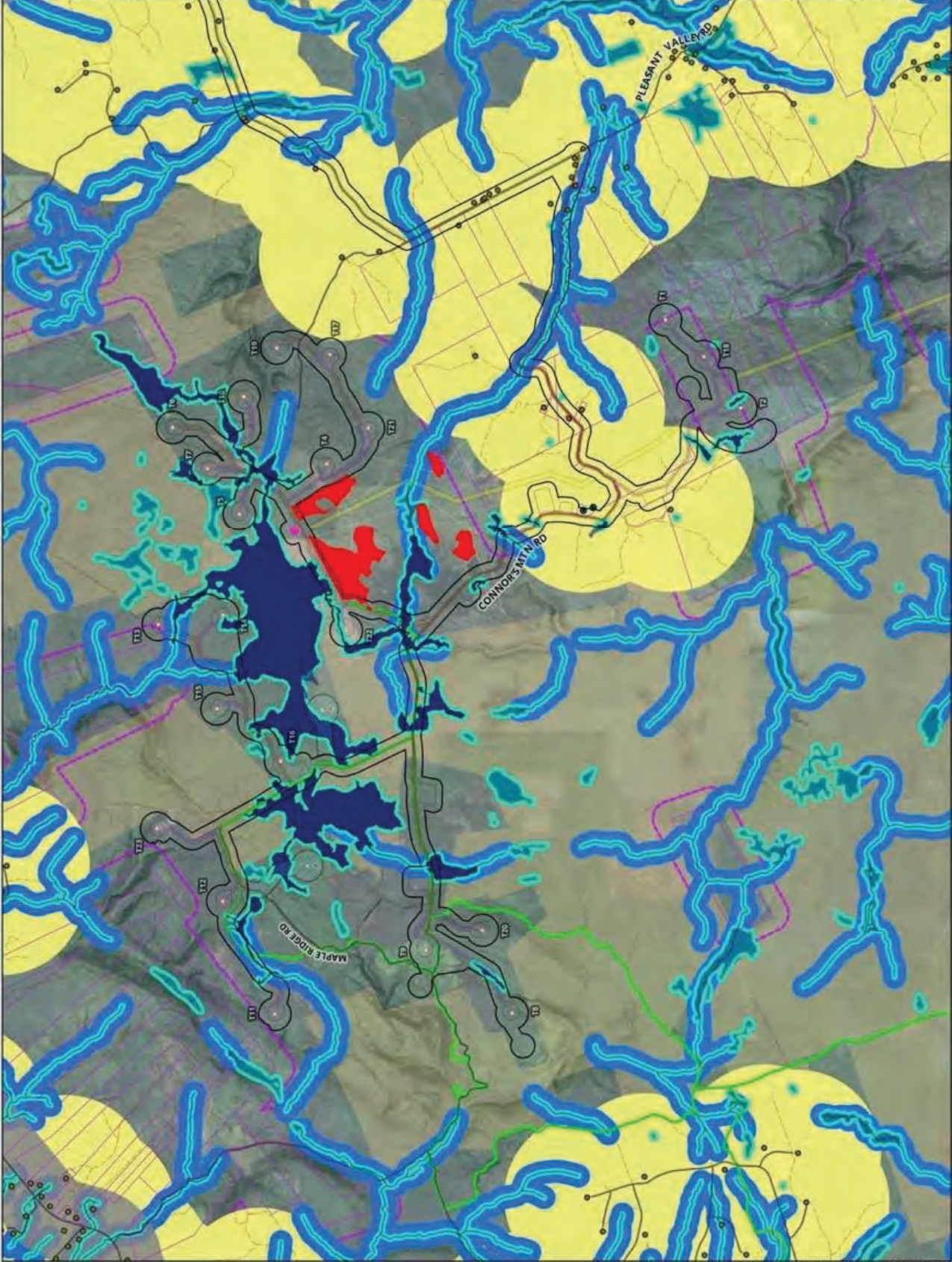
- Turbine Setback Buffers**
- 30m - Provincial Hydrology (Watercourse & Wetland) Setback
 - 111.5m - Municipal Hydrology (Watercourse) Setback
 - 173m - Project-Adjacent Private Property Boundary Setback (Height of Riser + 10m)
 - 399m - Provincial Highway Setback
 - 799m - Civil Address Setback (As Total Turbine Height)
 - 1000m - FM Radio Tower Setback
- Turbine Setback Layers**
- Old Growth Forest Policy (Avoid)
 - Civil Address
 - FM Radio Tower
 - Egg Mountain - James River Wilderness Area
 - Project-Adjacent Private Property
 - Shoreline of Nova Scotia (SANS) Trail Hydrology (NSNS/CBL 2025)
 - Watercourse
 - Wetland (Delimited)
 - Wetland (Provincial Outlets)
- Main Project Area Infrastructure**
- Area of Disturbance (Maximum)
 - Turbine Location (22)
 - Potential Development Area
 - Turbine Location (Alternate) (24)
 - Potential Development Area (Alternate (Turbine))
 - Road - Existing - To Be Improved
 - Road - New Construction
 - Electrical Substation Location
 - Electrical Transmission Infrastructure
 - Transmission Line Area of Disturbance
 - Transmission Line Potential Development Area
 - Addressed Road (NSTD, 2025)
 - Trail / Resource Road / No Maintenance



EIGG MOUNTAIN WIND PROJECT

Turbine Layout and Turbine Siting Constraints

DATE: 27/07/2026	FIGURE: 2.2
DRAWN BY: SF	APPROVED BY: NM
SCALE: 1:25,000 Coordinate System: NAD 1983 UTM Zone 20N 0 400 800 1,600 Feet 0 400 800 1,600 Meters	



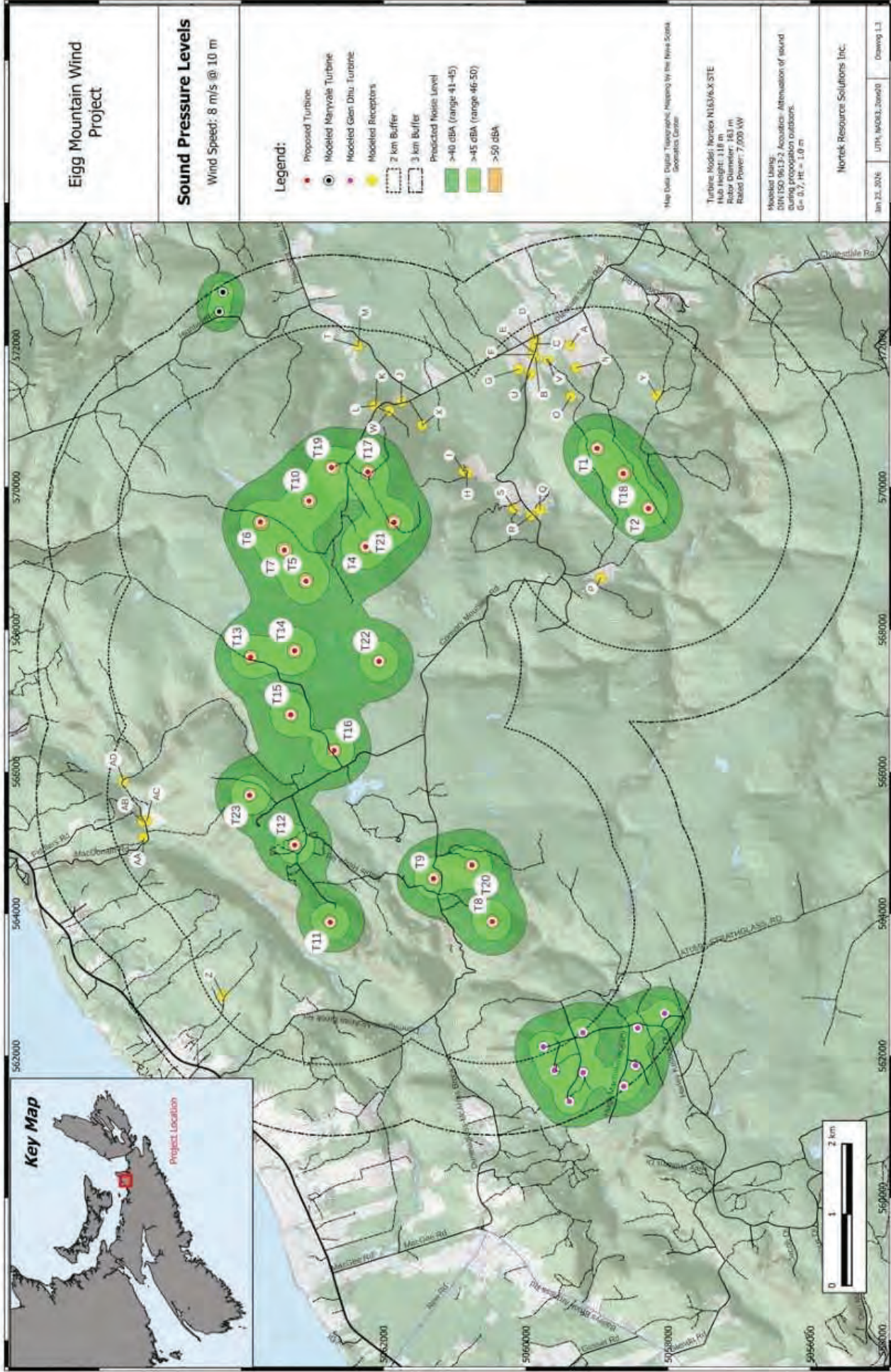


Figure 1: Modeled Sound Pressure Levels for the Proposed Eigg Mountain Wind Farm.

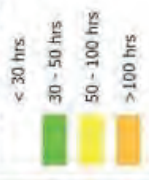


RENEWABLE ENERGY SYSTEMS
5605 Avenue de Gaspé
Suite 508
Montreal, Quebec, H2T2A4
Phone: (514) 525-2113

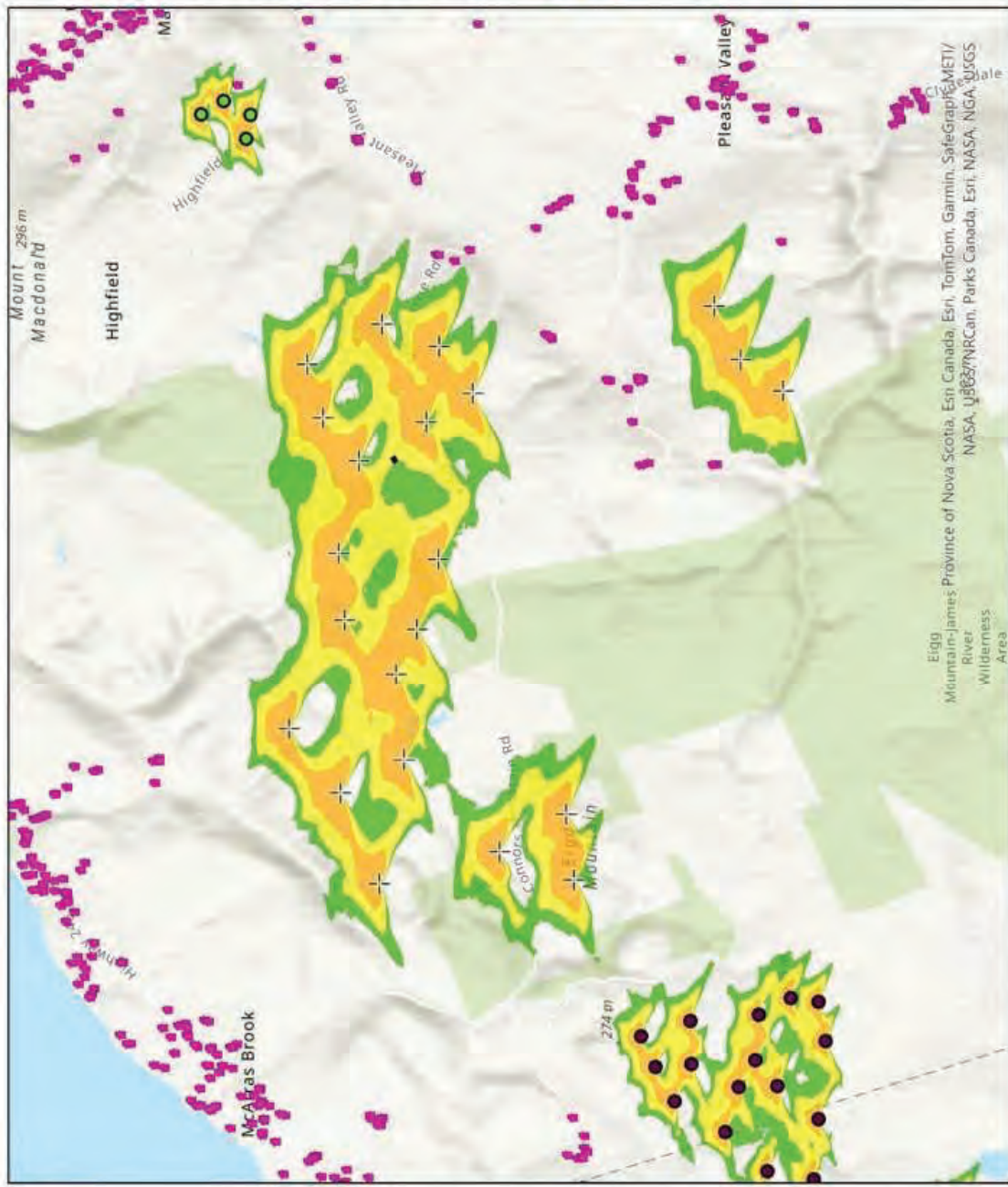
Legend

- Elgg Mountain Turbine Layout
- Potential Receptor
- Substation
- Maryvale Wind Farm
- Glen Dhu Wind Farm

Shadow Flicker - Real Case (Hours per year)



Shadow Flicker modelling was performed using WindPRO 4.0.



Predicted Shadow Flicker

Eigg Mountain Wind



PROJECT # 30777 MAP EDITOR ArcGIS Pro
PROJECT CODE CANatg EDIT DATE 4/16/2025
LAYOUT # 61 WIND ENG JM

COORDSYS NAD 1983 CSRS UTM Zone 20N

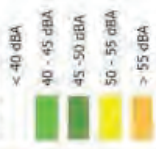


RENEWABLE ENERGY SYSTEMS
5505 Avenue de Gaspé
Suite 508
Montréal, Québec, H2T 2A4
Phone: (514) 525-2113

Legend

- Eigg Mountain Turbine Layout
- Potential Receptor
- Substation
- Maryvale Wind Farm
- Glen Dhu Wind Farm

**Predicted Sound level
(dBA) 22 WTGs - 35 dBA**
**Ambient Sound Level
included**

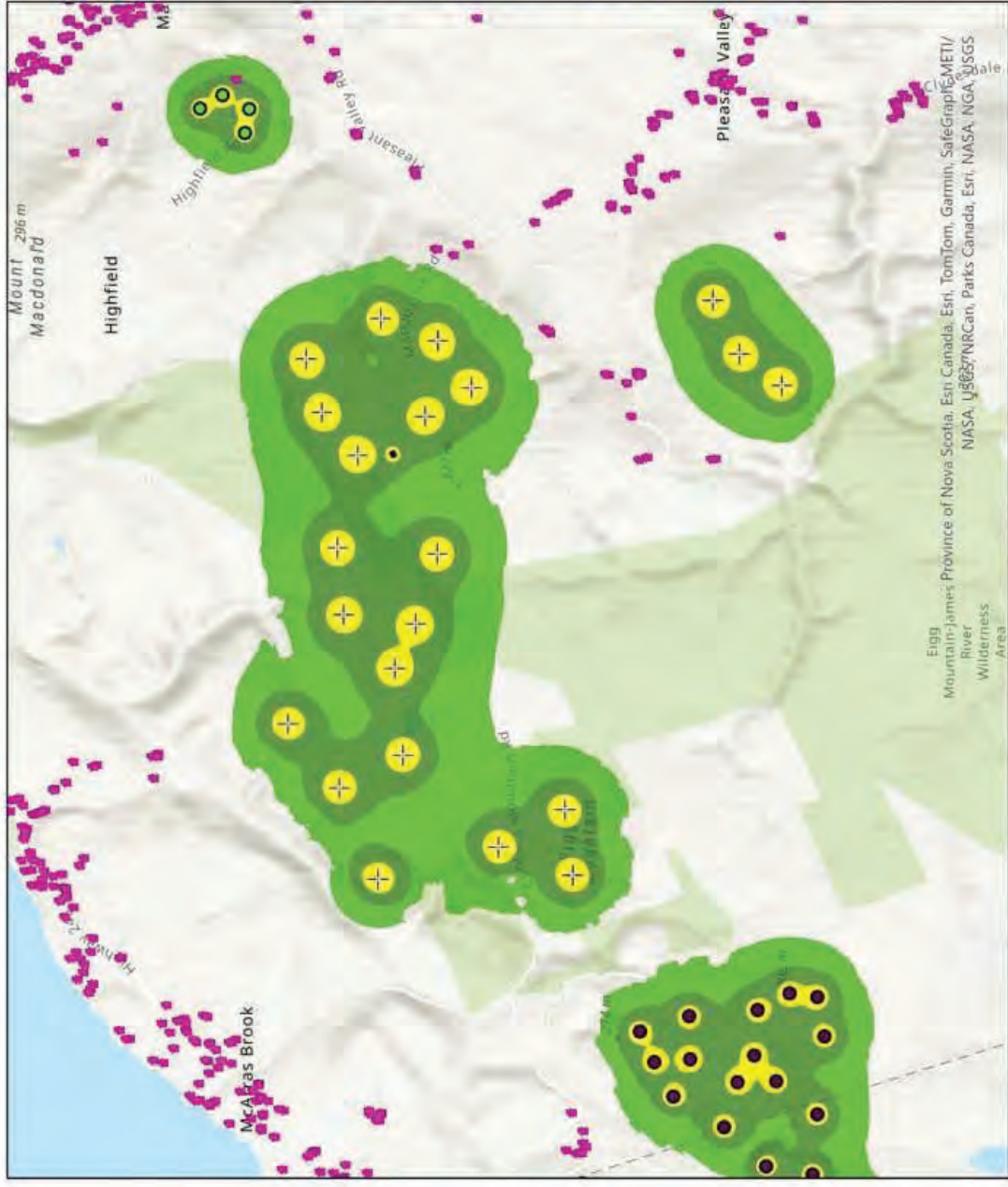


Noise modelling was performed in
Cadna A Version 2020 MR2 and
adheres to the ISO 9613-2 standard



Predicted Sound Level

Eigg Mountain Wind



PROJECT # 30777 **MAP EDITOR** ArcGIS Pro
PROJECT CODE CANalg **EDIT DATE** 4/16/2025
LAYOUT # 61 **WIND ENG** JM

COORDSYS NAD 1983 CSRS UTM Zone 20N

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From:
To: sterling.garvie@antigonishcounty.ca; ada.baden-clay@antigonishcounty.ca;
mary.macLellan@antigonishcounty.ca; Richelle.macLaughlin@antigonishcounty.ca;
Shawn.brophy@antigonishcounty.ca; wayne.melanson@antigonishcounty.ca; John.dunbar@antigonishcounty.ca;
Gary.mattie@antigonishcounty.ca; Harris.mcNamara@antigonishcounty.ca; Michellethompsonmla@gmail.com;
[Sean Cameron](#); jaim.Battiste@parl.gc.ca; [Environment Assessment Web Account](#)
Subject: Fwd: Eigg Mountain Wind Project
Date: March 17, 2026 4:31:50 PM

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----- Forwarded message -----

From: <[\[REDACTED\]@gmail.com](mailto:[REDACTED]@gmail.com)>
Date: Tue, 17 Mar 2026 at 16:11
Subject: Eigg Mountain Wind Project

.brop

I am writing to voice my support of the Eigg Mountain Wind Project

I have been following this project since it was introduced at the Arisaig Community Center in December 2023.

This project will provide considerable renewable green energy to Nova Scotia. Nova Scotia is attempting to become a green energy "superpower" and this is an important part of that. As a country and province we need to reduce our dependence on fossil fuels. Wind turbines have been used in Europe for years and provide clean energy. Our ancestors were prosperous when wind and sail were "king". Let us again become prosperous by embracing wind energy again.

RES has shown care and concern for the residents of Antigonish County and will provide numerous financial benefits for the community from the power generation, including tax revenue, a community benefit fund, education bursaries, education money for H.M. MacDonald School, jobs and spin off . We need all these things in Nova Scotia and in Antigonish County.

This project will be mainly on private land, it is not in the Eigg Mountain Wilderness Area.as some are saying. RES met with landowners on numerous occasions before going over land lease agreements. Landowners were well informed. These leases will provide income to numerous local landowners. Income that will stay here in Antigonish.

RES has a proven track record and experience with wind projects.

This is a winning project for Antigonish and will provide jobs and financial benefits to Antigonish Town and County well into the future. I see no downside..

For these reasons, I fully support this project and look forward to it moving forward.

Regards,

From:

To: nicholas.macinnis@antigonishcounty.ca; sterling.garvie@antigonishcounty.ca; adam.baden-clay@antigonishcounty.ca; mary.maclellan@antigonishcounty.ca; richelle.maclaughlin@antigonishcounty.ca; shawn.brophy@antigonishcounty.ca; wayne.melanson@antigonishcounty.ca; john.dunbar@antigonishcounty.ca; gary.mattie@antigonishcounty.ca; harris.mcnamara@antigonishcounty.ca; michellethompsonmla@gmail.com; sean.cameron@townofantigonish.ca; jaime.battiste@parl.gc.ca; [Environment Assessment Web Account](#)

Subject: Eigg Mountain Wind Project

Date: March 18, 2026 12:16:40 PM

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As a land owner in the Maple Ridge , Eigg Mountain area of Antigonish ,I am writing to add my voice in support of the Eigg Mountain Wind Project. This project not only helps the province meet its renewable green energy goals, but also opens the door to create jobs and income to Antigonish. Also what better way to help wean ourselves off fossil fuels and reduce our carbon footprint.

Clean water , clean air and clean energy are environmental benefits to life- style and prosperity. Other countries are ahead of us, but we have the resources to catch up and this project is one of them.

Another positive is the fact that this development is conducted on private property not Crown Land which stays intact. These are just a few thoughts I have on the project ,and I appreciate the chance to share a few with you , thank you for your time, hoping to hear back .

Regards,

Environmental Assessment - Project Comments

Submission ID

ce1cb472

Submission Date

19/03/2026 17:43

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>).

Select a Project:

Eigg Mountain Wind Project



Comments:

Is the transmission line corridor a part of the EA? It is not on the map.
As available, I would like to learn where the transmission line will be

Name:

Email:

City/Town

Antigonish

Postal Code

B2G 1J5

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

Please note:

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



Yes, I agree (must be selected to proceed)

Uploaded document(s)

No documents to display.

From:
To: [Environment Assessment Web Account](#)
Subject: Eigg Mountain Wind Project
Date: March 22, 2026 11:37:49 AM
Attachments: [Eigg Mountain Trails.docx](#)
[Harbour Authority.docx](#)

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Dear Sir or Madam;

On February 18, 2026 Eigg Mountain Wind Inc. registered the **Eigg Mountain Wind Project** for environmental assessment, in accordance with Part IV of the Environment Act. Accordingly, the public has been invited to send comments on or before March 30, 2026.

I have been asked to forward letters of comment on behalf of the attached organizations and individuals. The organizations and individuals have expressed their opinions as requested.

I would appreciate a confirmation that the attached letters have been received and that all is in order.

If you have any questions or concerns, please contact me immediately by return e-mail or by calling the number below.

Regards,

March 19, 2026

**Environmental Assessment Branch
Nova Scotia Environment & Climate Change
Nova Scotia**

Re: Letter of Support – Eigg Mountain Wind Project, Antigonish C0., NS

To Whom It May Concern,

I am writing to formally express my support for the Eigg Mountain Wind Project, submitted by Eigg Mountain Wind Inc. for Environmental Assessment under Part IV of the Environment Act. As a stakeholder with an interest in Nova Scotia's energy transition, I recognize the importance of responsibly advancing renewable energy infrastructure in the province.

The proposed 154 MW facility, consisting of 22 turbines, represents a meaningful contribution to the province's clean-energy transition. Projects of this scale are essential to improving energy security, reducing greenhouse-gas emissions, and meeting Nova Scotia's legislated climate commitments.

I have reviewed the publicly available Environmental Assessment Registration documents and I am encouraged by the proponent's thorough approach to environmental study, impact mitigation, and community engagement. The project design reflects careful consideration of ecological sensitivities, land use, and long-term operational stewardship.

Beyond its environmental contributions, the Eigg Mountain Wind Project stands to deliver substantial economic and social benefits to the surrounding communities. These include sustained municipal tax revenues, employment opportunities, contracting opportunities for local businesses, and long-term royalty income for landowners. In addition, the Community Benefit Fund will provide at least \$5 million in direct support for local programs and initiatives over the life of the project—funding that will have a meaningful and lasting impact throughout Antigonish County.

Given these environmental, economic, and community benefits, I strongly support the advancement of the Eigg Mountain Wind Project and respectfully encourage Nova Scotia Environment & Climate Change to approve the Environmental Assessment.

Thank you for the opportunity to participate in this process.

Sincerely,

Doctor's Brook, NS

Antigonish, NS

March 18, 2026

TO WHOM IT MAY CONCERN:

I am writing to express my utmost support for the **Eigg Mountain Wind Project** as a major step towards helping Nova Scotia achieve its renewable energy goals.

In addition to reducing greenhouse gas emissions, the project will bring economic benefits to local communities through job creation and regional investment.

I highly encourage decision-makers to move forward with this important project and continue investing in sustainable energy solutions for our province.

March 19, 2026

To Whom It May Concern:

I am writing to to express my sincere support for the Renewable Energy Solutions' (RES) proposal to construct the Eigg Mountain Wind Project in the Highfield area of Antigonish County.

There are many short-term and long-term benefits available to the local communities and local residents. There will be job opportunities throughout construction and some permanent jobs, but the benefits go far beyond employment. The spin-offs will create new economic opportunities and the yearly Community Benefit Fund of \$154,000.00 and the \$10,000.00 to the H.M. MacDonald School will bring a new life to the area.

This Wind project will bring a new and important source of tax revenue to the Municipality of Antigonish. New tax revenues of \$1.4 million annually will benefit every citizen of the Municipality and over the life of the projects represents about \$5 Million in new tax dollars.

As I understand, the energy generated by the Eigg Mountain Wind Project will service approximately 55,000 homes annually. This is an environmentally responsible development that helps our province meet its renewable green energy objectives. RES, the developer, is one of the first companies in the modern world to develop wind farms. They have proven expertise in wind development and we are fortunate to have them working on behalf of Antigonish County residents.

The Eigg Mountain Wind Project wind farm parallels many of our community's objectives. It supports economic growth, it provides a source of funding for community projects and it allows for Nova Scotia to further renewable energy goals.

This is a good project. It is good for the local communities, it is good for the residents of Antigonish County and it is good for the Municipality. I fully support the Eigg Mountain Wind Project and I am proud to know that this development is about to deliver clean energy to our communities.

Sincerely,

Doctor's Brook. NS

March 20, 2026

To Whom IT May Concern;

I am writing about the **Eigg Mountain Wind Project** proposal by Renewable Energy Systems (RES), for the Eigg Mountain area of Antigonish County. I am from the area and familiar with the land making up the wind farm footprint.

As I understand, the **Eigg Mountain Wind Project** will energize approximately 55,000 homes on an annual basis. This wind project along with other provincial wind farms are important to our ecology, our environment and in assisting Nova Scotia meet its renewable green energy objectives.

There are many benefits to be enjoyed by the surrounding communities as well as the Municipality. In addition to permanent long-term employment, the construction phase will provide many opportunities for workers and for companies to supply goods and services. Local men and women are already being employed in the local energy field but more importantly it will open the doors for young professionals to "stay at home" instead of having to "go west." This will help, in a big way, to build a stronger, more resilient community, important reasons the Project should be supported.

There are many benefits with this project. In addition to the environmental benefits, the Municipality will see new tax revenue of about \$1.4 Million per year or about \$50 Million over the life of the project. Revenue will be available to landowners and local business will have an opportunity to sell goods and services during the Project's development, construction and operational stages.

RES is approaching this development as a responsible Corporate stakeholder. They had several Open House events and have been available with industry experts to answer questions. But, equally important, they are giving back. Through the Community Benefit Fund they will donate each year, \$154,000 managed by a committee of community members, municipal representatives and RES. This represents about \$6 Million, over the life of the project. These funds will support community projects. Another important yearly donation is \$10,000.00 for the H.M. MacDonald School and its students. Over the life of the project, it means about \$2 Million dollars.

These are just a few benefits the project will deliver. There are many reasons for this development to succeed. Accordingly, I give it my utmost support.

Doctor's Brook, NS

March 20, 2026

To Whom It May Concern:

Renewable Energy Solutions (RES) has recently filed a wind farm proposal with the Department of Environment to construct the **Eigg Mountain Wind Project** in the Eigg Mountain/Highfield area of Antigonish County. This is a good project and it is the way of the future in terms of energy.

It is expected there will be some minor disruptions to the local environment such as tree clearing and roads, but they will quickly recover. However, there are many benefits to be gained from this development, benefits to the environment, clean energy, reduction in our carbon footprint, local employment and very generous yearly donations to our community and school system.

For the Municipality of Antigonish, as I understand, RES is projecting new tax revenues of \$1.4 Million per year. Over the life of the project, approximately 40 years, this is about \$56 Million dollars that will be for the benefit of all citizens of the Municipality. And, as I understand, the costs related to this tax revenue is much less than that the Fringe area, for example.

This is a good project. It benefits, not just the immediate surrounding area, but all people to varying degrees. Plus, it is an exciting opportunity for our Municipality to contribute to Nova Scotia's transition to renewable energy and sustainability. It supports responsible management of our natural resources now and for future generations.

We believe the **Eigg Mountain Wind Project** is being developed in a responsible manner by one of the world's most reputable wind management firms. It is our future and we welcome it whole-heartedly.

It is for these reasons we fully endorse development of the **Eigg Mountain Wind Project** in the Municipality of Antigonish.

Sincerely,

Doctor's Brook, NS

EIGG MOUNTAIN TRAILS ASSOC.

To Whom It May Concern,

I am writing to offer my full support for Renewable Energy Solutions' (RES) proposal to develop a wind farm within our community. Throughout the consultation process, RES has demonstrated a commendable level of transparency and engagement, taking meaningful steps to listen to residents and address questions through multiple community meetings.

The on-site visits to the proposed tower locations, led by RES representatives, have been particularly valuable. These visits have been instrumental in ensuring that the integrity of our local trail system is preserved, and they clearly reflect RES's respect for the natural beauty and recreational importance of our landscape.

In addition to the environmental benefits, this project is also projected to bring up to \$1.4 million in municipal tax revenue, \$154,000 annually to support local community projects and initiatives, and \$10,000 annually for local elementary school programs and projects.

Furthermore, RES's intention to hire local contractors whenever possible demonstrates a meaningful investment in our region's economic well-being. This approach supports local businesses, strengthens our workforce, and contributes to sustainable community development.

In my view, the proposed wind farm aligns strongly with our community's priorities. It represents an opportunity to advance renewable energy, support economic growth, and uphold responsible environmental stewardship.

Sincerely,

President, Eigg Mountain Trails Association

Harbour Authority of Arisaig

March 14, 2026

To Whom It May Concern;

As President of the Harbour Authority of Arisaig, representing twenty-three fishers, I am writing to express my staunch support for the Eigg Mountain Wind Project in Antigonish County.

The fishing community has long been the backbone of the rural Nova Scotia economy and Arisaig is no exception. Our harbour has been a hub of activity for generations, supporting local fishers and their families. We understand the importance of sustainable practices and the need to adapt to changing times while preserving our traditions and livelihoods.

The Eigg Mountain Wind Project represents an exciting opportunity for our community to participate in Nova Scotia's transition to renewable energy. We believe this project aligns well with our values of sustainability and responsible resource management – principles that are equally important in both the fishing and energy sectors.

We appreciate the efforts made by the Eigg Mountain Wind team to engage with our community and understand our unique perspective as a coastal fishing village. Their commitment to open dialogue and consideration of local interests has been commendable.

The Harbour Authority of Arisaig believes that the Eigg Mountain Wind Project can coexist harmoniously with our traditional industries. We see this as an opportunity to demonstrate how rural communities can embrace innovation while maintaining their cultural heritage.

In conclusion, we fully endorse the Eigg Mountain Wind Project. We look forward to the positive impacts it will bring to our community and the broader region, and we are excited to be part of Nova Scotia's renewable energy future.

Sincerely,

President, Harbour Authority of Arisaig

From:
To: [Environment Assessment Web Account](#)
Subject: Eigg Mountain Wind Project
Date: March 22, 2026 12:17:57 PM
Attachments:

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Dear Sir or Madam;

On February 18, 2026 Eigg Mountain Wind Inc. registered the **Eigg Mountain Wind Project** for environmental assessment, in accordance with Part IV of the Environment Act. Accordingly, the public has been invited to send comments on or before March 30, 2026.

I have been asked by [redacted] to forward his letter of comment to the Environmental Assessment Review panel as well as the councillors of the Municipality of Antigonish. [redacted] is expressing his opinion as requested.

If you have any questions or concerns, please contact me immediately by return e-mail or by calling the number below.

Regards,

March 15, 2026

Warden Nicholas MacInnis
Municipality of Antigonish
Antigonish, NS

Warden MacInnis and Councillors;

I am writing to you and your Municipal representatives to demonstrate my unwavering support for the Eigg Mountain Wind Project.

There are many benefits for our community and the Municipality in new tax revenue. In addition to the environmental benefits, some of the more obvious benefits to the immediate area include the following:

- Local employment during construction and long-term permanent jobs
- Municipal tax revenues of \$1.4 million annually
- Landowner royalty income of approx. \$800,000 annually throughout the life of the Project
- Community Benefit Fund: An annual fund of \$1,000/MW, up to \$154,000, managed by a committee of community members, municipal representatives, and the project owner, to support community projects and initiatives.
- A fund to provide \$10,000 annually for programs or projects for the H.M. MacDonald School and its students, with priority given to underrepresented students or groups to achieve increased accessibility.
- Training and education bursaries (5) for residents of the Municipality who would like to enter training or education programs that would be applied to the construction or operation of a wind energy facility.
- Contract opportunities for local businesses.
- Increased local spending on goods and services during the Project's development, construction, and operational phases.

These benefits will provide meaningful and long-term value to the community. The project will generate stable new revenue, create new economic opportunities and support community activities. New municipal tax revenues, landowner royalty payments and related construction will bring significant dollars to the area. This new economic activity will help strengthen the local economy in a major way. The Community Benefit

Fund is a major event providing communities and its residents with long-term finances to support local projects and initiatives.

There are many reasons to support the Eigg Mountain Wind Project and I mention just a few. This is a project with long-term benefits for the environment, community and Municipality. I absolutely support this project and ask that you and your councillors make every effort to see this important project move to a satisfactory conclusion.

Sincerely,

Cc: Sterling Garvie; Sterling.garvie@antigonishcounty.ca
Adam Baden; Adam.baden-clay@antigonishcounty.ca
Mary MacLellan; Mary.maclellan@antigonishcounty.ca
Richelle MacLaughlin; Richelle.maclaughlin@antigonishcounty.ca
Shawn Brophy; Shawn.Brophy@Antigonishcounty.ca
Wayne Melanson; Wayne.melanson@antigonishcounty.ca
John Dunbar; John.Dunbar@Antigonishcounty.ca
Gary Mattie; Gary.Mattie@Antigonishcounty.ca
Harris MacNamara; Harris.McNamara@Antigonishcounty.ca

From:
To: [Environment Assessment Web Account](#); [McInnis, Mark](#)
Cc:
Subject: Eigg Mountain Public Input Statement
Date: March 22, 2026 1:23:52 PM

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Hi Mr. McInnis,

I wish to submit the attached public input statement for the Eigg Mountain Wind Project EA. I was unable to upload it, as it is a significant document. Are you the EA branch contact for this project? If so, I would like to arrange a meeting.

Thanks very much.



Public Input - EA March 22 2026.pdf

March 22, 2026

Mr. Mark McInnis, Environmental Assessment Officer
Environmental Assessment Branch
Department of Environment and Climate Change
PO Box 442
Halifax, Nova Scotia
B3J 2P8

Re: Eigg Mountain Wind Project – Opportunities for Public Input

Dear Mr. McInnis and Environmental Assessment Branch Officers,

I am writing as a resident of Arisaig and as a member of the Community Liaison Committee for the proposed Eigg Mountain Wind Project. I have been actively engaged in discussions surrounding this development and appreciate the opportunity to provide formal input through the Environmental Assessment (EA) process. I wish to highlight key concerns, present critical evidence, and propose a practical solution that supports the Province's mandate while advancing both climate and biodiversity objectives.

I believe it is important to bring forward several ongoing realities associated with the Eigg Mountain Wind Project. I wish to emphasize my support for Nova Scotia's direction toward renewable energy targets related to climate change mitigation, greenhouse gas reduction, and the expansion of protected areas. These objectives are important, widely supported by Nova Scotians, and must be pursued in compliance with both the *Environment Act* and the *Endangered Species Act*, particularly with respect to the siting of industrial energy developments.

The Pictou–Antigonish–Guysborough region currently has the second-highest concentration of Mainland Moose in the province, making habitat protection in this area essential for species recovery (NSDNR, 2021). Habitat within this region, particularly areas meeting the biophysical requirements for Core Habitat, plays a pivotal role in ecological connectivity for moose (CBCL, as cited in EA, p. 153).

Based on my involvement and review of the procedural process, related communications, and the limited public understanding of wind industry implications, I consider it necessary to raise concerns regarding ongoing issues within the community. There is a clear perception that financial interests may be outweighing environmental science in the decision-making process. Statements within the EA—including those cited in the Eigg Mountain Wind Project Summary and Map—indicating that the project is “well received and strongly supported” appear to be unsubstantiated by quantitative data or research. If such evidence exists, I respectfully request that it be documented and made publicly available.

Furthermore, I request that the Minister decline approval of the project until such time as the proponent can confirm a proposed transmission line. In discussions with RES staff member

Land Acquisition Manager (October 16, 2025), it was indicated that, in the absence of agreements from required property owners, the proponent may rely on Nova Scotia Power's use of the *Expropriation Act* to complete necessary land acquisitions. This raises further concerns regarding the level of genuine public support for the project.

A Proponent's Guide to Environmental Assessment *states that the Branch's administrative duties are to ensure the EA process is open, transparent, accountable, and effective (NSE, 2017).*

I respectfully request that the Department develop, at minimum, a proximity-based conflict-of-interest policy applicable to project designers.

In the present case, local individuals appear to occupy positions of influence over infrastructure siting decisions that may result in significant long-term financial gains or losses affecting nearby family homes and properties. This situation gives rise to a reasonable apprehension of bias.

It is well established that industrial wind energy developments may fragment not only ecological landscapes but also the social fabric of affected communities and neighbouring properties. Of particular concern is the involvement of a local turbine siting engineer associated with the project who maintains a real estate partnership connected to land acquisition within the project area. Such circumstances raise serious concerns regarding fairness, independence, and procedural impartiality.

...the value of individual properties in close proximity to wind turbines can be adversely affected...Those within 2.4 km of a turbine that experienced adverse effects (approximately 11 percent decrease) ... (EA, p. 227)

These considerations may also help explain the scope and configuration of the project's area of disturbance, including its encroachment onto lands central to the identified critical habitat of the Eigg Mountain–James River Wilderness Area, while remaining comparatively distant from lands associated with personal property interests.

Further, prior actions—including the 2012 transfer of approximately 450 acres of municipal land into private ownership by representatives of the Municipality of the County of Antigonish—warrant careful scrutiny. These lands are identified in the EA as previously logged areas contributing to regional forest loss (CBCL, 2026). This history raises legitimate questions as to whether earlier municipal decisions and policies concerning species at risk were effectively circumvented.

In accordance with Section 2 of the *Environment Act*, the purpose of the Act is to support and promote the protection, enhancement, and prudent use of the environment, while recognizing key principles, including:

- (a) maintaining environmental protection as essential to ecosystem integrity, human health, and socio-economic well-being; and
- (b) upholding the principles of sustainable development, including:

- (i) the principle of ecological value, ensuring the maintenance and restoration of essential ecological processes and the preservation of biodiversity; and
- (ii) the precautionary principle, whereby a lack of full scientific certainty shall not be used as a reason to postpone measures to prevent environmental degradation where there are threats of serious or irreversible damage.

Widely Enjoyed but Inadequately Valued: Understanding the Economic, Environmental, and Health Benefits of Canada's Protected and Conserved Areas (Canadian Parks and Wilderness Society - CPAWS, 2026) reports:

...that protected and conserved areas provide important benefits to Canada's economy, environment, and public health. These can be summarized as follows:

Economic Contributions

- *In the 2023-2024 fiscal year Canada's terrestrial and ocean protected and conserved areas provided:*
 - o *\$10.9 billion to Canada's GDP, compared to \$1.8 billion in expenditures by the federal government*
 - o *150,000 jobs*
 - o *\$6.6 billion in labour income*
 - o *\$1.4 billion in tax revenue*
- *From 2008-2024, a 50% increase in expenditures in Canadian park agencies corresponded with a 51% - 250% increase in their contributions to GDP, labour income, and tax revenue.*

Carbon and Ecosystem Service Values

- *Nearly 51,400 gigatonnes of carbon are contained in protected areas: 93% of this is held in soil, 5% in vegetation and 2% in seabed sediment.*
- *Canada's protected and conserved areas hold carbon valued at \$51.1 trillion, based on the 2025 social cost of carbon established by the Canadian federal government.*
- *Ecosystem services provide recurring economic value: Parks Canada estimates this at \$156 to \$588 billion per year for National Parks and National Marine Conservation Areas, which make up only 25% and 13.5% of Canada's terrestrial and ocean protected areas.*

Health and Well-Being

- *A growing body of Canadian research, including a 2023 pan-Canadian survey, shows that protected and conserved areas provide wide-ranging health benefits, and support social and community well-being.*
- *Healthy, well-managed ecosystems are strongly linked to human health benefits and support both public health and conservation outcomes.*
- *Access to protected and conserved areas has the potential to be a cost-effective strategy for advancing Canada's economic, environmental, and public health outcomes.*

Protected areas also contribute to diversifying local economies while improving the quality of life of nearby communities.

As such, **I request that the Minister of Environment and Climate Change order a socio-economic analysis pursuant to Section 37(2) of the *Environment Act* and deem the current EA report deficient, requiring the proponent to provide further information.**

While projected revenues and financial gains are outlined in the EA, there are no quantified assessments of environmental impacts or socio-economic losses. Community members have expressed concerns regarding potential impacts on their way of life, loss of health benefits, access to wilderness recreation, property values, and the ability to develop family lands. Contrary to the statement that such issues were not raised during public engagement for the Project—specifically, that potential effects on property value were “not raised as a concern” (EA, p. 227)—these impacts remain a significant concern for affected residents.

I personally hosted the RES team on February 26, 2025, at my home to discuss the project’s direct implications for my personal, family and business property values. To date, I have received no communication regarding any mitigation process or compensation.

I note the following, as cited in CPAWS (2026):

...mental and physical health benefits associated with access to natural areas are threatened by the loss of biodiversity. The erosion of natural systems is particularly concerning as Canada faces rising public health pressures, such as mental health challenges and chronic disease (PHAC, 2016, 2022), alongside steadily growing health care costs reaching \$372 billion in 2024, accounting for 12.4% of GDP (CIHI, 2024). Together, these pressures underscore how the loss of healthy ecosystems can compound both economic and health vulnerabilities...

The growing uptake of preventative health care programs, such as nature prescriptions, further reflects the recognition that human health, biodiversity, and economic well-being are deeply interconnected (Lemieux et al., 2025).

A cost-benefit analysis is necessary to properly evaluate the broader implications of this project beyond its immediate footprint. The proposed industrialization and land rezoning associated with this undertaking will significantly diminish the ecological value of adjacent Wilderness Area attractions and the health-related benefits that private property owners derive from natural environments, given the substantial area of disturbance overlap.

Notably, significant ecological and socio-economic values are clearly identified, both quantitatively and qualitatively, in the Eigg Mountain–James River Wilderness Area designation documents prepared by Jacques Whitford Limited (2004).

Accordingly, I request that the EA Branch recommend that municipal zoning for industrial wind resource mapping areas reflect the total area of impact and disturbance, rather than being minimized based solely on the far smaller, site-specific locations of infrastructure.

Additionally, I request that the Minister of Environment and Climate Change, pursuant to Sections 2(b)(ii) and 40.1(c), in conjunction with the Minister of Natural Resources and in

accordance with the *Endangered Species Act* (specifically Section 1(h)), reject this undertaking based on the evidence presented.

CBCL highlights the following evidence, as cited in the EA:

~The Project has the potential to affect terrestrial wildlife through direct pathways, such as increased mortality risk from vehicle or equipment movement during construction, operation and maintenance, and decommissioning phases, and through indirect pathways, including habitat loss, fragmentation, and modification. Wildlife may also exhibit behavioural changes, either short- or long-term through avoidance of habitats subject to disturbance or noise, depending on species-specific tolerance to disturbance. (EA, p. 137)

~...the LAA encompasses regions that meet the criteria used to identify core habitat for Mainland Moose in the Recovery Plan. Of the total land area evaluated in the LAA, 33.6 percent meets one or more of the habitat parameters for moose habitat. (EA, p. 146)

~As evident by the observations made during the field programs, Mainland Moose are using habitats in the LAA year-round, though the habitats where moose are present vary seasonally. Signs of Mainland Moose observed included individuals, vocalizations, pellets, beds, tracks, and browse.

Moose tracks and pellets were observed during the winter tracking surveys. Evidence of Mainland Moose was observed during PGI surveys, on trail camera traps, and incidentally during other field programs. Direct observation of Mainland Moose by field personnel was recorded four times over the field survey period from November 2024 to December 2025. The first of these observations occurred May 2, 2025, when a moose was heard walking through the woods, near several piles of fresh scat. The second occurred May 22, 2025, where a calf was heard calling and then a cow moose was observed directly. The third occurred May 29, 2025, when a cow was observed during routine camera trap maintenance. The fourth occurred October 16, 2025, when a bull moose was heard vocalizing in a manner characteristic of the rutting season, the annual moose mating period.

Two winter tracking survey routes recorded observations of moose tracks, with all moose track observations occurring within mature hardwood forest stands. Evidence of moose was observed along five of the seven PGI transect routes. All five routes contained moose pellet groups, and several routes also showed additional signs such as tracks, scraping, browsing, and hair. One route included a direct sighting of a cow moose. Pellet group observations along PGI routes were documented across a range of habitats, including hardwood, mixedwood, softwood, and wetland areas.

Seven observations of Mainland Moose were captured on two of the 13 trail camera trap locations. One of the trail camera trap moose observations was along a road near an entrance to the Eigg Mountain - James River Wilderness Area. The other trail camera trap observation was in a softwood forest stand.

As described in the MEKS, frequent signs of Mainland Moose and Black Bear were observed during the site visits. Evidence of heavy moose browse was observed in upland areas and shrub zones, and evidence of tracks and trampled trails were observed in peat bog wetland areas. Additionally, evidence of North American Beaver (Castor canadensis) was observed. Numerous reports of Mainland Moose direct sightings, pellets, browse, and tracks were submitted by local community members.

As Mainland Moose are a location-sensitive species, the location observations will be provided to NSDNR under separate cover.

In general, the findings indicate that the LAA supports a year-round moose population, with several forested, open, and wetland habitat types providing suitable habitat components for various life stages. (EA, p.148)

~**Direct and indirect effects of the Project** on terrestrial wildlife could occur through several interconnected pathways. During construction, activities like earthworks and vegetation clearing may lead to habitat loss, alteration, and disruptions in movement patterns, as well as changes in food availability. The Project will require approximately 31.8 km of access roads, 18.9 km (60 percent) of which are existing gravel roads, that will require upgrades in sections. New gravel road sections will be needed where turbines branch from the existing roads, and alternate access routes are proposed, resulting in approximately 12.9 km (40 percent) of new linear disturbance. Increased road width and density may fragment habitat and affect wildlife movement. The rise in Project-related vehicle traffic poses a risk of mortality and injury due to collisions. Additionally, sensory disturbance from light and noise during construction, operation and maintenance, and decommissioning could impact wildlife behaviour. (EA, p.151)

~**Project activities may pose increased threats specific to Mainland Moose.** Forest clearing and road construction activities could increase White-tailed Deer access to moose habitat, heightening the risk of disease transmission. Additionally, the updated road infrastructure may facilitate non-Project related human access, potentially attracting individuals engaged in illegal moose poaching. (EA, p. 152)

~The Project is located in the Pictou/Antigonish/Guysborough Mainland Moose subgroup concentration area, and **the area is identified as Core Habitat by the Mainland Moose Recovery Plan (NSDNR, 2021)**. The Recovery Plan recognizes renewable energy projects and road construction as activities **likely to cause adverse effects**, including the destruction of important moose habitat, through habitat loss, conversion, degradation, and fragmentation. (EA, p. 153)

~Fragmentation affects the quality and connectivity of habitat for both individual wildlife and populations. Moose in the LAA could be impacted by both further fragmentation of the forests and vegetation removals in foraging areas resulting from turbine, road construction, and road widening. (EA, p. 154)

~Other non-priority species use habitats in the LAA; the Project construction and operation and maintenance phases may result in habitat loss and fragmentation for non-priority species. Project construction may remove refugia, increase predation risks, and **disrupt ecological balance**. (EA, p. 154)

~While direct research on the effects of wind-farm clearing and activity on Moose is limited, studies on other large ungulates and on Moose in forestry-cleared areas provide insight into how Project-related habitat loss and fragmentation could influence the local Mainland Moose population. Habitat loss, conversion, degradation, and fragmentation from **wind projects are known to present a threat to large terrestrial mammals** in Europe (Tolvanen et al., 2023 and Schöll & Nopp-Mayr, 2021). For example, one literature review study found that 67 percent of papers reviewed on large terrestrial mammals reported a displacement. Of **these studies, they found a consistent displacement of up to 5 km in response to wind farm disturbance** (Tolvanen et al., 2023). The clearing activities of the **Project may result in both short-term and long-term loss of suitable moose habitat in the AOD**. Forest clearing may reduce cover habitat for thermoregulation and shelter... (EA, p. 153)

Cumulative Effects

~The three closest wind power projects to the Project are Maryvale, Glen Dhu, and Fairmont Wind Farm. The distance from the closest turbine in the PDA to the nearest turbine located at Maryvale, positioned northeast of the Project site, is approximately 2.7 km. The distance from the closest turbine in the PDA and the nearest turbine at Glen Dhu (original site), situated to the west of the Project, is an approximate 1.9 km. (EA, p. 252)

*Page 255 Table 15.1

High – Cumulative Effects on the Endangered Mainland Moose, loss on one or more individuals is significant on a declining population.

~The Provincial Recovery Plan for Mainland Moose states that the loss of any breeding individuals from a depressed population is significant (NSDNR, 2021). Therefore, cumulative effects across the area encompassing the Pictou/Antigonish/Guysborough subgroup of Mainland Moose that result in the loss of at least one breeding individual should be deemed as a high effect, before implementation of mitigation strategies. (EA, p. 259)

~These projects, undertakings, and activities have resulted in noticeable changes in Mainland Moose habitat across the RAA. Additionally, although there is little recent evidence available to support this, with the known risks to Mainland Moose resulting from these projects, undertakings, and activities, it is likely that cumulative effects have resulted in the loss of individual(s). Based on available information, and discussions with local community members, cumulative effects on Mainland Moose from projects, undertakings, and activities in **the RAA exceed acceptable ecological and social limits.** (EA, p. 260)

As outlined above, the documented displacement of up to 5 km in response to wind farm disturbance raises a critical question: is the high density of Mainland Moose in the proposed project location the cumulative result of displacement from the pre-existing Maryvale and Glen Dhu wind farms within this radius? This underscores the need for further scientific evidence to ensure that the undertaking complies with legally binding environmental and endangered species legislation.

Given this empirical data, it is necessary that a 5 km wind farm setback be incorporated into critical habitat and protected area legislation without delay. Accordingly, **I request that the Environmental Assessment Branch, in collaboration with the Protected Areas Branch, develop and recommend legislative policy to this effect.**

February 28, 2024 the Alberta Utilities Commission (AUC)'s announced policy and regulatory changes to the rules for renewable energy development stating:

Establishing 35 km buffer zones around protected areas and pristine viewsapes... The intended outcome is to support continued responsible renewable energy development, while ensuring responsible land use, protecting the environment and Albertans' property rights, and providing long-term investor confidence. (retrieved March 20, 2026)

In addition, **I request that the Department recommend a moratorium on wind development within the Pictou–Antigonish Highlands Ecodistrict 330, as warranted by the available evidence.**

As outlined in the Preliminary Assessment of the Eigg Mountain–James River Study Area Report states *the region is recognized as important habitat for Mainland Moose and forms part of one of the three largest remaining concentration areas for the species in mainland Nova Scotia. Research demonstrates that increased road density and large-scale disturbance negatively affect moose populations by reducing thermal cover and increasing human access* (Department of Environment and Labour Protected Areas Branch, 2001).

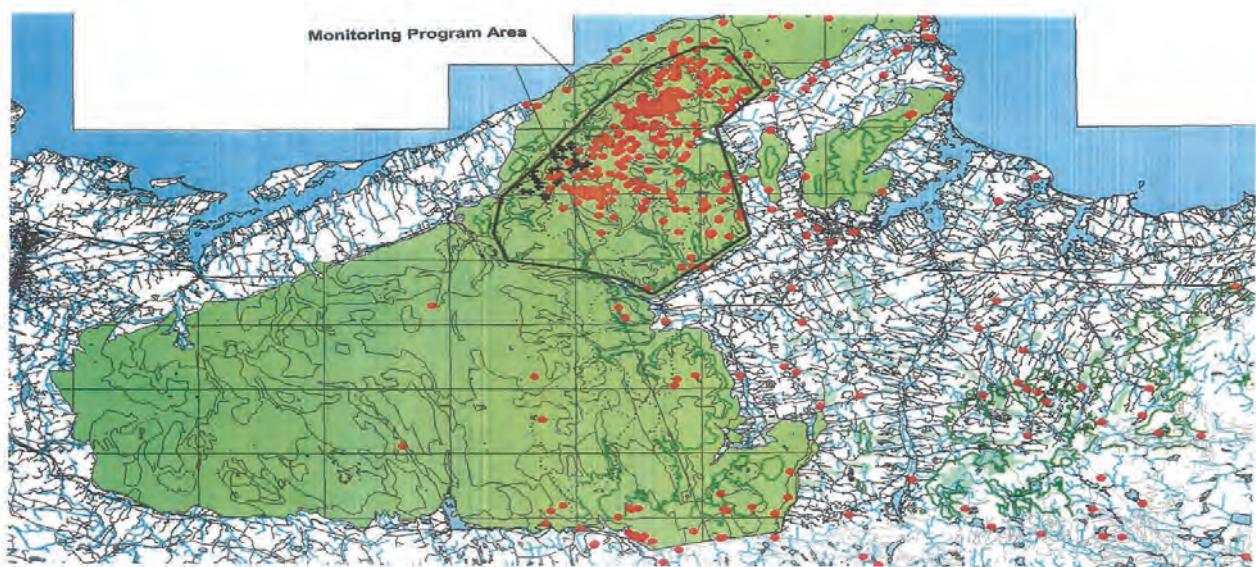


Figure 5.1: Proposed Glen Dhu Mainland Moose Monitoring Survey Area (source: Department of Natural Resources, 2008)

This proposed project overlaps directly with significantly concentrated data presented above in Figure 5.1 Mainland Moose Monitoring Survey Area, raising significant concern as this area serves as core feeding and calving habitat for an endangered population. **The Environmental Assessment Branch is therefore duty-bound to recommend that the proponent provide comparative scientific data, including pre- and post-construction impacts from adjacent developments at Glen Dhu and Maryvale, as this information was omitted from the EA.**

~The Species at Risk record refers to a Mainland Moose polygon overlapping with the northern portion of the Eigg Mountain - James River Wilderness Area 1.4 km north of the PDA. (CBCL as cited in EA, p. 144)

Given the current turbine siting presented in the EA, there is no clear, undisturbed northerly connectivity to the identified critical habitat noted above. As such, further study is warranted, as the EA timeline may not have allowed sufficient opportunity to assess long-established wildlife

movement corridors that conflict with the cluster of turbines labeled T13, T14, T15, T16, TA, as well as the eastern travel corridor intersected by area of disturbance from T6 and T7.

These travel corridors have been documented by provincial DNR staff through aerial surveys and are well known to local outdoor enthusiasts. In addition, it is concerning that the experimental browse sites created to support mainland moose recovery efforts, which are adjacent to and connected with these travel corridors, were not presented as scientific evidence within the EA document. Omitting such critical data from the EA report considerably alters the justification for the siting of the turbines as they are currently proposed.

An obvious mitigation measure would be to relocate these turbines closer to the proposed transmission line on PID 01303858. As this PID is identified as Crown land and is not available for utilization under the Green Choice Program, any resulting ecological impacts, biodiversity loss, and unnecessary expansion of the disturbed area would rest with the Crown and reflect a failure to integrate legislated, responsible environmental resource management.

Furthermore, this raises questions regarding the Crown's approval of the transmission line identified in Appendix A-A (PDF) of the EA, labeled "Transmission Line Options, Figure 2.1," as it intersects the highlighted Significant Ecological Area displayed in "Atlantic Canada Conservation Data Centre: Managed and Biologically Significant Areas, Figure 1.3."

That said, there remains a meaningful opportunity to align provincial climate objectives with biodiversity conservation in a manner that produces measurable benefits for all stakeholders.

Nova Scotia has established clear environmental targets related to climate change mitigation, greenhouse gas reduction, and the protection of wilderness areas. However, siting an industrial-scale energy project within core habitat for multiple endangered species raises serious ecological concerns. The Eigg Mountain area forms part of a broader, interconnected landscape supporting species at risk, including the endangered Bank Swallow, Barn Swallow, Canada Warbler, Chimney Swift, Rusty Blackbird, and Mainland Moose, as well as three vulnerable and two other threatened bird species.

Habitat fragmentation resulting from roads, turbine pads, and transmission corridors introduces edge effects, increases human access, and disrupts wildlife movement. These cumulative impacts must be carefully evaluated, as they undermine long-term species recovery efforts—especially given that the carbon sequestration value of a protected area extends indefinitely, whereas current wind energy technology represents a proposed lifespan of approximately 25 years.

This issue need not be framed as a choice between climate action and environmental protection. With thoughtful planning, transparent, science-based assessment, and meaningful public engagement, a balanced approach is achievable. Alternative siting options that avoid core habitat could allow Nova Scotia to meet renewable energy targets while maintaining ecological integrity and public trust.

A Simple Common-Sense Solution Supporting the Government's Mandate

I respectfully offer the following practical recommendations to the Province:

1. Identify the current project location as unsuitable due to its proximity to protected wilderness areas and multiple species-at-risk core habitats.
2. Evaluate alternative nearby locations, including the large Crown land block in the Greendale area, as more appropriate for development within our community, given:
 - o the lack of adjacency to protected areas;
 - o the absence of identified core habitat;
 - o limited recreational conflicts;
 - o the potential for significantly greater renewable energy generation; and
 - o a broader distribution of economic benefits throughout the municipal district.
3. Initiate private–Crown land exchanges with the currently committed landowners to honour their financial opportunities while supporting both conservation and economic objectives.
4. Provide RES with creditable support to attain renewable energy success.

I also urge the Department to ensure that the EA process fully considers cumulative effects, ecological connectivity, and long-term species recovery that are evidently confirmed within the proposed area of disturbance.

Given that this project is located on the traditional, ancestral, and unceded territory of the Mi'kmaq people, I am concerned that the EA references Mi'kmaq engagement but does not meaningfully incorporate Indigenous knowledge or stewardship practices. Incorporating principles such as Two-Eyed Seeing and Netukulimk would strengthen the integrity of the review process.

Nova Scotians value both climate leadership and the protection of natural heritage. By carefully evaluating this proposal and considering less ecologically sensitive alternatives, the Province has an opportunity to demonstrate balanced, science-based environmental governance without degrading the well-established, socio-economically valued Eigg Mountain–James River Wilderness Area.

my son—

deserves to maintain his birthright to biodiversity. His passion is hunting and trapping. The 5 km biodiversity displacement zone associated with this proposed project, together with the cumulative displacement zones from the Maryvale and Glen Dhu operations, encompasses our entire home range for hunting and trapping.

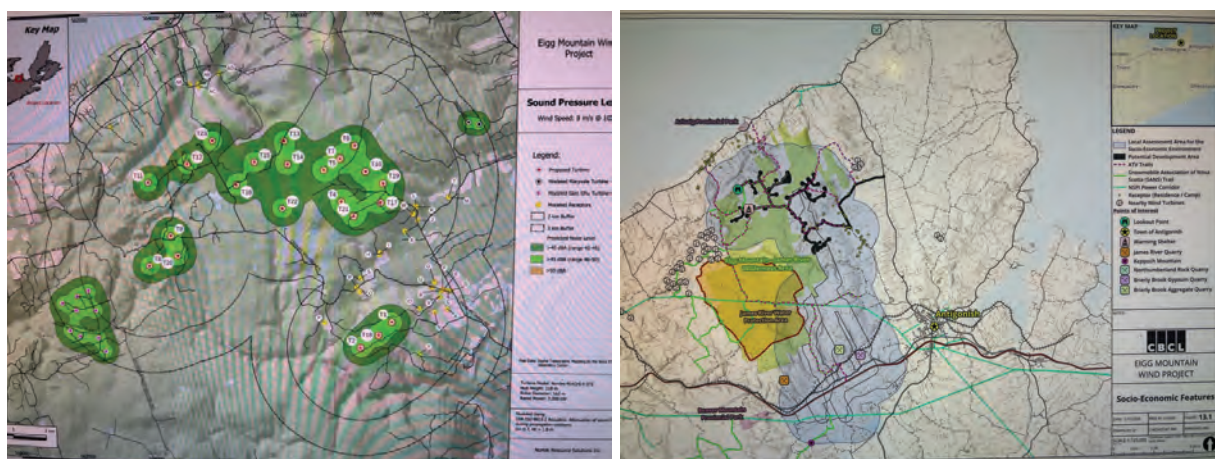
The point is this: would decision-makers remove all the grass from Christine Sinclair's home, or all the ice from Sidney Crosby's and Nathan MacKinnon's homes? at this calibre in his sport and in his active, nature-based way of life.

If so, Premier Houston, please identify a location that is safe and supportive of our quality of life. Proximity to a Wilderness Protected Area should suffice for my son and me, so we can continue our love of and passion for wilderness recreation and its health benefits.

Protecting Wilderness: A Summary of Nova Scotia's Wilderness Areas Protection Act states:

The Wilderness Areas Protection Act's primary objectives are to protect natural processes, biological diversity and outstanding natural features. The secondary objectives are use related. Activities such as wilderness recreation, environmental education and scientific research are encouraged. Sport fishing and traditional patterns of hunting and trapping are also generally permitted. (NSE, 2010)

As shown in the image below (left), at the 3 km mark, the 5 km displacement zone would extend into the Northumberland Strait from our home location. The image on the right displays the socio-economic features, with the area of disturbance clearly overlaid on a significant portion of the Wilderness Protected Area, further demonstrating the cumulative impact on land-based quality of life.



Thank you for your consideration. I look forward to continued engagement in this process. I have included a summary following this letter that highlights pertinent points for decision-makers and additional supporting resources.

Sincerely submitted in good faith,

Environmentally Concerned Parent and Licensed Hunting & Fishing Guide
B.Sc., B.Ed. (Science), M.Ed., Cert. Math, Cert. Outdoor Education

This brief identifies key deficiencies in the EA, outlines material risks supported by the proponent’s own evidence, and provides recommendations aligned with the Province’s statutory obligations under the *Environment Act* and the *Endangered Species Act*

1. Key Issues for Determination

The Minister must determine whether:

1. The EA contains sufficient information to assess environmental and socio-economic effects;
2. The Project is likely to cause significant adverse effects on species at risk, including Mainland Moose and their Core Habitat;
3. The assessment adequately considers cumulative effects and ecological connectivity; and
4. The process meets standards of transparency, fairness, and evidence-based decision-making.

Based on the current record, the answer to each of these questions is **no**.

2. Material Deficiencies in the EA

(a) Absence of Socio-Economic Analysis

The EA outlines projected economic benefits but does not quantify environmental costs or socio-economic losses. This omission is material.

Community concerns regarding property values, land use, and access to wilderness are documented yet dismissed in the EA, including the assertion that property value impacts were “not raised as a concern” (EA, p. 227), which is inconsistent with lived experience and local input.

A cost-benefit analysis is required to meet the intent of the *Environment Act*.

(b) Incomplete Project Description (Transmission Corridor)

Approval is being sought without a confirmed transmission route.

Information provided by the proponent indicates that, in the absence of voluntary agreements, land access may be obtained through the *Expropriation Act*. This introduces additional, unassessed socio-economic impacts and demonstrates that the Project footprint is not fully defined.

(c) Unsupported Claims of Public Support

Statements within the EA that the Project is “well received and strongly supported” are not supported by referenced, quantitative evidence.

Reliance on unverified assertions is inconsistent with the requirement for transparent, evidence-based decision-making.

(d) Procedural Fairness Concerns

The EA process does not appear to include safeguards addressing proximity-based conflicts of interest.

Where individuals involved in siting decisions may benefit financially from those decisions, a reasonable apprehension of bias arises. This undermines confidence in the integrity of the process and warrants policy intervention.

3. Evidence of Significant Adverse Effects

The proponent’s own EA documentation establishes a high risk of significant adverse effects on Mainland Moose and other wildlife.

Key findings include:

- The Project is located within a **Core Habitat concentration area** for Mainland Moose (EA, p. 153);
- The Local Assessment Area supports **year-round moose presence** across multiple habitat types (EA, p. 148);
- The Project will introduce **31.8 km of access roads**, including new linear disturbance (EA, p. 151);
- Anticipated effects include **habitat loss, fragmentation, and disruption of movement patterns** (EA, pp. 151–154);
- Increased access may elevate risks of **poaching and disease transmission** (EA, p. 152);
- Cumulative effects are explicitly rated as **high**, including the potential loss of breeding individuals in a declining population (EA, p. 259).

The Provincial Recovery Plan states that the loss of even a single breeding individual is significant.

4. Cumulative Effects and Displacement

The EA references literature indicating displacement of large mammals by up to **5 km** from wind farm disturbances.

Given the proximity of existing developments (Maryvale and Glen Dhu within ~2–3 km), a critical and unanswered question arises:

Is the current concentration of Mainland Moose within the Project area the result of cumulative displacement from adjacent developments?

This question goes directly to the adequacy of cumulative effects assessment and has not been addressed.

Failure to resolve this issue represents a substantive gap in the EA.

5. Ecological Connectivity and Siting Concerns

The current turbine layout disrupts established wildlife movement corridors, including those documented through provincial aerial surveys.

There is no clear, undisturbed northerly connectivity to identified critical habitat.

Additionally, the EA omits relevant scientific evidence, including experimental browse sites associated with moose recovery efforts. This omission materially affects the validity of the siting rationale.

6. Legislative Context

Under Section 2 of the *Environment Act*, decisions must:

- maintain environmental protection as essential to ecological integrity and socio-economic well-being; and
- apply the **precautionary principle**, particularly where there is risk of serious or irreversible harm.

The *Endangered Species Act* further requires that activities not result in adverse effects on species at risk or their core habitat.

Based on the evidence presented, these thresholds are not met.

7. Recommendations

In light of the above, I respectfully request that the Minister:

1. Deem the EA incomplete and require additional information, including:

- a full socio-economic impact assessment;
- a confirmed transmission corridor; and
- comparative cumulative effects data from nearby wind developments.

2. Withhold approval pending completion of a comprehensive and defensible assessment.

3. Reject the Project pursuant to the *Environment Act* and *Endangered Species Act* due to the high likelihood of significant adverse effects.

4. Direct policy development to address systemic gaps, including:

- minimum **5 km setbacks** from critical habitat and protected areas;
- mandatory cumulative effects analysis using regional data; and
- conflict-of-interest safeguards for project siting.

5. Consider a regional approach, including a moratorium on wind development within the Pictou–Antigonish Highlands Ecodistrict 330 pending further study.

8. Conclusion

This submission does not oppose renewable energy development. Rather, it underscores that such development must occur in a manner consistent with legislated environmental protections.

The evidentiary record demonstrates that the proposed Project:

- is located within critical habitat for an endangered species;
- introduces significant and cumulative ecological risks; and
- has not been supported by a complete or sufficiently rigorous assessment.

In these circumstances, the precautionary principle applies.

Approval of the Project, as currently proposed, would be inconsistent with the Province's statutory obligations.

Johnson, C. J., & Rea, R. V. 2024. Response of moose to forest harvest and management: a literature review. Canadian Journal of Forest Research, 54: 366-388.

<http://dx.doi.org/10.1139/cjfr-2023-0158>

Study	Study area	Road effect	Response of moose	Outcome
Bartzke et al. (2015)	Norway	Movement barrier	Moose avoided crossing of roads and rivers. Roads had a greater barrier effect when compared with rivers and powerlines	Negative
Beazley et al. (2004)	Nova Scotia	Road avoidance	The presence of moose pellets was negatively correlated with road density	Negative
Beyer et al. (2013)	Ontario	Road avoidance	Moose exhibited a nonlinear avoidance response to roads. Moose avoided roads when density reached thresholds of ~0.2 and 0.4 km/km ² in summer and winter. Seasonal movement differences explained crossing rates	Negative
Boer (1990)	New Brunswick	Hunting mortality	92% of moose killed by hunters were within 1 km of a forest road	Negative
Brown et al. (2018a)	Alaska	Road avoidance	Avoidance of roads/trails depended on disturbance. In dense trail areas, moose selected cover; in remote regions they avoided trails but selected forage during hunting. Male habitat selection sensitive to risk	Mixed
Burson et al. (2000)	Alaska	Road avoidance	Increased visitors/traffic in Denali NP had no apparent effect on moose distribution in road corridor	None

Courtois and Beaumont (1999)	Québec	Hunting	Hunting increased in cutblocks, but moose density and urban proximity were as important as road access. Camp hunters did not rely heavily on forestry roads	Mixed
Dickie et al. (2020)	Alberta	Road avoidance	Moose selected riparian features and avoided linear features. Moose moved faster on seismic lines, ice roads, polygonal disturbances, and riparian areas compared to forest	Mixed
Eldegard et al. (2012)	Norway	Road avoidance	Habitat use increased with browse and distance from roads. Moose used smaller roads more than major ones, and roads more at night than day	Negative
Fliflet (2012)	Norway	Movement barrier	Crossing decisions influenced more by time of day (twilight) than ecology. Crossings favored forage, gentle terrain, few buildings, little snow	Mixed
Harris et al. (2014)	Alaska	Trail avoidance	Moose avoided snowmobile trails. After displacement, they occupied similar habitats to pre-disturbance	Negative
Hill (2003)	Manitoba	Transmission line avoidance	Moose used hydro ROW for foraging, bedding, movement. No apparent avoidance in protected park setting	Positive
Hurley et al. (2007)	British Columbia	Vehicle collision	Moose-vehicle collisions in 2 national parks correlated with road design, habitat (conifer forest, wetlands, flat terrain within 100 m)	Negative
Laliberté and	Québec	Vehicle collision	Collisions more likely at high	Negative

St-Laurent (2020)			elevation, flat, high-quality habitat sites	
Laurian et al. (2008)	Québec	Road avoidance, movement barrier	Moose avoided areas ≥ 500 m from roads but 20% visited within 50 m, likely seeking salt. Road crossing frequencies 10–16× lower than expected	Negative
Loosen et al. (2021)	Norway & Sweden	Road avoidance	Browsing increased near secondary roads but decreased near primary roads. Browsing higher in young forests. Wolves altered browsing relative to road type	Negative
Mumma et al. (2019)	British Columbia	Road avoidance	Avoidance of resource roads varied with season and sex. Females avoided high-density roads in some seasons, males in hunting season	Mixed
Neumann et al. (2011)	Sweden	Trail avoidance	Snowmobile/hiker exposure increased movement rates/diurnal activity. Responses short-lived, negligible energetic effect at moderate disturbance	Negative
Neumann et al. (2012)	Sweden	Vehicle collision	Collision risk increased with infrastructure, speed limits. Lower on forestry roads compared to major highways	Negative
Rempel et al. (1997)	Ontario	Hunting mortality	Moose density rose in managed landscapes with habitat enhancement, but hunting access negated benefits	Mixed
Shanley and Pyare (2011)	Alaska	Road avoidance	OHV traffic displaced moose, altered habitat use near roads. Road-effect zone extended 500–1000 m. Threshold ~ 0.25 km vehicle travel/km ² /day	Negative

St-Pierre et al. (2022)	Québec	Road avoidance	Road use highest on 11–20 yr roads, lowest on >30 yr. Less use when cutblocks/low deciduous density surrounded roads	Negative
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Tattersall et al. (2020)	Alberta	Seismic line avoidance	Moose selected seismic lines with taller vegetation. Active restoration did not affect use	Negative
Timmerman n and Gollat (1982)	Ontario	Hunting mortality	Harvest greatest in roaded areas vs. roadless	Negative
Zeller et al. (2018)	Massachusetts	Vehicle collisions, road avoidance	Collisions higher on hightraffic, forested wetland roads. Moose more likely to cross small, low-traffic roads near wetlands and away from agriculture	Negative

From: [@gmail.com](#)>
Date: Tue, Mar 24, 2026 at 8:47 AM
Subject: Fwd: RES, windmill project of Eigg Mountain
To: [@gmail.com](#)>

To Whom It May Concern,

On behalf of the parish council of St. Margaret of Scotland church in Arisaig please accept this letter of support for the Eigg Mountain windmill project. Firstly, it supports the production of green energy with the benefit of providing electricity to our local communities. It may also keep the cost of electricity from increasing.

We have been following this project via community meetings. We have learned of the benefits to our communities such as financial support to our local school, to the Municipality by keeping taxes down, employing members of the community and boost to the economy by consumer spending. While there may not be direct benefit to the parish church there is a possible benefit to our Arisaig and Parish Community Centre which is very active by servicing members of the greater fringe area from town to Hwy 337 and to Pictou County. Many seniors take advantage of their program offerings as do the youth.

I understand members of our community are employed by RES which inherently benefits our community and keeps our youth here.

Chair of Parish Council for St. Margaret of Scotland
Sent from my iPad

Environmental Assessment - Project Comments

Submission ID

47874eb8

Submission Date

26/03/2026 15:35

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>).

Select a Project:

Eigg Mountain Wind Project



Comments:

As a person who camped, hiked, hunted, fished and atv'd through atvans trails for the last 4 decades I do not support the windmill project as it would have a long term effect on the wildlife and environment.

Name:

Email:

City/Town

Pleasant valley

Postal Code

B0N 1C0

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

Please note:

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



Yes, I agree (must be selected to proceed)

Uploaded document(s)

No documents to display.

Environmental Assessment - Project Comments

Submission ID

ab50589c

Submission Date

26/03/2026 21:20

Submission status

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Select a Project:

Eigg Mountain Wind Project



Comments:

I heard about this wind power project in the news today and as a Nova Scotian wish to comment that with a dwindling population of mainland moose in this location - I can understand why the community and activists groups to save this moose population are against it. The news report cited what used to be a population of 5,000 moose is now reduced to a remaining 250 who will be forced out of their natural habitat when this industrial activity moves in. As a Nova Scotian who is still fighting our Department of NSECC over an 'unwanted' industrial activity in my community which is also in 'the wrong location' for such an activity - I am writing to stand with the concerns of my fellow Nova Scotians to protect the mainland moose here in this area of Merigomish. As the news report stated and is the same sentiment my fellow concerned residents of my community have said to NSECC over our community's plight "it is not the activity of aggregate extraction that we are against, we understand that it is needed and necessary to help build/maintain our roadways and for other infrastructure - what we have been and are against is our government putting an unwanted activity like this in a location it is not

suiting for. And just like in Merigomish's opposition - this branch of our government will do what it wishes despite what the people say is best. And despite our Premier saying in November 2025 on the Mabou Beach Golf Course project that his government denied - that his government "listens to Nova Scotians, weighs the pros & cons and in the end, makes their decisions based on what is in the best interests of Nova Scotians. Well, Mr. Premier, the moose population of Merigomish doesn't have a voice so the people have to speak for them. How could you possibly allow this project to go ahead (if the EA is approved and it will be if history repeats itself and it does in this Province, over and over, especially since you've been re-elected) knowing the adverse impacts of their natural environment this project will have on them. I certainly hope that the Minister of DNRR is weighing in on this, yet another environmental travesty - given that their mandate, among other things, is specifically responsible for protecting species at risk, such as the endangered mainland moose, under the Endangered Species Act. I do hope that folks in the Merigomish area are appealing to that Minister to step in here. Just like in my community, this project should never have even been considered for discussion! Do the right thing here Minister Halman, Minister Masland and Premier Houston. STOP turning areas of this great Province into 'Sacrifice Zones' - it's a big enough Province with much 'unpopulated' spaces where these activities won't negatively impact human lives. And in some cases, not even wildlife - especially those at risk! DO THE RIGHT THING, for a refreshing change!

Name:

Email:

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

Please note:

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Uploaded document(s)

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Environmental Assessment - Project Comments

Submission ID

817b9f12

Submission Date

27/03/2026 14:50

Submission status

PROCESSED



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Select a Project:

Eigg Mountain Wind Project



Comments:

My concern is the potential for increased storm water runoff and the timing of that runoff from the water shed that flows into the Wrights River from the development unless steps are taken in the development of the project to prevent this. Flooding along the Wrights in the Town of Antigonish during both Spring ice breakups and increasingly during heavy rain events is a major issue for both residents and businesses, along with access to Saint Marth's Regional Hospital for all residents.

This issue was identified in the "Wright's River Ice Study" that was commissioned by the Town of Antigonish and prepared by _____ & Associates with _____, Department of Civil Engineering Technical University of Nova Scotia, May 1995. "The Study" was provided to _____ of CBCL who I spoke with at one of the information sessions. For a little background I am a former Councillor for the Town of

Antigonish and worked on the issue of flooding along The Wrights River. If you need a copy of the study just contact me.

Name:

Email:

City/Town

Antigonish

Postal Code

B2G 1V5

Attachment(s):

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Environmental Assessment - Project Comments

Submission ID

0b2fbc43

Submission Date

27/03/2026 17:05

Submission status

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Select a Project:

Eigg Mountain Wind Project



Comments:

This looks like a very good project. The workers have been interacting with Council for well over one year. This will be an opportunity to develop alternate energy and the site should not interfere with too many citizens.

The one issue that I have concerns with, and we had addressed this with the representatives of RES Group is to ensure that the roads have proper drainage to control the flow of water. Our Town is susceptible to flooding, and any large source of water entering the Rights River area could have a negative affect on our infrastructure, landowners and citizens. We need to buffer any drainage water that could be generated by the additions of hard surfaces, like the roads, and slow down the flows that will enter into the Right river or any tributaries.

Name:

Mayor Sean Cameron

Email:

mayor@townofantigonish.ca

City/Town

Antigonish

Postal Code

B2G 1W8

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