

## Comment Index

### Fast Acting Natural Gas Power Generating - Marshdale Project, Pictou County

Comment Period End Date: Feb 9, 2026

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**Nova Scotia Mi'kmaq**

Number	Source	Date Received
1	Pictou Landing First Nation	Feb 9, 2026
2	Kwilmu'kw Maw-Klusuaqn (KMK)	Feb 10, 2026

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Number	Source	Date Received
	45 Anonymous Public Comments	Dec 22, 2025 to Feb 6, 2026
	Margaree Environmental Association	Feb 8, 2026
	Canadian Association of Physicians for the Environment	Feb 9, 2026
	Sierra Club of Canada	Feb 9, 2026
	Ecology Action Centre	Feb 9, 2026

Date: December 23, 2025

To: Jeremy Higgins, Environmental Assessment Officer

From: Janet MacKinnon Executive Director Suitability and Applies Science

Subject: Fast acting natural gas power generations facility – Marshdale, Pictou County **Nova Scotia**

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**Scope of review:**

This review focuses on the following mandate: protected areas

**List of Documents Reviewed:**

WAPA

Online Mapping

**Details of Technical Review:**

Upper Stewiacke Wilderness area (pending) 9.5 KM to Southwest  
Drig Broke 5 Km to the South

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

**No comments**

Date: January 13, 2025

To: Jeremy Higgins, Environmental Assessment Officer

From: Environmental Health and Food Safety Branch – Sustainability and Applied Sciences Division

Subject: **Fast Acting Natural Gas Power Generation Facility – Marshdale, Pictou Country, Nova Scotia**

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**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 fast acting natural gas facility with capacity of up to 300 megawatts with combustion turbines and associated infrastructure (i.e., access roads, substation, buildings, etc.) that will provide electricity to the Nova Scotia electrical grid. The Project is located near the communities of Lorne, Hopewell, and Eureka in the Municipality of Pictou County, Nova Scotia.

The focus of this review is to evaluate the potential for the project to adversely affect human health, particularly in relation to impacts to air quality, sound and drinking water wells.

Potential human health impacts have been sufficiently addressed and are deemed to have no negative effect, post mitigation. No additional health concerns lie outside of those included in this assessment.

**Key Considerations:**

As part of this EA predictive modelling was undertaken to estimate project related impacts to air quality and sound.

Emission rate calculation for both air quality and sound are based on preliminary design data and may require updates once detailed engineering is completed.



Fisheries and Oceans  
Canada

Pêches et Océans  
Canada

PO Box 1006, P500  
Dartmouth, NS  
B2Y 4A2

January 19, 2026

*Our file Notre référence*

25-HMAR-00891

Jeremy Higgins  
Environmental Assessment Officer  
Nova Scotia Environment and Climate Change  
1903 Barrington St., Suite 2085  
Halifax, NS  
B3J 2P8

**Subject: DFO comments on the Environmental Assessment Registration Document (EARD) – Marshdale Natural Gas Power Generation Facility**

Dear Jeremy Higgins:

The Fish and Fish Habitat Protection Program (the Program) of Fisheries and Oceans Canada (DFO) received your request to review the Environmental Assessment Registration Document (EARD) for the proposed Marshdale Natural Gas Power Generation Facility in Pictou County, Nova Scotia on December 16, 2025. We understand that the proponent is proposing the following:

- The construction and operation of a natural gas power generation in Marshdale, Nova Scotia, which is one of two potential project locations. The Project will consist of a simple cycle combustion turbine generating station and supporting infrastructure. The purpose of the project is to provide foundational, reliable power to Nova Scotia's electrical system and is a cost-effective path toward grid decarbonization.
- The primary fuel for the combustion turbines is natural gas, supplemented with light fuel as necessary, and will be an up to 300 megawatt power facility.
- The size of the project area is approximately 55 hectares (ha) of private land with a project footprint of approximately 12.55 ha.
- Construction of the project is expected to begin in December 31, 2027, operations commencing in 2029 with a lifespan  $\geq$  30 years.

DFO has reviewed the EARD, select appendices and acknowledges the extensive supporting documentation that was submitted by the proponent as well. Due to the limited time period allocated to DFO for review and the extent of the material submitted, the Department could not conduct an extensive review of the entire submission package.

**Canada**

Unclassified - Non-Classifié

Our review focused on sections of the EARD, appendices and supporting documents most relevant to the conservation and protection of fish and fish habitat. DFO offers the following comments for consideration:

### **General**

- If you are uncertain about whether your project might require an authorization, you can [request for DFO to review](#) your project. We will help you identify and manage risks to fish and fish habitat, and notify you if an application for authorization is required.

### **9.0 Freshwater Aquatic Environment**

- The EARD notes that “DFO review typically occurs through the provincial watercourse alteration application process.” To ensure that project information related to fish and fish habitat is properly received and considered under the *Fisheries Act*, we recommend submitting applications directly to DFO rather than relying solely on the provincial process to forward information. This will help to avoid delays and ensures that federal review requirements are addressed.
- The proponent is encouraged to review DFO’s projects near water website to determine if there are [codes of practice](#) and/or [measures to protect fish and fish habitat](#) that may apply to their project.
- Sediment ponds do not typically capture all sediment, especially silts and clays which require long settling periods to settle out of the water column. Based on the description within the EARD, it is likely that some silts and clays will discharge from the project site into fish habitat. These particles are known to adversely affect salmonid species (Atlantic Salmon and Brook Trout), especially during sensitive life stages.

### **15.0 Accidents and Malfunctions**

- In addition to the mitigations listed in Section 15.0, the proponent is encouraged to consider additional mitigation measures to ensure the proper design, construction and maintenance of retention ponds:
  - Ensure proper design and construction including ensuring the pond is appropriately sized to handle the expected volume of sediment-laden water, use baffles to dissipate inflow energy and prevent the re-suspension of settled sediments, install liners to prevent seepage and protective groundwater;
  - Regularly maintain the settling ponds, including removing accumulated sediments to maintain pond capacity and efficiency and conduct frequent inspections to identify and repair any structural damage or blockages;

Unclassified - Non-Classifié

- Manage the inflow rate to prevent overflow and ensure effective sedimentation controls; and
- Plant vegetation around the pond to stabilize the soil and reduce erosion.

If you have any questions with the content of this letter, please contact Hayley Doyle at our Dartmouth office at (902) 476-8649 or by email at Hayley.Doyle@dfo-mpo.gc.ca. Please refer to the file number referenced above when corresponding with the Program.

Yours sincerely,

Hayley Doyle  
A/Senior Regulatory Review Biologist  
Ecosystems Management  
Fisheries and Oceans Canada

## Agriculture

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Date: January 19, 2026

To: Jeremy Higgins, Environmental Assessment Officer

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

Subject: Marshdale Fast Acting Natural Gas Power Generation Project  
Lorne, Hopewell and Eureka, Pictou County, Nova Scotia

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

There may be agricultural impacts given that:

- Within a 2 km buffer around the project site the lands are 17.4% (832 acres) Class 3 and 37.8% (1,809 acres) and Class 4 soils (Canadian Land Inventory; CLI). Class 3 soils are described as having “moderately severe limitations that restrict the range of crops or require special conservation practices” and Class 4 soils have “severe limitations”.
- Within a 2 km buffer around the project site are 200 acres of long term crops, 367 acres of rotational crops and 42 acres of inactive agriculture.
- There is a registered beef farm located 700 m from the project site and a registered forage farm 1.8 km from the project site.
- There are no agricultural lands located within the project area.

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Date: January 15, 2026

To: Jeremy Higgins, Environmental Assessment Officer

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

Subject: **Marshdale Fast Acting Natural Gas Generation Facility, Pictou County, Nova Scotia**

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**Scope of review:**

This review focuses on the following mandate: Traffic Engineering and Road Safety\_\_\_\_\_

**List of Documents Reviewed:**

*Marshdale Fast Acting Natural Gas Generation Facility Environmental Assessment*

**Details of Technical Review:**

The Proponent has initiated a request for expression of interest in selecting a company to complete the final design, construction and own and operate an up to 300 MW fast acting natural gas power generation facility. Two potential project locations have been selected, one in Marshdale and one in Salt Springs (both Pictou County). The individual EA's provide site and location specific information for each of the locations, but in general, work off the same base document.

The following comments are offered for the Marshdale EA registration document:

1. There are two important items that are not mentioned in the main EA document.
  - a. One is the estimated number or volume of trucks that will be required to support this operation during construction phase and also in the operational phase. A Traffic Management Plan is referenced in the EA and is to be completed with the assistance of provincial and municipal governments. This process must be completed as soon as possible to verify and assess potential truck volume impacts. However, in one of the appendices, there is a Noise Impact Assessment, which has a section on Site Traffic that assumes in their model a volume of 52 trucks per day. The proponent must verify the accuracy of the estimated truck volume.
  - b. The second important item to be identified by the Proponent is the transportation route for the heavy vehicles. The Proponent has referenced the Traffic Management Plan and a requirement for a Special Moves Permit to assist with and identify this. The Proponent will need to reach out to the

Department of Public Works contacts for Special Moves Permits, Darcy MacBain and Devon Pinks as soon as possible to complete the process. The contacts can be reached at [Darcey.MacBain@novascotia.ca](mailto:Darcey.MacBain@novascotia.ca) and [Devon.Pinks@novascotia.ca](mailto:Devon.Pinks@novascotia.ca).

2. In addition to the Special Moves Permit, Table 2.2. Provincial Regulatory Requirements identifies other NSDPW related requirements with respect to: Notification of Blasting, Access Permit/Working Within Highway Right-of-Way (WWHROW), as well as referencing the Nova Scotia Temporary Workplace Traffic Control Manual (NSTWTTCM). These are appropriate and inclusive.
3. The Project Area is identified in Drawing 2.1, Table 3.4 and identifies one new access road required off of White Hill Road. Construction of this access road will require approval through the WWHROW Permit (available from the Area Manager). However, in looking at Drawing 3.5, it indicates a second smaller access road but only one access is identified (from White Hill Road) as being required in the EA document. The Proponent must confirm the number of accesses required when using the WWHROW Permit.
4. When constructing the access road, any temporary workplaces created as a result of this, or as a result of any other project related operations will need to comply with the appropriate section of the NSTWTTCM. Any traffic control plans that are required are the responsibility of the proponent and will need to be reviewed and approved by the Area Manager.
5. There are references to erecting wildlife signage and speed limit signs in Table 17.1. If these signs are to be installed on provincially owned roads, they must be approved by the Area Manager.
6. Notification for any possible blasting via a Blast Management Plan reference in the report must be coordinated with the local Area Office (through the Area Manager) so that all necessary mitigation is done to ensure minimal impact on provincially owned roads.
7. Transportation Related Incidents are referenced in Section 15.5. The mitigation measures referenced to assist with this are comprehensive and inclusive.
8. Table 3.2 references Setback and Separation Distances for various environmental items, but none are noted for the road infrastructure.

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

1. The Proponent must identify the truck volume expected both in construction phase and operation phase. The Proponent must provide a Traffic Management Plan.
2. The Proponent must Request a Special Moves Permit.
3. The Proponent must confirm the number of access roads required for the project.

4. Any temporary workplaces created must comply with the Nova Scotia Temporary Workplace Traffic Control Manual.
5. All signage on provincially owned roads must be approved by the Area Manager.
6. A Blast Management Plan should be coordinated with the Area Manager.
7. The Proponent must identify any required setbacks/separation distances from road infrastructure.



Date: January 21, 2025

To: Jeremy Higgins, Environmental Assessment Officer

From: Climate Change Division – Lori Skaine

Subject: Marshdale Fast Acting Natural Gas Power Generation Facility, Pictou County, Nova Scotia

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**Scope of review:**

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

**List of Documents Reviewed:**

Marshdale Fast Acting Natural Gas Power Generation Facility EA Registration Document

**Details of Technical Review:**

**Adaptation:**

- In Table 7.2, the proponent has described the historical climate (1995 to 2024) using the closest meteorological station with 30 years of data. The proponent also describes how the climate is changing relevant to the location and appropriate to the anticipated operational project life of at least 30 years. The proponent used projected climate changes for the period 2041-2070 relative to the 1971-2000 baseline under CMIP6 (Coupled Model Intercomparison Project Phase 6). Specific climate variables considered were average temperature and total annual precipitation.
- Section 14.1 of the EA registration document provides an appropriate identification of potential climate change impacts on the project (more frequent extreme weather events, extreme heat, flooding, droughts, sea level rise, and wildfires) and associated opportunities for mitigation measures, including developing infrastructure to withstand extreme weather events, staff training on managing heat stress, re-vegetating roadside for increased water absorption and including on-site water storage and firefighting equipment.

**Mitigation:**

- The proponent describes the project as a dual-fuel simple cycle combustion turbine generating station with up to 300 MW capacity, fueled primarily with natural gas. The facility will have the ability to switch to light fuel oil as needed, and light fuel oil is forecasted to be used for less than 20% of annual operating hours.
- The registration document quantifies greenhouse gas (GHG) emissions from construction and operation. Per table 7.12, construction emissions are estimated at 56,152.81 tCO<sub>2</sub>e, which annualizes to 1,871.76 tCO<sub>2</sub>e/year over a 30-year

lifespan. Emissions from mobile equipment use in the construction phase are estimated at 19,934.99 tCO<sub>2</sub>e, while the production and transportation of steel and concrete are estimated at 13,222.07 tCO<sub>2</sub>e and 22,995.75 tCO<sub>2</sub>e, respectively.

- Operational emissions are estimated at 325,594 tCO<sub>2</sub>e/year, based on a 300 MW facility operating at 25% capacity factor (approximately 2,190 hours/year) under the provided fuel splitting assumptions. Over 30 years, operational emissions would total 9.768 Mt CO<sub>2</sub>e (operational emissions only).
- For avoided emissions, the proponent's GHG comparison uses a coal displacement baseline. Table 7.9 applies a coal emissions intensity to the facility's estimated annual generation (657,000,000 kWh/year), yielding 689,981 tCO<sub>2</sub>e/year as the baseline, concluding an annual reduction of approximately 52.8% and 10.931 Mt CO<sub>2</sub>e avoided over 30 years (relative to coal).

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

#### **Adaptation:**

- The proponent may wish to consider the likelihood and impact on project water needs over the lifetime of the project should there be a co-occurrence of drought and extreme heat.
- It is stated that the "Stormwater management systems will be designed to manage predicted volumes for the next 50 years." The proponent may wish to consider extreme precipitation events, as well as average predicted volumes, in developing Stormwater Management and Erosion and Sedimentation Control Plans. Climate change adjusted IDF curves are available from [climatedata.ca](http://climatedata.ca)

#### **Mitigation:**

- The construction steps listed (reducing idling, planning efficient routes, using local labor/materials where possible, and proper equipment maintenance) are good practice, but they will likely only make a small difference compared with the GHG emissions from operating the facility.
- Nova Scotia may need electricity that can be turned on quickly for peak winter demand and storm reliability. However, the project's overall GHG impact will depend a lot on:
  - how many hours the facility runs each year,
  - what fuel it uses (natural gas or light fuel oil), and
  - what other sources of electricity it replaces at the times it runs.
- Because the electricity system will change over time, the energy sources that this facility replaces will likely vary. We suggest the proponent:
  - clearly explain the expected operating profile, including specific rules for when the unit would turn on (for example, what specific system conditions would trigger operation), and
  - present avoided emissions as a range based on clear comparison scenarios, rather than using a single coal-only comparison.
- In addition to general construction measures, we suggest the proponent set out practical options to reduce operating emissions over time, including clear triggers or conditions for using lower-carbon fuels (for example, hydrogen blending,

renewable natural gas, or other possible lower-carbon substitutes) as supply chains and technical readiness improve.

- If annual emissions exceed 50,000 tCO<sub>2</sub>e/year, the facility would be a regulated facility under Nova Scotia's *Environment Act* and would need to register under Nova Scotia's Output-Based Pricing System (OBPS). The proponent should review:
  - Part XIB of the *Environment Act*;
  - the *OBPS Registration and Opt-in Regulations*;
  - the *OBPS Reporting and Compliance Regulations*; and
  - the OBPS Reporting and Compliance Standard.

For additional information, inquiries may be directed to [nsobps@novascotia.ca](mailto:nsobps@novascotia.ca).

- The Climate Change Division has provided substantively similar comments across comparable dispatchable generation EA registrations advancing in parallel, to keep mitigation review and expectations consistent.

Date: January 21, 2025  
To: Jeremy Higgins, Environmental Assessment Officer  
From: Beth Lewis, Director of Special Places Protection  
Subject: **Marshdale, Pictou County\_Fast Acting Natrual Gas Power Generation Facility**

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**Scope of review:**

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

**List of Documents Reviewed:**

Final Report for HRP A2025NS174 - Hopewell Project, Screening & Reconnaissance, Archaeological Resource Impact Assessment 2025.  
Report Approval Letter for HRP A2025NS174.

**Details of Technical Review (Archaeology):**

Three (3) archaeological features were identified and included two stone-lined cellars (feature 1 & feature 2), and a stone-lined well (feature 3), which have all been recorded as HPA-01. No other areas of moderate to high archaeological potential, significant archaeological features or cultural materials were identified.

It was recommended that HPA-01 be avoided, and a 30 m protection buffer be placed around it. If avoidance of this area or any part thereof was not feasible than a program of subsurface testing would be required. The remainder of the proposed development area was ascribed low potential for encountering protected archaeological resources.

It is indicated in the EA Document that the area of elevated archaeological potential, HPA-01, will be avoided with a 30 m buffer. This is in line with the recommendations from the HRP Report. So long as the report recommendations are adhered to, we have no concerns at this time.

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

we have no archaeological concerns with the EA document. The ARIA work by the consultant, including conclusions and recommendations detailed in the archaeology report, are reflected in the EA document. These conclusions and recommendations were approved by CCTH

**Details of Technical Review (Geology):**

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

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

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

Date: January 21, 2026

To: Jeremy Higgins, Environmental Assessment Officer

From: Department of Natural Resources and Department of Energy

Subject: **Fast Acting Natural Gas Power Generation Facility – Marshdale, Pictou Country, Nova Scotia**

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**Scope of review:**

This review focuses on the following mandate: Authorities and approvals required from the Land Services Branch, geoscience health and safety, mineral exploration, mineral development, abandoned mine openings, biodiversity, species at risk status and recovery, wildlife species and habitat management and conservation.

**List of Documents Reviewed:**

**Land Services Branch:**

- Environmental Assessment Registration Document, including Initial Project Description Plain Language Summary
- Appendices A to K
- Drawings 2.1 to 16.1
- GIS shapefiles

**Geoscience and Mines Branch:**

- Fast Acting Natural Gas Power Generation Facility Environmental Assessment Registration
- Map ME 2005-119: Geological Map of the Hopewell Area
- Geoscience Atlas
- Mineral Occurrence Database
- Abandoned Mine Openings Database
- NovaROC

**Wildlife Division:**

- Fast Acting Natural Gas Power Generation Facility – Marshdale (IAAC Project Title: Marshdale Natural Gas Power Generation Facility)
- Reviewed all wildlife and habitat layer in the IRM scans based on existing provincial GIS layers
- Consulted with the local IRM Biologist about this project

**Details of Technical Review:****Land Services Branch:**

Based on the information provided, the Project is located on privately owned land and the Project does not include or adjoin Crown lands. The private land parcel identification number (PID) cited in the EA Registration Documents (PID 00910307) appears to be incorrect - the correct PID number appears to be 65245375. No authorities or approvals are required from the Land Services Branch for the Project unless the scope of the Project changes to include Crown lands.

Based on the information provided, it is understood that other ancillary components required for the Project's operation, including a natural gas pipeline interconnection and a high-voltage transmission line, have been excluded from this EARD and will be assessed under separate approval processes. Authorities or approvals may be required from the Land Services Branch for any activity on Crown lands required for the project's ancillary infrastructure.

**Geoscience and Mines Branch:**

A preliminary review of the Fast Acting Natural Gas Power Generation Facility in Marshdale submitted by IESO Nova Scotia has been completed. The review notes that the geological characterization of the proposed site is appropriate. The Project Area is underlain by undivided Carboniferous mudrock and sandstone of the Mabou Group. The Proponent addresses the low potential for ARD and medium potential for encountering karst conditions and will address any geohazards that may be present once the geotechnical investigation is concluded. Proponent does not anticipate that blasting will be required and has erosion and sediment control plans in place as well as geotechnical investigations.

**Mineral Occurrences**

The proposed project area is ranked high for mineral potential associated with the prospective Cobequid-Chedabucto Fault Zone (CCFZ) and historical iron mining with the prospect of Iron ore-copper-gold deposits (IOCG) as well as local base metal occurrences and high aggregate potential with established aggregate quarries within 5 km of the Project Area. The Project Area does not currently overlap with any exploration licences or mining leases as of the effective date of this review, with the nearest licences within 100 m east of the Project Area. The proposed development is not anticipated to negatively affect exploration and mineral development activities.

**Wildlife Division:**

Strum Consulting assessed habitat and wildlife surveys across the site. This includes stream and wetland delineation, plant inventories, trail camera work, bird point counts,

and site surveys. This work seems adequate to evaluate the impact of this project on habitat, flora, and fauna on site.

The mitigation strategies suggested in the Strum's Environmental assessment for noise, dust, and lighting control on site, and for re-vegetating the site with native species post-construction appear sufficient to mitigate risk.

### **Birds**

Canada warbler (CAWA; federal: threatened, provincial: endangered) and eastern wood pewee (EAWP; Federal: species of concern, provincial: vulnerable) nests exist in the proposed project footprint. Under section 13(c) of the *Nova Scotia Endangered Species Act* it is illegal to destroy, disturb, or interfere with or attempt to destroy, disturb, or interfere with the specific dwelling place or area occupied or habitually occupied by one or more individuals or populations of an endangered or threatened species, including the nest, nest shelter, hibernaculum, or den of an endangered or threatened species. Avoidance of those wetlands and nests is the preferred course of action. Where avoidance is not possible, mitigations to remove the risk of destroying nests which is a prohibition under the NSESA and minimize other impacts to SAR will be required. The proponent should consult with DNR on proposed actions.

Presence of SAR birds in these wetlands may also trigger Wetlands of Special Significance under the Provincial Wetland Conservation Policy. The proponent should consult with Department of Environment and Climate Change if avoidance of these wetlands is not possible.

The EARD also suggests that groundwater extraction during project operations can impact surface water features by lowering the water table and reducing natural discharge of groundwater into nearby wetlands. The extent of indirect impacts to SAR bird wetland habitat are not clear; a hydrological field study is planned during the permitting stage.

Under the *Migratory Birds Convention Act*, the pileated woodpecker nest will need to be protected by placing a no-disturbance zone around the nest until at least January 2027 (18 months after discovery) to ensure the nest is not active. All nest locations and no-disturbance zones should be flagged prior to starting work, and workers informed about the zones. The proponent should consult with ECCC for further guidance (see also [Damage or Danger Permits for Nest Destruction: Pileated Woodpecker nesting cavities - Canada.ca](#)).

Measures to protect and mitigate against adverse effects to migratory birds during all Project phases should be applied. The incidental take of migratory birds, as well as their nests and/or eggs, is not permitted under the *Migratory Birds Convention Act* and *the NS Wildlife Act*. Mitigations include avoidance of certain activities (such as vegetation clearing/construction) during the regional nesting period for most birds, buffer zones around discovered nests, limiting activities during the breeding season around active nests, restricting lighting use at night during seasonal migration periods, and other best management practices.

## **Black Ash**

Four black ash trees were identified in one location on the project site. The recovery plan states that a 200 m no-disturbance zone should be maintained around all Black Ash individuals to minimize impact and support recovery. The direct project footprint is outside the 200m buffer, but the buffer does overlap with the proposed powerline. Mitigations should be developed to ensure impact of the powerline on Black Ash is avoided (by moving the powerline). To assess risk to Black Ash and develop mitigations, directed Black Ash surveys are required to ensure that there are no other black ash trees on site.

Indirect impacts to Black Ash wetland habitat during project operations from lowering of the water table should be assessed, and mitigations developed to maintain wetland hydrology.

## **Bats**

There are ACCDC records of bats and bat habitat within 5 km of the site. The proponent's bat habitat models for the project site suggest ample bat foraging and maternity roosting habitat on site. To assess risk and inform mitigations, bat monitoring is required to identify any bat foraging and roosting habitat.

## **Turtles**

No turtle sign was observed on the site during surveys, and suitable turtle habitat was not observed. However, Wood Turtle (endangered) has been observed within 1km of the project area and Snapping Turtle and Painted Turtle within 5km of the project area. The proponent should ensure a process is in place to respond to any turtle observations on site, which should include ceasing work until the turtle has moved on.

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

### **Land Services Branch:**

No further comments.

### **Geoscience and Mines Branch:**

No further comments.

### **Energy Branch:**

No comments.

### **Wildlife Branch:**

- Obtain all permits necessary to undertake the project as required under legislation related to wildlife, species at risk, watercourses and wildlife habitat alterations, including the Provincial Wetlands Conservation Policy and *Migratory Birds Act*.
- Provide digital way points and/or shapefiles for all flora and fauna surveys and incidental observations, including for all observations of Species at Risk and Species of Conservation Concern to NSNR (those species listed and/or assessed as at risk under the *Species at Risk Act*, *Endangered Species Act*, COSEWIC, as well as all S1, S2 and S3 species). Data should adhere to the format prescribed in

the NS DNR Template for Species Submissions for EAs and is to be provided within two months of collection.

- Wetlands with evidence of breeding SAR birds and Black Ash should be avoided. If avoidance is not possible, consult with ECC on compensation requirements under the Provincial Wetlands Conservation Policy and consult with DNR with regards to mitigations.
- Apply measures to protect and mitigate against adverse effects to migratory birds during all Project phases. The incidental take of migratory birds, as well as their nests and/or eggs, is not permitted under the *Migratory Birds Convention Act* and the *NS Wildlife Act*. Mitigations include avoidance of certain activities (such as vegetation clearing/construction) during the regional nesting period for most birds, buffer zones around discovered nests, limiting activities during the breeding season around active nests, restricting lighting use at night during seasonal migration periods, and other best management practices.
- Impact of lowering water table during project operations on wetland habitat should be assessed, and mitigations developed to maintain wetland hydrology and avoid SAR habitat degradation.
- To assess risk and inform mitigations, conduct directed Black Ash surveys to determine presence/absence across the project area.
- To assess risk and inform mitigations, bat monitoring is required to identify any bat foraging and roosting habitat within the project area.

(EA#25-13)

**DATE:** January 21, 2026  
**TO:** Jeremy Higgins, Environmental Assessment Officer  
**FROM:** Dawn M. Sutherland, Provincial Director of Planning  
**SUBJECT:** **MARSHDALE - FAST ACTING NATURAL GAS POWER GENERATION FACILITY, PICTOU COUNTY, NS**

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**Scope of Review:**

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

**Document(s) Reviewed:**

EARD-IPD Fast Acting Natural Gas Power Generation Facility - Marshdale

**Details of Technical Review:**

In Section 2.3.3 of the above-noted EA document, the Proponent indicates that Municipal Planning Strategies and Land Use By-laws in the Municipality of Pictou County of (MOPC) require approval and/or permits for industrial projects (Table 2.3). The Project is in the Rural General zone (G1) which permits industrial use subject to the approval of a development permit (Municipality of Pictou County, 2025a, 2025b). Individual Project components may also be subject to provisions under the *Municipal Government Act* and require amendments to the MPS/LUB.

The Proponent has engaged with staff and elected officials in MOPC and the Town of Stellarton via email and in person on multiple occasions, including a presentation to the entire Council of MOPC. The December 8, 2025, planned presentation to the Council of the Town of Stellarton was rescheduled to 2026. It is proposed that engagement with government officials will continue throughout the development, including construction and operational phases of the Project.

*Statements of Provincial Interest:*

- **Drinking Water:** Reasonably consistent. The Town of Stellarton Municipal Water Supply Area partially overlaps the Project area. This water supply area is not a designated Protected Water Supply Area. The MOPC Municipal Planning Strategy has included this water supply area and states that it has a goal of protecting it. The Town of Stellarton uses a multi-stage Water Contingency Plan based on water levels in the East River. These are meant to conserve water enroute to the municipal supply system. The Stellarton Source Water Protection rules do not specifically apply to groundwater withdrawal, which is managed through a permitting process administered by NSECC if daily withdrawal rates exceed 23,000 L/day. The Proponent will continue to engage with MOPC and the Town of Stellarton and will implement all watershed protection stipulations contained in the Municipal Development Agreement.
- **Agricultural Land:** No anticipated impact, as no agricultural land has been identified in the Project area.
- **Flood Risk:** No anticipated impact, as no flood areas have been identified in the Project area.
- **Infrastructure:** No anticipated impact. No identified impact on municipal infrastructure as defined by the SPI. The Project will use onsite water and wastewater systems.
- **Housing:** No anticipated impact. No identified impact on housing as defined by the SPI.

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

There are no outstanding information and/or conditions. All components considered under DMA's areas of mandate have been adequately addressed.

Date: January 21, 2026

To: Jeremy Higgins, Environmental Assessment Officer

From: Air Quality Unit

Subject: **Fast Acting Natural Gas Power Generation Facility – Marshdale, Pictou County, Nova Scotia**

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**Scope of review:**

This review focuses on the following mandate: Air Quality

**List of Documents Reviewed:**

- *Fast Acting Natural Gas Power Generation Facility – Marshdale EA Registration*
- *Appendix A-G*
- *Drawings 2.1 – 7.5*

**Details of Technical Review:**

The purpose of the proposed undertaking is to construct and operate a fast-acting natural gas facility with capacity of up to 300 megawatts with combustion turbines and associated infrastructure (i.e., access roads, substation, buildings, etc.) that will provide electricity to the Nova Scotia electrical grid. The Project is scheduled to begin construction in 2027 and is expected to be operational for at least 30 years.

Construction phase activities will primarily interact with the atmospheric environment through fugitive dust and exhaust emissions. The Project area is vegetated, which may help to reduce the travel distance of fugitive dust emissions from the Project. Given that the closest receptor is 833 m from the Project footprint, it is not anticipated that the fugitive dust and exhaust emissions would impact nearby receptors or impact baseline air quality conditions beyond the local assessment area. Overall, fugitive dust and exhaust emissions are considered intermittent, short-term, and should only impact the Project area.

The Proponent used the United States Environmental Protection Agency (US EPA) AERMOD air dispersion modelling software to model predicted ground-level concentrations of contaminants expected to be released from the Project during the operational phase, which include carbon monoxide (CO), nitrogen oxides (NO<sub>x</sub>), and fine particulate matter (PM<sub>2.5</sub>). The Proponent used ambient air quality data from the Pictou (NO<sub>x</sub> and PM<sub>2.5</sub>) and Halifax (CO) National Air Pollution Surveillance (NAPS) stations for baseline ambient concentrations.

The facility will use natural gas and ultralow sulphur diesel (ULSD) as primary and secondary fuel sources, therefore SO<sub>2</sub> emissions are expected to be negligible and not

modelled. Given the fuel types, all particulate emissions are expected to be PM<sub>2.5</sub>. The model assumes NO<sub>x</sub> emissions will be converted to NO<sub>2</sub> based on background ozone (O<sub>3</sub>) concentrations measured at the Pictou NAPS station. The modelled area is 10 km x 10 km grid (local assessment area) centered on the Project facility and modelling was performed in accordance with the Nova Scotia Environment and Climate Change (NSECC) Air Assessment Guidance Document (AAGD).

The model compared the Project's predicted impact to air quality with the limits in Schedule A of the Nova Scotia Air Quality Regulations (for NO<sub>2</sub>, CO, and total suspended particulate (TSP)) and the Canadian Council of Ministers of the Environment (CCME) Canadian Ambient Air Quality Standards (CAAQS) for PM<sub>2.5</sub> in the absence of a provincial PM<sub>2.5</sub> standard. Modelling results predict the cumulative impact (facility emissions plus background concentrations) to be well below the limits in Schedule A and the CAAQS for PM<sub>2.5</sub>. Of the modelled parameters, the 1-hour NO<sub>2</sub> had the highest fraction of the Schedule A limits (predicted to be 23.0% of the limit) and the 24-hour and annual PM<sub>2.5</sub> were 46.3% and 59.1% of the CAAQS, respectively. When compared with the TSP limit in Schedule A, the 24-hour and annual PM<sub>2.5</sub> was 10.4% and 7.4% respectively. The CO 1-hour and 8-hour was modelled to be 1.0% and 2.3% of the limits in Schedule A, respectively.

It is noted that modelling was performed under worst-case conditions with the facility operating continuously on light fuel oil. Emission rates are based on preliminary design data and may require updates as the Project details are further refined. Overall, facility emissions are considered low magnitude with respect to Schedule A and CAAQS and within the local assessment area.

The applicant commits to developing an air quality management plan prior to Project commissioning. The applicant also commits to measuring pre-operation on-site ambient baseline air quality conditions.

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

The Air Quality Unit notes the following key considerations:

- The use of dust management methods, along with best operational practices would minimize air quality impacts.
- It is unclear how dust will be mitigated and managed without an effective Dust Management Plan, including clear chains of responsibility for actions, including timely complaint resolution.
- Modelling should be updated if facility design/operation were to change.

Date: January 21, 2026

To: Jeremy Higgins, Environmental Assessment Officer

From: Air Quality Unit

Subject: **Fast Acting Natural Gas Power Generation Facility – Marshdale, Pictou County, Nova Scotia**

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**Scope of review:**

This review focuses on the following mandate: \_\_\_\_\_ Noise \_\_\_\_\_

**List of Documents Reviewed:**

- *Fast Acting Natural Gas Power Generation Facility – Marshdale EA Registration*
- *Appendix A – G*
- *Drawings 2.1 – 7.5*

**Details of Technical Review:**

The purpose of the proposed undertaking is to construct and operate a fast-acting natural gas facility with capacity of up to 300 megawatts with combustion turbines and associated infrastructure (i.e., access roads, substation, buildings, etc.) that will provide electricity to the Nova Scotia electrical grid. The Project is scheduled to begin construction in 2027 and is expected to be operational for at least 30 years.

The EARD presents expected noise levels produced by various equipment to be used during the construction phase, and attenuated sound levels at various distances from the source. Construction noise was identified as potentially having an impact on residents based on the data presented in Tables 7.16 and 7.17. The closest receptor is 833 m from the Project, Table 7.17 shows the potential for median and max noise levels at 960 m from the source to be 56 and 76 dBA, respectively. It is noted that the data from Tables 7.16 and 7.17 is considered worst-case, and actual noise levels during constructions may be less than predicted. The applicant suggested mitigations to minimise these effects, including limiting activities to the daytime (7am to 9pm), using noise suppressants on vehicles/equipment, and limiting idling.

Operational noise was assessed using the CadnaA noise modelling software. No baseline noise monitoring was conducted, instead the Proponent used a surrogate of 35 dBA during daytime, 30 dBA in the evening, and 25 dBA for nighttime (citing Health Canada's *Guidance for Evaluating Human Health Impacts in Environmental Assessment*). Modelling was performed with all stationary equipment operating simultaneously and with maximum hourly traffic at the site. The Proponent used a ground attenuation factor of 0.7 in the model, which is a less conservative approach than would be recommended, which may lead to an underestimation of impacts on receptors.

The modelling results predict the daytime and evening noise levels from the Project would be well below the permissible sound levels (PSLs) in the Department's Guideline for Environmental Noise Measurement and Assessment (GENMA). The modelling showed that one receptor could experience a nighttime noise level of 40 dBA, while another 39 dBA. If the background noise level at night is higher than the 25 dBA used in the model, there is potential for an exceedance of the nighttime PSLs in GENMA at these receptor locations. The noise contour plot (Drawing 7.5) shows several receptors in the 35-40 dBA band for which noise impacts were not assessed. It is unclear what the noise impact could be at these receptors, and if there is potential for exceedances.

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

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

The Air Quality Unit notes the following key considerations:

- If the baseline noise level exceeds 25 dBA (nighttime), it is possible that cumulative noise levels could exceed the 40 dBA nighttime PSL at receptor locations once the facility is operational. Recording baseline noise levels prior to construction can be used as evidence by the proponent in the event that the Department requests monitoring as part of complaints investigations in the future if they were to occur.
- The noise assessment was completed using a less conservative ground attenuation factor than would be recommended. Consequently, the noise impact at a number of receptors may be underestimated.
- It is unclear the noise impact at several receptors within the study area that were not included in the model.

Date: January 14, 2026

To: Jeremy Higgins, Environmental Assessment Officer

From: Air Quality Unit

Subject: **Fast Acting Natural Gas Power Generation Facility – Marshdale, Pictou Country, Nova Scotia**

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**Scope of review:**

This review focuses on the following mandate: Petroleum and Alternative Fuels

**List of Documents Reviewed:**

- EARD-IPD Fast Acting Natural Gas Power Generation Facility – Marshdale
- Drawing# 3.5

**Details of Technical Review:**

The purpose of the proposed undertaking (the Project) is to construct, own, and operate an up to 300 megawatt fast acting natural gas power generation facility located near the community of Marshdale in the Municipality of Pictou County (MOPC), Nova Scotia. The Project will consist of a simple cycle combustion turbine generating station, fueled primarily with natural gas and the ability to switch to light fuel oil (diesel) as necessary, and supporting infrastructure including petroleum storage tank systems.

Section 2.3.2 – Regulatory Framework, Provincial

The Registration document includes Table 2.2: Provincial Regulatory Requirements, which list the regulatory requirements that may apply to the project. Table 2.2 does not include the Nova Scotia Petroleum Management Regulations which could apply to the installation and operation of the petroleum storage tank systems for light fuel oil (diesel). However, it is noted that sections 6.2.7 and 8.5.4.2 of the Registration document state that the design of the fuel storage will comply with the Petroleum Management Storage Site Licensing requirements/Regulations.

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

The Air Quality Unit notes the following key considerations:

- The Petroleum Management Regulations could apply to the light fuel oil (diesel) storage tanks installed as part of the Project but were not acknowledged in the EARD.
- These regulations should be incorporated as needed in the design and operation of the proposed natural gas power generation facility.

Date: January 21, 2026

To: Jeremy Higgins, Environmental Assessment Officer

From: Water Resources Management Branch

Subject: **Fast Acting Natural Gas Power Generation Facility – Marshdale, Pictou Country, Nova Scotia**

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**Scope of review:**

This review focuses on the following mandate: Surface water quantity and quality, groundwater quantity and quality, and wetlands.

**List of Documents Reviewed:**

Environmental Assessment Registration Document (EARD), Appendices, Drawings and Shapefiles

**Details of Technical Review:**

**Surface Water**

The project site is located within the Pictou River primary watershed (technically, the “East/Middle/West Pictou River watershed” (1DP)), and more specifically the West River Pictou secondary watershed (1DP-3), and one tertiary watershed (1DP-3-D). Four headwater streams (WC1 – WC4) are located within the project area, of which two are ephemeral and the other two are intermittent.

The proponent delineated watercourses through desktop reviews and field assessments. They reviewed several databases, including Wet Areas Mapping (WAM) for the Project Area. Drawing 9.2 illustrates the predicted water features (e.g., watercourses, wetland, water accumulation and flow among identified features) in and near the project site by the WAM, which were used to guide the field investigations. Field assessments were carried out alongside wetland delineations between July 2–3, 2025. The outcomes of those investigations are presented in Drawing 9.3. The findings do not include all WAM-identified water accumulation and water flow, which may be related to the unusually dry conditions present during the fieldwork. As a result, the findings may not identify all existing water resources and may not properly reflect actual site conditions needed to assess potential impacts to water resources and support planning mitigation measures.

The proponent states that facility operations, including a demineralization plant for process water, potable water services and the fire water system, will use more than 23,000 litres of water per day. This amount of water use requires a water withdrawal approval in accordance with the Nova Scotia Environment Act and Activities Designation Regulations.

Water will be supplied by groundwater wells. The proponent expects that groundwater pumping will lower the water table, reducing groundwater baseflow to nearby surface watercourses and wetlands, described as “baseflow reduction”, and thus reducing the overall streamflow. Baseflow reduction to an unnamed tributary to Cameron Brook and Cameron Brook is estimated at 135–314 m<sup>3</sup>/day. Although the EARD indicates that depletion will vary with well placement and the number of wells, and may be significantly lower than projected, an assessment of the long-term impact on these watercourses over the project life was not provided. This assessment is essential to inform surface water quantity monitoring and the development of appropriate mitigation measures.

The proponent plans to add treated wastewater and stormwater from a shared settling pond into WC4 to help offset baseflow loss. Proposed monitoring of WC4’s streamflow and water quality will guide the design of the settling pond and its discharge point. Additional monitoring will be needed to confirm whether this discharge can offset baseflow loss. A full site hydrology study was not completed for the EA and should be completed, as part of the industrial approval application, to inform WC4’s streamflow and water quality, design of stormwater management systems (including settling pond), and erosion and sediment control systems. It should consider site size, grading, water management on and off site, wastewater production, and stormwater flows arising from heavy rain and climate change impacts over the facility’s lifespan.

The EARD notes that wastewater quality and quantity are unknown at this time because they will depend on the technologies chosen for wastewater treatment. Wastewater from production is expected to have about three times more dissolved substances (such as salts and hardness) than ambient groundwater. It may also contain spent chemicals or biocides from treatment processes. The EARD indicates that the site is in areas with medium to high risk for manganese, low risk for uranium, and medium risk for arsenic in bedrock wells. However, baseline groundwater quality was not assessed in the EA. This assessment should be completed to inform influent water quality in support of wastewater treatment design.

The proponent commits to ensuring that stormwater runoff and wastewater discharge from the site meets Canadian Council of Ministers of the Environment Freshwater Aquatic Life guidelines and Nova Scotia Tier I Environmental Quality Standards. As the Project is located within the Town of Stellarton Municipal Water Supply Area, wastewater and stormwater may require more stringent effluent quality to ensure the protection of local water resources.

To reduce the risk of surface water contamination, the proponent plans to use measures such as:

- Grading to direct surface water away from sensitive areas
- Diversion and collection ditches
- Roadside drainage channels and vegetated swales
- A settling pond
- Erosion and sedimentation control
- Designated storage areas for fuel and chemicals with secondary containment and impermeable surfaces
- Spill-prevention features and emergency response plans

- Routine inspections and on-site spill kits
- Maintaining machinery and avoiding work within 30 metres of streams

The proponent also plans to install a septic system and may need a sanitary wastewater treatment plant, depending on the final design. All proposed sanitary systems must be supported by an application to the department and meet appropriate design requirements. The hydrology study and settling pond design should account for discharges from these systems, if applicable.

The air quality management plan includes washing vehicles and equipment to reduce dust. The timing and amount of water used for this should also be considered in the settling pond design to mitigate impacts to water quality.

The proponent identified several risks to surface water quality. To mitigate these risks, they plan to develop the following during permitting:

- Surface Water Monitoring and Management Plan
- Stormwater Management Plan
- Erosion and Sedimentation Control Plan
- Site-Specific Contingency Plan
- Blast Management Plan (if required).

These plans should be coordinated for maximum effectiveness. Baseline surface water monitoring should help identify contaminants of concern and guide water and wastewater treatment designs. The Environmental Emergency Response Plan should align with these water-related plans.

Finally, the proponent plans to plow, sand, and salt roads in winter. They should follow the Code of Practice for the Environmental Management of Road Salt during these operations to minimize chloride impacts to water resources.

## Groundwater

The Project requires a significant and sustainable water supply, which is expected to be supplied by groundwater wells installed in or near the Project Area. The estimated peak raw water consumption is 175 m<sup>3</sup>/hr., and the average annual consumption is 23 to 31 m<sup>3</sup>/hr. Based on estimated average water demand and predicted well yields, the Project is expected to require 14-19 wells supplemented by onsite water storage. The EARD indicates that water recycling and alternate technologies will be considered to reduce overall water needs.

According to the EARD, potential impacts on groundwater may occur because of drawdown and potential interaction with nearby water wells, watercourses, and wetlands. The EARD identified one water supply well within 800 m of the Project Area, based on a desktop review. The EARD suggests mitigation and monitoring measures to reduce potential impacts, including pumping groundwater at sustainable yields, maintaining adequate spacing to minimize groundwater interference, implementing groundwater level and water quality monitoring and reporting, and developing a Water Conservation Plan

and Complaint Resolution Plan. Groundwater may also be affected by construction activities, primarily blasting, if blasting is required during construction.

Diesel fuel will be stored on site, which can impact groundwater quality in the event of a spill or accidental release. According to the EARD, the risk to groundwater associated with the use and storage of diesel fuel is considered low, given that all diesel will be stored in double-walled above ground tanks equipped with secondary containment, fuel handling areas will be located on impermeable pads with controlled drainage, and a Spill Prevention and Response Plan will be implemented.

According to the EARD, no sulphide-bearing formations were identified within the Project Area; however, this will be confirmed through a geotechnical investigation.

### **Wetlands**

The EARD identified eight wetlands within the Project Area, two of which are classified as Wetlands of Special Significance (WSS). The proponent has proposed direct alteration of wetlands (Wetlands 3, 4, and 5) as a result of construction activities. This also includes one WSS (WL4), designated due to the presence of Canada Warbler, a species listed as Endangered under the *Nova Scotia Species at Risk Act* and Threatened under *Canada's Species at Risk Act*. In total, approximately 1.7 ha of wetland is proposed to be directly altered, including 16,635 m<sup>2</sup> of Wetland 4, a large, treed swamp.

It is uncertain at this time what wetlands, including WSS, will have indirect impacts due to hydrological changes. The EARD identified that many isolated swamps within the project area may be vulnerable to indirect impacts and could see a change in hydrological function. In addition, indirect impacts to Watercourse 4 and the wetlands contiguous to it are unknown. Wetlands that have the potential to be indirectly impacted outside of the project area were not identified within the EARD.

The EARD notes that the proponent will be conducting a hydrogeological field study during the permitting stage which will include a groundwater-surface water interaction study to address potential indirect impacts to wetlands.

### **Key Considerations:**

#### **Surface Water**

Since the watercourse delineation was conducted in dry conditions, it is recommended that the proponent conduct field confirmation of all watercourses and water features in and near the Project Area prior to project work during representative hydrological conditions (i.e., periods that reflect typical seasonal precipitation and flow patterns, such as in spring and/or fall). Doing so would help ensure that all water resources in and near the Project Area are properly identified to support impact assessment and plan of appropriate mitigation measures.

The proponent should include a detailed assessment of the long-term impacts of groundwater pumping on streamflow and wetland hydrology on and near the project site.

This assessment should quantify expected flow/water reductions and associated impacts on affected water resources and cover at least the full project lifespan to support mitigation planning. This assessment should include a project site-specific hydrology study to support the design of water infrastructure. The study should account for flows originating from the sanitary wastewater system and assess streamflow in WC4 to determine whether the settling pond discharge can offset the loss of groundwater baseflow.

The proponent should also complete a baseline groundwater study to support wastewater treatment system design to ensure effluent meets applicable water quality criteria.

Additionally, the Surface Water Monitoring and Management Plan should:

- Include water quantity and water quality measurements at WC4 and other potentially impacted water resources (e.g., the unnamed tributary to Cameron Brook, Cameron Brook, and wetlands that may be directly or indirectly affected by the project).
- Collect data to evaluate how effectively site discharge offsets baseflow reduction when used for that purpose. Incorporate additional mitigation measures if discharge does not adequately maintain flow.

The proponent should consult with the Town of Stellarton regarding the proposed work and site discharge management.

Studies and plans should be coordinated for maximum effectiveness.

## Groundwater

The Project will require groundwater withdrawal approval(s), which involves a hydrogeological assessment in accordance with NSECC's Guide to Groundwater Withdrawal Approvals. This assessment considers potential impact on neighboring wells, watercourses, and wetlands. Potential impacts associated with the withdrawal can be minimized by implementing the mitigation, monitoring, and reporting measures noted in the EARD. Given the large volume of water required and the relatively low well yield, water conservation and efficiency measures should be considered, such as water recycling and alternate technologies to reduce overall water demand, as noted in the EARD.

The Project overlaps with the Town of Stellarton's Source Water Protection Area, which is supplied by the East River. Groundwater-surface water interaction and the potential effects of the proposed withdrawal on surface water and the Town's municipal water supply should be considered as part of the hydrogeological assessment and water withdrawal approval application, along with implementation of appropriate mitigation measures and monitoring and reporting requirements.

The Guide to Groundwater Withdrawal Approvals typically requires a water well survey for private wells within 500 m of the withdrawal. A pre-blast survey typically involves water supply wells within 800 m, if blasting is required. The precise number and location

of water supply wells within 800 m of the Project Area should be identified and validated in the field.

Impacts to groundwater quality associated with the onsite storage of diesel fuel is considered low, provided the measures outlined in the EARD are implemented.

### **Wetlands**

The proponent has proposed direct alteration to Wetland 4, a WSS. It is unclear to what extent wetlands will be altered indirectly through hydrological changes, including indirect WSS alterations. During the detailed design phase additional, hydrological assessments should be completed to identify indirect wetland alterations. Wetlands that are outside the Project Area that could be impacted should be identified, mapped and assessed. The proponent should consider all opportunities to minimize the impacts to wetlands, including changes to the project footprint and mitigations to minimize indirect impacts.

The proponent is required to submit a Wetland Alteration Approval Application for review and approval for any proposed wetlands to be directly or indirectly altered and complete any necessary compensation and monitoring. The proponent should utilize Nova Scotia's Wetland Alteration Application's Guided Template for the permit applications.

## Fisheries and Aquaculture

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Date: January 21, 2026

To: Jeremy W. Higgins

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

Subject: FAST ACTING NATURAL GAS POWER GENERATION FACILITY- Marshdale

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### **Scope of review:**

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

### **List of Documents Reviewed:**

- Environmental Assessment Registration Document (EARD for the Fast Acting Natural Gas Power Generation Facility – Marshdale)
- Appendix D – Water resource Assessment
- Appendix F – Freshwater Aquatic Environment
- All drawings

### **Details of Technical Review:**

#### Aquaculture:

The Department of Fisheries and Aquaculture's mandate includes the regulation, development, promotion and support of aquaculture and rockweed industries in Nova Scotia.

There are no aquaculture or rockweed harvesting operations within 25km of the proposed project.

#### Marine Fisheries:

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

Since there does not appear to be any connectivity to the marine environment, the facility should pose negligible impacts to NSDFA's Marine Fisheries' interests.

There are seven (7) licensed NS commercial marine fisheries buyers and/or processors located in Pictou County adjacent to the proposed site for the natural gas facility:

1. Pristine Bay Premium Oysters is located 11km Northeast of the proposed site,
2. Langille's Fish Ltd. is 28km North of the proposed site,
3. Seabright Fisheries Ltd. is 29km North of the proposed site,
4. North Nova Seafoods Ltd. is 34km North of the proposed site,
5. Lismore Seafoods Company is 46km Northeast of the proposed site,
6. Quality Seafoods East Ltd. is 46km of the proposed site, and the
7. Northumberland Fish Co-op is 54km Northwest of the proposed site.

The activities of the proposed natural gas facility would pose a negligible impact to the operations of the above-mentioned commercial marine fisheries facilities.

Regarding the commercial marine capture fisheries in the area, lobster is the most lucrative fishery adjacent to the proposed site. The waters within relative proximity of the proposed site are known as Lobster Fishing Area (LFA) 26A1. During the 2025 season, fishing in LFA 26A1 occurs generally from April 26 until June 26<sup>th</sup>. Since there does not appear to be any connectivity between the natural gas facility and the marine environment, and that there is a buffer of over 10km of land to mitigate against any potential impacts of leaks or environmental degradation, the project should pose negligible impacts to lobster and other commercial marine fisheries in the Northumberland Strait.

With regards to impacts to Indigenous communities, there is communal-commercial, Food, Social, and Ceremonial (FSC), and livelihood fishing conducted within LFA 26A1 in the water within proximity to the proposed site. The Indigenous community, Pictou Landing First Nation, located 26km North of the proposed site, possesses access to these licenses. The natural gas facility should pose negligible impacts to the lobster and other commercial marine fisheries (harvested by Pictou Landing First Nation) within proximity of the proposed site.

#### Inland Fisheries:

NSDFA's Inland Fisheries Division's mandate is the management and promotion of Nova Scotia's freshwater recreational sportfishery.

The EARD focuses on the four small watercourses within the project area, which range from ephemeral to intermittently flowing streams in heavily forested areas.

The proponent indicated that all watercourses will be avoided by infrastructure placement and that surface water management measures will be applied to ensure any discharged water will meet water quality guidelines so that water quality and quantity will be protected.

No fish assessments were conducted in areas believed to be fish habitat, rather assumptions were made on the likely presence of species based on data from adjacent areas. Water course (WC) 4 was identified as an intermittent watercourse, but was evaluated on July 2-3, 2025, when water conditions may have been low. The stream channel width, depth and habitat type is consistent with adequate habitat for juvenile Brook Trout, particularly at lower temperatures. These habitat types can provide important spawning and rearing habitats that support recreational fisheries in other parts of the watershed.

*WC4 is proposed for treated water discharge but an assessment has yet to be completed and therefore, NSDFA's Inland Fisheries Division is unable to fully assess the project, so it is requested that an evaluation WC4 be completed to:*

- determine how WC4 is utilized by fish (what species, when) seasonally i.e. spring, summer and fall, and to
- evaluate the impact of releases of treated water on WC4 habitat (e.g. flow, temperature); and
- determine mitigations if necessary.

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

The proposed natural gas facility in Pictou County has no connectivity to the marine environment, therefore as long as the project proponent adheres to the environmental policies, guideline, and regulations, as stated in the submitted EARD, risks to adjacent commercial marine fishery activities should be negligible.

As there are no aquaculture or rockweed harvesting operations within a 25km radius of the project location, there are no concerns from the aquaculture division of NSDFA.

No impacts to recreational fishing activity are expected within any fishing locations outside of the project area, if the project proponent adheres to all mitigations stated in the EARD. It is recommended that an evaluation of WC4 be completed to assess the fish populations and the potential implications of releasing treated water into WC4's habitat, and to inform mitigation measures, if necessary.

Project proponent should also be made aware of:

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

Date: January 20, 2026

To: Jeremy Higgins, Environmental Assessment Officer

From: ICE - LIFT

Subject: **Fast Acting Natural Gas Power Generation Facility – Marshdale, Pictou Country, Nova Scotia**

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**Scope of review:**

This review focuses on the following mandate: technical and approval subjects frequently addressed by LIFT

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**List of Documents Reviewed:**

*ENVIRONMENTAL ASSESSMENT REGISTRATION DOCUMENT & INITIAL PROJECT DESCRIPTION Fast Acting Natural Gas Power Generation Facility – Marshdale*

**Details of Technical Review:**

**Groundwater**

Based on our review, groundwater appears to be most likely to be impacted by this project. This is due to project and site-specific details provided by the proponent, including but not limited to:

- large water demands of the project;
- high risk of karst in the project area; and
- anticipated low groundwater availability.

Additional studies and plans will need to be completed and provided to the Department as part of the Industrial Approval process. The proponent did not provide sufficient information and details to fully characterise and understand risks to groundwater. The proponent has identified groundwater quantity as a limiting factor for the project, influencing final project design.

**Surface Water**

Based on our review, surface water quantity and quality may be impacted by this project. This is due to project and site-specific details provided by the proponent, including but not limited to:

- the receiving watercourse is intermittent, does not flow for the entire year;
- high groundwater demands of the project may deplete baseflow in nearby water bodies; and

- project discharge may impact surface water quality and quantity.

The proponent has identified that stream depletion if unmitigated “could impact the habitat’s capacity to support one or more life history stages of fish.”

Additional studies and plans will need to be completed and provided to the Department as part of the Industrial Approval process to mitigate risks to surface water.

## **Soil**

Based on the provided information, the project may adversely impact soil quality during its lifespan. The proponent does not appear to have identified soils as a valued component, or as an environmental media requiring baseline characterisation and compliance criteria. This information may be needed as part of the IA process.

The proponent has included phrasing indicating that fill soils may be present on the site, or the soils may be removed from the site for use elsewhere. This information may not be required as part of the IA process but may trigger regulatory obligations under the *Environment Act* and *Contaminated Sites Regulations*.

## **Air**

Based on the provided submission, diesel (also known as light fuel) may be used for up to 20% of the facility’s run time. Provided air quality discussion appears to have excluded sulphur oxides, which are known air quality contaminants from diesel combustion. An Air Quality Management Plan will be required as part of the IA process, which may address this issue.

## **Compliance Criteria**

The proponent has not provided a full list of compliance criteria, referencing they will draw from CCME FWAL, baseline quality, and NS Tier 1 EQS. The proponent has indicated that project wastewater will be combined with stormwater runoff prior to discharge. As part of the IA process, compliance criteria will need to be identified for all pertinent toxicants which may be discharged from the site.

The proponent has not yet begun collecting baseline quality data for groundwater, surface water, or soils. This data will be needed to establish appropriate compliance criteria. It is best practice and most defensible if this data is collected prior to any project activities which may alter environmental media quality.

Based on potential impacts to surface water and groundwater, such as changes in quantity, additional compliance criteria may be required for surface waters and groundwaters potentially adversely impacted by project activities. These compliance criteria may need to include water characteristics other than a typical toxicant list, depending on the final project design and water use. This will also be addressed during the IA process.

## **Waste and Residual Management**

The proponent has not provided a Waste Management Plan or Residual Management Plan. Based on the provided information, the proponent has identified activities which generate wastes and residuals typically addressed by such plans (eg. brine, spent filter medias, etc). These plans will be addressed by the IA process.

## **On Site Septic System**

The proponent has specifically identified that they will be using an on site septic system to dispose of grey water. The regulatory requirement is that sewage (i.e. grey water and black water) be treated by an on site sewage system. Depending on final details, this may require an approval to install and/or operate. Information provided by the proponent during the IA phase should resolve this.

## **Fuel Handling, Storage, and Emergency Response Planning**

The proponent has identified that approximately 9 million litres of diesel will be stored at the site. There are environmental risks associated with storing this volume of diesel. Additional information to characterise and mitigate the risks associated with this diesel storage will be required during the IA process.

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

Several environmental risks have been identified by the proponent and reviewer, many of which are mitigatable and will be addressed during the Industrial Approval process. The proponent did not provide sufficient information to fully characterise and understand risks to groundwater, and groundwater is a limiting factor for the project.

**Federal Authority Advice Record (FAAR)****FAAR Response must be submitted by January 28, 2026**

Marshdale Natural Gas Power Generation Facility Project – Independent Energy System Operator – Nova Scotia.

Registry File: [90111](#)

Department/Agency	Health Canada
Lead Contact	Jérémie Allain
Full Address	101 Roland-Therrien Boulevard Longueuil, Quebec, J4H 4B9, Canada Building MONTÉRÉGIE PLACE, Floor 4
Email	<a href="mailto:jeremie.allain@hc-sc.gc.ca">jeremie.allain@hc-sc.gc.ca</a>
Telephone	514-213-1846
Alternate Contact	Beverly Ramos-Casey – <a href="mailto:beverly.ramos-casey@hc-sc.gc.ca">beverly.ramos-casey@hc-sc.gc.ca</a> - 902-403-9658 Lauchie MacLean - <a href="mailto:Lachlan.Maclean@hc-sc.gc.ca">Lachlan.Maclean@hc-sc.gc.ca</a> – 782-409-3340

1. Will your department or agency exercise a **power, perform a duty or function**, or provide **financial assistance**, related to the project to enable it to be carried out in whole or in part?

As relevant,

- Specify the power, duty or function, or financial assistance, and the likelihood that it will be required to construct the project, based on the Initial Project Description, as either Required, Potential, Likely, Unlikely or Not Required
- Describe any associated Indigenous or public consultation, including timelines
- Describe any associated information requirements (e.g., alternative means assessment, habitat offsetting), and specify those that may be coordinated with the impact assessment process, if an impact assessment is required
- Identify any associated project-specific guidance or issues of which the proponent should be aware, or information the proponent should provide
- Indicate whether your department or agency has identified any power that it will not be exercising or may not be able to exercise to allow the project to be carried out, in whole or in part.

Health Canada (HC) will not exercise a power, perform a duty or function, or provide financial assistance related to the Project.

2. **Using Table 1**, identify project- and context- specific **key issues**, based on the expertise within your mandate<sup>1</sup> and the information in your possession, including the Initial Project Description, any exchanges with the proponent or others related to the project and known means to address the effects of the project. For each key issue:

- Specify the key issue (e.g., specific species and location)
- Specify the project component or activity linked to the key issue
- Explain why it's a key issue based on:
  - biophysical effect pathway(s) from the specific project component or activity
  - concern unique to the project or a priority within your mandate
  - the issue being material<sup>2</sup> to decision making under the *Impact Assessment Act*
- Identify how the issue could be resolved, including through means other than an impact assessment
- Identify additional information the proponent could provide including to give confidence on how the issue can be addressed through other means.

Jérémie Allain  
Name and title of Departmental /  
Agency Responder

January 28, 2026  
Date

<sup>1</sup> Refer to the [Memoranda of Understanding with IAAC](#).

<sup>2</sup> An issue is material to decision making if its analysis is anticipated to affect the conclusions on (1) whether adverse effects within federal jurisdiction or direct and incidental adverse effects (collectively adverse federal effects) are likely not significant, or of low, medium or high significance; (2) appropriate mitigation measures for significant adverse federal effects; or (3) justification in the public interest.

**Table 1: Key Issues to inform the impact assessment process**

This table should outline key issues to inform the impact assessment process, including whether an impact assessment is required and, if so, the scope of the assessment and tailoring of the Tailored Impact Statement Guidelines.

Key issues are the major concerns directly related to a project component or activity, the analysis of which is anticipated to be material to decision-making under the *Impact Assessment Act*.

Federal authorities' advice should be guided by the identification and resolution of key issues. If an impact assessment is required, it will be focused on key issues.

Comment ID	a) Key issue	b) Project component or activity	c)(i) Biophysical effect pathway(s)	c)(ii) Concern unique to the project or a priority within your mandate	c)(iii) Material to federal decision-making	d) Means for issue resolution	e) Additional information from the proponent
<p><i>Identify comments by organization and comment number.</i></p> <p>e.g.: IAAC-01</p>	<p><i>Specify the key issue (e.g., specific species and location).</i></p>	<p><i>Identify the project component or activity linked to the key issue.</i></p> <p><i>Be specific about the nature, scale, novelty and complexity or the component or activity.</i></p>	<p><i>Identify the specific biophysical effect pathway between the project component or activity and the affected environmental or human receptor (including Indigenous Peoples).</i></p>	<p><i>Describe why it's a key issue within the mandate of your department or agency, including in terms of priorities of the federal government and in terms of anticipated likelihood, severity or uncertainty of effects.</i></p> <p><i>Identify if the key issue is common for projects of this nature or in this sector, or whether it's unique to this project due to its complexity, size or novelty; a sensitive or rare receiving environment; and/or proximity of sensitive environmental or human receptors (including Indigenous Peoples).</i></p>	<p><i>Describe why the key issue is material to decision-making as either:</i></p> <ul style="list-style-type: none"> <li>• <i>an adverse effect within federal jurisdiction, or a direct or incidental adverse effect, that may be significant based on available evidence including:</i> <ul style="list-style-type: none"> <li>○ <i>federal experts' knowledge and experience with past project assessments;</i></li> <li>○ <i>presence of sensitive species, habitats or human receptors (including Indigenous Peoples);</i></li> <li>○ <i>novel or complex project activities, components or technologies;</i></li> <li>○ <i>high uncertainties in effects or in the effectiveness of mitigation measures;</i></li> <li>○ <i>unknown or unproven mitigation; or</i></li> </ul> </li> <li>• <i>a factor for the justification in the public interest anticipated to be material to decision-making such as a likely positive effect contributing to sustainability, to Canada's environmental obligations or climate change commitments or in supporting governmental priorities, such as reconciliation with Indigenous Peoples.</i></li> </ul>	<p><i>Describe how the key issue could be resolved or addressed by:</i></p> <ul style="list-style-type: none"> <li>• <i>Any means, including powers, duties, functions, frameworks, policies or guidance that your department or agency has;</i></li> <li>• <i>Any means, including powers, duties, functions, frameworks, policies or guidance from another jurisdiction, including the province;</i></li> <li>• <i>Common, proven, well-understood or standard mitigation measures to mitigate the effect or effect pathway(s); or</i></li> <li>• <i>Commitments made by the proponent (e.g., in the Initial Project Description).</i></li> </ul>	<p><i>Describe information the proponent can provide, or commitments the proponent can make, in their Response to the Summary of Issues that would provide confidence that the issue can be resolved by existing means.</i></p> <p><i>Consider whether information, studies, analyses or collaborative work with other authorities would be required to address the issue beyond existing means.</i></p>
<p>HC-01</p>	<p>Exposure of Indigenous peoples to Contaminants of Potential Concern (COPCs) and noise, if the area surrounding the project site is identified as important for traditional land use activities.</p>	<p>Construction and operation of the 300 MW natural gas-fired power generation facility may generate project-related emissions including:</p> <ul style="list-style-type: none"> <li>• air pollutant emissions from combustion of natural gas or ultra low sulfur diesel; and</li> <li>• noise emissions from construction noise</li> </ul>	<p>Indigenous receptors engaging in traditional land use activities can be exposed to COPCs via multiple environmental media (e.g., inhalation of NOx in air) during construction and project operations.</p>	<p>Under the <i>Impact Assessment Act</i> (IAA), Health Canada (HC) provides specialist or expert information and knowledge to support the assessment of impacts on the health of Indigenous peoples.</p> <p>The size of the project is comparable to natural gas power generating projects in the Atlantic Region. HC does not have</p>	<p>As per <i>Impact Assessment Act</i> Sections 2(e) and 2(f), non-negligible adverse effects on the health of Indigenous peoples related to the Project falls within federal jurisdiction.</p> <p>The Initial Project Description (iPD) document indicates that the closest First Nation community is Boat Harbour West Indian Reserve No. 37, which is part of the Mi'kmaq Pictou Landing First Nation (PLFN) (a Mi'kmaq community) located approximately 23.5 km southwest of the project. The proponent's consultation with indigenous communities (Section 5.1) indicates that the PLFN identified concerns regarding the project, including the environmental impact and requested to be informed regarding the planned</p>	<p>A list of mitigation measures is provided in Sections 7.1.3; 7.3.3 and 8.6, which could alleviate the potential risks from the pathways listed in column c) i). Standard mitigation may be sufficient to address the project effects outlined if designed through meaningful Indigenous engagement.</p> <p>As indicated in the Sections 5.1.2 and 13.5, the Proponent commits to continue its engagement with the Mi'kmaq communities to better inform the project's impacts and make required changes to minimize the impacts of the projects on their rights and interests.</p>	<p>As indicated in column d), the proponent will continue to gather information regarding traditional activities via consultation with the Indigenous communities and has committed to produce a MEKS in early 2026. This information could serve as a basis for future studies that may be needed to adequately assess the</p>

		<p>(e.g., potential blasting) and operational noise such as: turbines, generators, engines, etc.;</p> <ul style="list-style-type: none"> <li>• COPCs in sediment runoff and effluent discharge from the project site and mobilisation of COPCs due to soil disturbance in groundwater (e.g.: through blasting, if required).</li> </ul>		<p>knowledge of the receiving environment being sensitive or rare; however, further engagement with Indigenous peoples may help confirm the value of the surrounding environment for historical, present or future traditional land resource use activities.</p>	<p>Environmental Assessment (EA) studies and the Mi'kmaq Ecological Knowledge Study (MEKS).</p> <p>Section 13.1 of the iPD states that changes to the environment surrounding the project area is expected and "<i>potential impacts to the Mi'kmaq are anticipated to be localized to the Project Area and directly surrounding lands</i>". The location of Indigenous receptors and the traditional land use activities surrounding the project area will inform the significance determination of potential risks to Indigenous health.</p>	<p>Please note it is currently uncertain whether a provincial EA will provide the means to resolve the key issue (i.e., whether it will require the evaluation of potential health risks to Indigenous receptors if they are engaging in traditional land and resource activities in the vicinity of the project).</p> <p>HC supports the Proponent commitment to implement a noise complaint resolution plan. The implementation of this plan, in tandem with a communication plan with the communities, is another approach to monitor any emerging issues experienced by the community members or exceedances that are not captured by monitoring programs.</p>	<p>risk to Indigenous health.</p>
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Please insert additional rows as necessary.

**Federal Authority Advice Record (FAAR)****FAAR Response must be submitted by January 28, 2026**

Marshdale Natural Gas Power Generation Facility Project – Independent Energy System Operator – Nova Scotia.

Registry File: [90111](#)

Department/Agency	Environment and Climate Change Canada
Lead Contact	Stephen Zwicker
Full Address	16 <sup>th</sup> Floor Queen Square 45 Alderney Drive, Dartmouth NS B2Y2N6
Email	stephen.zwicker@ec.gc.ca
Telephone	(902)402-7145
Alternate Contact	Michael Hingston michael.hingston@ec.gc.ca

1. Will your department or agency exercise a **power, perform a duty or function**, or provide **financial assistance**, related to the project to enable it to be carried out in whole or in part?

As relevant,

- a) Specify the power, duty or function, or financial assistance, and the likelihood that it will be required to construct the project, based on the Initial Project Description, as either Required, Potential, Likely, Unlikely or Not Required

**Species at Risk Act permits**

For species listed in Schedule 1 of the *Species at Risk Act* (SARA) 2022 as Extirpated, Endangered, or Threatened, a section 73 SARA permit may be required from Environment and Climate Change Canada (ECCC) for activities that affect a listed terrestrial wildlife species, any part of its critical habitat, or the residences of its individuals, where those prohibitions are in place. Such permits may only be issued: if all reasonable alternatives to the activity that would reduce the impact on species have been considered and the best solution has been adopted; all feasible measures will be undertaken to minimize the impact of the activity on the species or its critical habitat of the residences of its individuals; and if the activity will not jeopardize the survival of the species. Permits are also required by those persons conducting activities that contravene the critical habitat destruction prohibitions (subsection 58(1)).

Prohibitions are in place for individuals and residences on federal lands and water in a province, reserve or any other lands under the *Indian Act*, or lands under the authority of the Minister of the Environment, and for birds listed under the *Migratory Birds Convention Act, 1994* (MBCA) wherever they occur regardless of land tenure.

Furthermore, prohibitions may be in force on land other than federal land pursuant to other orders or regulations under SARA. It is possible that further prohibitions may come into force in the future through orders in Council for individuals, residences and critical habitat on non-federal lands. It is also possible that, over the course of the assessment or after the assessment and during the lifetime of the Project, additional species could be listed under SARA; permits may be required for project activities that affect these additional species. Proponents are advised to monitor for such developments on the SARA Registry <https://www.canada.ca/en/environment-climate-change/services/species-risk-public-registry.html>.

Examples of activities that could require a *Species at Risk Act* permit include:

- Species surveys that would affect individuals or residences;
- Site preparation (clearing, grubbing, site access, staging, blasting);
- Construction and operation of temporary and permanent works and infrastructure;

- Creation of new roads, rails or power lines;
- Infilling of wetlands or watercourses;
- Any monitoring that requires the capture/release of individuals; and
- Sensory disturbance effects (artificial lighting, noise, vibration, human activity, vehicular traffic).

For most projects, the requirement for a SARA permit will always remain a possibility due to the widespread presence of SARA-listed migratory birds protected under the *Migratory Birds Convention Act, 1994* across Canada. Permits for these species apply to activities on all types of land tenure. ECCC will require detailed information on the potential effects of the project, including locations and/or occurrences of species at risk, their use of habitat and critical habitat within the project area, and specific effects on federal and non-federal land, before ECCC can determine whether a SARA permit is required.

Note that a SARA permit for activities involving migratory birds is only possible if they do not contravene the *Migratory Birds Convention Act*.

Links to publicly available documents:

- Guidelines for permitting under Section 73 of *Species at Risk Act* <https://www.canada.ca/en/environment-climate-change/services/species-risk-public-registry/policies-guidelines/permitting-under-section-73.html>
- Species at Risk Permitting Policy <https://species-registry.canada.ca/index-en.html#/consultations/2983>

In the event that a SARA permit is required, ECCC would evaluate and determine consultation requirements, if any. ECCC-led Indigenous consultation related to the issuance of SARA permits will be coordinated with consultation during the impact assessment where possible.

If a permit is issued, the description of the activity and how SARA's preconditions were met will be posted on the SARA Registry here: <https://species-registry.canada.ca/index-en.html#/permits>.

### **Migratory Birds Convention Act Permits**

The *Migratory Bird Regulations, 2022* (MBR 2022) protect migratory birds, their eggs and their nests, by prohibiting activities that may harm them. Unless a person has a permit or the regulations authorize it, it is prohibited to engage in the following activities:

- Capturing, killing, taking, injuring or harassing a migratory bird or attempting to do so;
- Destroying, taking or disturbing an egg; and
- Damaging, destroying, removing or disturbing a nest, nest shelter, eider duck shelter or duck nesting box, unless the following exceptions apply:
  - The nest does not contain a live migratory bird or a viable egg; and
  - The nest was not built by a species listed in Schedule 1.

Modernization of the MBCA in 2022 has additionally identified 18 species of birds whose nests are protected year-round (Schedule 1 of MBR 2022). The nests of species listed in Schedule 1 are protected at all times, unless the following conditions are met:

- Notification of the unoccupied nest has been submitted/received through the [Registry for Abandoned Nests](#); and
- The waiting time designated in the regulations has passed, during which time the nest has not been occupied by the migratory bird.

In some situations, it may be possible to obtain a permit to move or destroy an unoccupied nest of a Schedule 1 MBR 2022 species. For more information, please visit: <https://www.canada.ca/en/environment-climate-change/services/avoiding-harm-migratory-birds.html>.

ECCC advises that there is no mechanism under the MBCA and its regulations to grant a permit for activities that are not directly aimed at migratory birds, their nests and/or eggs, but which may harm them (e.g., land clearing).

Scientific Permits issued under the *Migratory Bird Regulations* may, for scientific purposes, including banding, or for rehabilitation or educational purposes, authorize the permit holder to: capture, kill, injure, or harass an individual; destroy, remove or disturb a nest; deposit bait under specific circumstances; exchange, give, or have in their possession a migratory bird, egg or nest; and if they are authorized to capture and band a migratory bird, take birds that are killed as a result of normal banding operations or that are found dead. Scientific permits are issued to authorize activities for scientific purposes that would otherwise be prohibited by the MBCA and its associated regulations, however, there are only certain exceptional situations where these types of permits may be available. These permits do not authorize activities that may adversely affect migratory birds.

The Canadian Wildlife Service (CWS) issues Scientific permits to authorize the capture and handling of migratory birds that become stranded at facilities that must be kept until they can be successfully released. These permits are most often associated with facilities and vessels with large amounts of artificial lighting that may attract seabirds and cause disorientation, stranding, or collisions, for which proponents are required to search and document such events at their facilities. The information gathered from capture and handling permits is being used to quantify the impact of artificial attraction (causing stranding events) on migratory birds. Stranded bird monitoring is conducted following CWS's *Procedures for handling and documenting stranded birds encountered on infrastructure offshore Atlantic Canada* (2017).

Links to publicly available documents:

For more information, please visit:

- [Migratory Birds Convention Act \(MBCA\) and Regulations;](#)
- [Fact sheet: Nest Protection under the Migratory Birds Regulations, 2022,](#) and;
- [Frequently asked questions: Migratory Birds Regulations, 2022.](#)

The *Migratory Birds Regulations* were amended in July 2022 and include additional protection measures for the abandoned nests of the Pileated Woodpecker. The Pileated Woodpecker is included on Schedule 1 of the amended MBRs and requires the notification of ECCC Minister, 36 months in advance, prior to destroying an abandoned nest.

Pileated Woodpecker will excavate Nesting Cavities in trees in proportion to the availability of suitable nest trees on the land scape. Factors that determine suitable nest trees include:

- Prevalence of tree diseases, insects, and physical conditions (rot, breaks, cracks) that can weaken trees and make them more suitable for cavity excavation;
- The tree's size. Nesting Cavities have been found in trees as small as 25 cm dbh (diameter at breast height), but are more often found in trees > 40cm dbh;
- Nesting Cavity entrance holes are about 10cm in diameter and found 8-15m above the ground;

More information on nest cavities can be found on ECCC's [Pileated Woodpecker Cavity identification Guide](#). For more information on the amended nest protections, frequently asked questions on how these protections apply to migratory birds, including Pileated Woodpecker, and your responsibilities for reporting abandoned nests, please visit [Fact Sheet Nest Protection Under the Migratory Birds Regulations, 2022](#) and [Frequently Asked Questions, Migratory Birds Regulations, 2022](#). For more information on permits related to Pileated Woodpeckers, please visit [Damage or Danger Permits for Nest Destruction: Pileated Woodpecker nesting cavities - Canada.ca](#) and [Damage to the Use of the Land: Pileated Woodpecker nesting cavities - Canada.ca](#).

b) Describe any associated Indigenous or public consultation, including timelines

Please See information on Indigenous or public consultation discussed in a) above.

c) Describe any associated information requirements (e.g., alternative means assessment, habitat offsetting), and specify those that may be coordinated with the impact assessment process, if an impact assessment is required

Please see additional information in links provided for permitting requirements identified in a) above.

d) Identify any associated project-specific guidance or issues of which the proponent should be aware, or information the proponent should provide

#### Open Science Data Platform (OSDP)

The Open Science Data Platform (OSDP) provides information relevant to cumulative effects and development activities across Canada and is publicly available at the following website: <https://osdp-psdo.canada.ca/dp/en>. More specifically, the platform provides a single window to access data and scientific knowledge relevant to understanding cumulative effects from existing federal, provincial, and territorial on-line databases and registries, including publications from the federal government and its scientists. It provides an interactive geospatial mapping tool to enable mapping of multiple datasets from multiple sources. It offers various features, including keyword-based searching, interactive data visualization on maps, and educational resources covering key topics such as cumulative effects, water, air, climate, biodiversity, land, economy and industry, health, and society and culture.

OSDP information may be of value to persons preparing and reviewing projects assessments, including cumulative effects assessments. The following are some examples of ECCC information available on the OSDP.

Water – quality and quantity \* National long-term water quality monitoring data \* Real-time hydrometric data \* Canadian Aquatic Biomonitoring Network (CABIN) \* National Pollutant Release Inventory (NPRI) o Facilities that reported releases to water \* Find additional water-related resources (including publications, datasets and monitoring stations) from ECCC on the OSDP here.

Biodiversity (e.g., birds, species at risk, wetlands) \* Critical habitat for species at risk (terrestrial) \* Range map extents – Species at risk \* Canadian wetlands \* Canadian Protected and Conserved Areas Database (CPCAD) \* Canadian Breeding Bird Census plots \* Priority places for species at risk \* Find additional biodiversity-

related resources (including publications, datasets and monitoring stations) from ECCC on the OSDP here.

#### Air Quality

\* National Pollutant Release Inventory (NPRI), including: o Facilities that reported release of criteria air contaminants

\* Canadian Environmental Sustainability Indicators (CESI), including o Average ambient fine particulate matter concentrations o Peak ambient ozone concentrations o Ambient volatile organic compound concentrations o Average ambient sulphur dioxide concentrations o Peak ambient nitrogen dioxide concentrations \* Find additional air-related resources (including publications, datasets and monitoring stations) from ECCC on the OSDP here.

Climate, including climate change \* Hourly and daily climate observations \* Monthly climate observation summaries \* Climate normals, averages and extremes 1981-2020 \* Homogenized surface air temperature \* Canadian homogenized monthly precipitation \* Adjusted precipitation \* Find additional climate-related resources (including publications, datasets and monitoring stations) from ECCC on the OSDP here.

Beyond ECCC's mandate, the OSDP also contains resources on topics led by departments and other levels of government (e.g., human health, economy and industry). The OSDP also provides access to regulatory registries that list government authorizations of other developments (e.g., Fisheries Act Registry), which can be useful in understanding the cumulative pressures on an area.

- e) Indicate whether your department or agency has identified any power that it will not be exercising or may not be able to exercise to allow the project to be carried out, in whole or in part.

None identified

2. **Using Table 1**, identify project- and context- specific **key issues**, based on the expertise within your mandate<sup>1</sup> and the information in your possession, including the Initial Project Description, any exchanges with the proponent or others related to the project and known means to address the effects of the project. For each key issue:
- a) Specify the key issue (e.g., specific species and location)
  - b) Specify the project component or activity linked to the key issue
  - c) Explain why it's a key issue based on:
    - i. biophysical effect pathway(s) from the specific project component or activity
    - ii. concern unique to the project or a priority within your mandate
    - iii. the issue being material<sup>2</sup> to decision making under the *Impact Assessment Act*
  - d) Identify how the issue could be resolved, including through means other than an impact assessment
  - e) Identify additional information the proponent could provide including to give confidence on how the issue can be addressed through other means.

<sup>1</sup> Refer to the [Memoranda of Understanding with IAAC](#).

<sup>2</sup> An issue is material to decision making if its analysis is anticipated to affect the conclusions on (1) whether adverse effects within federal jurisdiction or direct and incidental adverse effects (collectively adverse federal effects) are likely not significant, or of low, medium or high significance; (2) appropriate mitigation measures for significant adverse federal effects; or (3) justification in the public interest.

Stephen Zwicker, Environmental  
Assessment Coordinator  
\_\_\_\_\_  
Name and title of Departmental /  
Agency Responder

January 28, 2026  
\_\_\_\_\_  
Date

**Table 1: Key Issues to inform the impact assessment process**

This table should outline key issues to inform the impact assessment process, including whether an impact assessment is required and, if so, the scope of the assessment and tailoring of the Tailored Impact Statement Guidelines.

Key issues are the major concerns directly related to a project component or activity, the analysis of which is anticipated to be material to decision-making under the *Impact Assessment Act*.

Federal authorities' advice should be guided by the identification and resolution of key issues. If an impact assessment is required, it will be focused on key issues.

Comment ID	a) Key issue	b) Project component or activity	c)(i) Biophysical effect pathway(s)	c)(ii) Concern unique to the project or a priority within your mandate	c)(iii) Material to federal decision-making	d) Means for issue resolution	e) Additional information from the proponent
<p>Identify comments by organization and comment number.</p> <p>e.g.: IAAC-01</p>	<p>Specify the key issue (e.g., specific species and location).</p>	<p>Identify the project component or activity linked to the key issue.</p> <p>Be specific about the nature, scale, novelty and complexity or the component or activity.</p>	<p>Identify the specific biophysical effect pathway between the project component or activity and the affected environmental or human receptor (including Indigenous Peoples).</p>	<p>Describe why it's a key issue within the mandate of your department or agency, including in terms of priorities of the federal government and in terms of anticipated likelihood, severity or uncertainty of effects.</p> <p>Identify if the key issue is common for projects of this nature or in this sector, or whether it's unique to this project due to its complexity, size or novelty; a sensitive or rare receiving environment; and/or proximity of sensitive environmental or human receptors (including Indigenous Peoples).</p>	<p>Describe why the key issue is material to decision-making as either:</p> <ul style="list-style-type: none"> <li>an adverse effect within federal jurisdiction, or a direct or incidental adverse effect, that may be significant based on available evidence including:                             <ul style="list-style-type: none"> <li>federal experts' knowledge and experience with past project assessments;</li> <li>presence of sensitive species, habitats or human receptors (including Indigenous Peoples);</li> <li>novel or complex project activities, components or technologies;</li> <li>high uncertainties in effects or in the effectiveness of mitigation measures;</li> <li>unknown or unproven mitigation; or</li> </ul> </li> <li>a factor for the justification in the public interest anticipated to be material to decision-making such as a likely positive effect contributing to sustainability, to Canada's environmental obligations or climate change commitments or in supporting governmental priorities, such as reconciliation with Indigenous Peoples.</li> </ul>	<p>Describe how the key issue could be resolved or addressed by:</p> <ul style="list-style-type: none"> <li>Any means, including powers, duties, functions, frameworks, policies or guidance that your department or agency has;</li> <li>Any means, including powers, duties, functions, frameworks, policies or guidance from another jurisdiction, including the province;</li> <li>Common, proven, well-understood or standard mitigation measures to mitigate the effect or effect pathway(s); or</li> <li>Commitments made by the proponent (e.g., in the Initial Project Description).</li> </ul>	<p>Describe information the proponent can provide, or commitments the proponent can make, in their Response to the Summary of Issues that would provide confidence that the issue can be resolved by existing means.</p> <p>Consider whether information, studies, analyses or collaborative work with other authorities would be required to address the issue beyond existing means.</p>
ECCC-01	Migratory birds	The activities linked to the construction, operation, maintenance, and decommissioning of the proposed Project could have adverse effects on migratory birds.	The nature of effects of the project on migratory birds will vary based on a number of factors, including: project location, duration, scale, and configuration; ancillary project activities (e.g., land clearing, operation, etc.); existing cumulative effects; the type of habitat that may be	<u>Habitat Loss/Alteration and Disturbance/Destruction caused by Vegetation Clearing</u> (example: land clearing, site preparation, etc.) Clearing and other activities that cause habitat loss or alteration may lead to destruction, disturbance and fragmentation of habitat (foraging, nesting), habitat avoidance, sensory disturbance, and the	The federal <u><a href="#">Migratory Birds Convention Act (MBCA)</a></u> and its <u><a href="#">regulations</a></u> 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 <u><a href="#">Schedule 1 of the MBR 2022</a></u> are protected year-round. These general prohibitions apply to all lands and waters in Canada, regardless of ownership. For more information, please visit: <u><a href="#">Avoiding harm to migratory birds - Canada.ca</a></u> .	ECCC provides the following recommendations to avoid and minimize potential adverse impacts on migratory birds.  <u>Habitat Loss/Alteration and Disturbance/Destruction caused by Vegetation Clearing</u> Most migratory bird species construct nests in trees (sometimes in tree cavities) and shrubs, but several species nest at ground level (e.g., Common Nighthawk), 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	When providing information on migratory birds, the proponent should prioritize consideration of: (1) species listed under SARA/provincial legislation, assessed by COSEWIC, or ranked by ACCDC; (2) areas of migratory bird concentration (e.g., breeding, colonies, staging, wintering); (3) breeding/nesting areas of low-abundance or higher-trophic species; and (4) species identified through

			<p>disturbed; and sensitivity of species found in the project area. The pathway through which potential effects are conveyed will depend on the land, air and water constituents associated with the site along with the behavioural adaptability, presence and interaction with the species limiting factor (e.g., habitat supporting staging, nesting, roosting, or foraging) and population resilience.</p>	<p>inadvertent disturbance and destruction of individuals, nests and eggs of migratory birds.</p> <p>Projects involving the construction of linear footprints can cause the loss, fragmentation and alteration of habitat and may result in direct adverse effects on migratory birds during breeding, migration, staging and foraging. Linear disturbances may also cause connectivity issues and/or facilitate the movement of predators into an area and increase hunting access and efficiency.</p> <p><u>Sensory Disturbance</u> Noise and vibrations from site preparation, use of heavy equipment and blasting, artificial lighting, human presence and disturbance from construction, operation, maintenance and decommissioning activities may result in injury, mortality, sensory disturbance and change in habitat use. The amount, duration, frequency, and timing of disturbance are important to understand potential effects. Sensory disturbance may make adjacent habitats unsuitable for use by migratory birds and cause avoidance effects in many species.</p> <p><u>Lighting Attraction</u> Night-flying birds may be attracted to lights, resulting in possible injury or mortality:</p> <ul style="list-style-type: none"> <li>• Equipment and building strikes;</li> </ul>	<p>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."</p> <p>It is the responsibility of the proponent to ensure that activities are managed so as to ensure compliance with the MBCA and associated regulations.</p> <p>Further information can be found at: <a href="https://www.canada.ca/en/environment-climate-change/services/avoiding-harm-migratory-birds.html">https://www.canada.ca/en/environment-climate-change/services/avoiding-harm-migratory-birds.html</a> and <a href="https://www.canada.ca/en/environment-climate-change/services/avoiding-harm-migratory-birds-reduce-risk-migratory-birds.html">Avoiding harm to migratory birds - Canada.ca</a>.</p>	<p>bridges, ledges or gutters. In developing mitigation measures, it is incumbent on the proponent to identify the best approach, based on the circumstances, to comply with the MBCA. The following should be considered during project planning:</p> <ul style="list-style-type: none"> <li>• Avoid scheduling high disturbance activities, such as vegetation clearing, during the regional nesting period for migratory birds. Information regarding regional nesting periods can be found at: <a href="https://www.canada.ca/en/environment-climate-change/services/avoiding-harm-migratory-birds.html">Nesting periods - Canada.ca</a>. Some species protected under the MBCA may nest <i>outside</i> these timeframes.</li> <li>• Nest searches or pre-clearing surveys during the breeding season are not supported as mitigation in most habitat types (e.g., forests, grasslands, wetlands) due to low detectability and high likelihood disturbance to nesting birds.</li> <li>• Nest searches may be effective when conducted by experienced observers using appropriate scientific methods in simple habitats with limited potential nesting locations or small migratory bird communities. Examples include urban parks with few trees, vacant lots with limited nest sites, previously cleared areas where ground nesters may use exposed soil or stockpiles, and structures such as bridges, towers, beacons, or buildings commonly used for nesting (e.g., by swallows, robins, phoebes, Common Nighthawks, and gulls).</li> <li>• The risk of impacting active nests or birds caring for pre-fledged chicks discovered during project activities <i>outside</i> of the regional nesting period can be minimized by 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.</li> <li>• In developing and implementing a wildlife management plan, preventative measures to minimize the risk of impacts on migratory birds should be considered (see "Avoiding harm to migratory birds: guidelines to reduce the risk to migratory birds" at <a href="https://www.canada.ca/en/environment-climate-change/services/avoiding-harm-migratory-birds/reduce-risk-migratory-birds.html">https://www.canada.ca/en/environment-climate-change/services/avoiding-harm-migratory-birds/reduce-risk-migratory-birds.html</a>).</li> </ul> <p>Some ground nesting species of migratory birds, including the threatened (SARA) Common Nighthawk, and Killdeer, may be attracted to previously cleared areas for nesting in the spring and summer if there is a delay between clearing activities (e.g., clearing conducted during the fall/winter and construction scheduled in the spring and summer).</p> <p>In the event that a nest is discovered, it would be prudent for a proponent to consult ECCC and/or NS' Department of Natural Resources (NS NR) (depending on the species) regarding appropriate buffers and other</p>	<p>recognized prioritization frameworks (e.g., BCR priority species).</p> <p>The proponent should present proposed mitigation by: (1) clearly stating firm commitments to mitigation measures and demonstrating how the proponent intends to ensure compliance with the MBCA and its regulations; (2) defining objective criteria for determining when measures are not feasible; and (3) identifying contingency measures applicable across all project phases and seasons.</p> <p>The proponent should commit to scheduling high-disturbance activities, including vegetation clearing, outside the core migratory bird breeding period (mid-April to late August). Pre-clearing nest searches are not supported as effective mitigation for most habitat types.</p> <p>The proponent should conduct targeted searches for Pileated Woodpecker nesting cavities in areas to be cleared for the project and, if cavities are found, develop mitigation measures to ensure compliance with the MBCA and its regulations.</p> <p>The proponent should also commit to follow-up monitoring to verify predicted effects and effectiveness of all mitigation measures, and to implementing adaptive management where adverse effects to migratory birds and their habitat occur.</p> <p>The proponent should provide additional</p>
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				<ul style="list-style-type: none"> <li>• Complete or partial incineration leading to death or injury;</li> <li>• Disorientation and increased energy expenditure, which may lead to exhaustion and increased predation.</li> </ul> <p><u>Accidental Releases of Hazardous Substances</u> Adverse effects on migratory birds and their habitat could result from accidental release of hazardous substances (e.g., hydrocarbons). Depending on the nature of the release (e.g., toxicity, volume, exposure pathways), and the location and duration of the release, effects on wildlife could be acute, chronic, or both. Contamination of the environment through accidental spills can result in destruction or disturbance of nests and eggs, contamination of feathers, which can be detrimental to waterproofing capabilities, and change in food quantity/quality.</p>		<p>mitigation measures, and to prepare and implement a monitoring plan to verify their efficacy.</p> <p>The Pileated Woodpecker is listed on Schedule 1 of the Migratory Birds Regulations, 2022, which provides additional legal protection for its nests. To avoid impacts to this species, ECCC recommends:</p> <ul style="list-style-type: none"> <li>• Conduct targeted surveys within vegetation clearing areas to identify suitable Pileated Woodpecker nesting habitat and confirm cavity presence and occupancy (with surveys in the Maritimes recommended in late June).</li> <li>• If abandoned cavities are identified on trees proposed for removal, notify ECCC through the Abandoned Nest Registry.</li> <li>• Where cavities are present, maintain the nest intact, establish a vegetated buffer, and monitor cavity occupancy for up to 36 months prior to removal; if construction overlaps the breeding season, implement measures to prevent disturbance.</li> </ul> <p><u>Sensory Disturbance caused by Noise</u> ECCC-CWS recommends the following best management practices for noise disturbance issues:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Where possible, 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.</li> <li>• Keep all construction equipment and vehicles in good working order and loud machinery should be muffled if possible.</li> </ul> <p><u>Sensory Disturbance Caused by Lighting Attraction</u> The proponent should consider the following mitigation measures when designing the Project's Lighting Plan:</p> <ul style="list-style-type: none"> <li>• Use the minimum amount of aviation safety, warning and obstruction lighting needed on tall structures. Warning lights should flash and completely turn off between flashes;</li> <li>• Use the fewest number of site-illuminating lights possible in the project area. Only use strobe lights at night, at the lowest intensity and the smallest number of flashes per minute allowable by Transport Canada.</li> <li>• Reduce lighting levels during inclement weather events that may force migratory birds to land, or fly at lower altitudes, to prevent birds from landing in areas that would cause collisions;</li> <li>• Avoid or restrict the time of operation of exterior decorative lights such as spotlights and floodlights</li> </ul>	<p>information on exhaust stack design and operation (e.g., timing, frequency, duration, temperature profile and extent of the exhaust plume) to enable assessment of risk. The proponent should also commit to monitoring for bird and bat mortality in the vicinity of the stack and to implementing adaptive management if mortality is detected. ECCC will be in a better position to comment on exhaust-related risks once this information is provided.</p>
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						<p>environmentally sensitive areas, including shorelines and wetlands.</p> <p>ECCC recommends 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).</p> <p>For consideration in emergency response and contingency planning related to accidents and malfunctions, ECCC has prepared <i>Guidelines for Effective Wildlife Response Plans</i> (ECCC 2022) available online at: <a href="https://www.canada.ca/en/services/environment/wildlife-plants-species/national-wildlife-emergency-framework.html">https://www.canada.ca/en/services/environment/wildlife-plants-species/national-wildlife-emergency-framework.html</a>. Plans should include:</p> <ul style="list-style-type: none"> <li>• Measures to deter migratory birds from coming into contact with the oil or polluting substance;</li> <li>• Measures undertaken if individuals of migratory birds and/or sensitive habitat become contaminated; and</li> <li>• The type, extent of monitoring, and reporting in relation to various spill events.</li> </ul> <p>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.</p>	
ECCC-02	Species at Risk, Species of Conservation Concern, and their habitat	The activities linked to the construction, operation, maintenance and decommissioning of the proposed Project could have adverse effects on terrestrial wildlife including species at risk listed on the <i>Species at Risk Act</i> (SARA), or Species of Conservation Concern (SOCC) assessed by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) (e.g., birds, terrestrial mammals, amphibians, reptiles,	The nature of effects of the project on species at risk (including their residences and critical habitat defined under the SARA) can vary based on a number of factors, including: project location, duration, scale, and configuration; ancillary project activities (e.g., land clearing, operation, etc.); existing cumulative effects; the type of habitat that may be disturbed; and sensitivity of species found in the project area. The pathway	<u>Habitat Loss and Alteration</u> (example: land clearing, site preparation, etc.) Clearing and other activities that cause habitat loss or alteration may lead to destruction, disturbance and fragmentation of habitat (foraging, nesting), habitat avoidance, sensory disturbance, and the inadvertent disturbance and destruction of individual migratory bird species at risk and their nests and eggs, or of individual non-migratory bird species at risk, their residences and critical habitat.	<p>The purpose of the <i>Species at Risk Act</i> (SARA) is to 1) prevent wildlife species from extirpation or extinction, and 2) provide for the recovery of wildlife species that are extirpated, endangered or threatened as a result of human activity.</p> <p>The list of species protected by the SARA can be found on the <a href="#">Species at Risk Public Registry</a>. Under SARA s.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."</p> <p>Under section 79(2) of SARA, "The person must also identify the adverse effects of the project on listed wildlife species and its critical</p>	<p>ECCC provides the following recommendations to avoid and minimize potential adverse impacts on species at risk.</p> <p><u>Habitat Loss and Alteration caused by Vegetation Clearing</u> ECCC recommends that proponents establish buffer zones or setback distances to minimize potential impacts from disturbance activities. A 30 m buffer is likely not sufficient to address impacts on SAR, ground-nesting species, or highly mobile chicks of certain species. Should the nests of a migratory bird species at risk or any unfledged chicks be discovered, proponents should establish an appropriate-sized buffer for the relevant species. In general, ECCC recommends the following buffers for landbird SAR during the breeding season:</p> <ul style="list-style-type: none"> <li>• Low disturbance activities (e.g., site monitoring) – 50 metres</li> <li>• Medium disturbance activities (e.g., sensory disturbance) – 150 metres</li> <li>• High disturbance activities (e.g., clearing, use of heavy equipment) – 300 metres</li> </ul>	<p>The proponent should present proposed mitigation by: (1) clearly stating firm commitments to mitigation measures; (2) defining objective criteria for determining when measures are not feasible; and (3) identifying contingency measures applicable across all project phases and seasons.</p> <p>The proponent should commit to scheduling high-disturbance activities, including vegetation clearing, outside the core migratory bird breeding period (mid-April to late August). Pre-clearing nest searches are not supported as effective mitigation for most habitat types.</p>

		<p>arthropods, lichen, mosses, and vascular plants), and their habitat (e.g., wetlands).</p> <p>Based on the Initial Project Description, SARA-listed and COSEWIC-assessed species that may occur in the project area include: Black Ash (Threatened), Bank Swallow (Threatened), Barn Swallow (Threatened), Bobolink (Threatened), Canada Warbler (Threatened), Common Nighthawk (Special Concern), Eastern Wood-pewee (Special Concern), Evening Grosbeak (Special Concern), Olive-sided Flycatcher (Special Concern), Monarch (Endangered), and Myotis spp. bats (Endangered).</p>	<p>through which potential effects are conveyed will depend on the land, air and water constituents associated with the site along with the behavioural adaptability, presence and interaction with the species limiting factor (e.g., habitat supporting staging, nesting, roosting, or foraging) and population resilience.</p>	<p>Projects involving the construction of linear footprints can cause the loss, fragmentation and alteration of habitat and may result in direct adverse effects on species at risk during important life-stages. Linear disturbances may also cause connectivity issues and/or facilitate the movement of predators into an area and increase hunting access and efficiency.</p> <p>There is a higher risk that these effects would be more severe for migratory birds that are also SAR and species where habitat is sensitive to disturbance (e.g., wetlands) or where there is already a high degree of cumulative effects to habitat and individuals. Destruction and/or disturbance of habitat can have increased impacts on SAR individuals, residence(s), and their critical habitat, which can lead to changes in prey and predator dynamics, loss of food resources, loss of breeding areas, changes in migration or movement, and increased risk of mortality. For example, certain species of migratory birds (e.g., Bank Swallow, Common Nighthawk) may nest in large piles of soil left unattended/unvegetated during the most critical period of breeding season.</p> <p><u>Sensory Disturbance</u> Noise and vibrations from site preparation, use of heavy equipment and blasting, artificial lighting, human presence and disturbance from</p>	<p><i>habitat and, if the project is carried out, must ensure that measures are taken to avoid or lessen adverse effects and to monitor them</i>". Mitigation measures must be consistent with recovery strategies and action plans for the species. Indirect and direct effects should be considered.</p> <p>The proponent must manage activities to ensure compliance with the SARA and associated regulations. SARA Policy Guidelines (2016) are available at: <a href="http://Species at Risk Act: addressing considerations - Canada.ca">Species at Risk Act: addressing considerations - Canada.ca</a></p> <p><b>Important Note:</b> ECCC-CWS also recommends that the province be contacted for technical expertise on species at risk under their jurisdiction (e.g. bats, reptiles, amphibians, land-mammals, insects, plants, lichen, and birds not protected by the MBCA, such as raptors).</p> <p><b>Notification and Identification of Effects (SARA s. 79(1)(2))</b> Subsection 79(2) of SARA establishes a requirement to avoid or lessen <b>all (direct and indirect)</b> adverse effects of a project on listed wildlife species and critical habitat, regardless of the significance of those effects. Thus, in developing mitigation measures for listed wildlife species, the approach should be systematic and rigorous. The following mitigation sequence should be followed:</p> <ol style="list-style-type: none"> <li>1. Avoidance of the adverse effect.</li> <li>2. Minimization of the adverse effect.</li> <li>3. Restitution for the adverse effect (e.g., replacement, restoration or compensation/conservation allowances).</li> </ol>	<ul style="list-style-type: none"> <li>• Very high disturbance activities (e.g. blasting) – 1000 metres.</li> </ul> <p>In the event that a migratory bird SAR nest is discovered during activities, it is prudent for the proponent to consult ECCC and/or NS NR (depending on the species), regarding appropriate buffers and other mitigation measures, and to prepare and implement a monitoring plan to verify their efficacy.</p> <p><u>Sensory Disturbance caused by Noise</u> ECCC recommends the following best management practices for noise disturbance issues:</p> <ul style="list-style-type: none"> <li>• Develop mitigation for programs that introduce very loud and random noise disturbance (e.g., blasting programs) during the migratory bird breeding season for their region.</li> <li>• Where possible, 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.</li> <li>• Keep all construction equipment and vehicles in good working order and loud machinery should be muffled if possible.</li> </ul> <p><u>Sensory Disturbance caused by Lighting Attraction</u> The proponent should consider the following mitigation measures when designing the Project's Lighting Plan:</p> <ul style="list-style-type: none"> <li>• Use the minimum amount of aviation safety, warning and obstruction lighting needed on tall structures. Warning lights should flash and completely turn off between flashes;</li> <li>• Use the fewest number of site-illuminating lights possible in the project area. Only use strobe lights at night, at the lowest intensity and the smallest number of flashes per minute allowable by Transport Canada.</li> <li>• Reduce lighting levels during inclement weather events that may force migratory birds to land, or fly at lower altitudes, to prevent birds from landing in areas that would cause collisions;</li> <li>• Avoid or restrict the time of operation of exterior decorative lights such as spotlights and floodlights whose function is to highlight features of buildings or to illuminate an entire building. These lights, especially during periods of inclement weather, can draw birds from far away. Turn off these lights during migration season when the risk to birds is highest, and during periods when birds are dispersing from their nests or colonies;</li> <li>• Shield safety lighting so that the illumination shines down. Only install safety lighting where it is needed, without compromising safety;</li> </ul>	<p>With respect to species at risk, the proponent should identify potential adverse effects on listed species and critical habitat and implement mitigation measures that are consistent with applicable Recovery Strategies, Action Plans, and Management Plans, and that comply with the requirements of the Species at Risk Act.</p> <p>The proponent should also commit to follow-up monitoring to verify predicted effects and mitigation effectiveness, and to implementing adaptive management where adverse effects to species at risk or their critical habitat occur.</p> <p>The proponent should provide additional information on exhaust stack design and operation (e.g., timing, frequency, duration, temperature profile and extent of the exhaust plume) to enable assessment of risk. The proponent should also commit to monitoring for bird and bat mortality in the vicinity of the stack and to implementing adaptive management if mortality is detected. ECCC will be in a better position to comment on exhaust-related risks once this information is provided.</p>
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			<p>construction, operation, maintenance and decommissioning activities may result in injury, mortality, sensory disturbance and change in habitat use. The amount, duration, frequency, and timing of disturbance are important to understand potential effects. Sensory disturbance may make adjacent habitats unsuitable for use by species at risk and cause avoidance effects in many species.</p> <p><u>Lighting Attraction</u> Night-flying SAR birds may be attracted to lights, resulting in possible injury or mortality:</p> <ul style="list-style-type: none"> <li>• Equipment and building strikes;</li> <li>• Complete or partial incineration leading to death or injury;</li> <li>• Disorientation and increased energy expenditure, which may lead to exhaustion and increased predation.</li> </ul> <p><u>Accidental Releases of Hazardous Substances</u> Adverse effects on species at risk and their habitat could result from accidental release of hazardous substances (e.g., hydrocarbons). Depending on the nature of the release (e.g., toxicity, volume, exposure pathways), and the location and duration of the release, effects on species at risk could be acute, chronic, or both. Contamination of the environment through accidental spills can result in destruction or disturbance of nests and eggs, contamination of</p>		<ul style="list-style-type: none"> <li>• Shield street and parking lot lighting so that little escapes into the sky, and it falls where it is required. Consider using LED lighting fixtures as they are generally less prone to light trespass;</li> <li>• Limit construction activities to the day and avoid illuminating habitat adjacent to the worksite(s);</li> <li>• Develop a Bird Monitoring and Management Plan that describes what measures will take place to avoid incidental take. The Plan should include:             <ul style="list-style-type: none"> <li>○ Actions that will be used to prevent incidental take of migratory birds;</li> <li>○ A mortality monitoring plan that includes corrections for searcher efficiency, carcass persistence, and searchable area.</li> </ul> </li> </ul> <p>For further guidance regarding lighting attraction, please see the "<a href="#">International Light Pollution Guidelines for Migratory Species</a>".</p> <ul style="list-style-type: none"> <li>• ECCC advises that mortality monitoring and/or carcass searches may require a CWS Scientific Migratory Birds Convention Act (MBCA) permit. Information on the MBCA permitting process can be found at <a href="mailto:scf-atlpermis-cws-atlpermits@ec.gc.ca">scf-atlpermis-cws-atlpermits@ec.gc.ca</a>.</li> </ul> <p>Bird mortality incidents of 10 or more birds in a single event, or an individual species at risk, should be reported via email to <a href="mailto:SCFATLEvaluationImpact-CWSATLImpactAssessment@ec.gc.ca">SCFATLEvaluationImpact-CWSATLImpactAssessment@ec.gc.ca</a>.</p> <p><u>Accidental Releases of Hazardous Substances</u> 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, <i>"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"</i>. 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-metres of environmentally sensitive areas, including shorelines and wetlands.</p> <p>ECCC recommends 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</p>	
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				feathers, which can be detrimental to waterproofing capabilities, and change in food quantity/quality.		(collisions causing mortality, stranding due to light attraction).  For consideration in emergency response and contingency planning related to accidents and malfunctions, ECCC has prepared <i>Guidelines for Effective Wildlife Response Plans</i> (ECCC 2022) available online at: <a href="https://www.canada.ca/en/services/environment/wildlife-plants-species/national-wildlife-emergency-framework.html">https://www.canada.ca/en/services/environment/wildlife-plants-species/national-wildlife-emergency-framework.html</a> . Plans should include: <ul style="list-style-type: none"> <li>• Measures to deter migratory birds from coming into contact with the oil or polluting substance;</li> <li>• Measures undertaken if individuals of migratory birds and/or sensitive habitat become contaminated; and</li> <li>• The type, extent of monitoring, and reporting in relation to various spill events.</li> </ul> <p>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.</p>	
ECCC-03	Wetland alteration and destruction	Through field surveys and wetland functional assessments, Strum has identified several wetlands within the project and focus areas, including six that will be directly impacted by project activities.  Six potential wetlands of special significance (WSS) were identified  The activities linked to the construction, operation, maintenance, and decommissioning of the proposed project could have adverse effects on wetlands and their ecological functions.	Carrying out the project, particularly the activities related to construction, may alter the existing hydrological regimes essential for maintaining wetlands and thus affect the quality or availability of habitat for migratory birds, SAR, and other wildlife.	The destruction and alteration of wetlands is likely to have adverse effects on migratory birds and SAR that use these areas for breeding, foraging, resting and migration.	Wetlands provide important habitat and food sources for many species of migratory birds and SAR, the loss of which may contribute to adverse impacts to species that fall under federal jurisdiction under the <i>Migratory Birds Convention Act</i> and its associated regulations (MBR 2022) and the <i>Species at Risk Act</i> (SARA).  The Federal Sustainable Development Strategy Act enables the Federal Sustainable Development Strategy 2022-2026 that identifies the Government of Canada's commitment to the protection of biodiversity and reducing the degradation of natural habitats, including wetlands.	To promote wetland conservation, which is vital to many migratory birds and species at risk, ECCC recommends the following general beneficial management practices: <ul style="list-style-type: none"> <li>• Developments on wetlands should be avoided.</li> <li>• Where development does occur in the vicinity of wetlands, a minimum vegetation buffer zone of 30 metres should be maintained around existing wetland areas.</li> <li>• Hydrological function of the wetland should be maintained.</li> <li>• Runoff from development should be directed away from wetlands.</li> <li>• Implement a 30-metre buffer from the high-water mark of any water body (1:100 Flood Zone) to maintain movement corridors for migratory birds.</li> </ul> <p>The impact assessment should include information on how the proponent intends to avoid, minimize or mitigate the potential loss of wetlands. Where avoidance or minimization is not possible, the proponent may develop a Wetland Compensation Plan that outlines measures to offset the residual loss of wetland habitat and/or function as a result of the Project. More information can be found at <a href="https://www.ec.gc.ca/operational-framework-for-use-of-conservation-allowances/publications.gc.ca">Operational Framework for Use of Conservation Allowances (publications.gc.ca)</a>.</p> <p>ECCC advocates the goal of no net loss of biodiversity for all development projects that have the potential to adversely affect biodiversity under their mandate. The disturbance or loss of wetlands may have adverse effects on migratory birds and species at risk that use</p>	ECCC recommends the development of a Wetland Compensation Plan that fully describes the mitigation hierarchy, including: <ul style="list-style-type: none"> <li>• Identification of wetlands potentially affected by the project,</li> <li>• A detailed description of potential effects, and the reasons why avoidance and minimization of impacts were determined to not be possible, and</li> <li>• Identification and justification of proposed offset ratios.</li> </ul> <p>As a mitigation measure to compensate for the lost wetland habitat function associated with migratory birds and species at risk or species of conservation concern, in instances where such habitat cannot be avoided, ECCC recommends the use of conservation allowances as the last step in the</p>

						these areas for breeding, foraging, resting and migration.  ECCC requests the opportunity to review any wetland assessments and monitoring plans, once prepared.	mitigation hierarchy of avoidance, minimization, on-site restoration and offsetting.
ECCC-04	Effects to fish and fish habitat, water quality and Indigenous Peoples from the unplanned releases of substances to the environment	Site preparation, construction, and decommissioning phases will involve extensive use of gasoline and diesel-powered heavy equipment. Equipment used during these phases may also contain hydraulic oils and lubricants.  Operation of the facility will involve use of natural gas delivered via pipeline, as well as diesel fuel delivered to the site by truck and stored on-site. Other substances may be used and / or stored as part of project operations including lubricating oil and ethylene glycol.  Given the hazardous nature of several of the substances that will be handled, stored, and used for the project, there is potential for non-negligible adverse effects within federal jurisdiction if accidents and malfunctions result in the release of these substances to the land, air, or water.	The proposed project involves the storage, handling, and use of hazardous substances during all project phases. Accidents and malfunctions resulting in the release of these hazardous substances to the land, air, or water could result in non-negligible adverse impacts to areas under federal jurisdiction including fish and fish habitat, water quality, migratory birds, or changes to the environment resulting in non-negligible adverse impacts to Indigenous Peoples of Canada.	Accidents and malfunctions that may occur over the life of the project are not unusual in terms of complexity or scale, and many can be addressed through implementation of industry standard practices and mitigation measures at all phases of the project.  Nonetheless, even with the implementation of best practices and mitigation measures, there remains residual risk that accidents and malfunctions associated with the project could have non-negligible adverse effects under federal jurisdiction and within ECCC's mandate, including non-negligible adverse changes to fish and fish habitat, water quality, migratory birds, and changes to the environment resulting in non-negligible adverse impacts to Indigenous Peoples of Canada.  ECCC provides environmental emergency management planning advice and guidance related to potential accidents and malfunctions involving unplanned or uncontrolled releases or spills of hazardous substances into the environment, including scenarios where such releases could result in non-negligible adverse environmental effects within ECCC's mandate. These effects include	During all project phases, accidents and malfunctions could result in the release of hazardous substances to the environment, with potential non-negligible adverse changes to areas under federal jurisdiction, including fish and fish habitat, water quality, migratory birds, or changes to the environment resulting in non-negligible adverse impacts to Indigenous Peoples of Canada.	Mitigation measures and plans will be important during all phases of the project, given that activities during these phases could result in release of hazardous substances to the environment in the event of an accident or malfunction. The proponent has outlined within their initial project description (section 15) a suite of mitigation measures and plans that would reduce the risk of accidents and malfunctions and mitigate the impacts should accidents and malfunctions occur. These include: <ul style="list-style-type: none"> <li>• Using secondary containment for storage tanks containing hazardous substances to prevent their release completely or minimize the amount that enters the environment in the event of an accident or malfunction.</li> <li>• Keeping appropriately stocked spill kits and spill response equipment on site and available at all locations where spills could occur (including on mobile equipment), enabling rapid containment and clean-up of any hazardous substance that enters the environment.</li> <li>• Locating fuel storage areas, refuelling, and equipment maintenance a minimum of 30 m from watercourses, wetlands, and groundwater features</li> <li>• Carrying out regular inspections of equipment.</li> <li>• Developing comprehensive plans, including a spill prevention and response plan, emergency response plan, and fire prevention and evacuation plan, which will outline procedures and practices to reduce the risk of accidents and malfunctions and equip responders with the knowledge and information necessary to rapidly and effectively respond if they occur.</li> </ul> <p>Part 8 of the <i>Canadian Environmental Protection Act, 1999</i> on environmental emergencies (sections 193 to 205) addresses the prevention of, preparedness for, response to, and recovery from environmental emergencies caused by uncontrolled, unplanned, or accidental releases. It also addresses the reduction of any foreseeable likelihood of releases of toxic or other hazardous substances listed in Schedule 1 of the <i>Environmental Emergency Regulations, 2019</i>. This act may apply if Schedule 1 substances onsite meet or exceed the threshold to be regulated under the <i>Canadian Environmental Protection Act, 1999</i>. Technical Guidelines for the <i>Environmental Emergency Regulations, 2019</i> may be found at: <a href="https://www.canada.ca/en/environment-climate-change/services/environmental-emergencies-program/regulations/technical-guidelines.html">https://www.canada.ca/en/environment-climate-change/services/environmental-emergencies-program/regulations/technical-guidelines.html</a></p>	The proponent should commit to implementing all mitigation measures and developing all plans mentioned in the initial project description, as these will help to reduce the risk of accidents and malfunctions, as well as to mitigate environmental impacts should they occur.  As the project is further planned and developed, the proponent is encouraged to adopt all relevant industry best-practices regarding prevention, preparedness, response, and recovery in the context of spills resulting from accidents and malfunctions.

				impacts to fish and fish habitat, migratory birds, and changes to the environment resulting in non-negligible adverse impacts to Indigenous Peoples of Canada. Additionally, ECCC coordinates expert review of atmospheric transport and dispersion modelling of airborne contaminants, the fate and behaviour of contaminants, and hydrologic trajectory modelling of contaminants in water.			
ECCC-05	Greenhouse Gas Emissions Assessment	GHG emissions and climate change. The construction, operation, and decommissioning of the proposed Project will result in GHG emissions and may impact carbon sinks. GHG emissions during operations is estimated by the Proponent to be 325,594 t CO <sub>2</sub> /yr which are an important amount to consider.	N/A	<p>The assessment of the impact on carbon sinks and GHG emissions (including upstream emissions) from this project would be relevant in considering the extent to which the effects of the designated project hinder or contribute to the Government of Canada's ability to meet its environmental obligations and its commitments in respect of climate change (IAA s.22(i) factor to be considered).</p> <p>Should the Project be subject to an impact assessment under the Impact Assessment Act (IAA), the Strategic Assessment of Climate Change (SACC) would apply.</p>	<p>Designated projects that require an Impact Assessment (IA) under the <i>Impact Assessment Act</i> (IAA), regardless of whether they are federally or provincially regulated, must consider the Project's GHG emissions in terms of the Projects' contribution to Canada's ability to meet its environmental obligations and its commitments in respect of climate change.</p> <p>Application of the Strategic Assessment of Climate Change (SACC), as determined by IAAC, would generate the information to determine if the Project will contribute to Canada's climate change objectives and will inform the federal Minister's IA decision for the Project.</p>	<p><a href="#">The Strategic Assessment of Climate Change</a> (SACC) was published in 2020 and works in conjunction with the Impact Assessment Act to provide guidance on how to consider climate change throughout federal impact assessments.</p> <p>Proponents may find the technical guidance of the SACC helpful in assessing the impacts to climate change and in ensuring consistent, predictable, efficient and transparent consideration of impacts to climate change. Information typically requested for the project description is outlined in the SACC (including section 4.1) and the draft <a href="#">Technical Guide</a> (including sections 2.4, 3.3, and 4.2).</p> <p>Should IAAC determine an IA under the IAA is required for the Project, the SACC would apply, as circumstances warrant, to determine the extent to which the effects of the Project contribute to the Government of Canada's ability to meet its environmental obligations and its commitments in respect of climate change .</p>	<p>ECCC recommends that the Project's GHG emissions and climate change impacts be assessed and mitigated consistent with guidance in the SACC.</p> <p>The Proponent is encouraged to provide the methodology, data, emission factors and assumptions used for the GHG emission estimate, and information on measures being considered to reduce the project's GHG emissions on an ongoing basis, including conversion to low-carbon fuels.</p> <p>Technical guidance on the SACC can be found <a href="#">here</a>.</p>
ECCC-06	Air Emissions	Release of emissions through the combustion of natural gas or diesel	Given the nature and magnitude of the emissions from the proposed facility, dispersion of emissions will result in elevated ambient air concentrations in the vicinity of the proposed facility but are unlikely to result in any significant	ECCC provides expertise on the fate of air emissions to help support Health Canada's assessment of potential impacts within the federal mandate.	Any potential effect within federal jurisdiction would be related to Indigenous health impact from ambient concentrations in the immediate vicinity of the proposed facility. Details of this would fall under the purview of Health Canada.	<p>The prevalent use of natural gas will minimize air quality emissions compared to any other choice of fossil fuels, and a small buffer around the facility could also be sufficient (the location of any fence line was not apparent from the provided documentation) to limit exposure.</p> <p>The proponent should reference the Federal Guidelines for Stationary Gas Turbines, which provide applicable standards and expectations for NO<sub>x</sub> control in such installations.</p>	The proponent has already provided credible emissions scenarios and accompanying modelling, so no further information or studies would be needed to assess the fate of emissions. Even when background concentrations are included, all ambient concentrations predicted under maximum emission

			impacts in relation to the federal mandate.				rate, operational scenarios fall below existing ambient air quality criteria.
ECCC-07	Water Quality	<p>The activities linked to the construction, operation, and decommissioning of infrastructure can have adverse effects on the quality of groundwater and surface water.</p> <p>Constructing and maintaining access roads, excavating or reworking of soils, sediments or rocks, and drilling may result in the deposit of contaminants to watercourses and water bodies and result in adverse effects on water quality.</p> <p>Works near water during construction activities may result in disruption of soils, rock, and streambanks causing erosion and result in deposition of soils and sediments to waterbodies. Soils and sediments can also enter waterbodies through streambed disturbance. These suspended solids can have adverse effects on water quality.</p> <p>Contaminants may be introduced into waterbodies through stormwater discharge, groundwater resurgence, or spills resulting in adverse</p>	<p>Accidental spills can release contaminants to watercourses and waterbodies</p> <p>Disturbance of pre-existing contamination can affect adjacent watercourses</p> <p>Increased sediment concentrations and transport in surface water due to vegetation clearing, increased erosion on the project footprint, and erosion along effluent discharge channel</p>	<p>ECCC provides expertise on water quality to help support the assessment of potential impacts on water quality on nearby Indigenous Communities.</p> <p>Environment and Climate Change Canada (ECCC) is responsible for the administration of subsection 36(3) to (6) of the Fisheries Act which prohibits the deposit of a deleterious substance in waters frequented by fish unless authorized by regulations.</p> <p>The nature of potential impacts to water quality is common to this project type</p>	<p>Any potential effect within federal jurisdiction would be related to the release of contaminants into watercourses and waterbodies that could lead to effects on fish or fish habitat or of migratory birds as well as nearby Indigenous Communities.</p> <p>The groundwater and surface water modelling and monitoring would help determine the potential extent of any impacts.</p>	<p>Standard mitigation measures can be implemented to ensure water quality beyond the immediate project site is not significantly impacted.</p>	<p>Results from groundwater and surface water modelling and monitoring could be used to help determine the appropriate mitigation measures to be implemented.</p>

		<p>effects on water quality.</p> <p>Adverse effects to water quality could, in turn, result in adverse effects to sensitive ecosystem receptors.</p>					
ECCC-08	Water quality - effluent discharge	<p>The proposed project would generate reject process water to be directed to a settling pond, treated, and discharged to a nearby watercourse WC1.</p>	<p>Discharge of process water from the project operation to nearby surface watercourses and waterbodies</p>	<p>The nature of potential impacts to water quality is common to this project type</p>	<p>Any potential effect within federal jurisdiction would be related to the release of process water/contaminants into watercourses and waterbodies that could lead to effects on fish and fish habitat, of migratory birds as well as nearby Indigenous Communities.</p> <p>Groundwater and surface water modelling and monitoring as well as assessing wastewater treatment options would help determine the potential extent of any impacts.</p>	<p>In Section 9.1.6, the Proponent notes: "The quality (and quantity) of wastewater that will be generated by the Project is currently unknown, as this will vary depending on the specific technologies chosen for operation of the facility and demineralized water production." The proponent also notes that "Treated process water from the Facility is not anticipated to be elevated in temperature, as water used for cooling is released as steam through the stack."</p> <p>The Proponent notes the project is in a risk area for arsenic, manganese, and uranium content in groundwater. It can be expected that wastewater from project operations may contain three times the concentration of contaminants of potential concern than found in the pumped groundwater. The Proponent notes wastewater discharge will be treated as necessary to meet CCME FWAL guidelines and Tier I EQS prior to being released. Based on the limited information available on groundwater and wastewater characterization ECCC is not able to evaluate whether this is reasonably achievable.</p> <p>As well, Subsection 36(3) of the Fisheries Act prohibits the deposit of any deleterious substances in water frequented by fish or to any place where it may enter water frequented by fish, regardless of the ability of the receiving water to assimilate the deposit, unless authorized by federal regulations.</p> <p>Deleterious substances include any substance that, if added to water, would degrade, alter or form part of a process of degradation or alteration of the quality of water so that it is rendered deleterious to fish or fish habitat or to the use of fish by humans.</p> <p>There are currently no regulations under the Fisheries Act that authorize the deposit of industrial effluents from a facility, such as the one described in this project, into water frequented by fish. If these deposits were determined to be deleterious, they would be prohibited under the Fisheries Act.</p> <p>For more information on the pollution prevention provisions of the Fisheries Act, please visit <a href="https://www.canada.ca/en/environment-climate-">https://www.canada.ca/en/environment-climate-</a></p>	<p>Results from groundwater and surface water modelling and monitoring could be used to help determine the appropriate mitigation measures to be implemented to meet applicable water quality standards.</p>

						<a href="change/services/managing-pollution/fisheries-act-registry/frequently-asked-questions.html">change/services/managing-pollution/fisheries-act-registry/frequently-asked-questions.html</a>	
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*Please insert additional rows as necessary.*

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**TC Information: Marshdale Natural Gas Power Generation Facility Project (CIAR 90111) & Salt Springs Natural Gas Power Generation Facility Project (CIAR 90114)**

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**From** ATL One Window / Guichet unique ATL (TC/TC) <OneWindow-Guichetunique@tc.gc.ca>

**Date** Tue 2026-02-03 8:28 AM

**To** Marshdale NG Power Generation Project (IAAC/AEIC) <Marshdale@iaac-aeic.gc.ca>; SaltSprings@iaac-aeic.gc.ca <SaltSprings@iaac-aeic.gc.ca>; Higgins, Jeremy W <Jeremy.Higgins@novascotia.ca>

**Cc** Allaby, Christopher (TC/TC) <Christopher.Allaby@tc.gc.ca>; Poirier, Sylvie (TC/TC) <sylvie.poirier@tc.gc.ca>; Ginn, Melissa (TC/TC) <melissa.ginn@tc.gc.ca>

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

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

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Good morning Maddie (and Jeremy),

While Transport Canada (TC) might not have a regulatory role in these projects, we have reviewed the Environmental Assessment Registration Documents and it is important to note the following:

**Civil Aviation:**

The project descriptions mention 'exhaust stacks' (see Table 3.4). Depending on the height of these stacks, there may be requirements for marking and lighting. As such, the proponent should consult the [Standard 621 of the Canadian Aviation Regulations \(CARs\)](#) - Obstruction Marking and Lighting, and may need to complete an Aeronautical Assessment Form (AAF). 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>

**Transportation of Dangerous Goods:**

In Table 2.1 Federal Regulatory Requirements, the Proponent mentions the approval (from TC) of an Emergency Response Assistance Plan. Please note, while this may be a requirement, it is not something that would permit the project to proceed (i.e. potential operational requirement) and therefore should be removed from Table 2.1.

**Navigation Protection Program:**

In the event the project involves works on navigable waters, it is up to the proponent to self-assess their responsibilities under the *Canadian Navigable Waters Act* using the Navigation Protection Program's Project Review Tool at [Project Review Tool: Determine your project's requirements - Canada.ca](#).

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

*Canadian Navigable Waters Act*

<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>

I have also included our counterparts at Nova Scotia Environment and Climate Change (NSECC) who also requested a review of these documents and specialist information from TC. Jeremy, please accept this email as our response to NSECC's request on these two projects as well.

Thank you all. If there are any further questions for TC, please do not hesitate to reach out.

## **J. Jason Flanagan, M.Sc.**

Senior Environmental Advisor

Environmental Programs and Indigenous Relations

Transport Canada, Atlantic Region

[jason.flanagan@tc.gc.ca](mailto:jason.flanagan@tc.gc.ca) | Tel. : 506.227.8257 | TTY: 1.888.675.6863

Conseiller principal en environnement

Programmes environnementaux et Relations avec les Autochtones

Transports Canada, Région de l'Atlantique

[jason.flanagan@tc.gc.ca](mailto:jason.flanagan@tc.gc.ca) | Tél. : 506.227.8257 | ATS: 1.888.675.6863

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**From:** Marshdale NG Power Generation Project (IAAC/AEIC) <Marshdale@iaac-aeic.gc.ca>

**Sent:** Monday, January 05, 2026 1:36 PM

**To:** Flanagan, Jason (TC/TC) <jason.flanagan@tc.gc.ca>; ATL One Window / Guichet unique ATL (TC/TC) <OneWindow-Guichetunique@tc.gc.ca>; Katherine Cumming <katherine.cumming@pc.gc.ca>; Maurice, Jason <Jason.Maurice@labour-travail.gc.ca>; Cheung, Evelyn E [NC] <Evelyn.cheung@hrsdc-rhdcc.gc.ca>; Lazar, Eva ED [NC] <eva.lazar@hrsdc-rhdcc.gc.ca>; melissa.berube@hrsdc-rhdcc.gc.ca; Deborah Campbell <deborah.campbell@inf.gc.ca>; Giffin, CarolLee <CarolLee.Giffin@forces.gc.ca>; IA, WAGE <FEGC.EvaluationImpacts-ImpactsAssessment.WAGE@fegc-wage.gc.ca>; Rowan, Michael <Michael.Rowan@rcaanc-cirnac.gc.ca>; James Neary <James.Neary@rcaanc-cirnac.gc.ca>

**Cc:** Marshdale NG Power Generation Project (IAAC/AEIC) <Marshdale@iaac-aeic.gc.ca>

**Subject:** [External/Externe]: Marshdale Natural Gas Power Generation Facility Project

You don't often get email from [marshdale@iaac-aeic.gc.ca](mailto:marshdale@iaac-aeic.gc.ca). [Learn why this is important](#)

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Good day,

On December 15, 2025, the Impact Assessment Agency of Canada (IAAC) received an Initial Project Description (IPD) from the Independent Energy System Operator – Nova Scotia (the proponent) for the Marshdale Natural Gas Power Generation Facility Project (the project). Following our review, we have gained an understanding of the project issues and effects under federal jurisdiction. In the interest of efficiency and in order to focus efforts on the most relevant issues, IAAC is only seeking input from federal authorities whose expertise is best suited to respond to the needs, opinions or advice that will be required for the project.

As such, at this stage, we believe it is unlikely that your expertise will be required. We will notify you if issues requiring your participation arise later in the process, but for the time being, out of respect for your time, we will not systematically seek your opinion or advice on this project.

As always, we remain available to answer any questions you may have about the project. If you have any questions, please contact me at [Marshdale@iaac-aeic.gc.ca](mailto:Marshdale@iaac-aeic.gc.ca).

Thank you for your cooperation. We look forward to continuing to work with you.

Thank you,

Madeline Clarke

Project Manager, Atlantic Region  
Impact Assessment Agency of Canada / Government of Canada

Gestionnaire de projet, Région de l'Atlantique  
Agence d'évaluation d'impact du Canada / Gouvernement du Canada



# Pictou Landing First Nation



February 9, 2026

Jeremy Higgins  
Environmental Assessment Officer  
Nova Scotia Environment and Climate Change  
[Jeremy.higgins@novascotia.ca](mailto:Jeremy.higgins@novascotia.ca)

**RE: Fast Acting Natural Gas Power Generation Facility – Salt Springs & Marshdale, Pictou County**

Mr. Higgins,

When it comes to the proposed fast-acting natural gas power generation facilities in Salt Springs and Marshdale, I am deeply concerned—particularly in light of the prolonged drought Nova Scotia experienced this past summer. Proceeding with projects of this nature under such conditions appears reckless and short-sighted, especially given the known pressures on local water systems.

Equally troubling is the province's determination that these projects do not trigger the duty to consult with the Mi'kmaq of Nova Scotia. This conclusion is inappropriate and dismissive, given the real and foreseeable impacts on Mi'kmaq rights. Community members actively fish salmon in the affected areas, relying on these waterways for sustenance, cultural practices, and livelihood. If these waters are depleted or degraded, where are our people expected to exercise those rights? The project summary itself acknowledges that groundwater withdrawal will reduce baseflows in nearby watercourses, yet this risk is minimized rather than meaningfully addressed.

The so-called "plain language" summary provided is inadequate. It fails to identify specific species present in the area, which suggests a lack of care or seriousness in assessing ecological and rights-based impacts. Notably, black ash—an ecologically and culturally significant species—exists in the area. How does the province propose to ensure that these species are protected and able to thrive under the proposed development?

Finally, it must be noted that correspondence from the province was received weeks after the date stamped on the letters. This delay effectively reduced the time available to review and respond to the materials provided, further undermining the integrity of the process

Sincerely,

Pictou Landing First Nation

Cc:

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



February 9, 2026

Jeremy Higgins  
Environmental Assessment Officer  
Environmental Assessment Branch  
Nova Scotia Environment and Climate Change  
[jeremy.higgins@novascotia.ca](mailto:jeremy.higgins@novascotia.ca)

Mr. Higgins,

**Re: Fast Acting Natural Gas Power Generation Facility – Marshdale, Pictou County**

I write in response to your letter dated December 22, 2025, in which the province has declined to adhere to its consultation obligations pursuant to the *Constitution Act, 1982* and 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. This letter will also serve as a response to the Impact Assessment Agency of Canada's (IAAC) letter dated January 5, 2026.

The Mi'kmaq Nation in Nova Scotia has a general interest in all lands and resources in Nova Scotia as the Mi'kmaq Nation has never surrendered, ceded, or sold the Aboriginal title to any of its lands in Nova Scotia. The Mi'kmaq have a title claim to all of Nova Scotia and as co-owners of the land and its resources it is expected that any potential impacts to rights and title shall be addressed.

It is our expectation that Consultation will be forthcoming. With this Environmental Assessment being “engaged” on alongside the federal Impact Assessment Agency of Canada (IAAC) assessment being conducted in parallel, it is disappointing there is no offer to consult at this time and being classified as “engagement”.

Contrary to the statement in your previous letter that “the nature of this project is not likely to lead to appreciable adverse impacts to credibly asserted or established Mi'kmaq Aboriginal or Treaty rights,” it is the understanding of the Kwilmu'kw Maw-Klusuaqn (KMK) that this project has significant potential to impact salmon, moose and black ash, at a minimum. Accordingly, it has the potential to cause appreciable adverse impacts to the Mi'kmaq's established and asserted fishing, hunting and harvesting rights. This finding is supported by information presented in the Environmental Assessment Registration Document (EARD) as well as information presented by IAAC in a technical session dated January 22, 2026. The denial and delay in acknowledging the Crown's duty to consult appears to be unsupported by its own technical information, and we expect this shortcoming to be remedied as soon as possible. We are concerned that the Crown's

delay in initiating consultation will prejudice the Mi'kmaq, as we have already been prejudiced by the province's oversight in not sending us notice of this project until January 14, 2026, when the notice letter was dated December 22, 2025. These are impossibly short deadlines to operate within.

Atlantic salmon (*Salmo salar*) within the Southern Gulf of St. Lawrence Designatable Unit are currently listed federally as Threatened, and as of December 5, 2025, the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) recommended that the population be uplisted to Endangered, consistent with the species designation in the Inner Bay of Fundy. The proposed Fast Acting Natural Gas Power Generation Facilities intersect with a species undergoing heightened regulatory scrutiny and recovery obligations at both the federal and provincial levels.

The two proposed fast-acting natural sites carry ecological risk, the Salt Springs location presents a substantially higher risk due to its direct overlap with critical Atlantic salmon habitat that supports population persistence at watershed and regional scales.

The Salt Springs facility is located at the confluence of Eight Mile Brook and Six Mile Brook, immediately upstream of Salt Springs Provincial Park and in close proximity to the West River main stem. These tributaries constitute two of the most ecologically significant salmon habitats in Nova Scotia. The West River supports one of the few remaining relatively stable Atlantic salmon populations in the province, and Eight Mile Brook functions as a keystone cold-water tributary within this system.

Eight Mile and Six Mile brooks provide essential thermal refugia that sustain juvenile salmon survival during periods of elevated summer temperatures. Sustained exposure to higher-than-average temperatures, is well established to cause physiological stress, reduced growth, and increased mortality in Atlantic salmon, particularly at juvenile life stages. The proposed projects directly affect the tributaries that currently buffer these temperature extremes and maintain recruitment within the West River population. These conditions are further compounded by recent weather trends such as the previous drought experienced in the last several summers. According to the project documentation presented in the EARD, groundwater would be withdrawn from local aquifers for cooling purposes, treated, stored in tailings ponds, and subsequently discharged into the river system. Groundwater extraction at this scale risks reducing cold-water discharge that sustains thermal refugia in Eight Mile and Six Mile brooks. This risk is compounded by the thermal limitations of tailings ponds, which cannot cool effluent below ambient surface temperatures prior to release. Discharging warmed effluent into a temperature-limited system would further degrade habitat suitability for Atlantic salmon and other cold-water species.

The combined effects of groundwater withdrawal and elevated effluent temperatures would be expected to increase during summer water temperatures, reduce the spatial extent and effectiveness of thermal refugia, and decrease juvenile salmon survival. Given the West River population's reliance on these tributaries during annual thermal stress events, the proposed projects are likely to result in population-level effects, including reduced recruitment and increased mortality during warm-water years.

The proponent's site-selection rationale identifies proximity to the Maritimes Pipeline, high-voltage transmission infrastructure, and what is described as "low ecological importance" as key factors. However, available biological data indicate that the Salt Springs site supports Atlantic salmon (Endangered under COSEWIC), brook trout, American eel (Special Concern under COSEWIC), and additional species at risk, as well as provincially significant riparian habitat. Characterizing this sites as low ecological value is inconsistent with accepted ecological assessment criteria.

Furthermore, pipeline and transmission infrastructure intersect at multiple locations across northeastern Nova Scotia. Alternative locations therefore exist that would allow you to meet energy-generation objectives while substantially reducing ecological risk and regulatory exposure.

Atlantic salmon are of great importance to the Mi'kmaq of Nova Scotia and are considered sacred to our culture and way of life. This species remains a foundational food source across Mi'kma'ki and would historically feed our people year-round. Loss of access to salmon threatens Mi'kmaq food security, self-determination, and rights-based harvesting practices. It is imperative Nova Scotia Environment and Climate Change (NS-EC works towards ensuring the future of this species for the next seven generations in perpetuity.

As mentioned in the EARD, "the Project Area is located approximately 2 km north of Core Habitat for mainland moose", any habitat adjacent to Core Habitat for mainland moose must be considered general moose habitat. Industrial activity within moose habitat must be approached with caution and mitigated responsibly. The cumulative effects from continued development, including natural gas projects, other renewable energy developments, forestry, mining, agriculture, and road construction, risk long-term and potentially irreversible impacts to moose populations. These impacts include water degradation and the immediate and future loss of secure habitat and safe food sources.

While all species deserve to coexist in balance, the invasive nature of human activity has made harmony within our forests increasingly difficult. As our demands on these ecosystems intensify, so too does the stress on wildlife and the environment. Greater consideration must be given to

the forest's original inhabitants, those who rely on its integrity for survival. Habitats for this endangered species are becoming increasingly fragmented as industry continues to intrude. NS-ECC continues to approve projects at an alarming rate with little consideration given to the local species in the area, and accordingly, little consideration given to the Mi'kmaq rights that rely on these species.

Mainland moose populations are continuing to decline in Nova Scotia. With the moratorium on harvesting moose remaining in place in the Cape Breton Highlands, sustained efforts are needed to protect the remaining population in Mainland Nova Scotia for the next seven generations of harvesters and beyond. Again, it is deeply disturbing that Nova Scotia is denying its obligation to consult with the Mi'kmaq regarding these potential impacts to s. 35 harvesting rights in relation to moose.

With the EARD stating that there are four Wisqoq (Black Ash) observed within the Project Area, our office has yet to be consulted on impacts to this culturally- and historically significant species, to which the Mi'kmaq assert harvesting rights. We also query what direction the province has provided to the proponent regarding the importance of collaborating with the Mi'kmaq on the protection and management of this species. In the past, our team has collaborated with other proponents to great success regarding this species and yet there have been no such invitations to collaborate on this occasion., There should be a requirement for a Wisqoq Management Plan to be developed with our office to ensure the species is handled with respect and care.

KMK's Archaeology and Research Division (ARD) is unable to provide comments on the Archaeological Resource Impact Assessment (ARIA) at this time, due to delays in the ARIA being shared with our office by NS-ECC. This resulted in insufficient time for KMK to review and comment. Our comments pertaining to potential archaeological concerns will be forwarded as soon as possible upon the completion of the ARIA review.

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. We assert s. 35 rights in relation to such archaeological and cultural heritage and fully expect to be consulted regarding potential impacts to the same.

As soon as possible, the province needs to begin its consultation with the Mi'kmaq of Nova Scotia regarding this proposed Natural Gas Facility. The Office of L'nu Affairs was in error when it failed to identify concerns or conduct an adequate assessment of impacts to rights.

Appropriate time needs to be accorded for consultation and discussion with communities who may have an interest in this project. With Pictou Landing being the nearest Mi'kmaw Community and having a dark history of large-scale industrial developments adjacent to their community, such as the Boat Harbor Project, it is imperative that the local Mi'kmaw Communities are adequately informed well in advance of large-scale projects such as this.

It is disappointing that this is another EARD being presented by NS-ECC with no final Mi'kmaq Ecological Knowledge Study (MEKS) completed at the time of the EARD being released for review and comment. The MEKS remains a crucial tool in accessing how projects may impact the Mi'kmaq's section 35 Rights. KMK expects the MEKS will be provided to our office for review and comment upon its finalization.

While it is encouraging to see this project support the transition off fossil fuels by allowing natural gas to help diversify Nova Scotia's electrical grid, this project appears to also contribute to greenhouse gas emissions. Our office is seeking clarity on emission outputs of this proposed project and the mitigations proposed by NS-ECC and the proponent. We recognize that more needs to be done to transition away from fossil fuels and we would be encouraged to see the Mi'kmaq at the forefront of various renewable energy projects. With the provincial and federal governments making NetZero targets to transition Mi'kma'ki (Unceded land of the Mi'kmaq of Nova Scotia) away from fossil fuels, and with Nova Scotia's primary source of electricity being coal generation, the Mi'kmaq of Nova Scotia recognize that other sources of energy and fuels are needed to help meet these targets.

**Our office would like to stress again the importance of the Crown meeting its consultation obligation, which it has yet to acknowledge and initiate.**

In the Impact Assessment Agency of Canada's previous correspondence, the Agency stated its intent to "initiate a dialogue on the consultation process that would be meaningful to the Mi'kmaq of Nova Scotia about the project." We would like to remind both the provincial and federal governments that they are signatories to the *Terms of Reference for a Mi'kmaq-Nova Scotia-Canada Consultation Process* (ToR) as ratified on August 31, 2010, the mechanism that implements the Mi'kmaq Consultation Process in Nova Scotia.

KMK therefore emphasizes that a thorough, good faith consultation process must now be initiated both provincially and federally, consistent with the duty to consult and with the established ToR. Comparable projects handled by the Impact Assessment Agency of Canada, such as the Fifteen Mile Stream Gold Project, the Beaver Dam Gold Project, and the Regional Assessment of Offshore Wind Development in Nova Scotia, all involved meaningful Mi'kmaq participation and resulted in stronger, more defensible processes and improved project outcomes.

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

Yours in Recognition of Mi'kmaq Rights and Title,

Director of Consultation  
Kwilmu'kw Maw-Klusuaqn

C.C.:

Kwilmu'kw Maw-klusuaqn  
Kwilmu'kw Maw-klusuaqn  
Marshdale NG Power Generation Project, Impact Assessment Agency of Canada  
Joanna Tombs, Impact Assessment Agency of Canada



# Environmental Assessment - Project Comments

Submission ID

37d98a26

Submission Date

22/12/2025 17:26

Submission status

SUBMITTED



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Select a Project:

Fast Acting Natural Gas Power Generation Facility - Marshdale



## Please note:

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**Comments:**

I have spent most of my life being poisoned from the emissions of the pulp mill and the power plant - I live nearby. We finally eliminated one of them, so why are we entertaining the idea of bringing in another source of pollution? I am fully aware of the jobs that this will create, but we need to stop putting temporary financial gain ahead of our health and the health of the planet. There are no jobs on a dead planet.

Stop looking to fossil fuels. Invest in renewables.

**Name:**

**Email:**

**City/Town**

Pictou Landing

**Postal Code Attachment(s):**

B0K 1X0

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Maximum file size per file: 10 MB

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

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# Environmental Assessment - Project Comments

Submission ID

20a9d090

Submission Date

22/12/2025 18:15

Submission status

SUBMITTED



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Select a Project:

Fast Acting Natural Gas Power Generation Facility - Marshdale



## Please note:

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**Comments:**

I understand the need to wean off coal. However, replacing one fossil fuel with another is a step backwards, it's like taking a lateral job that doesn't have any forward momentum re pay structure etc. Ultimately it will end up setting us further back than if we took the time to properly switch to a renewable.

Secondly, and most importantly the effects that this will have on the ground water in the area is deeply concerning after a summer of ongoing drought. Many wells are STILL dry in Pictou County. This will exacerbate issues of water access in a community that already struggles.

I cannot support this development and urge the province to go back to the drawing table for a long term solution that actually looks to the future.

**Name:**

**Email:**

**City/Town**

Hardwood Hill

**Postal Code Attachment(s):**

B0K 1R0

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# Environmental Assessment - Project Comments

Submission ID

33da95ab

Submission Date

22/12/2025 18:37

Submission status

SUBMITTED



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### Select a Project:

Fast Acting Natural Gas Power Generation Facility - Marshdale

### Comments:

Why are we building more fossil fuel infrastructure when we could be building battery storage or pumped hydro for baseline energy needs.

### City/Town

Dartmouth

Postal Code Attachment(s):

B3A 4Y2

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xlsx

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# Environmental Assessment - Project Comments

Submission ID

576e8d5c

Submission Date

22/12/2025 19:51

Submission status

SUBMITTED



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Select a Project:

Fast Acting Natural Gas Power Generation Facility - Marshdale



## Please note:

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**Comments:**

This comment is applicable to both Natural Gas facilities as the problem is the same with both. What are we doing? To be putting so much time and money into fossil fuels to combat climate change caused by fossil fuels is laughable. Natural gas is not green, it is just not as bad as coal. This province is now encouraging these wrongheaded projects as well as the green hydrogen project in Guysborough. In that one we are going to burn sustainable energy in Solar, Wind and a renewable energy in biomass all to create a gas that is greener than fuels used now. If you have to use large amounts of energy resources to produce another form of energy you are missing the entire point of efficient use of the earth's problems. If we were serious about reducing carbon and not overburdening a power grid that is woefully inadequate for the increasing load to come then we would be putting solar directly on houses and removing demand from the grid. Yet here we are doing the exact opposite. These ideas are foolish and hard to see how they serve the long term future of Nova Scotia.

**Name:**

**Email:**

**City/Town**

**Postal Code Attachment(s):**

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# Environmental Assessment - Project Comments

Submission ID

0ee87a48

Submission Date

22/12/2025 20:10

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Select a Project:

Fast Acting Natural Gas Power Generation Facility - Marshdale



## Please note:

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**Comments:**

The levelized cost of energy (LCOE) of renewables coupled with battery storage is now cheaper than the cost of a gas peaker plant in all jurisdictions, including Nova Scotia. Battery storage and renewables are on a clear price trajectory downward, so they will be even more cost competitive in the near future. Meanwhile the cost of gas plants have been on the increase due to supply chain issues and backlogs in turbine parts. Why isn't the cheapest option being presented to taxpayers and ratepayers? Why isn't this being presented as technology agnostic? 4 hour battery backup is sufficient to bridge peak hours, provides a free and unlimited source of electricity, and doesn't burden future generations with locked in fossil fuel emissions. From both a cost and environmental perspective, choosing a 300MW gas turbine in 2026 over cheaper renewables appears to be an ideological choice over evidence-based policy

**Name:**

**Email:**

**City/Town**

**Postal Code Attachment(s):**

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# Environmental Assessment - Project Comments

Submission ID

8755fb0a

Submission Date

22/12/2025 20:28

Submission status

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Select a Project:

Fast Acting Natural Gas Power Generation Facility - Marshdale



## Please note:

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**Comments:**

The province needs to consider the rehabilitation of former lake and pond beds. These areas have been filled in with silt from poor road maintenance and forestry activities. Rehabilitation of these areas would totally negate the need for Aquifer water supplies to the new potential plant. If the K-Class roads and old Ponds/Lakes were dug back out (gravel for concrete silt for growing soil) we could restore our natural surface water supplies for supply to the potential plant... A contract with potential operators about maintaining these surface water supplies would be a good idea. This negates the need for extraction from aquifers. Our Mainland moose and salmon population is in serous decline because of the destruction of our riverbeds, natural pond/lake beds. There's guys like Harrison Moore in DNR that study this shit for a living but we're overlooking it because of political bureaucracy. If we we restore our natural surface watersheds. We don't need to worry about pulling cooling fluids from underground. Making NSP to sign onto the maintenance for those watersheds might be beneficial for the future of our ecological and energy futures.

**Name:**

**Email:**

**City/Town**

**Postal Code Attachment(s):**

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# Environmental Assessment - Project Comments

Submission ID

33350813

Submission Date

22/12/2025 21:15

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Select a Project:

Fast Acting Natural Gas Power Generation Facility - Marshdale



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**Comments:**

I support the proposed Fast Acting Natural Gas Power Generation Facility at Marshdale as an important step in ensuring reliable electricity for Nova Scotia. This project will strengthen grid stability during peak demand and periods of low wind or solar generation. It will provide economic benefits through local construction jobs, long-term employment, and increased municipal tax revenue, while supporting businesses and workers. This facility represents a balanced approach that supports community needs, provincial energy security, and environmental responsibility.

**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

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

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## Uploaded document(s)

No documents to display.



# Environmental Assessment - Project Comments

Submission ID

49e5a33c

Submission Date

26/12/2025 07:41

Submission status

SUBMITTED



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### Select a Project:

Fast Acting Natural Gas Power Generation Facility - Marshdale

### Comments:

Natural gas plants in Alberta were thought to cause birth defects in unborn children. It was on The Nature of Things.

### City/Town

Trenton

Postal Code Attachment(s):

B0k 1x0

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

Maximum file size per file: 10 MB

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

Maximum number of files allowed: 10

Yes, I agree (must be selected to proceed)

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## Uploaded document(s)

No documents to display.



# Environmental Assessment - Project Comments

Submission ID

d648b083

Submission Date

26/12/2025 13:14

Submission status

SUBMITTED



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Select a Project:

Fast Acting Natural Gas Power Generation Facility - Marshdale



## Please note:

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**Comments:**

Nuclear power—specifically the BWRX-300—would be a stronger option. It has an estimated construction timeline of about 30 months and an operating life of 60 to 90 years. Sydney is a suitable location given its population base and industrial demand. With the ability to ramp output at roughly ~1 MW per second, it pairs exceptionally well with variable renewable sources such as wind power.

**Name:**

**Email:**

**City/Town**

Glace Bay

**Postal Code Attachment(s):**

B1A 3B3

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

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Maximum number of files allowed: 10

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## Uploaded document(s)

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# Environmental Assessment - Project Comments

Submission ID

fda78f25

Submission Date

31/12/2025 16:56

Submission status

SUBMITTED



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Select a Project:

Fast Acting Natural Gas Power Generation Facility - Marshdale



## Please note:

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

**Comments:**

The proposed IPSO Fast Acting NG Power generation facility in Pictou County is located to the financial benefit of IPSO and certainly not to the benefit of the rural residents.

Any industrial plant cannot be sited in a rural setting currently devoid of any industrial enterprise.

The facility requires adequate ground water from new wells adequate to support the equivalent of 750 residences, not an insignificant potential impact on current residents.

How will the developer guarantee the quantity and quality of the ground water will not be adversely affected by the addition of the equivalent of 750 homes? What are the plans to verify the availability of the incremental quantities of water of suitable quality.

There will be visible pollution from lighting in the facility in a rural area where currently there is no such pollution.

There will be visible pollution from turbine exhaust treatment which I assume is steam like plumes.

There will be some level of noise pollution from the facility in a rural area where there is none at present.

While noise levels may meet standards it certainly does not mean there will be no noise. Due to the intermittent nature of the operation of the facilities, the start up and shut down of large gas turbines to match grid load, will further aggravate any noise emitted from the facility.

Light fuel oil will be trucked to the site and stored. What will the fuel be used for? Is there auxiliary diesel engine drive equipment included in the facility that will further add to noise and air pollution. What plans are proposed to "guarantee" no spills will occur from the handling and storage of light fuel oil - in my experience I am not aware of how such a guarantee can be implemented.

Similarly, I am not aware of how guarantees can be implemented to ensure zero impacts on water quantity and quality.

Clearly there will be impacts on the residents near where the facility will

**Name:**

**Email:**

operate. These are rural areas currently enjoyed by residents because of the advantages for them living in rural Pictou County.

The proposed location is just not suitable for an industrial plant. Residents should not have to pay the price for the intrusions such a facility will cause including, but not restricted to, property values.

I am confident that other sites are less intrusive to residents but require incremental investment by IPSO for interconnections for natural gas and the power grid.

For an example, why are the IPSO facilities not suitable for location on the NS Power Trenton Generating Plant site?

**City/Town**

Braeshore

**Postal Code Attachment(s):**

B0K 1H0

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Maximum file size per file: 10 MB

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

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# Environmental Assessment - Project Comments

Submission ID

b677a5fe

Submission Date

02/01/2026 10:38

Submission status

SUBMITTED



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Select a Project:

Fast Acting Natural Gas Power Generation Facility - Marshdale



## Please note:

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

**Comments:**

Why would this even be considered.  
There is a 32MW generator with water supply sitting on the Northern Pulp site in Abercrombie.  
Also has Natural Gas connection.  
A big waste to everyone if this facility is lost and dismantled.  
Big costs for a new facility with big environmental hazards for the new proposed sites.

**Name:**

**Email:**

**City/Town**

**Postal Code Attachment(s):**

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

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# Environmental Assessment - Project Comments

Submission ID

3dcfebd9

Submission Date

07/01/2026 14:09

Submission status

SUBMITTED



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Select a Project:

Fast Acting Natural Gas Power Generation Facility - Marshdale



## Please note:

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**Comments:**

I have a few major problems with this project.

Is this project a closed loop system?  
The proposal doesn't specify if it will be a once through or closed loop system which has a huge impact on the water withdrawal of the facility. The possibility of reusing waste water is briefly mentioned but no details are given. It is shocking that this isn't properly addressed when low water levels have been a massive concern in this province in the last 2 years. Low water levels in the aquifer and the river will impact fish and humans.

Phasing out coal power is necessary but natural gas is only a marginal improvement when it comes to greenhouse gas and other pollutants. It is said that these facilities will be used to "fill the gaps" left by renewables but as of now renewable projects are not being put forward at the same rate. Offshore wind in the Northumberland straight could meet Nova Scotia's energy demands a hundred fold with much lower impacts and no greenhouse gas emissions from energy production. But unlike this proposed facility a large windfarm would be highly visible, not tucked away and hidden in the woods where people are less likely to notice and take issue with it.

**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

Yes, I agree (must be selected to proceed)

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# Environmental Assessment - Project Comments

Submission ID

4dada6ed

Submission Date

12/01/2026 15:44

Submission status

SUBMITTED



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### Select a Project:

Fast Acting Natural Gas Power Generation Facility - Marshdale

### Comments:

Take a look at the following short video....It suggests a battery plant is probably a better alternative

\

[https://www.youtube.com/watch?v=fR-t-eMq\\_Y](https://www.youtube.com/watch?v=fR-t-eMq_Y)

### City/Town

Halifax

Postal Code Attachment(s):

B3H 0B3

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xlsx

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# Environmental Assessment - Project Comments

Submission ID

5c4f4404

Submission Date

12/01/2026 17:38

Submission status

SUBMITTED



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Select a Project:

Fast Acting Natural Gas Power Generation Facility - Marshdale



## Please note:

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

**Comments:**

I have concerns regarding the building of a plant in the Marshdale area. There are two significant wetlands close by.

One wetland approximately 1km to the North surrounded by Hemlock measures 1000 meters long and another approximately 1.3km to the SE that runs alongside the railroad measuring 1.5km long. Both of these wetlands are fully intact and both important migratory breeding areas for waterfowl and passerine bird species.

These wetlands are also important aquatic feeding areas for Swallow Species including the endangered Barn Swallow. At the wetland near the railroad Olive Sided Flycatcher was heard singing from the forest edge in 2016 and again in 2017 a few hundred meters to the NW of the proposed site. In this general area I have found Canada Warbler (endangered) singing during breeding season 900m to the South as well as Eastern Wood Pewee (vulnerable) a few hundred meters to the North of the proposed site. The vulnerable Bobolink nests in nearby fields on the Marshdale Road nearby. Common Nighthawk (threatened) has been observed near the site by myself, feeding overhead.

In the older Hemlock forest 800m to the North, Spotted Coralroot (*Corallorhiza maculata*) was found in 2021 (apparently secure in Nova Scotia vulnerable or imperiled in all other Maritime provinces).

The water usage of this proposed power plant is of significant concern due to the possible degradation of these wetlands and surrounding streams. If this were to happen there would be a corresponding loss of very significant habitat for fish, amphibian and avian species. Further, locals rely completely on the water table of the area for their water supply. Loss of our dearly loved drinking water from our wells would be devastating.

A fuel oil spill in an area like this would

**Name:****Email:**

have a significant and destructive threat to the surrounding wetlands, streams and the water table. During a construction period road traffic would be increased dramatically, degrading our quiet rural way of life, affecting food gardens from road dust and of course excessive noise.

I am unsure why an area in Abercrombie, near the old pulp mill, was not considered. There is a gas pipeline here and access to the grid and of course a significant supply of fresh water from the Middle River reservoir. Placing a power plant here would be much more central and less risk to rural residents that may be impacted by these plants.

**City/Town**

Westville

**Postal Code Attachment(s):**

B0K 2A0

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Yes, I agree (must be selected to proceed)

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No documents to display.

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## Proposed Marshdale Natural Gas Power Plant

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Date Wed 2026-01-14 10:20 AM

To Environment Assessment Web Account <EA@novascotia.ca>

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

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I am writing to formally oppose the proposed natural gas power generation facility near Marshdale, Pictou County.

I live in Marshdale, approximately 3.5 kilometres from the proposed site. I chose to live here because it is a rural, residential area free from large industrial development. I do not believe a major power generation facility belongs in this community, and I do not support this project proceeding at this location.

My home relies on a private well for drinking water. Project materials indicate the facility would use groundwater wells, with annual water use equivalent to approximately 750 households. Introducing an industrial-scale groundwater user of this size into a rural area where residents depend entirely on private wells presents an unacceptable risk to both water quantity and long-term groundwater stability.

I am also concerned about air quality. This area currently has clean rural air and no major industrial emitters. While the facility is described as natural gas-fired, the proposal allows for the use of other, less clean-burning fuels. This creates uncertainty around future emissions and cumulative impacts over the life of the project.

In addition, the introduction of a large industrial facility will negatively affect property values and the ability to sell homes in the surrounding area. Risks to wells, air quality, noise, and the loss of rural character make the area less desirable to buyers and represent a real financial impact on residents who invested here with the reasonable expectation the area would remain non-industrial.

Most importantly, this is fundamentally a land-use issue. Facilities of this scale should be located in existing industrialized areas with municipal water supplies and established energy infrastructure. A rural community dependent on private wells is not an appropriate location when industrial alternatives exist.

This is not a case where mitigation measures can resolve the concerns. The issue is location. Marshdale is not an appropriate site for an industrial power generation facility.

I respectfully request that regulators reject this proposal as currently sited and require that any future

facilities be located in appropriate industrial areas with municipal services.

Sincerely,

Marshdale, Pictou County



# Environmental Assessment - Project Comments

Submission ID

d08d771b

Submission Date

14/01/2026 09:52

Submission status

SUBMITTED



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Select a Project:

Fast Acting Natural Gas Power Generation Facility - Marshdale



## Please note:

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**Comments:**

I am writing to formally oppose the proposed natural gas power generation facility near Marshdale, Pictou County.

I live in Marshdale, approximately 3.5 kilometres from the proposed site. I chose to live here because it is a rural, residential area free from large industrial development. I do not believe a major power generation facility belongs in this community, and I do not support this project proceeding at this location.

My home relies on a private well for drinking water. Project materials indicate the facility would use groundwater wells, with annual water use equivalent to approximately 750 households. Introducing an industrial-scale groundwater user of this size into a rural area where residents depend entirely on private wells presents an unacceptable risk to both water quantity and long-term groundwater stability.

I am also concerned about air quality. This area currently has clean rural air and no major industrial emitters. While the facility is described as natural gas-fired, the proposal allows for the use of other, less clean-burning fuels. This creates uncertainty around future emissions and cumulative impacts over the life of the project.

In addition, the introduction of a large industrial facility will negatively affect property values and the ability to sell homes in the surrounding area. Risks to wells, air quality, noise, and the loss of rural character make the area less desirable to buyers and represent a real financial impact on residents who invested here with the reasonable expectation the area would remain non-industrial.

Most importantly, this is fundamentally a land-use issue. Facilities of this scale should be located in existing industrialized areas with municipal water supplies and established energy

**Name:****Email:**

infrastructure. A rural community dependent on private wells is not an appropriate location when industrial alternatives exist.

This is not a case where mitigation measures can resolve the concerns. The issue is location. Marshdale is not an appropriate site for an industrial power generation facility.

I respectfully request that regulators reject this proposal as currently sited and require that any future facilities be located in appropriate industrial areas with municipal services.

Sincerely,

Marshdale, Pictou County

**City/Town**

Marshdale

**Postal Code Attachment(s):**

B0K 1C0

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

Maximum number of files allowed: 10

Yes, I agree (must be selected to proceed)

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**Re: Alternative Sites to Proposed Natural Gas Plant in Marshdale**

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**Date** Wed 2026-01-14 6:14 PM

**To** Info - Marco MacLeod MLA <info@marcomacleod.com>

, chester.dewar@munpict.ca  
<chester.dewar@munpict.ca>; Premier <PREMIER@novascotia.ca>; Environment Assessment Web Account  
<EA@novascotia.ca>

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

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Hi Marco,

Thank you for the response. I'm still struggling to understand the logic being used.

What I know — and what is obvious on the ground — is this:

The alternative sites I raised (Trenton/Abercrombie Point, Stellarton, and Granton) are **industrial zones**. They are built-up areas that already support large industrial users, have municipal water and wastewater (in the majority of cases), access to natural gas, and existing infrastructure. They are also locations where heavy industry already exists, is expected and does not intrude into residential communities.

By contrast, the Marshdale site is essentially **rural farmland in a residential, private-well fed community**. Its defining characteristics appear to be proximity to a gas pipeline and proximity to a transmission line — but it is otherwise remote, unserved, and not an established industrial area.

That's where I'm having trouble reconciling the explanation.

Why does the presence of a transmission line in a rural residential area outweigh the fact that there are industrial-zoned areas nearby that already support major industry and municipal services? What infrastructure would need to be extended or upgraded in the alternative sites? And why is upgrading or extending infrastructure in an industrial zone considered less reasonable than placing a large industrial power plant in a rural setting? And would there not also be significant infrastructure costs to be incurred in Marshdale as well?

I am finding very hard to understand how a remote unserved rural area is a better option than a natural gas fed industrial zone with municipal services. If there is a clear, detailed explanation for why the industrial alternatives are not viable, I would genuinely appreciate understanding it. Marshdale can't be the only option.

Thank you,

On Jan 14, 2026, at 3:22 PM, Info - Marco MacLeod MLA <info@marcomacleod.com> wrote:

Thanks for taking the time to reach out regarding the fast acting natural gas generator project.

The IESO has submitted their Environmental Assessments for both sites to the Department of Environment and Climate Change. Please find details here:

<https://novascotia.ca/nse/ea/fangpgf-salt-springs/> and  
<https://novascotia.ca/nse/ea/fangpgf-marshdale/>

I suggest engaging directly by submitting your written comments to  
*Environmental Assessment Branch Nova Scotia Environment & Climate Change*  
*P.O. Box 442*  
*Halifax,*  
*NS B3J 2P8*

Or by email at [EA@novascotia.ca](mailto:EA@novascotia.ca).

You can also submit your comments to the Impact Assessment Agency of Canada at  
[www.iaac-aeic.gc.ca](http://www.iaac-aeic.gc.ca).

To answer your question simply- the sites were chosen because it is where the Maritimes & Northeast Pipeline intersects with an appropriate electrical transmission line. The three sites mentioned in your email do not offer both these pieces of infrastructure. Hopefully this answer helps. Please feel free to reach out to the IESO directly, they can definitely provide more in-depth responses. Their email is [community@ieso-ns.ca](mailto:community@ieso-ns.ca)

Regards,

Marco MacLeod  
MLA Pictou West

<Outlook-jrk1of2k.png> [info@marcomacleod.com](mailto:info@marcomacleod.com)  
<Outlook-uqnizran.png> 902.485.8958  
<Outlook-iljdy4ec.png> 37 Water Street  
PO Box 310  
Pictou NS  
B0K 1H0

---

**Sent:** January 14, 2026 1:16 PM

To: [dannymla@bellaliant.com](mailto:dannymla@bellaliant.com) <dannymla@bellaliant.com>; Info - Marco MacLeod MLA  
<info@marcomacleod.com>

Cc: [pictoueastamanda@gmail.com](mailto:pictoueastamanda@gmail.com) <pictoueastamanda@gmail.com>; [chester.dewar@munpict.ca](mailto:chester.dewar@munpict.ca)  
<chester.dewar@munpict.ca>; [premier@novascotia.ca](mailto:premier@novascotia.ca) <premier@novascotia.ca>

**Subject:** Alternative Sites to Proposed Natural Gas Plant in Marshdale

Good Afternoon Danny & Marco,

Please see the attached email I previously sent to the Premier and Chester Dewar's email address. I am adamantly opposed to the proposed Natural Gas Power Plant location in Marshdale as I am a resident there. I am writing to ask why the following three industrial zoned alternative sites have not been proposed.

### **1) Trenton / Abercrombie Point Industrial Lands**

- **Municipal water and wastewater already in place**
- **Established heavy-industrial zoning and land-use precedent**
- **Existing industrial natural gas access**
- **Large contiguous parcels or very easy parcel assembly to reach ~50 ha**
- **Minimal interaction with residential areas and no private-well risk**

### **2) Stellarton – Albion / Highway 104 Industrial Corridor**

- **Municipal water and wastewater**
- **Fully industrial-zoned employment lands**
- **Existing natural gas distribution and grid access**
- **Requires multi-parcel assembly to reach 50 ha**
- **Slightly closer to commercial/residential activity than Trenton**

### **3) Granton – Industrial / Resource Lands**

- **Best chance of a single contiguous 50 ha parcel**
- **Existing large industrial users (e.g., Michelin)**
- **Industrial/resource land-use context**
- **Municipal water availability must be confirmed - May still rely on industrial groundwater or dedicated servicing**

I do not understand why a Natural Gas Power Plant makes any sense in a rural residential area where there are other more suitable options in your ridings.

**Yes, there's a gas pipeline near Marshdale – but gas access alone doesn't make it an appropriate site. This is a rural, private-well community. A 50-hectare industrial power plant belongs in an industrial zone with municipal services, like Trenton, Granton, or Stellarton – not in a residential rural area.**

**Heavy industry belongs in industrial zones, not rural neighbourhoods.**

Looking forward to hearing from both of you.

Marshdale Resident



# Environmental Assessment - Project Comments

Submission ID

fec6a354

Submission Date

19/01/2026 20:49

Submission status

SUBMITTED



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Select a Project:

Fast Acting Natural Gas Power Generation Facility - Marshdale



## Please note:

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**Comments:**

We have an opportunity to invest in and build infrastructure for renewable energy forms, the technologies for which continue to become increasingly affordable, accessible and reliable. Nova Scotia can use a mix of tidal, wind, and solar with good battery storage systems to create a reliable grid that reduces greenhouse gas emissions in line with the commitments the province has made. The devastating impacts of climate change are all around us, with marginalized peoples and communities bearing the brunt of the consequences. Nova Scotia has relied on coal, the dirtiest form of energy for so long. It is time to do better and be realistic and humane about addressing our overconsumption of polluting fuels and to take the very obvious choices in front of us. If the government is truly committed to the interests of its citizens and communities, rather than the interests of corporations, the choice is very simple. Natural Gas is not the best step forward we can take in terms of diversifying, stabilizing, and sustaining clean energy and investing in a liveable future for this province.

**Name:**

**Email:**

**City/Town**

**Postal Code Attachment(s):**

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

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# Environmental Assessment - Project Comments

Submission ID

e23d07e8

Submission Date

20/01/2026 11:11

Submission status

SUBMITTED



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Select a Project:

Fast Acting Natural Gas Power Generation Facility - Marshdale



## Please note:

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**Comments:**

Point blank: There is no action which involves the increased use of natural gas which defines itself on the basis of building a better future without being inherently dishonest and shortsighted. Further investment into fossil fuels is irreconcilable with the short and long term well being of Nova Scotians, Canadians, and all people. Despite the changing political climates brought about by the Trump administration that no doubt are fueling Canada's u-turn towards natural gas infrastructure, it is simply not the time in history for this reversal to be taking place.

Investment into Canadian energy is a necessity. But we cannot sideline renewables and their exponential development and accessibility in recent years, which will only continue to grow. It is imperative that we use this period in history as one in which people developed not just smart solutions, but wise solutions. There is no thriving Canadian future that involves the continued use of fossil fuels. Any other stance is simply dishonest or misinformed.

Our home Nova Scotia has seen its climate change. Wildfire seasons are longer and more extreme, burning far more land than they ever have. Severe droughts are now almost certain to be an annual occurrence. There is not a Nova Scotian alive who has not experienced these changes firsthand, let alone a human alive on the planet who has not seen their local climate made unstable and unsafe. We know with absolute certainty that these changes are caused by human use of fossil fuels. This is science that has been understood for a century that governments worldwide have suppressed and deliberately discredited. We will not stand for this. Not from our home.

Be on the right side of history.

**Name:**

**Email:**

City/Town

Dartmouth

Postal Code Attachment(s):

B2X 1G4

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Maximum file size per file: 10 MB

Accepted file types: doc, docx, jpg, jpeg, pdf, png, xls,  
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# Environmental Assessment - Project Comments

Submission ID

8838bd01

Submission Date

22/01/2026 08:46

Submission status

SUBMITTED



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### Select a Project:

Fast Acting Natural Gas Power Generation Facility - Marshdale

### Comments:

Why not battery storage.  
Just look at the success of the Oneida project:  
Under budget.  
Ahead of schedule.  
Fits with local renewable projects like wind and solar.  
Clean.

**City/Town**

Antigonish

**Postal Code Attachment(s):**

B2G 2L4

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

Maximum file size per file: 10 MB

Accepted file types: doc, docx, jpg, jpeg, pdf, png, xls,  
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# Environmental Assessment - Project Comments

Submission ID

be5603a2

Submission Date

23/01/2026 17:33

Submission status

SUBMITTED



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Select a Project:

Fast Acting Natural Gas Power Generation Facility - Marshdale



## Please note:

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

**Comments:**

So our province plans to buy American methane, one of the WORST greenhouse gases, for power generation?

Instead of improving our solar or wind capacity?

Instead of investing in nuclear energy?

Instead of investing in better tidal/hydro generation? Our dams which are woefully in need of repair and maintenance by the way.

What kind of decision is this?

Let's lead, not lag, please.

This screams of nearsighted ignorance. Nova Scotia is already experience the extreme effects of climate change, and we want to be part of the problem?

Make better choices than this.

**Name:**

**Email:**

**City/Town**

Dartmouth

**Postal Code Attachment(s):**

B2W 1N6

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Maximum file size per file: 10 MB

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# Environmental Assessment - Project Comments

Submission ID

38491f4d

Submission Date

25/01/2026 18:14

Submission status

SUBMITTED



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Select a Project:

Fast Acting Natural Gas Power Generation Facility - Marshdale



## Please note:

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

**Comments:**

Dear NS Environment & Climate Change,  
Thank you for considering public comments on this project.

IESO wants to build multiple fossil fuel power plants in our province, with no carbon capture, that rely solely on methane, imported from the US (at their unpredictable discretion), while somehow claiming it's green and strengthens our independence. This is terribly misguided, and I hope you will decline this application entirely.

-Energy Security-

These methane gas power plants will run on US methane. Nova Scotia has no gas reserves or pipelines to anywhere else. Now that all our homes and businesses have been converted to heat pumps that are completely reliant on electricity to run, is this really the best time to go all-in with an unreliable methane supplier? If the US turns off the tap as part of their trade war (or inflates the price to extortionist levels), what good will these power plants be? This is a childishly obvious attempt to increase fracking in Nova Scotia (one of the Premier's pet projects), at a time when other Canadian regions are banning the use of "natural gas" in all new buildings. These billion dollar (each) methane gas power plants will be the wedge that splits Nova Scotia's illogically repealed fracking ban wide open. We already see this happening with the recently announced \$30 million for Dalhousie to research "the nature and location" of methane gas reserves, with no science-based review of impacts including social, health, environmental and economic issues. What century is this? Please, read the room.

-Greenwashing of Methane Gas-

It's been over 30 years since the world

**Name:****Email:**

decided that "natural gas" is an inappropriate nickname for "methane gas", which is 95% methane and 5% other hydrocarbons, but IESO only refers to it as "natural gas" and never mentions the word "methane", which is dishonest marketing - the very definition of greenwashing.

According to the Government of Canada website:

"Methane is a greenhouse gas that is over 84 times more potent than carbon dioxide... responsible for about 30% of the rise in temperature to date and half a million premature deaths globally each year... STRONG, RAPID, AND SUSTAINED METHANE REDUCTIONS ARE CRITICAL TO ADDRESSING CLIMATE CHANGE and improving our health and air quality."  
<https://www.canada.ca/en/services/environment/weather/climatechange/climate-plan/reducing-methane-emissions.html>

Thankfully, at least this fossil fuel is not Columbian blood coal that people are murdered for, but it does nothing to advance our climate change targets. Just the opposite in fact, because as demand increases, more fracking wells will come online adding their leaked emissions, which will increase global warming even more than coal would. This is a waste of opportunity, time and money, that we cannot afford.

Nova Scotia used to briefly supply it's own methane and Enbridge, Emera & Exxon Mobil built a pipeline to export it to the US. But they quickly depleted the Sable Offshore Energy Reserves in just 18 years, which shut down in 2019, so the pipeline flow-direction had to be reversed, so we could import the fuel that we rely on from the US.

We had no choice, because so many Nova Scotian homes and businesses were convinced to convert to "natural gas" for short term corporate profits, and their furnace equipment lasted longer than the entire gas reserve. But now we DO have a choice. We can act like it's 2026 instead of 1926.

There is nothing "long term", "sustainable", "green", "renewable" or

"Nova Scotian" about methane gas, and I encourage everyone to stop using these incorrect terms in reference to it.

#### -Industrial Water Abuse-

After the long drought we had this summer that emptied wells, there is a lot of concern about the enormous amount of water these methane power plants will require.

Methane burns too hot for the turbines, so it has to be cooled down with water. A lot of water!

We're told that 26,000 gallons per hour is the water consumption of 750 residential homes.

That's assuming all 750 of those homes run a 15-minute shower every hour that the plant is running.

It's also more than the entire population of Marshdale, concentrated into one very small area, with a much deeper well drilled underneath everyone else's, raising fears that gravity will drain water from residents' wells to feed the power plant.

Most of that water will vaporize as steam and not return to the ground.

Residents' water rights should not be "trumped" by a privately owned power plant to use it as cheap coolant, while we're experiencing droughts & wildfires every other year.

The promise of 10-15 jobs in our community is a pitiful trade off, especially considering very few of those will go to local residents, if any. Similarly, it seems unlikely that the construction phase will benefit many local residents or businesses.

#### -Mitigation-

IESO has claimed that when (not if) these first two methane plants in Pictou are up and running, the province will look to build more methane plants all across the province. If the government manages to ram this through (as appears to be happening), let's please set up every safeguard we can to prevent the province from being sucked dry.

Because each power plant will be quickly followed by other thirsty

operators that are hungry for power, like AI data centres.

Data centres also have enormous water use requirements for their non-evaporative cooling systems, and can pollute groundwater with PFAS forever chemicals which remain in the human body and are linked to infertility; pregnancy/fetal and childhood development disorders; thyroid disease; cancer; and other illnesses no one deserves to experience, creating more burdens to our strained health care and social support systems.

This rigged "supermajority" government (won with only 24% of the vote, by breaking its commitment to fixed general election dates) might have the authority to rush the construction of more fossil fuel power plants from the 1900's if it wants to (despite never mentioning it in their election campaign).

But is there anything that can be done to fortify our land and water use protections against worst case industrial water extraction and pollution?

Municipal Land Use Bylaws only protect town water supplies. Rural residents are unprotected from industrial overuse.

Is there a way to connect these plants to the towns' water supply with a reverse osmosis system?  
Or pipe in harbour water?

Or, better & cheaper yet, use modern and cost-competitive battery banks that charge when the wind blows and the sun shines, like the rest of the developed world is doing to ABANDON their plans for new methane plants.\* These would become an increasingly strategic asset as more wind energy comes online; a practical investment in our future.

\*source: "Giant batteries that ensure stable power supply by offsetting intermittent renewable supplies are becoming cheap enough to make developers abandon scores of projects for gas-fired generation world-wide." - November 21, 2023, (Reuters)

https://www.reuters.com/business/energy/giant-batteries-drain-economics-gas-power-plants-2023-11-21

-Just Say No to New Methane-

(You can't spell Nova Scotia without "No")

Aquifer-monitoring guarantees are practically meaningless, given this province's long history of extractive industries breaking contractual promises, leaving taxpayers to live with the mess while on the hook for enormous social, economic and healthcare costs, over decades, if they ever get cleaned up at all.

This is not about NIMBY.

We all want a reliable power grid, and for Nova Scotia to prosper without drying up and burning.

This is about responsibility to the people and the planet, before private industry and the Premier's personal interests, which this scheme seems to cater to.

I'm hoping for an ounce of prevention, please.

The time to stop 12 new methane gas power plants across Nova Scotia is now, before the first one is built.

Let's step into this century and not repeat mistakes of the past.

Thank you.

**City/Town**

Salt Springs

**Postal Code Attachment(s):**

B0K 1P0

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# Environmental Assessment - Project Comments

Submission ID

89157c9e

Submission Date

26/01/2026 20:06

Submission status

SUBMITTED



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Select a Project:

Fast Acting Natural Gas Power Generation Facility - Marshdale

Comments:

This is the future of power generation for Nova Scotia.

City/Town

Hebbsville

department's w

Postal Code

B4v 7a8

**Attachment(s):**

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xlsx

Maximum number of files allowed: 10



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

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## Uploaded document(s)

No documents to display.

February 1, 2026

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**Minister Department of Environment**  
1894 Barrington Street, Suite 1800  
P.O. Box 442, Halifax, NS, B3J 2P8  
[Minister.Environment@novascotia.ca](mailto:Minister.Environment@novascotia.ca)

and

**Hon. Julie Dabrusin**  
Minister Environment  
House of Commons  
Ottawa, Ontario K1A 0A6  
[ministre-minister@ec.gc.ca](mailto:ministre-minister@ec.gc.ca)

## The Environmental Assessments for the Proposed

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### **Unacceptable EAs - Dismiss the two 300 MW gas plant proposals for Nova Scotia:**

The Environmental Assessments for two proposed 300MW gas plants lack independent non-biased scrutiny. They fail completely, to do in a professional manner, the requirement to examine project alternatives. Instead, these EAs only adopt the biased position of the proponent, which wrongly states that there are no viable alternatives to building these two gas plants. These EA's simply promote the need for the construction of these two massive gas

burning, and polluting, electrical generating factories. It is embarrassing that these two environmental assessments, probably costing a half million dollars or more, have failed to look at project alternatives in a competent manner.

The capital cost of these plants is not stated, although it is likely \$1 billion dollars each. It is not just the capital cost of the gas plants, but the long-term fuel and operating and maintenance costs, over 40 years, that need to be examined in these EAs. Not examining the alternatives properly in the EAs, is a total failure in these EAs to seek such approvals.

Oil and gas industry lobbyists have influenced governments in this region to think that gas plants are now needed. To now see that such biased project ideas have already proceeded to have EAs completed, on behalf of the Nova Scotia Independent Energy System Operator, and at public cost is unacceptable. **These EAs, and these proposed plants, should be summarily dismissed.**

There is nothing smart or reasonable about building gas plants that are not needed. These plants will be a major user of fossil fuels, and producer of related greenhouse gases and pollution that will degrade air quality, water quality and public and environmental health for 40 or more years. This is the poorest decision making one could imagine for Nova Scotia's energy future.

These EAs do not even provide a real project alternatives section. What little there is, less than 2 pages, relies on repeating general comments provided by the proponent, and do not even examine properly the alternatives that the proponent claims to have look at. The couple of vague negative references to alternatives in the EAs, cannot be found to exist either in their Appendix, or even an internet search.

### **The Alternatives Are Obvious- They Are Available Now:**

**1) Existing Coal Fired Power:** For an 80% reduction in carbon from electrical generating sources in Nova Scotia, there is no need to turn off all the coal fired power plants. One 150 MW coal fired power plant can provide significant backup on the few days a year when power from wind, solar, hydro plants, and battery back up are insufficient. This is known. In a meeting and tour of part of the Nova Scotia Power management facility in February 2025(\*1), I was shown, and then discussed the fact that Nova Scotia Power has learned how to run their coal fired power plants to be fast acting, even if they need to start up from 0 kw, to then quickly be backing up wind power. This last coal plant can be retired as soon as other back up options are in place, as described below.

### **2) Weather Forecasting:**

-Nova Scotia is in a very fortunate position, because we have very good winds for generating power on land.

-Predicting available wind power and solar is more or less an exact science. Nova Scotia Power has years of experience in how to fill in around wind power from other sources on days where there is not sufficient wind.

**3) Hydro Quebec:** The proponent rejects using power from Hydro Quebec, because they claim they cannot contract for firm power. This is the wrong question to ask, and displays a bias that is ignorant of operations management, intentionally so.

- On June 13<sup>th</sup>, 2018, at a meeting with senior New Brunswick Government officials, our Clean Power Now group were advised that 300MW or under could be booked for space on New Brunswick power lines to import power from Quebec, over existing transmission lines.

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- Over the last 15 years has NSP or Nova Scotia ever asked Hydro Quebec to bid for firm contracts when they become available? Can Nova Scotia get one of these firm contracts instead of Hydro Quebec renewing contracts with U.S. utilities? This discussion simply hasn't happened, nor is it a future option being discussed or planned. It should be.

-The question that needs to be asked is: how much power and at what cost over existing lines as of 2030 can be delivered to Nova Scotia, as firm power, or/and also on occasion as non-firm power?

-Nova Scotia Power already regularly buys some amount of power from Hydro Quebec.

-When power is needed to support the Nova Scotia grid, if our wind and solar and hydro are not able to provide the proper amount that we need, then whoever the system operator is, contacts Hydro Quebec, likely a few days in advance of needing some power, to request how much power Hydro Quebec can sell to Nova Scotia.

-This is an active relationship. For example, on any given particular day for the subsequent 36 hours or three days, or five days, Hydro Quebec would indicate how much power they have available and at what price, so both utilities would quickly know if that that amount of power could be moved through New Brunswick and into Nova Scotia.

The failure to understand or consider the dynamic nature of this existing relationship, as part of the alternative to these proposals for gas plants that are not needed, is a fundamental failure of these EAs.

**4) Battery Storage:** The EAs say that battery backup (likely 300MW by 2030) is being built, but is not appropriate or enough, but they do not indicate why such a judgement on this is being made, or prove that this is valid.

- More battery storage could be built, and at a cheaper cost, compared to two 300 MW gas plants. (\*2)

-Contrary to information in these EAs, if you look up the reference that batteries are not sufficient in these EAs, you find that the Federal government infrastructure bank is giving \$138 million to one of the First Nation communities in Nova Scotia to partner to construct 150 MW of battery storage, to provide fast acting grid backup, and to be online by 2030. This EA reference is exactly the opposite of what these EAs lead the reader to believe in these EAs. (\*3)

-If you want to have 300 MW of battery storage it is going to cost around \$300-400 million. Quite economical compared to each 300 MW gas fired power plant costing \$1 billion just to construct. Then, there is the additional costs of the gas, and ongoing operating and maintenance of these gas plants.

-Grid scale batteries are long lasting, and almost always charged up at the lowest cost price from renewables.

-These battery storage units are already being distributed around the province to reduce transmission losses. These batteries can be charged up in off-peak times.

-600 MW of battery storage costing no more than \$1 billion dollars, may be sufficient, based on wind and solar science, to cover any power needs. What sizing we actually need, to not build these gas plants, is not examined, an inexcusable failure of these EAs.

5) **Battery Backup:** Both EAs in the project alternatives section, identical in both, refer to a report that we cannot reference, that grid scale batteries won't work for fast acting backup, which is nonsense. Does such a report even exist?

6) **Better Options:** The cost and price risk to ratepayers is less with battery backup, and other sources of backup already discussed, including one 150MW coal plant- already paid for.

- use 300MW of more or battery backup – when built.
- The cost of power from Hydro Quebec, through New Brunswick is not examined.
- organize the grid to accept power from EVs, with a program to get people to buy EVs with a 50% subsidy, and a clause for 10 years, that requires these cars be available for grid supply, 50,000 cars x 80KW battery is 4,000,000 KWH.
- how much is available from solar, can there be 100MW+ of solar available.

It is unacceptable that these options, not properly explored, have been dismissed in the EA's.

7) **Backup Requirements:** Vice-Presidents at NSP have explained to me and others in meetings of our CLEAN POWER NOW group, over the last decade, that maybe, and only maybe, there is the need of significant backup for only 5-7 days a year. Hardly justification for spending \$2 billion dollars when you have multiple system options on those days, which can be predicted several days in advance.

8) **What NSP presently does as low wind days approach:**

- Determine how much they can procure from Hydro Quebec, or any extra that can be had from Newfoundland, PEI and New Brunswick.
- Notify the Interruptible Power Rate customers that they may have to shut down, and then about 100-150MW is then available.
- In the future keep a coal plant which is already paid off, available for those few days a year.

**9) The cost of the gas for 40 years:** Think about the cost of the gas for the next 40 years. Is anybody able to come up with any idea of what the cost on the world market of this gas is going to be? Or its availability? And what about the cost to public health and environment?

**10) Power Rates will go up a huge amount:** Nova Scotia ratepayers, are going to be paying off through their power bills the \$2 billion cost of building these proposed, *unnecessary gas plants*, and in addition, the cost of the gas. The amount that our electricity bills will go up because of the cost of gas cannot be estimated. Building these gas plants, is a huge mistake with costs that will harm Nova Scotia for many years.

**11) Independent System Operator – Independent or the Premier’s Yes Men?**

- Nova Scotia has a new government agency called the Independent Energy System Operator.
- Why suddenly is their first major undertaking two 300 MW gas fired power plants? Where is the evidence that this is needed, and the best option? And how did the IESO decide this? The need, and the process that has gone on here, has certainly not been justified in the EAs.
- What is the purpose of the Independent Energy System Operator in Nova Scotia? Nova Scotia Power is operating the energy system properly, and was planning their decarbonization to meet the 2030 deadline.
- There is a significant financial cost to setting up and running the IESO as a new arm of government. How do these costs compare to the status quo that we’ve had, relative to the cost on our bills as ratepayers?
- There might be some rationale why Ontario and Alberta have IESOs, but those jurisdictions have massive and complex power needs, we don’t.
- Is the IESO just the Premier’s front for control of our electric power system?
- You don’t decarbonize by building gas plants, but you sure can make your friends wealthy building these plants. This looks like classic Pork Barrel politics.

**12) These 2 Proposed Gas Projects Are A Two Billion Dollar PORK BARREL:** The optics are very bad here, so let’s discuss them.

- In his first term, Premier Houston decided that we needed an Independent Energy System Operator, which came into being after a study was done for the Province/Premier (\*4). Rob Batherson, the former President of the Conservative Party of Canada, and former President of the Progressive Conservative Party of Nova Scotia, was paid \$100,000 to assist with administrative duties for this study (\*5).
- Did the Premier want to have an Independent Energy System Operator, so that he could more closely control electricity procurement in Nova Scotia. This report is written to say what the Premier wanted.
- The next step in this process once the IESO was being set up, at significant public cost, was to appoint the IESO Board of Directors, chosen by the Premier. The Directors are certainly a group of qualified professional people, management executives, but none of them represent, experience in renewables, and what is the best mix of power sources for decarbonizing the grid in Nova Scotia.
- In 2025, having been re-elected, Premier Houston appointed himself as the Minister of Energy.

- The next step the Premier takes as the Minister of Energy, is that the IESO calls for a party to build and own these \$2 billion for these proposed gas plants, that are to be huge construction projects located as close as possible to the Premier's home riding.
- It is shocking to see shortly after this that the IESO releases EAs for these two gas plants. They were obviously commissioned secretly months before. Were these tendered contracts? Is their cost known? Where are similar studies examining other renewable power supply options instead of just these gas plants? Not done.
- The Premier is also very public about the fact that he fantasizes that Nova Scotia will be a major gas producing province through fracking. Fracking is strongly opposed by the Nova Scotia public. That public opposition led to a legislative ban against fracking in 2014. Premier Houston removed that ban on fracking in 2025 without public consultation or public support.
- Will the Premier soon proclaim his fantasy that Nova Scotia fracked gas will be used for these gas plants. In any case the gas, local or not, gas would be provided at world market prices.
- These gas plants by desire, rather than legitimate process or need, are similar to when John Buchanan was Premier. Buchanan had built coal fired power plants that were not needed, and we have a legacy of having the dirtiest electricity in Canada on a per capita basis.
- The difference between the Buchanan days and now, is that Premier Houston has organized this process in a more sophisticated manner than 30 - 40 years ago, to try to avoid these proposed gas plants being seen for what they really are, a two billion dollar pork barrel of construction projects, as near to the Premier's home riding as possible.
- Look up the definition of Pork Barrel in Canada, and this fits the description perfectly.

**13) The Failures of Building Gas Plants:** Both Quebec and Ontario built gas fired electricity plants in the last 30 years, and in both provinces these have been huge mistakes, a massive costly liability, not needed or even used. Now it seems that Eastern Canadians are about to be the next fools stepping up for gas plants, that are not needed. (\*7)

- If these proposed gas plants are built, Nova Scotians for up to two more generations, will be saddled with major polluting electrical energy, and be a laggard in Canada for getting off fossil fuels. This will lock Nova Scotia into long-term economic and environmental harm.
- The mindset that gas is the next step for clean energy, is a direct step backwards from decarbonization.

**14) A Failure of Decision Making:**

- The problem with all this, is that none of it is in step with best policy decisions, and best practices, that are taking place in many jurisdictions, that are already adopting high levels of renewables, decarbonization, and battery backup. If we even need an IESO, this new organization should search the world, hiring the best experts, for what are the best options for Nova Scotia's energy system planning and decarbonization.
- The Premier's decision to spend what will be billions to provide infrastructure for offshore wind, will leave our communities stuck in the same rut we have been in for years, lacking proper funds for infrastructure that we need, from good roads to public transportation, schools to recreation facilities, to funds for public service, public safety or health care. One more stupid mega project idea, that drains money away from where it is most needed.

### **15) Why Fix What Is Not Broken?**

- The cost to Nova Scotia electricity consumers for this new power, should have been part of these environmental assessments for these proposed gas plants. This is a very big issue relative to proposing to build these gas plants. How can such proposed projects as these be justified? They would add billions of dollars of costs to our power bills, and an unknown long term future cost for the fuel, will certainly cause significant increases in our power bills.
- Reducing Nova Scotia's carbon footprint from electricity by 80% by 2030 does not mean that NSP turns off 100% of the coal plants. Operating an existing, paid for coal fired power plant that would need to operate somewhere between five and thirty days a year makes the need to construct two 300 MW gas plants at a likely cost of \$2 billion dollars look like what it is- ridiculous.
- Importing some amount of power from Quebec through system planning, on an ongoing basis, also eliminates the need to build two 300 MW gas plants.
- Construction of 150 MW of battery storage is already being undertaken with assistance from the Federal Infrastructure Bank. Why not simply add another 150 megawatts, or 300 megawatts, or more? 600Mw of batteries, would cost less than these two proposed billion dollars each gas plants, and be cheaper to run.

This not a happy situation. It's actually a sad situation to live in a province where system planning has suddenly become so politically biased, so as to not even be able to clearly examine best alternatives, and make the right decisions that are best for the price of electricity in Nova Scotia. Here comes our mega project that will be like Newfoundland's Muskrat Falls fiasco, to Nova Scotia's economy.

**16) Biased Decision Making:** The proposed construction of these billion dollars each gas plants, has the same biased assumptions that led to how we got the Maritime Link, and Newfoundland and Labrador's Muskrat Falls. For example;

- If there had been an unbiased analysis, Newfoundland would have instead built wind projects across the province over 2 decades instead of Muskrat Falls, at a fraction of the cost.
- When NSP decided on the Maritime Link versus Hydro Quebec power almost 13 years ago, Nova Scotia did a biased comparative study in 2013, by studying 300MW from Newfoundland versus 500 MW from Quebec. You couldn't bring 500MW from Quebec but you could have brought 350MW. (\*8). While the Maritime Link today may be a good asset for power in the region, the original study was biased and led to a decision that was not the best cost option for Nova Scotians.
- Biased decision making and biased studies, have led to a history of bad decision making, that has plagued Nova Scotia for generations. It is time to put an end to the idiotic mega-project mentality, that proposes gas plants for 2030.
- The bias is clear, the politics are clear, and these gas plant projects should be rejected at the outset.

Spending \$2 billion dollars to lock us into gas plants is as regressive as it gets. Nova Scotia can be a leader in its transition to renewables, but not unless we decarbonize.

As Ministers you should be saying NO to building two 1 billion dollar 300 MW fossil fuel gas plants in Nova Scotia. There are cheaper, better, available options.

you at your request.

### References

- 1) Nov 21, 2024 meeting with | Director, Energy and Risk Management | [Nova Scotia Power](#)
- 2) <https://spaces.hightail.com/receive/8EVH8GIEXU>

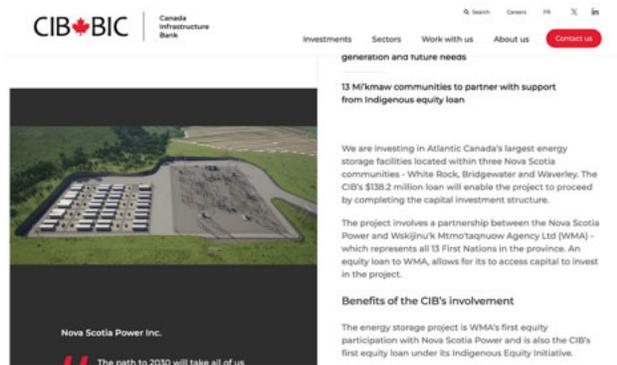


## Nova Scotia's 2030 Clean Power Plan

Nova Scotia Department of Natural  
Resources and Renewables



3) <https://spaces.hightail.com/receive/TdNiHwEBmw>



#### 4) Clean Electricity Solutions Task Force

The task force of two was comprised of Alison Scott, a former Nova Scotia deputy minister of Energy and former member of the National Energy Board, and [John MacIsaac](#), a former senior vice-president of Nalcor Energy in Newfoundland and Labrador from 2016-2019.

5) Additionally, Rob Batherson, a Conservative Party operative, was extended a non-publicized [\\$100,000 contract](#) to assist Scott and MacIsaac with “administrative” duties.

<https://www.halifaxexaminer.ca/economy/energy/task-force-recommends-sweeping-reforms-of-nova-scotia-power-and-uarb/>

#### 7) Ontario Gas Plant Failures & Controversies

-Ontario:

- **The 2011/2013 Scandal (\$1B+ Cost):** The Liberal government cancelled two gas-fired power plants (Oakville and Mississauga) in 2011 to save seats in a provincial election, a move that cost taxpayers an estimated \$1 billion.  
<https://taf.ca/ontarios-next-gas-plant-scandal/>

-Quebec:

**Failed Past Project (Bécancour):** Hydro-Québec previously paid over **\$1-billion in compensation** to TransCanada Corp. for a "hardly-used" gas plant in Bécancour, which was mothballed.

Jan 14, 2016 — *Hydro-Québec has found it cheaper to pay TransCanada not to produce power rather than to pay for electricity from Bécancour and resell it on the ...*

8) <https://spaces.hightail.com/receive/UOcJO5nnzz>

**Analysis of Proposed Development of the  
Maritime Link and Associated Energy from  
Muskrat Falls Relative to Alternatives**

Prepared for:

**Nova Scotia Department of Energy**

January 16, 2013



[poweradvisoryllc.com](http://poweradvisoryllc.com)  
978 369-2465

# Environmental Assessment - Project Comments

Submission ID

37888a4b

Submission Date

03/02/2026 18:21

Submission status

SUBMITTED



All comments received from the public consultation will be posted on the department's website for public viewing, following the necessary redactions of personal information in accordance with the Freedom of Information and Protection of Privacy Act.

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

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

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

## Privacy Notice

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

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

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

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

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

## Select a Project:

Fast Acting Natural Gas Power Generation Facility - Marshdale

## Comments:

The proposal to construct a 300-MW natural gas power generation facility in Marshdale raises serious concerns about long-term energy security, climate alignment, and strategic planning for Nova Scotia's electricity system.

1. Global experience shows the risks of continued reliance on fossil fuels

Across much of the world, jurisdictions are actively moving away from fossil-fuel-based electricity generation—not out of idealism, but out of necessity. Europe provides a stark and instructive example. The war in Ukraine exposed how deeply vulnerable gas-dependent power systems are to geopolitical shocks, supply disruptions, and price volatility.

In the United Kingdom, electricity prices are set through a marginal pricing mechanism, where the most expensive generator—often natural gas—determines the price for all electricity on the grid. As gas prices spiked, households and industries faced unprecedented energy bills, despite growing shares of renewable generation. This has had lasting social and economic consequences and has triggered renewed debate about

the wisdom of gas-centric power systems.

This is not a hypothetical risk—it is a lived reality for millions of people. Nova Scotia should be learning from this experience, not repeating it.

## 2. A 30-year fossil fuel asset conflicts with climate commitments

The proposed facility is expected to operate for a minimum of 30 years. This timeline alone should raise red flags. Nova Scotia, like Canada more broadly, has made clear commitments to deep greenhouse gas reductions and net-zero targets within that same timeframe.

There is no such thing as a “clean” fossil fuel when used for combustion-based electricity generation. While natural gas may emit less carbon dioxide than coal, it remains a significant source of GHG emissions and methane leakage across its supply chain. Locking in new gas infrastructure today creates a structural dependency that makes future emissions reductions harder, more expensive, and more politically difficult. Once built, these facilities do not simply disappear when cleaner options become available—they demand utilization to justify their capital cost, risking long-term carbon lock-in.

## 3. Why is demand-side management and efficiency not the priority?

Perhaps the most concerning aspect of this proposal is not what it includes, but what it sidelines. Demand-side management (DSM) and energy efficiency remain the lowest-cost, lowest-risk, and fastest-to-deploy resources in any electricity system.

Nova Scotia continues to waste enormous amounts of energy in:

Poorly performing buildings

Inefficient industrial processes

Under-optimized commercial energy use

Every megawatt avoided through efficiency is a megawatt that does not need to be generated, transmitted, or backed up with fossil fuel capacity. Jurisdictions that have aggressively pursued DSM have consistently shown that reliability can be maintained—often improved—without expanding fossil infrastructure.

The question that must be asked is: why are we planning new gas capacity before fully exhausting our efficiency and demand-reduction potential?

## 4. The need for genuinely long-term thinking

Energy infrastructure decisions made today shape outcomes for generations. A 30-year gas plant reflects short-term system thinking in a world that demands long-term resilience.

True long-term planning would prioritize:

Deep energy efficiency and DSM

Grid-scale storage and flexible demand

Electrification aligned with renewable generation

System resilience that does not depend on volatile fuel markets

Nova Scotia has the opportunity to design an electricity system that is resilient, affordable, and aligned with its climate goals. Committing to new fossil fuel infrastructure at this moment risks undermining all three.

We should be thinking not just about the next reliability challenge—but about the energy system we want to leave behind.

**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:

**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)

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Uploaded document(s)

No documents to display.

**Fw: EAs Marshdale and Salt Spring, Pictou Co.**

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**From** Higgins, Jeremy W <Jeremy.Higgins@novascotia.ca>  
**Date** Wed 2026-02-04 7:50 AM  
**To** Environment Assessment Web Account <EA@novascotia.ca>

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@sitemedia.ca>

**Sent:** Tuesday, February 3, 2026 6:03 PM  
**To:** Environment Assessment Web Account <EA@novascotia.ca>  
**Cc:** info@marcomacleod.com <info@marcomacleod.com>; Sean.Fraser@parl.gc.ca <Sean.Fraser@parl.gc.ca>  
**Subject:** EAs Marshdale and Salt Spring, Pictou Co.

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

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

I am writing as a resident of Pictou Co. Both of the Environmental Assessments for the proposed Marshdale and Salt Spring sites should be dismissed. Below, please find comprehensive arguments that in my opinion, obviate any serious consideration of these projects. I echo his objections.

To these comments I will also add my voice to the concerns already expressed by many Pictou County residents regarding the excessive use of water these proposed projects are projected to use. The summer of 2025 should alarm all Nova Scotians given the lengthy drought that was experienced. This type of drought should be expected to occur again in the future. Large industrial sites such as those proposed that use huge amounts of water would put the public at risk and affect other industries such as agriculture.

Nova Scotia should not be considering investing billions of dollars in fossil fuels especially given the tremendous advance of renewable energy technologies. These proposed projects in Marshdale and Salt Springs are egregiously out of step with our country's energy future. Instead, Nova Scotia should continue to focus on wind and solar and related technologies as it has been doing and not be I claims of fossil fuel based technologies.

n to these projects.

From:

www.blackriver.group

To:

Hon. **Timothy Halman** and Hon. Julie Dabrusin

**Minister** Department of Environment Minister Environment

1894 Barrington Street, Suite 1800 House of Commons

P.O. Box 442, Halifax, NS, B3J 2P8 OEawa, Ontario K1A 0A6

Minister.Environment@novascoMa.ca **ministre-minister@ec.gc.ca**

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- Why suddenly is their first major undertaking two 300 MW gas fired power plants? Where is the evidence that this is needed, and the best option? And how did the IESO decide this? The need, and the process that has gone on here, has certainly not been justified in the EAs.

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- Is the IESO just the Premier's front for control of our electric power system?

- You don't decarbonize by building gas plants, but you sure can make your friends wealthy building these plants. This looks like classic Pork Barrel politics.

12) These 2 Proposed Gas Projects Are A Two Billion Dollar PORK BARREL: The options are very bad here, so let's discuss them.

- In his first term, Premier Houston decided that we needed an Independent Energy System Operator, which came into being after a study was done for the Province/Premier (\*4). Rob Batherson, the former President of the Conservative Party of Canada, and former President of the Progressive Conservative Party of Nova Scotia, was paid \$100,000 to assist with administrative duties for this study (\*5).

- Did the Premier want to have an Independent Energy System Operator, so that he could more closely control electricity procurement in Nova Scotia. This report is written to say what the Premier wanted.

- The next step in this process once the IESO was being set up, at significant public cost, was to appoint the IESO Board of Directors, chosen by the Premier. The Directors are certainly a group of qualified professional people, management executives, but none of them represent, experience in renewables, and what is the best mix of power sources for decarbonizing the grid in Nova Scotia.

- In 2025, having been re-elected, Premier Houston appointed himself as the Minister of Energy.-The next step the Premier takes as the Minister of Energy, is that the IESO calls for a party to build and own these \$2 billion for these proposed gas plants, that are to be huge construction projects located as close as possible to the Premier's home riding.

- It is shocking to see shortly after this that the IESO releases EAs for these two gas plants. They were obviously commissioned secretly months before. Were these tendered contracts? Is their cost known? Where are similar studies examining other renewable power supply options instead of just these gas plants? Not done.

- The Premier is also very public about the fact that he fantasizes that Nova Scotia will be a major gas producing province through fracking. Fracking is strongly opposed by the Nova Scotia public. That public opposition led to a legislative ban against fracking in 2014. Premier Houston removed that ban on fracking in 2025 without public consultation or public support.

- Will the Premier soon proclaim his fantasy that Nova Scotia fracked gas will be used for these gas plants. In any case the gas, local or not, gas would be provided at world market prices.

- These gas plants by desire, rather than legitimate process or need, are similar to when John Buchanan was Premier. Buchanan had built coal fired power plants that were not needed, and we have a legacy of having the dirtiest electricity in Canada on a per capita basis.

- The difference between the Buchanan days and now, is that Premier Houston has organized this process in a more sophisticated manner than 30 - 40 years ago, to try to avoid these proposed gas plants being seen for what they really are, a two billion dollar pork barrel of construction projects, as near to the Premier's home riding as possible.

-Look up the definition of Pork Barrel in Canada, and this fits the description perfectly.

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-The mindset that gas is the next step for clean energy, is a direct step backwards from decarbonization.

14) A Failure of Decision Making:

-The problem with all this, is that none of it is in step with best policy decisions, and best practices, that are taking place in many jurisdictions, that are already adopting high levels of renewables, decarbonization, and battery backup. If we even need an IESO, this new organization should search the world, hiring the best experts, for what are the best options for Nova Scotia's energy system planning and decarbonization.

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-The cost to Nova Scotia electricity consumers for this new power, should have been part of these environmental assessments for these proposed gas plants. This is a very big issue relative to proposing to build these gas plants. How can such proposed projects as these be justified? They would add billions of dollars of costs to our power bills, and an unknown long term future cost for the fuel, will certainly cause significant increases in our power bills.

-Reducing Nova Scotia's carbon footprint from electricity by 80% by 2030 does not mean that NSP turns off 100% of the coal plants. Operating an existing, paid for coal fired power plant that would need to operate somewhere between five and thirty days a year makes the need to construct two 300 MW gas plants at a likely cost of \$2 billion dollars look like what it is-ridiculous.

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-Construction of 150 MW of battery storage is already being undertaken with assistance from the Federal Infrastructure Bank. Why not simply add another 150 megawatts, or 300 megawatts, or more? 600MW of batteries, would cost less than these two proposed billion dollars each gas plants, and be cheaper to run.

This not a happy situation. It's actually a sad situation to live in a province where system planning has suddenly become so politically biased, so as to not even be able to clearly examine best alternatives, and make the right decisions that are best for the price of electricity in Nova Scotia. Here comes our mega project that will be like Newfoundland's Muskrat Falls fiasco, to Nova Scotia's economy.

16) Biased Decision Making: The proposed construction of these billion dollars each gas plants, has the same biased assumptions that led to how we got the Mari4me Link, and Newfoundland and Labrador's Muskrat Falls. For example;

-If there had been an unbiased analysis, Newfoundland would have instead built wind projects across the province over 2 decades instead of Muskrat Falls, at a fraction of the cost.

-When NSP decided on the Mari4me Link versus Hydro Quebec power almost 13 years ago, Nova Scotia did a biased comparative study in 2013, by studying 300MW from Newfoundland versus 500 MW from Quebec. You couldn't bring 500MW from Quebec but you could have brought 350MW. (\*8). While the Mari4me Link today may be a good asset for power in the region, the original study was biased and led to a decision that was not the best cost option for Nova Scotians.

-Biased decision making and biased studies, have led to a history of bad decision making, that has plagued Nova Scotia for generations. It is time to put an end to the idiotic mega-project mentality, that proposes gas plants for 2030.

-The bias is clear, the politics are clear, and these gas plant projects should be rejected at the outset.

Spending \$2 billion dollars to lock us into gas plants is as regressive as it gets. Nova Scotia can be a leader in its transition to renewables, but not unless we decarbonize. As Ministers you should be saying NO to building two 1 billion dollar 300 MW fossil fuel gas

plants in Nova Scotia. There are cheaper, better, available options.

I would be pleased to speak with you at your request.

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## References

1) Nov 21, 2024 meeting with  
Risk Management | Nova Scotia Power

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2) <https://spaces.hightail.com/receive/8EVH8GIEXU3>) [hXps://spaces.hightail.com/receive/TdNiHwEBmw](https://spaces.hightail.com/receive/TdNiHwEBmw)

#### 4) Clean Electricity Solutions Task Force

The task force of two was comprised of Alison ScoX, a former Nova Scotia deputy minister of Energy and former member of the National Energy Board, and [John MacIsaac](#), a former senior vice-president of Nalcor Energy in Newfoundland and Labrador from 2016-2019.

5) Additionally, Rob Batherson, a Conservative Party operative, was extended a non-publicized **\$100,000 contract** to assist ScoX and MacIsaac with "administrative" duties.

<https://www.halifaxexaminer.ca/economy/energy/task-force-recommends-sweeping-reforms-of-nova-scotia-power-and-uarb/>

#### 7) Ontario Gas Plant Failures & Controversies

-Ontario:

- The 2011/2013 Scandal (\$1B+ Cost): The Liberal government cancelled two gas-fired power plants (Oakville and Mississauga) in 2011 to save seats in a provincial election, a move that cost taxpayers an estimated \$1 billion.

<https://taf.ca/ontarios-next-gas-plant-scandal/>

-Quebec:

Failed Past Project (Bécancour): Hydro-Québec previously paid over \$1-billion in compensation to TransCanada Corp. for a "hardly-used" gas plant in Bécancour, which was mothballed.

Jan 14, 2016 — Hydro-Québec has found it cheaper to pay TransCanada not to produce power rather than to pay for electricity from Bécancour and resell it on the ...8) <https://spaces.hightail.com/receive/UOcJO5nzz>

From:

[timothy.halman@blackrivergroup.com](mailto:timothy.halman@blackrivergroup.com)

[www.blackriver.group](http://www.blackriver.group)

To:

Hon. **Timothy Halman** and Hon. Julie Dabrusin

**Minister** Department of Environment Minister Environment

1894 Barrington Street, Suite 1800 House of Commons

P.O. Box 442, Halifax, NS, B3J 2P8 Ottawa, Ontario K1A 0A6

Minister.Environment@novascotia.ca [ministre-minister@ec.gc.ca](mailto:ministre-minister@ec.gc.ca)

The Environmental Assessments for two proposed 300MW gas plants lack independent non-biased scrutiny. They fail completely, to do in a professional manner, the requirement to examine project alternatives. Instead, these EAs only adopt the biased position of the proponent, which wrongly states that there are no viable alternatives to building these two gas plants. These EAs simply promote the need for the construction of these two massive gasburning, and polluting, electrical generating factories. It is embarrassing that these two environmental assessments, probably costing a half million dollars or more, have failed to look at project alternatives in a competent manner.

The capital cost of these plants is not stated, although it is likely \$1 billion dollars each. It is not just the capital cost of the gas plants, but the long-term fuel and operating and maintenance costs, over 40 years, that need to be examined in these EAs. Not examining the alternatives properly in the EAs, is a total failure in these EAs to seek such approvals.

Oil and gas industry lobbyists have influenced governments in this region to think that gas plants are now needed. To now see that such biased project ideas have already proceeded to have EAs completed, on behalf of the Nova Scotia Independent Energy System Operator, and at public cost is unacceptable. These EAs, and these proposed plants, should be summarily dismissed.

There is nothing smart or reasonable about building gas plants that are not needed. These plants will be a major user of fossil fuels, and producer of related greenhouse gases and pollution that will degrade air quality, water quality and public and environmental health for 40 or more years. This is the poorest decision making one could imagine for Nova Scotia's energy future.

These EAs do not even provide a real project alternatives section. What little there is, less than 2 pages, relies on repeating general comments provided by the proponent, and do not even examine properly the alternatives that the proponent claims to have looked at. The couple of vague negative references to alternatives in the EAs, cannot be found to exist either in their Appendix, or even an internet search.

The Alternatives Are Obvious- They Are Available Now:

1) Existing Coal Fired Power: For an 80% reduction in carbon from electrical generating sources in Nova Scotia, there is no need to turn off all the coal fired power plants. One 150 MW coal fired power plant can provide significant backup on the few days a year when power from wind, solar, hydro plants, and battery backup are insufficient. This is known. In a meeting and tour of part of the Nova Scotia Power management facility in February 2015(\*1), I was shown, and then discussed the fact that Nova Scotia Power has learned how to run their coal fired power plants to be fast acting, even if they need to start up from 0 kw, to then quickly be backing up wind power. This last coal plant can be retired as soon as other backup options are in place, as described below.

2) Weather Forecasting:

-Nova Scotia is in a very fortunate position, because we have very good winds for generating power on land.

-Predicting available wind power and solar is more or less an exact science. Nova Scotia Power has years of experience in how to fill in around wind power from other sources on days where there is not sufficient wind.3) Hydro Quebec: The proponent rejects using power from Hydro Quebec, because they claim they cannot contract for firm power. This is the wrong question to ask, and displays a bias that is ignorant of operations management, intentionally so.

- On June 13<sup>th</sup>, 2018, at a meeting with senior New Brunswick Government officials, our Clean Power Now group were advised that 300MW or under could be booked for space on New Brunswick power lines to import power from Quebec, over existing transmission lines.

-With the installation of a 345kv line underway from Nova Scotia into New Brunswick, it is likely that 600MW could be booked as firm power from Quebec.

- In the autumn 2018, we met in Ottawa with the NRCAN Minister's head policy advisors, to request that they convene a meeting of all parties to make such a deal happen, but no steps were taken to do this.

- Nova Scotia, Nova Scotia Power, and Quebec Hydro have never convened a meeting to come to a contract offer, to provide part of Nova Scotia's needs with firm power. There is an inherent bias in Nova Scotia, and also at Nova Scotia Power, against Hydro Quebec. NSP doesn't want to be a secondary player to Hydro Quebec. NSP's parent EMERA considers themselves as a competitor to Hydro Quebec.

- Over the last 15 years has NSP or Nova Scotia ever asked Hydro Quebec to bid for firm contracts when they become available? Can Nova Scotia get one of these firm contracts instead of Hydro Quebec renewing contracts with U.S. utilities? This discussion simply hasn't happened, nor is it a future option being discussed or planned. It should be.

-The question that needs to be asked is: how much power and at what cost over existing lines as of 2030 can be delivered to Nova Scotia, as firm power, or/and also on occasion as non-firm power?

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- 2) <https://spaces.hightail.com/receive/8EVH8GIEXU3> <https://spaces.hightail.com/receive/TdNiHwEBmw>
- 4) Clean Electricity Solutions Task Force  
The task force of two was comprised of Alison Scofield, a former Nova Scotia deputy minister of Energy and former member of the National Energy Board, and John MacIsaac, a former senior vice-president of Nalcor Energy in Newfoundland and Labrador from 2016-2019.
- 5) Additionally, Rob Batherson, a Conservative Party operative, was extended a non-publicized \$100,000 contract to assist Scofield and MacIsaac with "administrative" duties.  
<https://www.halifaxexaminer.ca/economy/energy/task-force-recommends-sweeping-reforms-of-nova-scotia-power-and-uarb/>
- 7) Ontario Gas Plant Failures & Controversies  
-Ontario:
  - The 2011/2013 Scandal (\$1B+ Cost): The Liberal government cancelled two gas-fired power plants (Oakville and Mississauga) in 2011 to save seats in a provincial election, a move that cost taxpayers an estimated \$1 billion.  
<https://taf.ca/ontarios-next-gas-plant-scandal/>
- Quebec:  
Failed Past Project (Bécancour): Hydro-Québec previously paid over \$1-billion in compensation to TransCanada Corp. for a "hardly-used" gas plant in Bécancour, which was mothballed.  
Jan 14, 2016 — Hydro-Québec has found it cheaper to pay TransCanada not to produce power rather than to pay for electricity from Bécancour and resell it on the ...  
<https://spaces.hightail.com/receive/UOcJO5nnzz>

# Environmental Assessment - Project Comments

Submission ID

bf0e6007

Submission Date

04/02/2026 11:53

Submission status

SUBMITTED



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## Select a Project:

Fast Acting Natural Gas Power Generation Facility - Marshdale

## Comments:

Please deny this application. Spending roughly a billion dollars, committing us to burning fossil fuel for 20-30 or more years is FISCALLY IRRESPONSIBLE. There are cheaper and more environmentally appropriate alternatives. \$200 million is currently being spent for 150MW battery backup in Nova Scotia. Even without likely economies of scale the same \$1 billion should get at least 750MW of battery backup instead of the 300MW of this gas turbine. Further the new transmission line from NB to NS should be available by 2028, likely making this gas plant superfluous after only a year or two of operation.

As an environmental impact statement this one is gravely defective for lack of honest consideration of the full range of societal and environmental costs of these gas plants, as well as for inadequate consideration of alternatives, such as those referenced in the submission by

Name:

Email:

City/Town

Postal Code

Attachment(s):

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# Environmental Assessment - Project Comments

Submission ID

0f6fdca9

Submission Date

04/02/2026 12:34

Submission status

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Fast Acting Natural Gas Power Generation Facility - Marshdale

## Comments:

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Please deny this application. Spending roughly a billion dollars, committing us to burning fossil fuel for 20-30 or more years is FISCALLY IRRESPONSIBLE. There are cheaper and more environmentally appropriate alternatives. \$200 million is currently being spent for 150MW battery backup in Nova Scotia. Even without likely economies of scale the same \$1 billion should get at least 750MW of battery backup instead of the 300MW of this gas turbine. Further the new transmission line from NB to NS should be available by 2028, likely making this gas plant

superfluous after only a year or two of operation.

**Name:**

**Email:**

**City/Town**

E. Lawrencetown

**Postal Code**

B2Z 1P4

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# Environmental Assessment - Project Comments

Submission ID

3875a295

Submission Date

04/02/2026 14:40

Submission status

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## Select a Project:

Fast Acting Natural Gas Power Generation Facility - Marshdale

## Comments:

I am opposed to this initiative and think it should not be approved.

This project seems to lock in the province to be using fossil fuels and producing greenhouse gasses for decades to come. I am not convinced that the proposal has considered alternatives, notably battery storage or purchase of electricity from green sources outside the province. Even using the coal-fired plants a bit longer would seem preferable to making a long-term commitment to burn methane for power.

Name:

Email:

**City/Town**

Wolfville

**Postal Code**

B4P 1V1

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# Environmental Assessment - Project Comments

Submission ID

f0cb8176

Submission Date

05/02/2026 08:32

Submission status

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## Select a Project:

Fast Acting Natural Gas Power Generation Facility - Marshdale

## Comments:

We need to decarbonize. Gas is not the next step in that process, and will not help us have clean energy. This plant will produce greenhouse gases and pollution from major fossil fuel use, which will then negatively affect public health and environmental health for decades. This plant cannot be part of this province's transition to using more clean energy, and the people living near it, as well as others farther away who will also experience the negative effects, should not be sacrificed for the illusion that gas-fired plants will help transition away from using fossil fuels.

Name:

Email:

City/Town

Halifax

Postal Code

B3L 3k7

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## EAs for the Proposed Marshdale & SaltSpring Gas plants

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@ns.sympatico.ca>

**Date** Thu 2026-02-05 12:20 PM

**To** Environment Assessment Web Account <EA@novascotia.ca>; Marshdale@iaac-aeic.gc.ca <Marshdale@iaac-aeic.gc.ca>; SaltSprings@iaac-aeic.gc.ca <SaltSprings@iaac-aeic.gc.ca>; ministre-minister@ec.gc.ca <ministre-minister@ec.gc.ca>; Minister, Env <Minister.Environment@novascotia.ca>

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

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Good morning;

I find it difficult to have to address this issue of the proposed Marshdale and SaltSprings Gas plants. Nova Scotians have so roundly objected to fracking for Natural Gas to the point of banning it in our province. Without consideration this current government has made a complete reversal and has gone so far as to fund Dalhousie University to the tune of \$30 million to promote industrial development of this industry in our province. These government directions are reckless and regressive, undermining the wishes of the people of NS to truly decarbonize but demonstrating quite clearly that it is the fossil fuel/oil interests that are all that really matter to this government.

The Environmental Assessments for two proposed 300MW gas plants lack independent unbiased scrutiny and have failed completely to fulfill the requirement to examine project alternatives. The report that renewables are not up for the task lacked the scrutiny needed and simply fell back on the interests of the fossil fuel industry's desire to build at enormous expense, (roughly \$1 Billion ea), infrastructure that could be done at a fraction of the costs by utilizing battery storage through renewable sources.

And It's not just the capital cost of these gas plants to consider, but also the long-term fuel and operating and maintenance costs, over 40 years, which have also not properly been examined by the EAs. So again by not examining the possible alternatives the EAs conclusion are a reckless disservice to the people of NS.

Just how independent is the Nova Scotia Independent Energy System Operator, whose transparent bias to favour the interest of the fossil fuel industries is there for all to see. Due diligence was not done. These EAs do not provide any real project alternatives section in their report, citing renewables as insufficient.

NS is ideally located for a wide range of alternative energy sources. (BioMass is not a green alternative energy source). The huge cost to build and operate the Marshdale and SaltSpring Gas Plants are neither wanted or necessary.

A 300 MW of battery storage is going to cost around \$300-400 million compared with the price tag which is upward to \$2 Billion. Quite economical compared to each 300 MW gas fired power plant costing \$1 billion just to construct plus the additional costs of the gas, and ongoing operating and maintenance of these gas plants.

It would therefore be more cost effective and responsible to build grid scale batteries that are long lasting, and are almost always charged up at the lowest cost price from renewables. These battery storage units are already being distributed around the province to reduce transmission losses and these batteries can be charged up in off-peak times.

By doubling the battery storage capacity to 600 MW of battery storage the cost would roughly be \$1 billion dollars, half of the proposed 2 gas plants and may be sufficient, based on wind and solar science, to cover any power needs. The failure to examine what sizing is actually needed in NS, in lieu of embracing the build of these gas plants, is an inexcusable failure of these EAs.

Nova Scotia electricity consumers are already being saddled with ever rising bills. Was this even a consideration when the EAs for these proposed gas plants was done? This is a very big issue relative to proposing to build these gas plants. How can such proposed projects as these be justified? They would add billions of dollars of costs to our power bills, and then there is the unknown long term future cost for the fuel, which will certainly cause significant increases in our power bills.

The reduction of Nova Scotia's carbon footprint from electricity by 80% by 2030 does not mean that NSP has to turn off 100% of the coal plants. Operating an existing, paid for coal fired power plant that might be needed to operate for short periods of time annually makes the need to construct two 300 MW gas plants at a likely cost of \$2 billion dollars absurd.

I sincerely believe that spending \$2 billion dollars to lock us into gas plants is extremely regressive. Nova Scotia can and should be a leader in our transition towards renewables. It can only happen if we decarbonize and stop supporting fossil fuels.

As Ministers, in this time of global climate crisis and water bankruptcy, it is your responsibility to act for the best long term well being of all Nova Scotians. You should be saying **NO** to building two 1 billion dollar 300 MW fossil fuel gas plants in Nova Scotia as there are cheaper, better, available options.

**Fw: Gas**

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**From** Higgins, Jeremy W <Jeremy.Higgins@novascotia.ca>

**Date** Fri 2026-02-06 7:50 AM

**To** Environment Assessment Web Account <EA@novascotia.ca>

For salt springs

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@gmail.com>

**Sent:** Thursday, February 5, 2026 10:45 AM

**To:** Environment Assessment Web Account <EA@novascotia.ca>; Marshdale@iaac-aeic.gc.ca <Marshdale@iaac-aeic.gc.ca>; altSprings@iaac-aeic.gc.ca <altSprings@iaac-aeic.gc.ca>; ministre-minister@ec.gc.ca <ministre-minister@ec.gc.ca>; Minister, Env <Minister.Environment@novascotia.ca>

**Subject:** Gas

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Hello representatives,

Please consider the following information before approving any Gas development.

We deserve to go in the right direction, away from fossil fuels, towards a better future that doesn't destroy this land and our air and water.

Thank you for your consideration,

---

## The Environmental Assessments for the Proposed

Dear Ministers of Environment:

Unacceptable EAs - Dismiss the two 300 MW gas plant proposals for Nova Scotia:

The Environmental Assessments for two proposed 300MW gas plants lack independent non-biased scrutiny. They fail completely, to do in a professional manner, the requirement to examine project alternatives. Instead, these EAs only adopt the biased position of the proponent, which wrongly states that there are no viable alternatives to building these two gas plants. These EA's simply promote the need for the construction of these two massive gas burning, and polluting, electrical generating factories. It is embarrassing that these two environmental assessments, probably costing a half million dollars or more, have failed to look at project alternatives in a competent manner.

The capital cost of these plants is not stated, although it is likely \$1 billion dollars each. It is not just the capital cost of the gas plants, but the long-term fuel and operating and maintenance costs, over 40 years, that need to be examined in these EAs. Not examining the alternatives properly in the EAs, is a total failure in these EAs to seek such approvals.

Oil and gas industry lobbyists have influenced governments in this region to think that gas plants are now needed. To now see that such biased project ideas have already proceeded to have EAs completed, on behalf of the Nova Scotia Independent Energy System Operator, and at public cost is unacceptable. These EAs, and these proposed plants, should be summarily dismissed.

There is nothing smart or reasonable about building gas plants that are not needed. These plants will be a major user of fossil fuels, and producer of related greenhouse gases and pollution that will degrade air quality, water quality and public and environmental health for 40 or more years. This is the poorest decision making one could imagine for Nova Scotia's energy future.

These EAs do not even provide a real project alternatives section. What little there is, less than 2 pages, relies on repeating general comments provided by the proponent, and do not even examine properly the alternatives that the proponent claims to have look at. The couple of vague negative references to alternatives in the EAs, cannot be found to exist either in their Appendix, or even an internet search.

The Alternatives Are Obvious- They Are Available Now:

1) Existing Coal Fired Power: For an 80% reduction in carbon from electrical generating sources in Nova Scotia, there is no need to turn off all the coal fired power plants. One 150 MW coal fired power plant can provide significant backup on the few days a year when power from wind, solar, hydro plants, and battery back up are insufficient. This is known. In a meeting and tour of part of the Nova Scotia Power management facility in February 2025(\*1), I was shown, and then discussed the fact that

Nova Scotia Power has learned how to run their coal fired power plants to be fast acting, even if they need to start up from 0 kw, to then quickly be backing up wind power. This last coal plant can be retired as soon as other back up options are in place, as described below.

## 2) Weather Forecasting:

- Nova Scotia is in a very fortunate position, because we have very good winds for generating power on land.
- Predicting available wind power and solar is more or less an exact science. Nova Scotia Power has years of experience in how to fill in around wind power from other sources on days where there is not sufficient wind.

3) Hydro Quebec: The proponent rejects using power from Hydro Quebec, because they claim they cannot contract for firm power. This is the wrong question to ask, and displays a bias that is ignorant of operations management, intentionally so.

- On June 13th, 2018, at a meeting with senior New Brunswick Government officials, our Clean Power Now group were advised that 300MW or under could be booked for space on New Brunswick power lines to import power from Quebec, over existing transmission lines.
- With the installation of a 345kv line underway from Nova Scotia into New Brunswick, it is likely that 600MW could be booked as firm power from Quebec.
- In the autumn 2018, we met in Ottawa with the NRCAN Minister's head policy advisors, to request that they convene a meeting of all parties to make such a deal happen, but no steps were taken to do this.
- Nova Scotia, Nova Scotia Power, and Quebec Hydro have never convened a meeting to come to a contract offer, to provide part of Nova Scotia's needs with firm power. There is an inherent bias in Nova Scotia, and also at Nova Scotia Power, against Hydro Quebec. NSP doesn't want to be a secondary player to Hydro Quebec. NSP's parent EMERA considers themselves as a competitor to Hydro Quebec.
- Over the last 15 years has NSP or Nova Scotia ever asked Hydro Quebec to bid for firm contracts when they become available? Can Nova Scotia get one of these firm contracts instead of Hydro Quebec renewing contracts with U.S. utilities? This discussion simply hasn't happened, nor is it a future option being discussed or planned. It should be.
- The question that needs to be asked is: how much power and at what cost over existing lines as of 2030 can be delivered to Nova Scotia, as firm power, or/and also on occasion as non-firm power?
- Nova Scotia Power already regularly buys some amount of power from Hydro Quebec.
- When power is needed to support the Nova Scotia grid, if our wind and solar and hydro are not able to provide the proper amount that we need, then whoever the system operator is, contacts Hydro Quebec, likely a few days in advance of needing some power, to request how much power Hydro Quebec can sell to Nova Scotia.
- This is an active relationship. For example, on any given particular day for the subsequent 36 hours or three days, or five days, Hydro Quebec would indicate how much power they have available and at what price, so both utilities would quickly know if that that amount of power could be moved through New Brunswick and into Nova Scotia.

The failure to understand or consider the dynamic nature of this existing relationship, as part of the alternative to these proposals for gas plants that are not needed, is a fundamental failure of these EAs.

4) Battery Storage: The EAs say that battery backup (likely 300MW by 2030) is being built, but is not appropriate or enough, but they do not indicate why such a judgement on this is being made, or prove that this is valid.

- More battery storage could be built, and at a cheaper cost, compared to two 300 MW gas plants. (\*2)

-Contrary to information in these EAs, if you look up the reference that batteries are not sufficient in these EAs, you find that the Federal government infrastructure bank is giving \$138 million to one of the First Nation communities in Nova Scotia to partner to construct 150 MW of battery storage, to provide fast acting grid backup, and to be online by 2030. This EA reference is exactly the opposite of what these EAs lead the reader to believe in these EAs. (\*3)

-If you want to have 300 MW of battery storage it is going to cost around \$300-400 million. Quite economical compared to each 300 MW gas fired power plant costing \$1 billion just to construct. Then, there are the additional costs of the gas, and ongoing operating and maintenance of these gas plants.

-Grid scale batteries are long lasting, and almost always charged up at the lowest cost price from renewables.

-These battery storage units are already being distributed around the province to reduce transmission losses. These batteries can be charged up in off-peak times.

-600 MW of battery storage costing no more than \$1 billion dollars, may be sufficient, based on wind and solar science, to cover any power needs. What sizing we actually need, to not build these gas plants, is not examined, an inexcusable failure of these EAs.

5) Battery Backup: Both EAs in the project alternatives section, identical in both, refer to a report that we cannot reference, that grid scale batteries won't work for fast acting backup, which is nonsense. Does such a report even exist?

6) Better Options: The cost and price risk to ratepayers is less with battery backup, and other sources of backup already discussed, including one 150MW coal plant- already paid for.

- use 300MW of more or battery backup – when built.

-The cost of power from Hydro Quebec, through New Brunswick is not examined.

--organize the grid to accept power from EVs, with a program to get people to buy EVs with a 50% subsidy, and a clause for 10 years, that requires these cars be available for grid supply, 50,000 cars x 80KW battery is 4,000,000 KWH.

-how much is available from solar, can there be 100MW+ of solar available.

It is unacceptable that these options, not properly explored, have been dismissed in the EA's.

7) Backup Requirements: Vice-Presidents at NSP have explained to me and others in meetings of our CLEAN POWER NOW group, over the last decade, that maybe, and only maybe, there is the need of significant backup for only 5-7 days a year. Hardly justification for spending \$2 billion dollars when you have multiple system options on those days, which can be predicted several days in advance.

😏 What NSP presently does as low wind days approach:

- Determine how much they can procure from Hydro Quebec, or any extra that can be had from Newfoundland, PEI and New Brunswick.

- Notify the Interruptible Power Rate customers that they may have to shut down, and then about 100-150MW is then available.

- In the future keep a coal plant which is already paid off, available for those few days a year.

9) The cost of the gas for 40 years: Think about the cost of the gas for the next 40 years. Is anybody able to come up with any idea of what the cost on the world market of this gas is going to be? Or its availability? And what about the cost to public health and environment?

10) Power Rates will go up a huge amount: Nova Scotia ratepayers, are going to be paying off through their power bills the \$2 billion cost of building these proposed, unnecessary gas plants, and in addition, the cost of the gas. The amount that our electricity bills will go up because of the cost of gas cannot be estimated. Building these gas plants, is a huge mistake with costs that will harm Nova Scotia for many years.

11) Independent System Operator – Independent or the Premier's Yes Men?

- Nova Scotia has a new government agency called the Independent Energy System Operator.
- Why suddenly is their first major undertaking two 300 MW gas fired power plants? Where is the evidence that this is needed, and the best option? And how did the IESO decide this? The need, and the process that has gone on here, has certainly not been justified in the EAs.
- What is the purpose of the Independent Energy System Operator in Nova Scotia? Nova Scotia Power is operating the energy system properly, and was planning their decarbonization to meet the 2030 deadline.
- There is a significant financial cost to setting up and running the IESO as a new arm of government. How do these costs compare to the status quo that we've had, relative to the cost on our bills as ratepayers?
- There might be some rationale why Ontario and Alberta have IESOs, but those jurisdictions have massive and complex power needs, we don't.
- Is the IESO just the Premier's front for control of our electric power system?
- You don't decarbonize by building gas plants, but you sure can make your friends wealthy building these plants. This looks like classic Pork Barrel politics.

12) These 2 Proposed Gas Projects Are A Two Billion Dollar PORK BARREL: The optics are very bad here, so let's discuss them.

- In his first term, Premier Houston decided that we needed an Independent Energy System Operator, which came into being after a study was done for the Province/Premier (\*4). Rob Batherson, the former President of the Conservative Party of Canada, and former President of the Progressive Conservative Party of Nova Scotia, was paid \$100,000 to assist with administrative duties for this study (\*5).
- Did the Premier want to have an Independent Energy System Operator, so that he could more closely control electricity procurement in Nova Scotia. This report is written to say what the Premier wanted.
- The next step in this process once the IESO was being set up, at significant public cost, was to appoint the IESO Board of Directors, chosen by the Premier. The Directors are certainly a group of qualified professional people, management executives, but none of them represent, experience in renewables, and what is the best mix of power sources for decarbonizing the grid in Nova Scotia.
- In 2025, having been re-elected, Premier Houston appointed himself as the Minister of Energy.
- The next step the Premier takes as the Minister of Energy, is that the IESO calls for a party to build and own these \$2 billion for these proposed gas plants, that are to be huge construction projects located as close as possible to the Premier's home riding.
- It is shocking to see shortly after this that the IESO releases EAs for these two gas plants. They were obviously commissioned secretly months before. Were these tendered contracts? Is their cost known? Where are similar studies examining other renewable power supply options instead of just these gas plants? Not done.
- The Premier is also very public about the fact that he fantasizes that Nova Scotia will be a major gas producing province through fracking. Fracking is strongly opposed by the Nova Scotia public. That public opposition led to a legislative ban against fracking in 2014. Premier Houston removed that ban on fracking in 2025 without public consultation or public support.
- Will the Premier soon proclaim his fantasy that Nova Scotia fracked gas will be used for these gas plants. In any case the gas, local or not, gas would be provided at world market prices.
- These gas plants by desire, rather than legitimate process or need, are similar to when John Buchanan was Premier. Buchanan had built coal fired power plants that were not needed, and we have a legacy of having the dirtiest electricity in Canada on a per capita basis.
- The difference between the Buchanan days and now, is that Premier Houston has organized this process in a more sophisticated manner than 30 - 40 years ago, to try to avoid these proposed gas plants being seen for what they really are, a two billion dollar pork barrel of construction projects, as near to the Premier's home riding as possible.

-Look up the definition of Pork Barrel in Canada, and this fits the description perfectly.

13) The Failures of Building Gas Plants: Both Quebec and Ontario built gas fired electricity plants in the last 30 years, and in both provinces these have been huge mistakes, a massive costly liability, not needed or even used. Now it seems that Eastern Canadians are about to be the next fools stepping up for gas plants, that are not needed. (\*7)

-If these proposed gas plants are built, Nova Scotians for up to two more generations, will be saddled with major polluting electrical energy, and be a laggard in Canada for getting off fossil fuels. This will lock Nova Scotia into long-term economic and environmental harm.

-The mindset that gas is the next step for clean energy, is a direct step backwards from decarbonization.

14) A Failure of Decision Making:

-The problem with all this, is that none of it is in step with best policy decisions, and best practices, that are taking place in many jurisdictions, that are already adopting high levels of renewables, decarbonization, and battery backup. If we even need an IESO, this new organization should search the world, hiring the best experts, for what are the best options for Nova Scotia's energy system planning and decarbonization.

-The Premier's decision to spend what will be billions to provide infrastructure for offshore wind, will leave our communities stuck in the same rut we have been in for years, lacking proper funds for infrastructure that we need, from good roads to public transportation, schools to recreation facilities, to funds for public service, public safety or health care. One more stupid mega project idea, that drains money away from where it is most needed.

15) Why Fix What Is Not Broken?

-The cost to Nova Scotia electricity consumers for this new power, should have been part of these environmental assessments for these proposed gas plants. This is a very big issue relative to proposing to build these gas plants. How can such proposed projects as these be justified? They would add billions of dollars of costs to our power bills, and an unknown long term future cost for the fuel, will certainly cause significant increases in our power bills.

-Reducing Nova Scotia's carbon footprint from electricity by 80% by 2030 does not mean that NSP turns off 100% of the coal plants. Operating an existing, paid for coal fired power plant that would need to operate somewhere between five and thirty days a year makes the need to construct two 300 MW gas plants at a likely cost of \$2 billion dollars look like what it is- ridiculous.

-Importing some amount of power from Quebec through system planning, on an ongoing basis, also eliminates the need to build two 300 MW gas plants.

-Construction of 150 MW of battery storage is already being undertaken with assistance from the Federal Infrastructure Bank. Why not simply add another 150 megawatts, or 300 megawatts, or more? 600Mw of batteries, would cost less than these two proposed billion dollars each gas plants, and be cheaper to run.

This not a happy situation. It's actually a sad situation to live in a province where system planning has suddenly become so politically biased, so as to not even be able to clearly examine best alternatives, and make the right decisions that are best for the price of electricity in Nova Scotia. Here comes our mega project that will be like Newfoundland's Muskrat Falls fiasco, to Nova Scotia's economy.

16) Biased Decision Making: The proposed construction of these billion dollars each gas plants, has the same biased assumptions that led to how we got the Maritime Link, and Newfoundland and Labrador's Muskrat Falls. For example;

-If there had been an unbiased analysis, Newfoundland would have instead built wind projects across the province over 2 decades instead of Muskrat Falls, at a fraction of the cost.

-When NSP decided on the Maritime Link versus Hydro Quebec power almost 13 years ago, Nova Scotia did a biased comparative study in 2013, by studying 300MW from Newfoundland versus 500 MW from Quebec. You couldn't bring 500MW from Quebec but you could have brought 350MW. (\*8). While the Maritime Link today may be a good asset for power in the region, the original study was biased and led to a decision that was not the best cost option for Nova Scotians.

-Biased decision making and biased studies, have led to a history of bad decision making, that has plagued Nova Scotia for generations. It is time to put an end to the idiotic mega-project mentality, that proposes gas plants for 2030.

-The bias is clear, the politics are clear, and these gas plant projects should be rejected at the outset.

Spending \$2 billion dollars to lock us into gas plants is as regressive as it gets. Nova Scotia can be a leader in its transition to renewables, but not unless we decarbonize.

As Ministers you should be saying NO to building two 1 billion dollar 300 MW fossil fuel gas plants in Nova Scotia. There are cheaper, better, available options.

I would be pleased to speak with you at your request.

Sincerely

**new fuel plants**

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@gmail.com >

**Date** Thu 2026-02-05 8:33 PM

**To** Marshdale@iaac-aeic.gc.ca <Marshdale@iaac-aeic.gc.ca>; SaltSprings@iaac-aeic.gc.ca <SaltSprings@iaac-aeic.gc.ca>; ministre-minister@ec.gc.ca <ministre-minister@ec.gc.ca>; Minister, Env <Minister.Environment@novascotia.ca>; Environment Assessment Web Account <EA@novascotia.ca>

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

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As a registered voter in NS (Richmond County) I strongly feel the environmental assessments for the proposed Marshdale and SaltSpring gas plants In Nova Scotia should be summarily dismissed, and the projects cancelled

# Environmental Assessment - Project Comments

Submission ID

88be871c

Submission Date

06/02/2026 13:48

Submission status

SUBMITTED



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## Select a Project:

Fast Acting Natural Gas Power Generation Facility - Salt Springs

## Comments:

My primary concern is that both the construction and operational phases of this project will have a significant detrimental impact on Nova Scotia's Atlantic salmon population.

For context, all rivers in Pictou County, with the exception of the Middle River, support Atlantic salmon. This is highly unusual within Nova Scotia, where only a few dozen rivers still maintain salmon populations. The West and East Rivers are the two most productive systems in the county, accounting for the majority of salmon in the region. While there are proposals to locate power generation facilities on both rivers — and impacts are likely in each — it is my professional opinion as a Marine Ecologist that constructing a facility at the proposed West River site would result in severe and potentially irreversible harm to the salmon population.

The proposed Salt Springs facility would be located along Eight Mile Brook and Six Mile Brook, tributaries of the West River situated north of Salt Springs Provincial Park. These

tributaries represent two of the most ecologically important salmon habitats in Pictou County and arguably within the province. They are among the primary spawning areas used by Atlantic salmon each spring, making their protection essential if conservation and recovery of the species is to be taken seriously.

The most significant risk associated with the proposed facilities is water use. According to documentation submitted by the IESO, the plants would withdraw groundwater from local aquifers for cooling purposes. After use, this water would be treated and stored in tailings ponds before being discharged back into the river system. This poses a major threat to salmon, brook trout, and American eel.

Spawning success in Eight Mile and Six Mile Brook is driven largely by their function as cold-water refugia — the largest and most consistent cold-water inputs in Pictou County. During summer months, water temperatures in the main stem of the West River regularly exceed 26°C, while temperatures in these tributaries typically remain around 16°C. Atlantic salmon and brook trout begin to experience temperature-related stress and mortality when water temperatures exceed approximately 22°C for prolonged periods, conditions that occur annually in this system. As a result, thousands of juvenile salmon and trout migrate into these tributaries each summer to survive periods of elevated temperature.

Groundwater withdrawal from nearby aquifers would reduce the natural cold-water inputs that sustain these refugia. Compounding this issue, treated effluent discharged from tailings ponds would be reintroduced at temperatures well above natural groundwater levels, as tailings ponds are incapable of cooling water below ambient surface temperatures. This combination represents a direct threat to the thermal stability of these critical habitats.

I would also note that the site was selected due to its proximity to the Maritimes Pipeline, high-voltage transmission lines, and what has been described as “low ecological significance.” However, the IESO and Strum report identifies the presence of Atlantic salmon (Endangered under COSEWIC), brook trout, American eel (Special Concern under COSEWIC), black bear, red fox, white-tailed deer, and Black Ash (Threatened under the Nova Scotia Endangered Species Act). If this assemblage constitutes “low ecological significance,” it raises serious questions about how ecological value is being defined.

With respect to infrastructure proximity, the Maritimes Pipeline and high-voltage transmission lines intersect at numerous locations across northeastern Nova Scotia, including along the Middle River, which does not support Atlantic salmon or American eel. In my view, selecting one of the most ecologically sensitive watersheds in the region when less impactful alternatives exist nearby represents a significant disservice to both the environment and the local community. The process appears rushed and insufficiently thought out.

I have raised these concerns repeatedly with Aaron Long, Project Manager at IESO. Despite this, he maintains that the project would not require a federal impact assessment and would not impact fish habitat — conclusions that are not supported by the ecological realities of this system.

**Name:**

**Email:**

**City/Town**

stellarton

**Postal Code**

B0K 1S0

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# Environmental Assessment - Project Comments

Submission ID

19b582ec

Submission Date

06/02/2026 13:50

Submission status

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## Select a Project:

Fast Acting Natural Gas Power Generation Facility - Marshdale

## Comments:

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**Name:**

matt russell

**Email:**

Mattrussell7373@gmail.com

**City/Town**

stellarton

**Postal Code**

B0K 1S0

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# Environmental Assessment - Project Comments

Submission ID

a9d9a1d5

Submission Date

07/02/2026 09:39

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## Select a Project:

Fast Acting Natural Gas Power Generation Facility - Marshdale

## Comments:

What is there to gain and What is there to loose?

If Pictou wants to gain a few (really a few) job for maintaining this facility - which it likely does not have the specialized workforce to manage these plants (maybe it does) but the Pictou community should know the reality Of job creation.

Generation of power is not the same as fixing the grid. That is leased to Emera. And they have very strong contracts which the province has for all its efforts not been able to make them budge - it just makes power more expensive (through government intervention, borrowing cost of Emera went up - and they pushed that cost on consumers) . A crapy electric pole that breaks still cant bring in power... this wont fix that.

Natural gas... we are importers of this gas= expensive = expensive electricity.

While the province wants to develop NG in the province, there has BEEN NO INTEREST.

Not even a exploration lease. Even if there was cheap gas - the business risk is too real for any firm to bet on NS (regardless of the party in power). Only bad actors would think it worth it which tend to generate super fund sites. (A superfund site is something like what happened to boat harbour)

Questions to ask:

- how may jobs for pictou during construction?
- how many job for pictou after?
- is there a nssc program to give specialists jobs?
- will it drop electricity prices?
- are there example of towns that generate power that are booming and stayed that way in Nova Scotia?
- who owns the power generation plant? How are they sharing profits? Or will capital return go all to them?
- how will this plant improve the physical grid for NS?
- where will all the water be taken from? Is it fresh water? Is there discharge from these plants? (Fresh water will be more expensive than electricity - that IS a truly valuable resource that needs protection. By 2030, expectation that supply of fresh water wont cover the demand. Then it becomes very valuable... leasing it now for nothing is not a good idea)
- future development, no one will want to build around these. Is this land valuable other wise?
- when (its not a question of if) governments around the world ban NG (just like they did to coal) this plant will be phased out. Is there a plan in place for decommission? Pension guarantees?
- this is not a viable economic engine of growth. Period. If the community does not own the plant - and the shareholder are somewhere else. The city and its inhabitants wont see much returns (thats a fact) - how will it help Pictou grown?
- power needs to be used. What will it be used for? Is there a new manufacturing plant that wants this power? Or is this to be exported to the rest of NS, NB or Maine?

I love to visit Pictou, and I tell you that we did not visit because of the Mill, or these new proposed methane smoke stacks... we visited because of the community, the warm feeling that always invited us in and to see a community that has always been proud. (Pictou is a town where a lot of things happened that were important to banking, shipping, development...)

The government decided to over spend, and is in a pickle and is trying to fix this by scrapping the barrel for ideas... please dont be the community that falls for it.

**Name:**

**Email:**

**City/Town**

**Postal Code**

B3k 3t9

**Attachment(s):**

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