

Salt Springs

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Salt Springs, NS

February 6, 2026

Environmental Assessment Branch

PO Box 442, Halifax, NS

**Re: Proposed 300 MW Natural Gas Power Plant in Salt Springs**

My wife and I have read the Strum Consulting environmental review report for the 300 MW fast acting natural gas power generation facility being planned for Salt Springs, Pictou County. As you can see from our mailing address, our property is within one kilometer to the proposed location of this project.

The project has been labeled as the most cost-effective path but to what end? To this point, the project appears to be driven by deadlines rather than the necessary field research to ensure positive outcomes.

**Community Engagement:**

Independent Energy System Operator (IESO) held a meeting in West River Fire Hall on November the 12<sup>th</sup>, 2025 - it was advertised as a consultation but in reality, was a variety of information stations documenting aspects of the project where the public could pose questions. This was the first public session on the proposed project so one would have expected a presentation on the project. It is difficult to pose questions when no information had been shared in advance of the community meeting. IESO are supposed to be the professionals so why was a detailed presentation not provided so the questions could be posed from the audience rather than from one-on-one discussions? A true consultation involves information being shared and an opportunity to provide feedback - this did not take place. Where is the transparency?

While we realize a community committee has been established, we have not been approached for our input. We are not aware of any feedback or information that's coming from the members of that committee. Why hasn't the postal service been used to convey information to residents? Assuming that people sit by their computers looking for information is a fallacy. There needs to be a proper public consultation with the community where difficult, but important questions can be posed. There also needs to be a commitment from the proponents as to how problems and issues, if they arise, will be addressed.

The environmental review report was released over the Christmas period with requests for commentary by February the 9th 2026. Everything seems to be rushed. The whole process to this point appears to be that the project is a done deal. In addition, there apparently is a community committee to work with the project proponents however at this point in time I'm not aware of who

represents us on the committee. We've never been asked for our input and have not been provided any additional detail on this 'engagement'. So again, not quite sure whether there's a true community engagement taking place here or whether it's just on paper – just a 'check-mark' to say it has been completed. It is quite obvious that the provincial government wants this project to proceed. Is government prepared to defend growing our reliance on US petro-fuels? That flies in the face of public opinion in Nova Scotia and Canada.

### **Draft Environmental Assessment**

We do not question that a great deal of work has been put into the report. However, much of the information generated appears to be from desktop reviews and scenarios for many of the questions in the report. The answers make reference to the compliance with recognized standards rather than variances that currently exist in the local area such as impact on our ground water, impact on birds and animals, noise pollution caused by increased traffic and light pollution caused by night time operation.

In general, there doesn't appear to be a lot of details on the actual project. Most of the information is based on desk top reviews rather than actual detailed research on the project proposed for this specific area.

We are very concerned about the proposed amount of water needed for this project which estimates usage to be equivalent to 750 homes per year. This is over 10 times the current draw in this area. What about the homeowner wells in the area? What is being done to ensure our wells are not negatively impacted by this project? As homeowners, we have a concern for our water supply and the disruption of our home environment. In the report, a number of residential well locations have been identified but to our knowledge there's been no direct interface with the respective homeowners. What technologies are being employed to validate the aquifer property assumptions in the report? Should private wells go dry it appears that homeowners will be tasked to prove this project is the root of the problem. We have been here for 40+ years, raised a family and have never had an issue with our well, even with this past year of extreme drought.

The fuel needs when primarily using diesel equates to 52 trucks per day so there will be a traffic and noise impact as well as lighting concerns. The site chosen appears to rely on the interface between the existing power grid and the northeast gas line. Will the proponents of this proposal validate the source of the propane and diesel fuel? If it is American, why would politicians believe that Nova Scotians are any more prepared to grow the US petrochemical dependence than we are to support the US alcohol industry? That flies in the face of public opinion in Canada.

Impact on air quality has not been clearly examined. I believe that a smoke stack of 100 feet is not nearly high enough to dissipate any pollutants coming from the plant – particularly at the foot of Mount Thom. I imagine the pollutants would impact the air quality in our community.

This will also have an impact on the natural birds and animals that live in this community such as our barn swallows, owls, wild birds, and wild life and their respective habitats. We have lived here and enjoyed the bird population, the animal population, the lack of noise pollution and the lack of light pollution. This has been very important to us as we've continued to invest in this community.

For us, the official return of spring is when our hummingbirds and barn swallows return. We would hate to see this not continue because of noise and light pollution in our community. My wife and I

chose to

live in rural Nova Scotia because we appreciate all the benefits of living in a rural community. We were determined that our children would grow up in this community – both commuting (to Truro and Halifax) because the value of living here outweighed any commuting sacrifices we had to make. We have lived in Salt Springs for the past 40 plus years and we're here because we both appreciate the interface with nature and tranquil environment.

We can understand why the report is more focused on wetland protections, wildlife habitat and fauna and fish habitat because they have no voice. However, there needs to be a greater effort made interfacing with the community. Community members are the parties who have made investments and pay taxes. The report states that the team will continue to engage the community, working with neighboring land owners. Talk is cheap. Actions need to be taken to assure the community of positive outcomes and that this project is truly the correct approach. How many folks do you suppose actually looked up the report and browsed 303 pages? -particularly at a time of busyness over the holidays.

If you look at the statistics, we are a senior population here in this community so proposing or highlighting the fact that we have employment opportunities here is a moot point given that most of our residents are retired. We feel that there's been a decent effort done to try and assess this potential project however a lot of the work was done on previous research projects as desktop reviews. This is fine in some cases but I think it's important if you're looking at going forward with a project of this magnitude that actual analysis/research should be completed. While the provincial government may be comfortable accepting potential risk associated with this project it is important to note that this risk gets put on the tax payers and members of our community. We have not agreed to accept such risk.

If you need any further information from us, we'd be happy to speak with you.

Thank you

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## IESO NS Natural Gas Power Plant Site, Salt Springs

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@gmail.com>

**Date** Sun 2026-02-08 7:44 PM

**To** sean.fraser@parl.gc.ca <sean.fraser@parl.gc.ca>; Premier <PREMIER@novascotia.ca>; info@marcomacleod.com <info@marcomacleod.com>; Environment Assessment Web Account <EA@novascotia.ca>

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

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We are writing to express OPPOSITION to the planned natural gas power plant which will be adjacent to our property in Salt springs.

We have lived here since 2001 and have enjoyed the freedom of minimal noise and traffic. This planned construction will put an end to that.

Our concerns are regarding the water supply, noise, air quality from the emissions, decrease of property value and disruption of our peace.

What guarantee does IESO give us to protect our investments? When we were first told of this planned construction we met with \_\_\_\_\_ of IESO. The response regarding our water security was that prior to any commencement of work, our well would be tested for quality and quantity, and then tested again after the plant was operational. How can we ensure that if something went wrong with our water supply we would be fixed? Also our foundation would be checked prior to construction for cracks and then a repeat check after completion of the project.

Nothing was mentioned regarding the plant using diesel fuel. What if there is a fuel leak?

It is unfortunate that this was a 'done deal' before the announcement was made. This is a fact as a land lease contract had been signed with our neighbour for right of way when we met with the IESO reps.

There has to be a better location for this natural gas power plant than in a residential area. Why could this not be constructed on the old Northern Pulp property or at the Trenton Generating Station? Both these properties already have the infrastructure in place.

Salt Springs, Pictou County, NS

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## Environmental Assessment comments Fast Acting Natural Gas Power Generation Facility – Salt Springs IESO Nova Scotia Project # 25-12223

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Date Sun 2026-02-08 11:07 PM

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

Cc TNC Mail <@tncweb.ca>

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To whom it may concern,

I am submitting comments on the Fast Acting Natural Gas Power Generation Facility – Salt Springs IESO Nova Scotia Project # 25-12223.

I will be referring to listed sections and pages from the Environmental Assessment Registration Document and Initial Project Description – Plain Language summary.

### 1. Water use

Nova Scotia had an intense drought in the summer of 2025, and everyone is worried about well water. I live in Salt Springs and experienced an unprecedented drop in my well water, which was not resolved until well into November. 14.5.2 page 45, states the project will need multiple wells to support the facility and groundwater withdrawal can also impact surface water through reduction in baseflows. The proposal indicates a water requirement equivalent to 750 households or approximately 330,000 litres of water per day. This threatens the safety of our private well water.

### 2. Habitat loss

- a. **Wetlands** – According to the Nova Scotia Wetland conservation policy, 53 species protected under provincial law are dependent on wetlands for survival. Section 14.7 page 48 states 29 wetlands are identified within the Project Area, 18 further assessed for wetland functions. Of the 18 characterized, 11 wetlands have been identified as a potential Wetland of Special Significance (WSS) with 6 designated for alteration. Who is looking out for these species? Either they are protected or they are not? 29 Black Ash trees with historical significance to the indigenous community were identified. On page 50 they will “maximize avoidance of impacts to Black Ash and its supporting habitat” what does this mean and how will it be monitored / measured?

On the Surface Water, fish habitat and wetlands poster, presented at the community meeting, it states “provincial wetland permitting will be completed and necessary compensation for lost wetland habitat will be implemented.” I asked how that would happen, would it be applied to other wetland areas in Pictou County? The presenter

stammered and said, “well no, it could be compensation for any project anywhere” So this is greenwashing.

- b. **Six Mile Brook** – during the biophysical baseline report for the Six Mile Brook Pit Expansion project in 2023, conducted by McCallum Environmental Ltd, juvenile, and adult Atlantic Salmon were the most abundant species in the Six Mile Brook. Fish capture results suggest that brook trout, brown trout and Atlantic Salmon were spawning within the tributary. Atlantic Salmon and brook trout are considered priority species.

Section 14.6.2 page 47 states continued groundwater removal from the power plant will lower the water table, directly impacting the habitat’s capacity to support one or more life processes of fish.

- c. **Migratory and local birds** – Between April 29th and July 4th, 1074 bird species were observed representing 74 species with 4 species at risk. <https://ieso-ns.ca/wp-content/uploads/2025/11/Salt-Springs-Open-House-Posters.pdf>. I live in Salt Springs and have participated in Project Feeder watch for five years. In all that time I have only accumulated 16 Winter bird species in my yard in Salt Springs and 76 Summer species on my Merlin app, traveling around the whole province. I believe 74 species in the proposed plant site is a significant amount, for example, I live 4km away from the site and I have never recorded Canada Jay, blackpoll warbler, or boreal chickadee, as found by the environmental assessment. This seems to be a significant site and requires further research to assess the risks. As such in section 14, 10 .3 they had to list 17 (!) mitigating measures to try and reduce effects on avifauna.

Section 19.3-page 61 states habitat loss could reduce potential breeding habitat for species protected under the Migratory Bird Regulations. Clearing of vegetation will be scheduled to occur outside of breeding season. If vegetation clearing must occur during the breeding and nesting season, a pre disturbance nest sweep area search will be included. I find this statement hard to believe. I believe it is essential that nesting of protected bird species is protected. Construction must be done at times of year to reduce impact to bird nesting.

Page 53 - Wetland compensation fees may be used to assist with funding wetland-dependent avian research, especially regarding Canada warbler that is found in relatively high densities within the Project Area. Does that make it okay to destroy habitat for species at risk? No!

Section 14.9.2 – “It is likely that wildlife that currently use habitat within the Project Footprint will be displaced by the Project into the surrounding environment.” Where? Where will they go? Look around, habitat loss has occurred throughout this area. The natural world has no where else to go. Do we have to develop every square centimeter of Nova Scotia?

I propose using an already developed industrial site for this power plant. The existing coal generating site at Trenton has access to Natural Gas, existing infrastructure, lots of water. Renewable natural gas or biomethane sourced from the Pictou County Solid Waste Facility would be an actual alternative moving

towards Nova Scotia's clean power plan. The electrical grid and the Middle River are nearby this existing industrial site.

Finally, if IESO is putting the onus on a private company to construct, own and run the plant, how are they committed to guaranteeing all of the above mitigation measures they listed under each of the physical and biological factors in section 14? Why is there no agreement in place to hold the company accountable? Will they just let what happens happen and blame the private company? We the people of Salt Springs need more guarantee than that. We need our water rights protected. The avifauna and wildlife need their rights protected.

Sincerely,

Salt Springs

Plant Food and Environmental Sciences  
Dalhousie University, Faculty of Agriculture



## **Response to the Environmental Assessments for the Marshdale and Salt Springs Natural Gas Power Generation Facility Projects**

executive members of the  
Margaree Environmental Association, Cape Breton, NS.

February 8, 2026

We and our organization have been involved in a wide range of environmental issues, including the promotion of alternative energy, and have campaigned actively to reduce the use of fossil fuels to generate power. Our organization was formed in 1988, and over the past four decades we have challenged government policies and programs, advised government and industry on forestry and environment, and have developed projects to further human and environmental health.

We reviewed the Environmental Assessments for the proposed Marshdale and Salt Springs 300MW natural gas power generating facilities and find these assessments to be both inadequate and suspicious. They are inadequate because they fail to properly investigate non-fossil fuel alternatives, and suspicious because they do not establish the need for natural gas power development in the current Nova Scotia context.

We contend that new fossil fuel-based power generating plants are not needed here at this time. Instead, we should continue to build new alternative infrastructure, make deals with Quebec for supplementary hydro power, and use our existing coal fired power plants for back-up when wind, solar, and hydro power are inadequate.

To augment our use of alternative power, more battery storage should be built instead of expensive natural gas power plants. Once the capital cost of battery storage is expended, the maintenance of the storage is minimal, versus the on-going high cost of natural gas.

Burning natural gas has excessive operating costs and unconscionable environmental costs to both the climate of the planet, and through the inevitability of fracking, the geology of Nova Scotia. It will be the ratepayers, the public and the environment that bears the onerous costs if these gas power plants are built.

Our provincial government has recently announced an austerity plan in light of provincial debt and deficit, and in the premier's words, we must start with government. Why then, has the provincial government created the new IESO agency to manage power generation in the province, when the skills and resources exist to do that already. The formation of the IESO is both suspicious and contradictory.

The two proposed 300MW natural gas power generation projects, the process by which the government has initiated them, the long-term costs to be borne by the rate-payers and the public, the failure to consider better alternatives and best practices, together lead us to think that there is something fishy here; that there are other agenda at play; the whole thing just doesn't pass the sniff test.

Instead, it is our conviction that Nova Scotia should continue to expand wind power, build more battery storage, negotiate a deal with Quebec for supplementary hydro power, and make responsible use of existing coal plants for back-up power when needed.

Sincerely,

# Environmental Assessment - Project Comments

Submission ID

7ede349e

Submission Date

09/02/2026 10:28

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## Select a Project:

Fast Acting Natural Gas Power Generation Facility - Salt Springs

## Comments:

I live in Salt Springs, Nova Scotia. My grandmother and her grandmother washed their clothes in Six Mile Brook. Now, I am blessed to walk the same river with my granddaughter.

Times change, energy needs change.

Coal burning for energy is no longer an option.

Nova Scotia needs to be able to offer opportunities for all to make a living.

So here we are. I really have no concerns, other than our Provincial Government thinks that they can fast track a fossil fuel burning energy plant within a stone throw from my family and neighbours. Really? I am very confused.

When a full and unbiased environmental assessment is complete, transparent and shared in a user friendly manner, I believe you will see that the risk to our well, West River, Six Mile Brook, overall quality of life for everyone will demand you go back

to the beginning and find a sustainable, environmentally friendly and economically feasible way forward for the long term.

**Name:**

**Email:**

**City/Town**

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## Select a Project:

Fast Acting Natural Gas Power Generation Facility - Salt Springs

## Comments:

Salt Springs Natural Gas Power Generation Facility Project  
Opposition

Submission Regarding Proposed Natural Gas Facility, Salt Springs

I am writing to oppose the proposed 300-megawatt natural gas plant planned for Salt Springs. My home is located within one kilometre of the proposed site, and I have significant concerns about this project's viability, process, and broader context.

Process Failures and Lack of Transparency

The Environmental Assessment registration was publicly announced on December 22, 2025, during the holiday period when public attention is minimal. Despite photographs in the assessment clearly showing summer site conditions, no public notice was provided

while this project was developed over many months. For a community with well-documented limited internet access—an issue regularly addressed in municipal planning—the proponent relied almost exclusively on online notices and social media. No direct mail was sent to residents within the impact zone. This represents a fundamental failure of meaningful community engagement.

No financial details have been disclosed. No analysis demonstrates whether this will reduce electricity costs for Nova Scotians. If this project offered genuine financial benefits to ratepayers, one would expect these advantages to be prominently featured in public communications. The absence of such information is conspicuous, particularly given the extensive public promotion of other energy initiatives.

#### Financial and Economic Concerns

The economic rationale does not withstand scrutiny. This facility will operate on natural gas with 20% backup diesel capacity, requiring substantial onsite fuel storage. Both natural gas and diesel markets are characterized by significant price volatility. Committing Nova Scotia to fossil fuel infrastructure amid demonstrated market instability represents questionable long-term planning, particularly as renewable energy costs continue to decline.

The project structure privatizes profits while socializing environmental and health risks onto a small number of rural residents. Property values within the impact radius will decline for homes near industrial facilities, yet no compensation mechanism exists. A private operator requires returns on capital investment, typically resulting in higher costs for ratepayers while profits flow elsewhere. The financial burden falls disproportionately on nearby residents while economic benefits accrue elsewhere.

#### Absence of Strategic Energy Planning

This proposal emerges within a broader context that raises questions about coherent energy sector planning. Recent months have seen announcements regarding offshore wind development, onshore natural gas exploration, uranium mining, hydrogen initiatives, and various other energy projects. In October 2025, Premier Houston appointed himself Energy Minister—a portfolio now held by an individual whose professional background is in accounting rather than energy sector management or planning.

This appointment has created additional concerns for local representation. The MLA for Pictou West, which encompasses Salt Springs, serves as Ministerial Assistant to the Minister of Energy—effectively reporting directly to Premier Houston in his capacity as Energy Minister. This arrangement compromises the ability of local elected representation to advocate independently for constituent concerns regarding this facility.

Best practices in energy sector development typically involve: retention of specialized energy consulting firms with demonstrated credentials; development of integrated resource plans showing how various initiatives complement each other; independent technical review by qualified energy sector professionals; and transparent disclosure of long-term strategic frameworks. The absence of publicly available information regarding which energy consulting firms are providing strategic guidance, what integrated planning documents exist, or how these various initiatives form a coherent strategy represents a departure from standard practices in responsible energy sector development.

Nova Scotia has existing coal-fired generating stations scheduled for retirement or conversion. Point Tupper Generating Station is already planned for natural gas conversion in 2029. These facilities possess established infrastructure—existing gas pipelines, transmission lines, highway access, and appropriate industrial zoning. Other

jurisdictions, particularly Alberta, have developed substantial expertise in coal-to-gas plant conversions. The absence of a publicly disclosed analysis explaining why new infrastructure in a residential area is preferable to utilizing existing industrial sites with superior infrastructure represents a significant gap in project justification.

#### Alternatives Assessment Deficiency

No alternatives assessment has been made public. The stated rationale—proximity to the Maritimes and Northeast Pipeline—does not explain why existing industrial sites with comparable or superior infrastructure access were not selected. For a project of this scale and impact, the absence of disclosed alternatives analysis represents a fundamental planning deficiency that cannot be remedied through post-approval processes.

#### Health and Environmental Impact

No health impact assessment has been conducted for residents living near this facility. Families with young children and elderly residents will experience direct exposure to air emissions, noise pollution, and visual impacts, yet no baseline health data exists and no projections have been provided. Environmental implications for adjacent wetlands and Six Mile Brook ecosystems have not been adequately addressed. These resources cannot be restored once compromised.

This project directly contradicts provincial and federal climate commitments. Investing in new fossil fuel infrastructure designed to operate for 30 years while claiming climate leadership is difficult to reconcile with stated environmental objectives.

#### Precedent and Community Rights

Rural residents make property investments and life decisions based on existing zoning frameworks and land use regulations that explicitly restrict large-scale industrial development in residential areas. These are not merely informal expectations—they are legally established protections that determine permitted land uses, govern property values, and define community character. Salt Springs is a residential rural community without industrial zoning or designation for heavy industrial activity.

Approving a 300-megawatt industrial power generation facility in this location circumvents the zoning protections that rural residents relied upon when purchasing property and establishing homes. This represents a fundamental breach of the land use planning framework that protects residential communities from incompatible industrial operations. If provincial approval processes can override municipal zoning restrictions to permit major industrial facilities in residential areas, then no rural community in Nova Scotia possesses meaningful protection against similar impositions.

The precedent established by approving this project would effectively nullify rural residential zoning protections province-wide. It would signal that large-scale industrial development can be imposed on any rural residential community regardless of existing land use designations, municipal planning frameworks, or community character. This undermines the entire foundation of land use planning and eliminates the reasonable expectation that zoning regulations provide enforceable protection of residential property rights.

#### Expert and Public Opposition

Professionals within our community, including engineers with direct experience on similar projects and healthcare providers, have raised substantive objections. Their expertise merits serious consideration. Public opposition to this project has been significant, yet this has not prompted the release of additional information or analysis to

address raised concerns.

### Conclusion

This proposal fails on multiple grounds: inadequate public process, absence of alternatives assessment, questionable financial assumptions, lack of evidence of integrated strategic planning, insufficient health and environmental review, compromised local political representation, disregard for established zoning protections, and availability of superior alternative locations with existing infrastructure. It imposes concentrated harm on a small residential community while offering uncertain system-wide benefits that have not been quantified or demonstrated.

I strongly urge rejection of this application. Any future consideration must include: comprehensive alternatives assessment with public disclosure of site selection criteria and comparison to existing industrial sites; transparent financial analysis including ratepayer impact projections and rate implications; health impact studies for affected residents with baseline data collection; documentation of energy sector consulting expertise guiding project development and site selection; public disclosure of how this project integrates with broader provincial energy strategy; demonstration of compliance with or proper variance from existing zoning regulations; and genuine community consultation with notice methods appropriate for rural populations with documented limited internet access.

The people of Salt Springs deserve the same rigorous planning, expert guidance, transparent process, respect for established zoning protections, and independent political representation that would be expected for any major infrastructure project affecting residential communities.

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# Environmental Assessment - Project Comments

Submission ID

3395ab90

Submission Date

09/02/2026 11:24

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## Select a Project:

Fast Acting Natural Gas Power Generation Facility - Salt Springs

## Comments:

Environmental Assessment Comment: Salt Springs Natural Gas Facility

Submitted by:

My home sits less than one kilometre from where this proposed industrial facility would be built. I am writing not as an expert in energy policy or environmental science, but as someone whose family has lived on this land for eight generations—long enough to understand what we stand to lose.

My ancestors cleared this land, farmed it, raised their families here, and are buried in its soil. Their voices are in the wind that moves through these trees. Their lives are woven into every brook and hillside. This is not a

metaphor—it is the lived truth of deep roots. There are now eight generations of our family here—I am the sixth, my daughter is the seventh, and my grandchildren are the eighth.

I have spent my entire life in this community, raised my own family here, and dedicated my career to educating children in these schools. I have watched this place change over the decades, and I understand what has been lost when development comes without wisdom or restraint. I have also witnessed what endures when we protect what matters.

#### What This Place Means

Six Mile Brook is where generations of children in this community learned to swim, fish, and sit quietly and watch the great blue heron hunt in the shallows. It is where we learned reverence for clean water and living things. The wetlands surrounding this proposed site are not empty space waiting for development—they are home to black ducks that return each spring, to wood ducks nesting in the trees along the water's edge, to kingfishers diving for fish in waters my grandparents knew, to tree swallows that fill the summer air, and to ecosystems that have functioned here far longer than any of us have been alive.

The stillness here is not the absence of life—it is the presence of peace that rural communities are built on. The quiet is not silence—it is the sound of wind in maple leaves, of water over stone, of songbirds at dawn. This is what people come to rural Nova Scotia to experience. This is what those of us who live here have protected for generations. This is what would be irrevocably altered by an industrial power plant operating less than one kilometre from homes where families have lived for nearly 250 years.

#### The Breaking of Trust

When I established my home here, I did so with the understanding that this was residential rural land, protected by zoning from industrial development. This was not naïve hope—it was the legal framework governing land use in our community. I invested my life savings in a home in a place I loved, confident that the zoning protections meant something. I planned for this home to carry me through retirement and hold the value I had worked my entire life to build.

Now, at this stage of my life, I find myself facing the prospect of an industrial facility that will eliminate that value overnight. I have no means to relocate. I have nowhere else to go. This is my home, and I am being asked to accept its destruction—not for the good of my community, which opposes this project, but for the profit of interests that have no connection to this place and no regard for those of us who live here.

This is more than financial harm. It is a betrayal of the fundamental promise that zoning laws exist to protect residents like me from exactly this kind of industrial imposition.

#### The Absence of Representation

Our local MLA now serves as Assistant to the Minister of Energy—the very minister advancing these projects. Where does that leave us? Who speaks for Salt Springs when our elected representative reports directly to the person advancing this proposal? I have voted in every election, participated in my community, and trusted that democratic representation meant something. Now I feel powerless, watching decisions made far from here by people who will never live with the consequences.

This facility will not make our homes more affordable. It will not employ our neighbours for decades. It will not improve our lives in any measurable way. It will bring noise, light pollution, air emissions, truck traffic, and industrial operations to a residential community of families who chose to live here specifically because it was not an industrial area.

#### What This Represents

I am trying to speak calmly about something that breaks my heart. This project represents profound disrespect—for this place, for the people who have cared for it across generations, for those who came before us, and for those who should inherit it after we are gone. It prioritizes short-term profit over long-term stewardship. It reflects the view that rural communities and rural people matter less, and that our homes and our heritage are acceptable sacrifices for projects that could be located in already-industrialized areas with proper infrastructure.

There are existing power generation sites in Nova Scotia—facilities with gas pipelines already in place, transmission lines already built, industrial zoning already established, and communities already adapted to that reality. Those sites make sense. This does not. The only explanation for choosing Salt Springs over those alternatives is that we are seen as having less power to resist. That is not planning. That is exploitation.

#### The Question I Cannot Answer

How do I explain to my granddaughter that the brook where her mother learned to swim, where I learned to swim, and where my mother learned to swim is now in the shadow of an industrial power plant? How do I tell her that the peace her ancestors protected for six generations was sold in a process announced three days before Christmas, with a February deadline? How do I help her understand that the home her family built, the land her family tended, and the community her family sustained were considered acceptable collateral damage?

I have spent my life as an educator, teaching children to value this province, understand its history, care for its environment, and participate in democracy. I do not know how to reconcile those lessons with what is happening here.

#### My Request

I am asking—pleading—for this proposal to be rejected. Not because I oppose energy development in principle, but because this is the wrong location, chosen for the wrong reasons, through the wrong process. There are better sites. There are better alternatives. There are better ways to plan our energy future that do not require sacrificing residential communities that have endured for generations.

If those making this decision have any regard for rural Nova Scotians, any respect for heritage and continuity, or any understanding that some places deserve protection from industrial development, please look at Salt Springs and see what I see. See the legacy of

become eight generations in Six Mile Brook. See clean water and thriving wetlands. See a community that has cared for this land and been sustained by it. See people who deserve better than to be told their homes and heritage are expendable. This is not just land. This is not just property value. This is the place my family has called home since before Canada was a country. It deserves more consideration than it has received. We deserve more respect than we have been shown.

I am one person, one voice, one vote. I am speaking for my ancestors who cannot speak, for my grandchildren who will inherit whatever we leave them, and for this land that has given my family everything.

Please do not allow this to proceed.

Respectfully submitted,

Sixth-generation resident, Salt Springs, Nova Scotia  
Salt Springs NS

**Name:**

**Email:**

**City/Town**

**Postal Code**

**Attachment(s):**

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

Maximum file size per file: 10 MB

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Yes, I agree (must be selected to proceed)

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## Uploaded document(s)

No documents to display.

Public Comment — Environmental Assessment Registration for the Fast Acting Natural Gas Power Generation Facility — Salt Springs

To whom it may concern,

We are writing to submit public comment regarding the proposed Fast Acting Natural Gas Power Generation Facility in Salt Springs. We have concerns related to the project's proposed use of clean water and wetlands, its vulnerability under drought conditions, and the adequacy of consultation with Mi'kmaw communities.

The project includes ongoing withdrawals of clean water for operational purposes at a time when local water systems have already demonstrated significant fragility. Extreme drought conditions resulted in critically low water levels in Six Mile Brook and the West River from June through October 2025. These conditions underscored the vulnerability of both surface water and groundwater systems relied upon by residents, ecosystems, and downstream users. Approving new industrial water demands without clear, enforceable safeguards presents a risk under current and projected future climate conditions.

In January 2026, the United Nations declared that the world has entered a “state of global water bankruptcy.” The report calls for a transition from crisis response to bankruptcy management, grounded in acknowledgment of irreversible losses, protection of remaining water resources, and policies that align with hydrological realities rather than past norms (United Nations University, 2026).

Related to these concerns, we are also concerned about potential impacts to wetland areas where the facility is proposed. It is well established that wetland degradation is a significant driver of biodiversity decline, with impacts exceeding those observed in most other ecosystem types.

We are further concerned about the apparent lack of meaningful consultation with Mi'kmaw communities. Commitments to reconciliation and the principles of the Peace and Friendship Treaties must be upheld. Indigenous decision-making frameworks that consider impacts seven generations into the future should meaningfully inform assessment and decision-making processes.

As local residents, parents, and active community members engaged in regenerative land practices, we are submitting these comments to outline our initial concerns with the proposed project. We recognize the need to transition away from coal-fired electricity generation. We have firsthand experience living alongside renewable energy infrastructure. Each energy option presents both benefits and trade-offs that warrant careful consideration.

We acknowledge Nova Scotia's commitment to moving away from coal-fired electricity generation by 2030 and urge that this transition be undertaken in a manner that prioritizes long-term land and water stewardship, community resilience, and intergenerational responsibility.

We are also involved in youth programming that supports connection to local forests and ecosystems. We encourage decision-making that supports resilient communities, responsible resource use, and strong, enforceable environmental protections.

Sincerely,

**Reference**

United Nations University Institute for Water, Environment and Health (UNU-INWEH). (2026). *Global Water Bankruptcy Report*. United Nations University.

# Environmental Assessment - Project Comments

Submission ID

07bc085a

Submission Date

09/02/2026 15:23

Submission status

SUBMITTED



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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 - Salt Springs

## Comments:

February 09, 2026

Public Comment on NS Project Environmental Assessment:

Re: Fast Reacting Fossil Fuel Gas power plants

- comment to both [1] Saltspring, NS and [2] Marshdale, NS

[1] NO to new fossil fuel power plants -there should be no approval to using combustion carbon fossil fuel technology due to the fossil fuel combustion air pollution and increased carbon accumulative impacts over the proposed 30 years - we need change and we have a clean tech option

[2] NO to the location and concept model - while fast reacting power plants on demand are needed for grid balance the should be decentralized and distributed along the grid and clean technologies that do no release air pollution or carbon emissions

[3] Agriculture and local food security relies on rural lands air and water --so it is not the place to construct brand new fossil fuel combustion power plants to release small

Particulate matter pollution.

[4] Current Federal and Provincial laws set a path to mitigate carbon emissions and shift to clean energy supply – so with real options - an approval would not comply with the mandate of our laws.

===What we need to do ===

More Wind and more solar and more grid scale batteries distributed along the grid.....plus now is the time to deploy Canadian made fast reacting Hydrogen PEM Fuel Cells ...clean power to meet demand supply and balance the power grid.

TO BE CLEAR -- NO to the fossil fuel GAS Plants -- based on the impacts of pollution and carbon release.

So...PLEASE deny the project the Environment Assessment --- and Please CONSIDER the options and opportunity to deploy fast reacting clean tech power plants that do not pollute and align with Canadian laws and pollution goals to protect our environment and health and our economy as discussed here:

=== the Options ===-

..NOTE those loyal to Texan oil cartel empire plan a gas plant is in NB.....and now NS – half regulator and grid system controller and half independent energy system operator association non profit ?????? --huh??? --NS IESO --is “now ” acting as proponent and back room deal speed and wants to get approval for same fast reacting fossil fuel carbon pollution power plants here in Saltsprings and Marshdale- both in Pictou County NS..... and then sell it to a private operator????,,using our tax dollars to do so???---- an oil cartel loyal game play that is as it appears.....up to 300MW plant in each place.....after oil loyal NSPOWER failing to procure cheaper wind power for over a decade since Comfit era . ...developers plans shelved back then...until the Hydrogen hype from water to ship to EU markets...now we be gettin wind built...but Houston and the oil cartel still want to sell oil and gas and monetize known reserves and pollute us all ...so.....SHAME on the DELAY and ongoing air pollution our youth and natural world must endure...and they want to approve more pollution????..for the oil cartel loyal – say NO.

---so...not sure if NS Assembly of Chiefs and KMKNO team or Pictou Landing team have been consulted at all...

---the NS Assembly of Chiefs should say No to these proposed Pictou County NS gas combustion power plants --but then advocate for a clean technology option ---an option for 'standby on demand fast reacting power supply" --- which is what the provincial energy strategy says is needed to meet supply demand as we shift to mostly Wind and Solar as well as Storage Batteries....

--the option which is correct - was discussed in NS Energy Strategy itself are -- Hydrogen PEM Fuel Cells a zero carbon fast reacting standby power plant... ..so why now Oil Cartel multi-generator gas plants and one other project planned in NB too!!.....more lies and delays as they cling to drilling and monetizing oil and gas reserves and all of it controlled by the OIL CARTEL...

---so instead of Gas plants -- the Assembly could demand NS buy Canadian clean tech like the Germans are doing--- our World Leader - the Germans and EU and others buy Canadian - Ballard Power Systems of BC - Hydrogen Proton Exchange Membrane Fuel Cells -- stationary power plants for Grid or Building scale or for buses trains etc----no combustion, .no spark no carbon....instead Hydrogen Gas is pulled through a membrane to join with oxygen which forms pure clean water vapour while the Fuel Cell produces an "electrochemical current" -- a clean source of electricity ..on demand....much more Fast reacting...zero pollution...clean electricity.

NS is building Wind....with proposed Hydrogen Production Plants....but that 'electrolyser tech is expensive.....there is a better more economical process to produce the greenest hydrogen gas ....clean hydrogen from pollution....like Waste we now landfill... or industrial effluents or even emissions,

--NS has 18 municipal owned Landfills plus others by industry....be it noted that the Germans and EU are now recently contracting "other Canadian CleanTech" to process

industrial society Waste instead of landfilling which will restructure elements of waste and produce useful products for circular industrial supply chains, such as Hydrogen Gas - that tech is an Electric powered Plasma Torch Thermal Processing Waste Restructuring Plant -- the waste gets zapped to gaseous state where base elements separate and can be recovered and restructured to useful materials --Hydrogen Gas, and solid Carbon material, and some metals are streamed off, and the rest is cooled to an inert slag rock for aggregates markets - inert meaning you can use it is a fish tank and the rock will not leachate elements to the water Aggregates and metals and carbon all have markets....and the Hydrogen Gas is for Ballard Power Fuel Cells – the developed clean tech to supply Fast Reacting on demand power plant to meet Grid supply demand.

---win win win--- problem solving option --- no fossil fuel gas plant not needed since we have Hydrogen Fuel Cells ----no need to frack NS or extract oil globally any longer than needed ----no landfilling waste and releases of other pollution since we can process it to restructured recovered resources .and for energy supply too...PLUS it is paid for by selling Hydrogen Gas and products from waste as well as the cost of current waste and pollution disposal and mitigation...towards zero pollution release.—the economic cost of not pollution - versus the infinite increasing cost of pollution – we need closed loop industrial processes, circular industrial supply and decarbonized energy – not new fossil fuel gas plants approved for 30 years.

---Hydrogen Fuel Cells are scaled and distributed along the Grid – since industrial waste can be processed at a landfill that means more landfilling - so put the Fuel Cells at the 18 Landfills -Plasma Torch Waste Restructuring Plant then pipes Hydrogen Gas to the tank...and the Fast Reacting Fuel Cells can ramp to full power in mere seconds or off again at strategic locations along the Grid.....close to where the grid needs to meet demand.....the German Grid model ...and now they also plan to process the methane at landfills and the new solid waste to stop landfilling to make Hydrogen Gas for their power Grid supply demand and for ev fuel cell motive power for buses and Trains....Mercedes Citaro Buses started selling test pilot buses to global transit fleets in 1999 and they and Ford were both Major shareholders in Ballard Power Systems of Canada --- buy Canadian...

----so since NS and others are problem stretching gas ---- they need regulatory direction to a modern more harmonious with nature pollution solving option and a strong NO on a new Gas plant project.

--the Oil loyal drillheads on the gravy train dont give up

---so... I hope the Chiefs of NS look at partnerships and opportunities to invest in our future and can move forward problem solving clean tech progress for a harmonious more civilized power supply ----and bring us out of the Premier Houston dark ages of barbaric polluting oil cartel gas plants.

--- Take note on Fuel Cells and hydrogen -- the US granted \$94 million last year to Ballard Power Systems to attract a new giga-factory for fuel cells production in Rockwell Texas... but now that is delayed by policy changes of the current administration-- drill drill drillheads...and delays by lies

--- so say NO to any approval for 30 years of fossil fuel combustion emissions “air pollution and carbon impacts” at both proposed gas plants in NS [and one in NB], based on the health and climate impacts.

--- and say No to Nuke Plants in Ontario – instead wake up and talk Ballard into building the NEW Fuel Cells in Canada -- a new giga factory global export plant in Ontario and expanded BC facility And then order 1200MW plus for Ontario Fuel Cells and shutter the 1200 MW of planned GE Hitachi Small Nukes planned to be built in one central plant place ...no – deploy our Fuel Cells – and drive economy of scale for sales of Fuel Cells to EU and global markets == stationary and motive energy supply

---then for NS --order 600 MW of Fuel Cells for NS....and distribute them to all 18 landfills ...and stop landfilling and use Plasma tech to make the Hydrogen gas on site... Fast Reacting Hydrogen PEM Fuel Cells.....the same ones the EU and Germans and others are integrating for clean power...

--wake NS ECC and federal IAAC ....this gas plant plan is a new delay by the oil

cartel....they love to pollute our families and any approval does not align with our carbon and pollution goals

--say NO to gas plants and I and others hope the CHIEFS say No too.

--stop polluting us all and our Earth.

--oh and how does the carbon emissions get captured at these new state of the art small multigenerator fast power plants....or do they plant to capture any carbon emissions??

-- Please Note - Plasma Torch Process is a cheaper way for Pathway Alliance to do the Carbon capture MPO project which is also a source of waste to hydrogen gas supply --So.. we need to partner and to fund and support the deployment of Plasma Torch Thermal "emissions" Processing systems at the target Carbon Capture project oil processing facilities, for Alberta and for other facilities for Methane emissions reductions elsewhere. Note - if the oil industry uses steam reformation to process the captured hydrocarbon emissions now pressure vented and flared during oil and gas processing ....they then need to store the CO2 formed while getting the hydrogen gas to sell...which is a major cost for storing CO2 and a pipeline --.HOWEVER -- if they use the patented Hydrocarbon emissions Plasma Torch process developed and patented by Pryrogenesis of Canada who is stepping out as the world leader - then that plasma process produces hydrogen gas and also solid carbon material is recovered for markets.....meaning there is no CO2 produced that needs stored and delivered to a major underground storage system via a major CO2 pipeline....

--NOTE - and those oilsands tailings can all be processed via closed loop clean tech - and including plasma processes --solids - emissions -effluents-.

===Canada has an opportunity here ===

--mass production scale factory of Ballard Fuel Cells new plant in Ontario.....and for the long waiting viable clean hydrogen supply --support mass production- and deployment--selling globally -- and buying our own Canadian Clean tech HERE in NS and NB for fast reacting fuel cells ...not Fossil fuel turbines and pollution impacts or the Nuke Plants in Ontario.

---then we take manhattan ...then berlin. - oh right .the Germans already plan to use our plasma tech to make hydrogen from industrial waste...so.. deploy our solutions to pollution

--say no to gas plants...and yes to progress...fuel cells and plasma tech processes are ready....stop pollution releases-solids - emissions - effluents-selling restructured waste to useful products such as hydrogen gas for Fuel Cells—we invest in closed loop industrial processes - circular industrial supply waste to resources - we mine our pollution for resources - and stop releases of pollution

--change can require regulatory motivation to lead investment

===Pollution - carbon imbalance - Climate impacts-- habitat losses to industry - Biodiversity loss==

==Canadian legal mandates to protect a healthy environment and meet climate goals===

===say NO to approvals for fossil fuel gas plants based on the 30 years accumulative pollution impacts - ===we have Options - clean tech solutions to pollution...we mine our pollution for Hydrogen and elemental resources towards zero pollution releases

--30--

Submitted Feb9,2026

**Name:**

**Email:**

**City/Town**

Truro, NS

**Postal Code**

— — —

**Attachment(s):**

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No documents to display.

## **Concerns for the Proposed Natural Gas Power Generating Plant in Salt Springs Pictou County**

The West River suffers from the effects of acid rain, this can have serious impacts on aquatic life, such as difficulty breathing, decreased blood circulation, and an increase of a toxic form of aluminium. In 2024 CarbonRun implemented various tanks that hold powdered limestone to be released into the river helping to lower the alkalinity of the river water, thus improving the habitability of the river water. What was the point of implementing this project if the water levels will not be adequate for species migration. Will the positive results be disregarded and the possibility of even more restoration in the years to come to be ignored?

“A groundwater surface water interaction assessment will be included as required to ensure groundwater withdrawal does not negatively impact water quantity (and quality) of nearby aquatic features and groundwater well users” how could it not impact the water quality and quantity available to locals, including wildlife, when it is projected to use a peak of 175m<sup>3</sup>/hr with an annual consumption of 23 to 31 m<sup>3</sup>/hr?? To put that into perspective one cubic meter equals 1000 liters. What do you think that'll do to the water table during our seasonal droughts? Which are becoming longer and more severe, thanks to the rising global temperature and resulting extreme weather fluctuations.

With less ground water comes lower river water levels especially when our summers are getting drier with less bouts of rain to help supplement and recharge water levels. That makes the river a less hospitable place for aquatic organisms and the land organisms that rely on them for a food source. This will greatly impact the food web as the effects compound with each resulting level starting with micro organisms and insects within the damp soil and water, and ending with large predators (Bald Eagles, Fishers, Bears, etc.) and land mammals (Deer, Porcupines, Racoons, etc.) that rely on the river for drinking water.

Less ground water in the surrounding forest means a higher risk of forest fires, and what's going to happen to the secondary stored liquid fuel when a fire gets too close?? They have fire safety measures planned but we all know how hard it is to control a wildfire in the middle of a drought.

“Wastewater will be directed to a settling pond and is planned to be discharged at a controlled rate after being tested and treated to meet CCME FWAL guidelines and NS Tier I EQS for water.” How will they keep wildlife from entering the untested discharge? Water fowl will almost definitely be attracted to the body of water held on site, how do you think the untreated water will affect them and their young?

Artificial lighting is set to be present long term 24/7 throughout the facility and along the service road, light pollution at night can be disruptive to wildlife and vegetation causing irregular growth patterns and a disturbance to circadian rhythms with negative effects to hunting patterns and foraging trails. Not to mention the countless flying insects that will perish seeking out the lights.

Yes it'll create approx. 125 jobs but those are only temporary during construction, and after they only plan on employing 15 long term positions. By the sounds of their proposal, they will select from a private company and not locals like many presume. Where do the locals stand to benefit then?

What of the sound pollution? Salt Springs is a more populated area than you would imagine and the vibrations and sounds generated from these stations can travel far, they claim it will sound like a fridge running outside (when indoors) but what about when you are outdoors, especially not during the 2-3 years of construction.

The sheer amount of machines needed to construct this facility certainly will not reduce emissions nor the sound pollution. During the operation period staff will be required 24 hours/day, 7 days/week, does that mean it will be running constantly? Will there be no break from the humming vibrations? "In the case of exposed bedrock, blasting may be required to accommodate infrastructure and foundation installation." Is this what they call minimal sound output?

Increased road traffic from transport trucks and heavy equipment will likely increase the amount of wildlife (especially displaced ones from the project site) killed by vehicle collisions. The document states that speed limits will be enforced but when does that actually happen in this county? Pulp and lumber trucks get away with speeding every day, What is to stop these transport trucks from speeding as well?

The proponent claims to share the goal of reducing greenhouse gas emissions, then why build this plant and use them anyway when we could be switching to battery storage systems that can store energy from renewable sources, such as wind and solar, and release it to supplement peak usage times.

The old Pulp Mill was finally shut down halting its damaging effects on our environment, but now 2 power generating stations may take its place, which is a huge step backwards in becoming environmentally sustainable.

"If we're comparing a pile of garbage to a smaller pile of garbage, yes, it's not as bad. But if we're comparing it to something like wind or solar, it's much more environmentally damaging." - an energy co-ordinator with the Ecology Action Centre.

Sincerely:

A Salt Springs area resident for nearly 90 years.

A Salt Springs area resident for 58 years

A Salt Springs area resident for 58 years

A Salt Springs area resident for nearly 30 years

# Environmental Assessment - Project Comments

Submission ID

ed9d8c8f

Submission Date

09/02/2026 20:12

Submission status

SUBMITTED



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## Select a Project:

Fast Acting Natural Gas Power Generation Facility - Salt Springs

## Comments:

To Whom it may concern,

We are writing to express significant concerns regarding IESO's Environmental Assessment Summary for the proposed Salt Springs natural gas generation facility. There are several major gaps in this assessment that make it impossible to understand the real risks to our community. We respectfully ask that you address these issues with IESO when you meet with them.

### Lack of Cumulative Impact Assessment

The summary evaluates the Salt Springs project in isolation, despite the simultaneous proposal of a second facility in Marshdale. Cumulative effects on air quality, noise, traffic, emergency response capacity, and ecological disturbance must be assessed together, not separately.

#### Insufficient Air Quality Analysis

The summary states that emissions will remain within guidelines but provides no modelling data, no worst case scenarios, and no analysis of diesel emissions or cold start spikes. This level of analysis is inadequate for a project involving fossil fuel combustion.

#### Minimal Consideration of Diesel Backup Risks

Diesel use introduces significant risks, including toxic emissions, spill potential, and groundwater contamination. These risks are not meaningfully assessed or modelled in the summary.

#### Incomplete Noise Assessment

Noise impacts are described only in general terms. There is no detailed modelling, no consideration of low frequency noise, and no assessment of nighttime operation in a quiet rural soundscape.

#### Limited Wildlife and Habitat Assessment

The summary relies heavily on desktop review and short field surveys. Seasonal limitations, species at risk considerations, and habitat fragmentation are not adequately addressed.

#### Groundwater and Well Protection Not Demonstrated

The summary does not include hydrological modelling or analysis of potential impacts on private wells, which are essential to rural communities. Without this information, groundwater protection cannot be assured.

#### Insufficient Community Consultation

One open house does not constitute meaningful engagement. There is no evidence that community concerns were incorporated into project planning or that residents were given adequate opportunity to understand or respond to the proposal.

#### Misleading Framing of Greenhouse Gas Impacts

The summary positions the project as supportive of clean energy goals without providing a full GHG inventory or comparing emissions to renewable or storage alternatives. This framing is incomplete and potentially misleading.

#### Generic, Unsupported Narrative Sections

The narrative sections of the EA contain generic, template like language that does not appear to be supported by the level of site specific analysis required under Nova Scotia's environmental assessment regulations. This raises concerns about the depth and rigor of the assessment.

#### Nova Scotia's Environmental Risk Assessment (released in December 2025)

The summary presents the project as if it aligns with Nova Scotia's clean energy goals, even though natural gas is still a fossil fuel and the assessment does not compare it to renewable alternatives.

Nova Scotia's own Environmental Risk Assessment shows that we are facing stronger storms, heavier rainfall, more flooding, more drought, and higher wildfire risk — and Pictou County is identified as one of the counties at higher risk. These are exactly the conditions that make diesel based infrastructure more dangerous. None of these climate driven risks are meaningfully addressed in the EA.

Given these concerns, we respectfully request that the assessment be expanded to include a full cumulative impact analysis, detailed modelling, and meaningful community engagement before any approval is considered. I would also like to note that we are not opposed to peaker plants in principle; however, adequate consideration must be given to where such facilities are placed to minimize impacts on existing communities.

Sincerely,

**Name:**

**Email:**

**City/Town**

Six Mile Brook

**Postal Code**

B0K 1R0

**Attachment(s):**

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

Maximum file size per file: 10 MB

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Maximum number of files allowed: 10

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**Fwd: Proposed gas/diesel power plant**

---

**Date** Mon 2026-02-09 8:30 PM

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

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

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Sent from my iPad

Begin forwarded message:

**Date:** February 9, 2026 at 7:43:46 PM AST

**To:** sean.fraser@parl.gc.ca

**Subject: Proposed gas/diesel power plant**

Dear Sean,

As a property owner in Salt Springs, I'm deeply concerned about the proposed Natural Gas/Diesel Power Generation Facility. The community has not been truly informed about the negative consequences of this project. The massive amounts of water needed to run this facility will negatively affect the quality and quantity of our wells. Fresh water is the 'lifeblood' of daily living. What is the value of having electricity when you no longer have good household water? We were told that water could be trucked to us.....is that really the long-term solution to a dry well or a contaminated well?

Another concern is the pollution: air pollution, noise pollution, light pollution at night, and the possibility of a diesel leak/spill. All of these affect our health and quality of life in this bucolic area that we have chosen for our homes. It seems like only yesterday that we finally got rid of the pollution and stench from Northern Pulp. An industry that completely destroyed Boat Harbour and that the taxpayers helped fund to the tune of tens of millions of dollars. The taxpayers will be funding this new project again: should we not have a say in how those dollars are spent?

This new Power Generation Facility will negatively affect the value of our properties. Every resident has put hard work and hard-earned dollars into their property, only to have the value decreased by a polluting facility nearby.

Another area of concern is that we will be importing this Natural Gas and Diesel from the United States. Over the past year, we have learned that we do not want to be reliant on

them. They can no longer be trusted as an ally. If the United States is going to continue their Economic Warfare on Canada, then let's not give them the power to regulate the cost of our electricity.

The effluent from the tailing ponds will be discharged into Six Mile Brook. Is this Brook not a salmon run? Many people fish in Six Mile Brook and West River and this will be taken away from them. Indigenous people depend on this for food. Let's not contaminate these natural waterways like we did in Boat Harbour.

Sean, please put yourself in the shoes of the residents of Salt Springs, and decide whether or not all the risks are worth the gamble.

Thank you for your attention,

.....  
Sent from my iPad



**The Ecology Action Centre is concerned about the development of the proposed Salt Springs Gas Power Generation Facility (Gas Plant).**

These gas plants will not support decarbonization and ultimately limit environmental progress. Our comments are based upon the EA Registration Documents for the proposed project at Salt Springs

- 1) The proponent – IESO – is a non-for profit responsible for the planning and reliable operation of Nova Scotia’s bulk electricity system. Whereas the purpose of EA is to promote sustainable development by protecting and conserving the environment, the EAC seeks to identify and assess adverse effects on the environment. The involvement of NGOs and the general public is crucial to achieve this goal, and the EAC appreciates the opportunity to engage with the IESO on the construction of gas plants. The Proponent’s Guide to Environmental Assessment notes that “in certain circumstances, special consultations may be held with First Nations.” The EAC urges the proponent to engage in the aforementioned special consultations given the relative proximity of both projects to Pictou Landing First Nation, and the history of environmental racism in Nova Scotia. Nova Scotia environment minister Iain Rankin has referred to decades of effluent dumping in Boat Harbor as one of the worst cases of environmental racism in Canada, and it is important that both the proponent and the Department of Environment and Climate Change (NSECC) ensure that the consultation process for the EA is perceived as legitimate by the general public and Mi’kmaq people specifically. Every opportunity should be taken to consult with First Nations, and we strongly believe special consultation is warranted as the part of this EA process.
- 2) In section 3.3.2.3 Freshwater, pg. 15 it states that “A sustainable groundwater supply will be required for power plant operation. Preliminary desktop investigations estimate a peak raw water consumption of 175 m<sup>3</sup>/hr and average annual consumption of 23 to 31 m<sup>3</sup>/hr based on the expected power plant operation.” Both the 2022 and 2025 Climate Change Risk Assessments identify increased risk of drought, and less snow and water in the coming decades, which may reduce the availability of fresh water. These risks – along with rising water rates exacerbated by industrial demand on local water supplies – could harm residential access to water. The gas plants require 24/7 operation, and the resulting water usage could further increase the risk of drought, while decreasing local capacity to respond to wildfires.
- 3) Section 3.5 Project timelines. According to S&P Global, overall demand for gas plants has increased sharply – driven by AI, as well as demand in other sectors. Wait times are as much as seven years in the US, and costs are up 2.5 percent in some US markets<sup>1</sup>.

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<sup>1</sup> <https://www.spglobal.com/energy/en/news-research/latest-news/electric-power/052025-us-gas-fired-turbine-wait-times-as-much-as-seven-years-costs-up-sharply>



- 4) The EAC questions the feasibility of timeline for construction and operation of both gas plants presented by the proponent, and is concerned about the impact of potential delays and rising costs on consumers. Nova Scotia's clean power plan calls for the development of 300MW of Battery Storage, noting that battery prices haven't fallen by 95% in recent decades and that Nova Scotia is also home to world-class expertise in batteries, and rapidly growing new firms specializing in Battery Energy Storage Systems (BESS). The proponent's Request for Expressions of Interest (REOI) for fast-acting power generation imposed unnecessary limitations on the type of generation requested – namely simple cycle, fast acting, combustion turbine package – when other forms of dispatchable generation could provide the same benefits to the grid with a lowest risk of delays and cost overruns, GHG emissions produced as a result of the operation of both gas plants are subject to Nova Scotia's output-based pricing system (OBPS) as each facility exceeds 50,000 tCO<sub>2</sub>e, with associated costs passed on to ratepayers. The projects will be subject to emissions limits under the Clean Electricity Regulations, diminishing associated system benefits and reliability benefits for ratepayers, particularly when compared to other forms of dispatchable generation such as BESS projects
- 5) Issues with Section 7 under Mitigation pg. 83 The EAC is skeptical about the feasibility of producing renewable natural gas. No fossil fuel can become renewable, nor can it become low carbon. Advertising fossil fuels as such is misleading, coercive and greenwashing. Carbon capture storage (CCS) only buries carbon eliminating it from the atmosphere and is not an effective long term solution as continuing to do so will cause further waste and overcrowding to existing land mass due to domination by CCs facilities.
- 6) In Section 9.2 – Wetlands - If a wetland meets the criteria for a potential WSS it should not be altered. This includes WL16 at the Salt Spring site (potential WSS with observation of Canada Warbler).
- 7) In Section 10.3 – Terrestrial Fauna - The proponent should also create a Wildlife Management Plan in cooperation with NSNR which includes plans to respond to moose sightings on site.
- 8) In Section 10.4 – Avifauna - Mitigation measure should include avoiding the destruction or disturbance of habitat for the SAR bird species observation on site. The known and predicted habitat of these SAR-listed species at the site should be avoided as per SARA (and the Migratory Birds Convention Act).
- 9) The EAC communicated our preference for a technology neutral REOI at a meeting in December. This sentiment is reflected in our comments as well. We would like to note that it was unclear to EAC staff that their request for a meeting with EAC was understood by the proponent as a component for their engagement for the proposed gas plants.

- 10) The application for 2 gas plants of 300MW each indicates an overbuild of gas larger than what was defined in the clean power plan (300MW). There is no indication of retrofitting existing assets to meet dispatchable energy needs. The Clean Power plan indicates that only 300 MW of New dispatchable power generators be added to meet the 2030 goal. These plants do not include the pre-existing 450 MW of oil/gas that is said to be included in the plan. This is in addition to 100MW to be received in a new deal for a portion as new gas peaker plant output recently announced with New Brunswick Power. Overbuilding of gas generation would be ineffective, inefficient, and environmentally damaging, and costly, especially when there are lower carbon alternatives. The dash to gas risks negative and unnecessary impacts on the environment and on ratepayers. Similarly, EAC is skeptical of the feasibility of sustainable hydrogen and forestry biomass use as a fuel input for these gas plants. The US Department of Energy<sup>2</sup> estimates that the maximum amount of hydrogen can be blended and carried in natural gas pipelines is theoretically 15%, and the EAC is concerned that plants will lock in emissions with little chance of GHG reduction as a result of hydrogen blending.
- 11) Section 2 – EAC would like to reiterate that batteries and battery storage have not been adequately evaluated as a viable low carbon alternative to the proposed gas plants. The REOI does not address battery storage as a dispatchable energy resource. Unlike gas, BESS plants would not be subject to OBPS or volatility in the price of fuel inputs and will be integral to deployment and integration of intermittent renewable energy resources in Nova Scotia – including offshore wind. Similarly, there are pre-existing shovel ready projects. In the Pictou County region Mi'kmaq majority-owned, shovel-ready 150 MW/600-1,200 MWh BESS exists in Trenton. The EAC is concerned that the deployment of these gas plants will undermine this business case for the deployment of these BESS plants, and that competitive procurement based on a technology neutral REOI would provide better value to ratepayers while adhering closely to the Nova Scotia Clean Power Plan.

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<sup>2</sup> [Hydrogen Pipelines | Department of Energy](#)

# Environmental Assessment - Project Comments

Submission ID

a03f7026

Submission Date

09/02/2026 22:24

Submission status

SUBMITTED



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## Select a Project:

Fast Acting Natural Gas Power Generation Facility - Salt Springs

## Comments:

If this new gas plant goes ahead in Salt Springs it could cause all the wells at private homes in the surrounding area to go dry. They need 25,000 gallons of water per hour to run the plant. It is not worth taking this chance on the surrounding residents losing their water. They are going to burn oil at this plant, if this oil leaks into the ground there could be widespread contamination of all the drinking water for the residents of the Salt Springs area. This gas plant should be located in an area where there are no homes. The natural gas pipeline is hundreds of kilometres long. You should find a better location and then run a transmission line to the main grid.

Name:

**Email:**

**City/Town**

**Postal Code**

**Attachment(s):**

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# Environmental Assessment - Project Comments

Submission ID

01cdbae8

Submission Date

09/02/2026 23:21

Submission status

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## Select a Project:

Fast Acting Natural Gas Power Generation Facility - Salt Springs

## Comments:

I have mixed feeling about these natural gas plants. I would prefer no fossil fuels but when it's a huge difference compared to coal and the timeline involved, it's hard to argue. However, there are significant concerns that I don't feel have been properly addressed/researched yet to make an informed decision if you're the government that is, anytime soon. I know we're under the gun for 2030 but we have to get this right if it's going to be done here and or in Salt Springs. I will copy and paste a document that I wrote-up and had touched-up a bit by AI for reading clarity:

Marshdale Natural Gas Plant – Community and Environmental Concerns

In regard to water:

Summer 2025 produced a significant drought in our area. The East River flowing through Stellarton was so low that rocks were visible above the water — something I cannot recall seeing in my 39 years living here. We experienced several consecutive weeks without rain.

Drilling is taking place at depths of approximately 500 metres. Based on publicly available information, it is unclear where groundwater at this depth ultimately discharges. Water must flow somewhere. Even in the absence of a known surface stream or conduit leading from the proposed site to the East River, subsurface connections cannot be ruled out. Has any groundwater tracing or monitoring (for example, tracer studies) been considered to determine where this water ultimately ends up?

The water used at the site is converted to steam. Can this steam be captured, condensed, and reused — for example, to support or restore nearby marshes?

Even if groundwater is accessed at depth, removing this volume of water daily over decades raises concerns about long-term impacts that may not be immediately apparent. I hope contingency plans exist to address unforeseen consequences. The surrounding natural environment and nearby communities depend on careful, precautionary planning.

Is it confirmed that this groundwater source can reliably sustain the required flow rate 24 hours a day, year-round, for the next 30 years? If this water supply becomes constrained in the future, does this pose a risk of creating a stranded asset?

Regarding the controlled release of treated water:

Could this water be used to create or enhance marshes within the immediate area or elsewhere in Pictou County? Restoring wetlands outside the county to meet regulatory requirements does not feel equitable. If wetlands are impacted locally, restoration should occur locally whenever feasible, particularly since migratory birds return to specific areas for ecological reasons.

Will a detailed environmental assessment be conducted specifically on the release of treated water into the surrounding environment?

If monitoring later shows that nearby wetlands are being dried or altered as a result of groundwater withdrawal, what mitigation measures would be implemented?

In regard to birds:

The Environmental Assessment appears to focus primarily on the project footprint. It does not adequately assess adjacent properties, nearby roadways, or the broader surrounding area.

American Bittern are known to nest in the large wetland along the train tracks near Lorne Station Road, which falls within the emissions modelling area. Migratory birds reaching this marsh must fly through the affected airspace and will be exposed to both emissions and noise.

I propose that night-time operations be restricted during peak migration periods when birds are known to be actively migrating.

Birds in this area are widespread — not limited to one marsh. Along Culloden Road and Stellarton Trafalgar Road, for example, birds line thickets, trees, and adjacent farm fields. Many have migrated from Central America, South America, and the southern United States. These species rely on acoustic cues and clean air to locate breeding and staging habitat. Many can hear high- and low-frequency sounds beyond human perception, yet the noise model appears to be based on human thresholds.

I am concerned about construction and operational noise interfering with birds' and mammals' ability to communicate for breeding and rearing young.

Why were passive monitoring tools such as Audiomoths or radar not used to monitor birds continuously, day and night? Bird activity varies by species and time of day. For example, American Bittern typically vocalize shortly after dawn. Limited site visits cannot capture this complexity or adequately assess areas beyond the project boundary.

Why was the Nova Scotia Bird Society not contacted to help connect with local birders who know the area well? I, and others, would have volunteered to assist with counts.

Additional questions:

Will emissions be released at a height designed to minimize disruption to typical bird migration altitudes?

Will stacks be shut down at night during peak spring and fall migration periods?

Why does the EA reference “migrating geese” when Canada Geese are present year-round in Pictou County?

Will tailing ponds be covered to prevent bird access?

Will sound cannons be avoided entirely?

I do not see my eBird records — or those of other local observers — being used, despite documented sightings of Common Nighthawks, Black-billed Cuckoos, warblers, and many other species within the emissions zone. No surveys appear to have been conducted on neighbouring properties, and ground vibration effects on nearby wetlands were not addressed.

In regard to amphibians:

Will amphibians be collected and relocated to nearby suitable habitat, or is there a risk they will be displaced or destroyed during site preparation?

In regard to electricity:

Will new and existing transmission lines be fitted with bird-safe reflectors or line-marking devices to reduce collision and electrocution risk?

In regard to fuel:

Diesel is identified as a secondary fuel, with consumption listed at up to 75,000 litres per hour. Given that a standard tanker truck carries approximately 40,000 litres, this volume raises questions about logistics, emissions, and alignment with environmental goals.

Does diesel exhaust exit through the same stacks as natural gas combustion?

Will exhaust be treated with scrubbers?

Was air quality modelling conducted assuming diesel combustion, or only natural gas?

In regard to noise:

Noise modelling appears to be based on human tolerance levels. However, many species — including red fox, black bear, raccoon, deer, amphibians, birds, skunks, and porcupines — have more sensitive hearing across broader frequency ranges.

Black bears were reportedly detected via trail cameras, but for how long were cameras deployed, how many were used, and were neighbouring properties included? Wildlife does not adhere to property boundaries.

Will physical noise and vibration barriers (both above and below ground) be constructed

to limit sound propagation through air and soil? In a quiet rural environment like Marshdale, low-frequency hums can travel long distances at night.

Was sound monitoring conducted at a comparable fast-acting natural gas facility in a similarly rural setting? Urban facilities such as Dartmouth are not representative. A comparable rural reference site would provide a more accurate model.

In regard to construction, post-construction, and design:

Who will monitor workers for environmental compliance, and how frequently?

Lighting should be shielded and directed downward during and after construction.

Lighting can attract owls hunting rodents; poison use should be prohibited.

Roof design should prevent Killdeer nesting and uncontrolled snow shedding.

If green roofing is used, regular ecological monitoring will be required.

Temporary and permanent wildlife fencing should be installed.

Baseline and ongoing samples (water, soil, air) should be collected, documented, and retained.

Bird-safe glass or commercial deterrents (e.g., Feather Friendly) should be installed and maintained.

In regard to jobs:

Will Nova Scotia Power employees affected by coal plant closures be offered retraining or transition opportunities? Will former Northern Pulp workers have access to training or priority hiring if qualified?

What are the long-term health outcomes for workers exposed to emissions over many years? Have comparable facilities been consulted regarding worker health impacts?

In regard to trees:

Will trees removed during construction be replaced locally, watered, mulched, and maintained during early growth stages?

Will additional tree planting occur beyond one-for-one replacement to help offset emissions?

Can treated water be used to support these plantings?

In regard to consultants:

Hatch:

Why were they selected, and do they have experience conducting sound analysis for fast-acting gas plants in rural environments?

Strum:

Why did their assessment not extend beyond the project boundary, given that water, air, sound, and wildlife impacts extend well beyond property lines? If scope limitations were imposed, that raises concern about the adequacy of the assessment.

In regard to ethics:

IESO is publicly funded. How can the public be assured that environmental protection and community well-being are weighted alongside cost efficiency? Rural residents did not ask for industrial facilities near their homes, and long-term impacts to landscape character and peace deserve meaningful consideration.

In regard to property values:

For landowners who chose Marshdale for its quiet, views, and rural character — including those planning retirement homes or land sales — the presence of industrial stacks, emissions, and long-term truck traffic may negatively affect property values. Greater effort should be made to explore alternatives that minimize community disruption.

In regard to the Community Liaison Committee:

I joined the CLC out of concern that environmental considerations were being underrepresented. Given the number of unresolved issues, this concern remains valid.

Will CLC members be permitted to visit the site throughout construction and operation to verify compliance?

I will propose that qualified local naturalists and birders be granted monitored access to assist with independent observation.

In regard to ongoing monitoring:

I propose continuous, long-term monitoring using:

Acoustic bird recorders

Wildlife cameras

Air and water quality sensors

Ground vibration monitoring

Low- and high-frequency sound analysis

Monitoring should occur both on-site and in surrounding areas for the full life of the project.

In regard to wildlife deterrence:

Natural scent-based deterrents could be used to discourage wildlife from approaching fencing, ponds, and other hazards.

In regard to squirrels and birds:

Tree removal will inevitably displace squirrels and birds. Installing nesting boxes away from high-noise zones would help mitigate habitat loss.

In regard to emergencies:

With New Glasgow being the nearest paid fire department, do local and volunteer departments have the staffing, equipment, and training to respond to a major fire, explosion, or large-scale fuel spill? What contingency plans exist if volunteer capacity declines over time?

In regard to road traffic:

Heavy truck traffic will increase noise, safety risks, and road degradation. Will road maintenance be prioritized for the life of the project?

Additional measures could include:

Increased RCMP enforcement during construction

Penalties for repeat speeding violations by project vehicles

Rotating electronic speed display signs to improve compliance

Conclusion:

Both the Marshdale and Salt Springs projects raise serious concerns for me. While Marshdale appears more suitable than Salt Springs due to proximity to homes, natural gas — though cleaner than coal — still carries local environmental and community costs.

Perfect locations do not exist. However, projects of this scale must be assessed and monitored rigorously, transparently, and beyond property boundaries. Passive bird monitoring, expanded environmental assessments, and long-term oversight are essential if these projects are to proceed responsibly.

Respectfully,

Community Liaison Committee Member & Proud Nature Lover

**Name:**

**Email:**

**City/Town**

**Postal Code**

**Attachment(s):**

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# Environmental Assessment - Project Comments

Submission ID

a5a922b5

Submission Date

10/02/2026 00:59

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SUBMITTED



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## Select a Project:

Fast Acting Natural Gas Power Generation Facility - Salt Springs

## Comments:

I am writing to formally oppose the proposed natural gas and diesel power plant development in Salt Springs, Nova Scotia.

My family has deep roots and land in this area, and we are extremely concerned about the environmental, health, and long-term community impacts of this project. The introduction of a natural gas and diesel facility in a rural residential region raises serious questions about air quality, water safety, noise pollution, and ecosystem disruption.

Local residents have taken it upon themselves to complete extensive independent research on this project. Community members have already submitted numerous evidence-based concerns outlining why this development is neither financially beneficial to the region nor environmentally responsible. These concerns include long-term economic risk and environmental degradation.

Despite this significant community effort, it has been deeply concerning to witness the lack of informed engagement from local MLAs, whose responsibility is to represent and protect the areas they serve. Public statements and discussions to date suggest limited knowledge of the project's potential risks, including an inability to answer direct questions regarding environmental impacts to the surrounding area.

Furthermore, a scheduled town hall meeting intended to discuss this project with residents was cancelled at the last minute, removing a critical opportunity for transparent dialogue. There has been no meaningful effort to reschedule or facilitate open, informed discussion with the dozens of homeowners and families who have expressed serious concern about this development.

It is the perception of many residents that local MLAs are prioritizing alignment with the political party they represent over the responsibility they hold to the constituents living in the affected area. By failing to take community concerns seriously or demonstrate genuine scrutiny of this project, they are not fulfilling their duty as public servants to advocate for the safety, wellbeing, and interests of the people they were elected to serve.

To date, there also appears to be a lack of transparent, independent environmental assessment data available to local residents. Information that has been shared publicly seems to rely heavily on proponent-supplied material rather than third-party scientific review. This does not provide communities with the balanced, evidence-based analysis required to make informed decisions about projects of this scale and risk.

Salt Springs is a quiet, environmentally sensitive area where families rely on well water, clean air, and the natural landscape for their health and livelihoods. Industrial energy infrastructure of this nature is incompatible with the character and safety of our community.

I respectfully urge regulators to deny approval of this project unless and until comprehensive, independent environmental assessments, meaningful community consultation, and full risk disclosures are completed and publicly reviewed.

Protecting rural communities, water sources, and environmental health must take priority over private industrial expansion.

Thank you for the opportunity to submit this comment.

**Name:**

**Email:**

**City/Town**

**Postal Code**

**Attachment(s):**

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Maximum file size per file: 10 MB

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**Re: Response to Environmental Assessments for Marshdale and Salt Springs Natural Gas Power Generation Facility Projects**

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Date Mon 2026-02-09 1:59 PM

Cc Environment Assessment Web Account <EA@novascotia.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

Well said.

On Sun, Feb 8, 2026 at 5:22 PM

Please see attached our response on behalf of the Margaree Environmental Association regarding the Environmental Assessments for the two 300MW natural gas power generating projects being  
Scotia.  
estions you may have regarding our submission.

**Fast Acting Natural Gas Power Generation Facility - Marshdale, Pictou County and Fast Acting Natural Gas Power Generation Facility – Salt Springs, Pictou County**

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Date Mon 2026-02-09 3:59 PM

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

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Environmental Assessment Branch  
Department of Environment and Climate Change  
PO Box 442  
Halifax, NS, B3J 2P8

Email [ea@novascotia.ca](mailto:ea@novascotia.ca)

Re: Fast Acting Natural Gas Power Generation Facility - Marshdale, Pictou County and Fast Acting Natural Gas Power Generation Facility – Salt Springs, Pictou County

To whom this may concern,

Thank you for this opportunity to provide public comments on these projects.

It is unclear in these filing documents whether one or two fast-acting gas power facilities are being proposed by the IESO. The documents state that multiple locations were considered, but do not indicate whether one receives EA approval if the other is still in the works. Without clarity, essentially, two plants equal twice the concern.

While understanding Nova Scotia's Energy Plan and federal requirements to phase out coal energy by 2030, the justification for this development remains clouded. Without a domestic gas supply in hand, dependence on the Maritimes-NorthEast pipeline promotes continued North American fossil fuel procurements and importation of hydraulically fractured gas from the United States and/or other parts of Canada. There is no way to know where the gas originated once in the pipe. Although the current government in NS has ill-advisedly removed the fracturing ban in Nova Scotia to provide potential for a local onshore supply, and has called for renewed interest in offshore investments, no bids are publicly known to be forthcoming.

Evidence of detrimental health and environmental effects caused by fracking and associated gas infrastructure is abundant, though it is unfortunately and continually ignored by industry regulators. Public concerns regarding natural gas reach much farther than the immediate fallout zone of PM emissions from these proposed plants and must be considered in the long-term impacts associated with an imported or locally sourced natural gas supply.

The cumulative effects of leaking pipelines, flaring gas wells, fracking fluids, and environmental disruption are not minimal on the planet, and should not be ignored in the overall assessment of these projects. Regulations are not set, nor traditionally upheld sufficiently, across the board. Simply being “cleaner than coal” is not an ideal solution for future energy production in Nova Scotia, and the impacts on environmental and citizens' health across a fracked continent are not negligible. See examples: <https://endocrinedisruption.org/audio-and-video/fracking-related-health-research-database/search-the-database#keywords=&stream0=animal&stream1=human&stream2=in+silico+and+risk%2Fhazard+assessment&stream3=in+vitro&action=search>

<https://concernedhealthny.org/category/documentation/peer-reviewed/>

It is apparent that a clear bias towards continued expansion in wind turbines exists within these proposals, and that other viable alternative energy sources may not have been adequately investigated by the IESO, including upgrades to existing small hydro, investment of in-stream hydro (<https://www.smart-hydro.de/renewable-energy-systems/hydrokinetic-turbines-river-canal/>), pumped hydro energy storage ([https://atb.nrel.gov/electricity/2022/pumped\\_storage\\_hydropower](https://atb.nrel.gov/electricity/2022/pumped_storage_hydropower)), compressed air and gravity energy, ([https://www.e3s-conferences.org/articles/e3sconf/pdf/2020/22/e3sconf\\_icpeme2020\\_01001.pdf](https://www.e3s-conferences.org/articles/e3sconf/pdf/2020/22/e3sconf_icpeme2020_01001.pdf)), and algae – capable of carbon capture at existing coal burning facilities and producing biofuels. (<https://pondtech.com/>).

Section 3.4.211 Vegetation management should include a ban on broad-spectrum pesticides and herbicides that may migrate from the project site and adversely affect neighbouring properties.

Groundwater modelling should be implemented in the planning process, and assurances must be made to MOPC that ensure public water quantity and quality will not be negatively affected.

If approved, continuous emission monitoring equipment must be installed to ensure public safety and regulatory compliance.

I believe that the privatization of Nova Scotia's current energy production was a mistake made by previous governments, and that all new energy infrastructure should remain the property of citizens of the province and not be controlled by any private company, even in partnership with First Nations.

As another alternative option, IESO could renew negotiations with the Churchill and Muskrat Falls hydro facilities to provide affordable rates, not only for New Yorkers, until 2041. Those project cost overruns should not prevent Nova Scotians from benefiting from these existing Canadian clean energy producers.

Thank you for your time and attention.

Regards,

Concerned Citizen



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Salt Springs Natural Gas Power Generation Facility Project  
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Project reference number: 90114

Environmental Assessment Branch  
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February 9, 2026

**RE: Fast Acting Natural Gas Power Generation Facility – Marshdale and Salt Springs**

As physicians and healthcare providers representing the Canadian Association of Physicians for the Environment (CAPE) in Nova Scotia, we are submitting our concerns regarding the proposed fast-acting natural gas power generation facilities for Marshdale and Salt Springs in Pictou County, submitted by IESO Nova Scotia.

CAPE is a national non-partisan, physician-led organization with over 36,000 supporters and regional committees in 9 provinces, including Nova Scotia. We bring an evidence-based and health-focused approach to the intersecting issues of environment, health, and social justice.

For the purposes of this submission, CAPE Nova Scotia will address and refute the proponent's assumption that the construction and operation of these 300 MW gas power generating facilities in Marshdale— for a minimum of 30 years—pose negligible risk to the health and wellbeing of Nova Scotians.

## What Is Natural Gas?

While the industry frequently uses the term "natural gas" to suggest a clean or organic energy source, this phrasing is a marketing descriptor rather than a scientific one. From a medical and environmental health perspective, it is more precise to identify the substance by its primary chemical component: methane (CH<sub>4</sub>).

Therefore, below we refer to methane gas and the fast acting methane gas power generating facilities.

Methane is a supercharged greenhouse gas that is well known to accelerate global heating.

## Burning fossil fuels is the primary cause of climate change<sup>1</sup>

This is no longer a matter of serious debate. The United Nations, the World Health Organization, the International Energy Agency, and the Canadian government have all issued warnings and reports calling for the rapid reduction of burning fossil fuel and a transition to renewable energy. Their reports and statements underscore the grave dangers posed by the escalating climate crisis, biodiversity crisis, and air pollution—and their cascading effects on human health and mortality.

## Health Effects Arising from Climate Change

The warming climate in Nova Scotia is already resulting in preventable injury, illness, and death. National data confirms that climate change is a primary driver of health effects related to rising temperatures, extreme heat, and the expansion of zoonotic diseases.<sup>2</sup>

- **Extreme Heat and Respiratory Health:** In Canadian cities, extreme heat increases mortality rates by 2% to 13%.<sup>3</sup> Furthermore, air pollution from fossil fuel combustion and increasing wildfire smoke already causes approximately 15,300 premature deaths in Canada annually.<sup>4</sup>
- **Infectious Diseases:** Warming temperatures have facilitated the northward expansion of ticks, making Lyme disease a permanent and growing health threat in our region.<sup>5</sup> In just the last five years we have seen the emergence of two other tick-borne infections in Nova Scotia: anaplasmosis and babesiosis.
- **Mental Health and Displacement:** The devastating floods and wildfires Nova Scotia has experienced are not just infrastructure crises; they are mental health crises. We see spikes in PTSD, anxiety, and depression following these events.

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<sup>1</sup> [Causes and Effects of Climate Change | United Nations](#)

<sup>2</sup> Berry, P., & Schnitter, R. (Eds.). (2022). *Health of Canadians in a Changing Climate: Advancing our Knowledge for Action*. Health Canada

<sup>3</sup> Ibid

<sup>4</sup> Health Canada. (2022). *Canada's Changing Climate: Implications for Health and Well-being*.

<sup>5</sup> Berry, P., & Schnitter, R. (Eds.). (2022). *Health of Canadians in a Changing Climate: Advancing our Knowledge for Action*. Health Canada

## Impact on Healthcare Delivery and Infrastructure

Extreme weather events and wildfires, which are becoming more frequent because of climate change, also directly impact healthcare workers, their clinics, and hospitals. When wildfires occur, smoke infiltration can compromise the air quality within medical facilities, and evacuation orders can force the closure of community clinics, disrupting essential care. Severe flooding and storms can block transit routes, preventing healthcare staff from reaching their shifts and delaying emergency response times. These disruptions create a secondary health crisis where the system's capacity to respond is diminished exactly when the community's need is greatest.<sup>6</sup>

## Why does this project worry us?

There is no doubt that Nova Scotia is, as is the rest of the world, experiencing the adverse effects of climate change. Given the release of methane associated with the processes of its exploration, extraction, transportation, and use, Nova Scotia should not be developing technologies that rely on fossil fuel extraction to support electricity generation. Additionally, the exploration and extraction of methane frequently rely on fracking, with clearly demonstrable short and long term adverse health effects.

## Local Health Risks of Methane Gas Plants

Burning methane gas doesn't just fuel climate change. It comes bundled with toxic pollutants that threaten our health. These include volatile organic compounds, particulate matter, and smog-forming gases that can lead to premature death, breathing and heart problems, and even cancer. A report from the Health and Environment Alliance estimates that gas plant emissions cause 2,800 premature deaths in Europe as well as ~15,000 cases of respiratory illness including lung cancer, COPD, and childhood asthma, and incurring health and productivity costs in excess of 8.7 billion euros (US\$9.11 million USD)<sup>7</sup> Even though the air quality modeling in the environmental assessment shows levels of pollutants below nationally recommended thresholds, there is no guarantee that any level of these toxins is safe for humans.<sup>8 9</sup>

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<sup>6</sup> Berry, P., Enright, P., et al. (2022). "Adaptation and Health System Resilience." In *Health of Canadians in a Changing Climate*.

<sup>7</sup> Health and Environment Alliance. Health and Environment Alliance. 2022 [cited 2024 Dec 31]. False fix: the hidden health impacts of Europe's fossil gas dependency. Available from: <https://www.env-health.org/false-fix/> in *Cradle to Grave: The Health Toll of Fossil Fuels and the Imperative for a Just Transition*. September 2025 by the Global Climate and Health Alliance <https://climateandhealthalliance.org/cradle-to-grave-the-health-toll-of-fossil-fuels-and-the-imperative-for-a-just-transition-2nd-edition/> accessed February 9 2026

<sup>8</sup> [Health Impacts of Air Pollution in Canada: Estimates of morbidity and premature mortality outcomes – 2021 Report](#)

<sup>9</sup> [Mortality and Morbidity Effects of Long-Term Exposure to Low-Level PM2.5, BC, NO2, and O3: An Analysis of European Cohorts in the ELAPSE Project - PubMed](#)

## **Summary**

In this submission, we focus on the direct health implications of methane, primarily as they relate to its role in driving climate change. However, we are equally concerned about the risks associated with hydraulic fracturing (fracking) should there be any intention to source gas locally within Nova Scotia.

Until the full scope of the supply chain is disclosed and a comprehensive health risk assessment is conducted, this project should be paused.

Sincerely,

Chair, Canadian Association of Physicians for the Environment – Nova Scotia (CAPE NS)



## Comments on the Salt Springs Gas Fired Plant February 9, 2027

### Executive Summary

Sierra Club Canada Foundation (SCCF) is a national environmental organization dedicated to advancing climate protection, safeguarding public health, and conserving biodiversity. SCCF has a longstanding interest in the assessment of large-scale fossil fuel infrastructure, particularly where such projects risk undermining climate commitments, increasing public health burdens, or fragmenting ecosystems.

Sierra Club Canada Foundation submits this comment to the Nova Scotia Department of Environment and Climate Change regarding the proposed Salt Springs Natural Gas Power Generation Facility (the Project) in Pictou County, Nova Scotia. **Sierra Club respectfully submits that the Project should not be approved under the *Environment Act*.**

The Environmental Assessment Registration Document (EARD) does not provide sufficient evidence to justify approval. Across several key areas—project need, alternatives, climate change, human health, wetlands, species at risk, water resources, and cumulative effects—the EARD relies on narrow analyses that downplay risk, defers critical questions, and assumes negative impacts are either acceptable or unavoidable.

The proponent asserts that the Project is necessary to ensure electricity system reliability as coal-fired generation is phased out and renewable energy is added to the grid. But the EARD seems to assume a fossil gas solution is the only way forward, without showing why non-emitting solutions won't work. Where need is just asserted, not proven, approval of the Project would be premature.

**Reasonable alternatives—like energy storage, imports, demand response, and regional coordination—are mentioned but dismissed**, without comparative analysis. This reverses the logic of impact assessment and prevents a determination of whether the Project's adverse effects are avoidable.

**The Project would lock in new fossil fuel pollution for decades.** The EARD does not impose enforceable limits on run hours or lifetime emissions, does not meaningfully assess lifecycle greenhouse gas emissions or methane leakage, and relies on speculative claims of hydrogen readiness. Approval would foreclose examination of fossil fuel lock-in and cumulative climate impacts.

**Human health impacts are treated as a box to check for regulatory compliance.** This approach does not adequately address episodic emissions associated with peaking operation, cumulative exposure to fine particulate matter (PM<sub>2.5</sub>), or interaction with climate-driven heat stress.

**The Project would permanently alter wetlands in a province that has already lost too many.** The EARD evaluates wetlands primarily by area rather than function and does not assess watershed-scale hydrological effects or downstream implications for cold-water refugia relied upon by Atlantic salmon.

Endangered species—including Black ash, mainland moose, wood turtle, Canada warbler, and monarch butterfly—are inadequately assessed by limited surveys and mitigation plans that do not capture cumulative habitat loss or long-term viability.

**Cumulative effects are a central issue.** The Project is advancing alongside other proposed fossil gas infrastructure in Pictou County. Even if one accepted the proponent's asserted need (which Sierra Club does not), greenfield siting compounds cumulative environmental harm and underscores why premature approval is inadequate.

**Taken together, these deficiencies prevent a meaningful determination that the Project's effects are well understood or acceptable.**

**The Minister is also being asked to assess a second proposed gas-fired plant at Marchdale.** Because of the interconnected nature of the impacts of these plants (i.e.: the need for, project description, scale, scope, impacts, and cumulative impacts), we further recommend a joint assessment for these plants.

## 1. Need for the Project

*From a Minister's approval perspective, the question of whether project need has been demonstrated is central to determining whether a proposed activity warrants approval under the Environment Act, particularly where asserted need may drive long-term environmental risk.*

The proponent asserts that the Salt Springs Natural Gas Power Generation Facility is necessary to ensure electricity system reliability in Nova Scotia as coal-fired generation is phased out and variable renewable energy is added to the grid (Salt Springs Environmental Assessment Registration Document (EARD), s. 2.2, p. 4). This asserted need is framed as urgent and self-evident and is grounded primarily in provincial policy objectives to procure dispatchable capacity.

However, the EARD does not demonstrate that this project—or fossil gas generation at this scale—is necessary to meet those objectives. Instead, the proponent defines “need” in a manner that presumes the solution in advance, effectively treating new gas generation as the default response to reliability challenges rather than one option among many. The EARD acknowledges that Nova Scotia's electricity system is undergoing a transition driven by coal phase-out, electrification, and increased renewable generation (EARD, s. 2.2, p. 4). Yet it does not provide a transparent, comparative analysis showing why those system changes require the construction of a new 300 MW fossil fuel facility with an expected operating life extending well beyond Nova Scotia's and Canada's net-zero electricity commitments (EARD, Project Description, pp. 21–22).

This distinction matters. The Minister's role is not to accept assertions of need at face value, but to assess whether the proponent has demonstrated that the project is justified considering its environmental, health, and climate impacts. Where need is asserted rather than proved, and where it is inseparable from a pre-selected fossil solution, approval would be premature.

## 2. Consideration of Reasonable Alternatives

*Consideration of reasonable alternatives is a core consideration, as it informs whether potential adverse effects are avoidable or have been prematurely locked in by early project design choices.*

The EARD states that the proponent considered alternatives to the Project, including grid-scale battery storage, additional renewable generation, and increased electricity imports (EARD, s. 2.4, p. 8). However, these alternatives are dismissed at a general level without comparative analysis, modelling results, or cost transparency.

Battery energy storage is acknowledged as providing fast response with no direct atmospheric emissions, yet it is rejected on the basis that it would not, in the proponent's view, provide sufficient capacity or duration (EARD, s. 2.4, pp. 8–9). This assertion is offered without supporting evidence in the registration document, and without evaluating combinations of storage, demand response, transmission upgrades, or regional coordination that could collectively meet reliability needs. Similarly, increased interprovincial electricity imports and transmission-based solutions are identified but dismissed without analysis of constraints, timelines, or comparative impacts (EARD, s. 2.4, p. 8). Rather than being evaluated as alternatives to the Project, these options are framed

as measures that may be pursued in parallel, implicitly assuming that the gas facility must proceed regardless (EARD, s. 2.4, p. 9).

This approach reverses the logic of impact assessment. **Alternatives are not mitigation add-ons; they are central to determining whether the Project itself is justified. In the absence of a credible alternatives record, the Minister cannot reasonably conclude that the Project's adverse effects are acceptable or unavoidable.**

### 3. Greenhouse Gas Emissions and Climate Change

*Greenhouse gas emissions and climate change are clear provincial interests and tied to Nova Scotia's and Canada's climate commitments and the cumulative effects of long-lived fossil fuel infrastructure.*

The Salt Springs Project is a fossil fuel-fired electricity generating facility with an expected operational life of several decades (EARD, Project Description, pp. 21–22). As such, it would lock in new greenhouse gas emissions well beyond the period in which Canada and Nova Scotia have committed to achieving a net-zero electricity system. The EARD acknowledges that the Project will emit greenhouse gases during construction and operation but frames these emissions as acceptable because the facility is intended to support renewable integration and coal phase-out (EARD, s. 2.2, pp. 4–5). This framing assumes, rather than proves, that new fossil gas generation is the most climate-responsible way to achieve reliability objectives, which is not true. Operational emissions are assessed narrowly, without enforceable limits on run hours or annual emissions over the life of the facility (EARD, Operations Description, pp. 21–22). Without enforceable restrictions on annual emissions throughout the facility's operational lifespan, a plant initially approved as a peaking resource could gradually transition into a regularly operated asset if electricity demand increases.”

**The EARD also does not meaningfully assess lifecycle greenhouse gas emissions, including upstream emissions associated with natural gas extraction, processing, and transportation. Methane leakage, a major contributor to near-term climate forcing, is not substantively addressed (EARD, Climate Change discussion, general treatment).**

Taken together, these deficiencies prevent a meaningful assessment of whether the Project is compatible with Nova Scotia's climate commitments. Approving the Project would skip a crucial review of fossil fuel lock-in and cumulative climate impacts, central to the public interest.

### 4. Human Health and Air Pollution

*Human health effects, including air quality impacts and exposure to fine particulate matter, are central.*

The Salt Springs Project would introduce a new industrial source of air pollution into a rural area of Pictou County, yet the Environmental Assessment Registration Document (EARD) treats human health impacts as a secondary consideration, resolved through regulatory compliance. This approach is inadequate for the purposes of the Minister's decision-making process, where the question is not only whether emissions meet standards, but whether the Project's effects on people are fully understood and acceptable. The EARD acknowledges that the facility will emit nitrogen oxides (NO<sub>x</sub>),

particulate matter, carbon monoxide, and other air contaminants during operation, with additional emissions during start-up and shut-down events (EARD, Air Quality Assessment, pp. 45–52). These emissions are modelled against provincial and federal ambient air quality criteria, and the proponent concludes that predicted concentrations fall below applicable thresholds.

**However, compliance with ambient standards does not equate to the absence of health effects—particularly for nearby residents and vulnerable populations.** The EARD does not meaningfully assess how repeated short-duration emission spikes from a peaking facility may affect local air quality, nor does it examine potential cumulative exposure over time as the plant operates across decades (EARD, pp. 49–51).

Fine particulate matter (PM<sub>2.5</sub>) is especially concerning — it's one of the most harmful air pollutants to human health due to its ability to penetrate deep into the lungs and enter the bloodstream, contributing to cardiovascular disease, respiratory illness, asthma exacerbation, premature mortality, and cognitive decline. **There is no established safe threshold for PM<sub>2.5</sub> exposure.** The EARD acknowledges that the Project will emit particulate matter associated with natural gas combustion, including PM<sub>2.5</sub>, and includes modelling intended to show compliance with ambient air quality standards (EARD, Air Quality Assessment, pp. 45–52). However, this analysis is framed around short-term compliance with regulatory limits rather than an assessment of health risk over the Project's full operating life.

As a peaking facility, the Project is designed to cycle on and off in response to grid conditions. This operating profile increases the likelihood of repeated short-duration PM<sub>2.5</sub> emission spikes, particularly during start-up and ramping events, which are not well captured by annual or averaged concentration metrics (EARD, pp. 49–51). The EARD does not meaningfully assess how these episodic emissions may affect nearby residents over time, especially when experienced repeatedly across years or decades.

**Moreover, the EARD does not examine PM<sub>2.5</sub> exposure for sensitive populations, including children, seniors, and individuals with pre-existing respiratory or cardiovascular conditions, despite the well-documented disproportionate health impacts of fine particulate pollution on these groups.** Nor does it assess background PM<sub>2.5</sub> levels in the region in combination with Project emissions, an omission that is particularly relevant in evaluating cumulative health effects in rural communities (EARD, p. 47).

The proponent also characterizes the Project location as rural and sparsely populated, implicitly minimizing health concerns on the basis of lower population density (EARD, p. 47). This framing overlooks the reality that rural residents may experience higher relative exposure due to proximity, limited buffering, and fewer mitigation measures than urban industrial settings.

Notably, the EARD does not assess potential cumulative air quality and health effects in combination with other existing or proposed industrial activities in Pictou County. By evaluating emissions in isolation, the assessment fails to account for how incremental increases in pollution—each deemed insignificant on its own—can collectively contribute to meaningful health burdens over time.

From a provincial public-interest perspective, these omissions are significant. Human health is a core consideration under the *Environment Act*, and an approval decision that relies primarily on regulatory compliance risks overlooks localized and cumulative effects that are not well captured by standards-based modelling alone. Given the project's lifespan, fossil fuel reliance, and proximity to communities, a more thorough health assessment is needed.

## 5. Wetlands and Habitat

Wetlands are a defining feature of Nova Scotia's landscape and provide critical ecological functions, including groundwater recharge, baseflow maintenance, flood attenuation, water quality regulation, carbon storage, and habitat for fish, wildlife, species at risk, and migratory birds. Nova Scotia's Wetland Conservation Policy recognizes wetlands as among the most productive and valuable ecosystems in the province and identifies their essential role in maintaining watershed health and ecological resilience.

The most recent province-wide wetland inventory indicates that approximately 6.5% of Nova Scotia's land base consists of freshwater wetlands, with peatlands (bogs and fens) comprising more than three-quarters of that total. The same inventory and policy documentation acknowledge that historic wetland loss in Nova Scotia has been substantial, particularly in fertile lowland areas, river floodplains, and near population centres. While precise province-wide estimates of freshwater wetland loss remain uncertain, losses are known to be high.

Importantly, the Policy emphasizes that wetlands must be evaluated not only by area, but by function, noting that wetland loss or degradation diminishes flood regulation, water purification, groundwater recharge, biodiversity support, and climate moderation services. It further recognizes that wetlands operate as interconnected systems, often linked hydrologically and ecologically to surrounding watercourses, forests, and downstream habitats, and that incremental losses can result in disproportionate functional decline at the watershed scale.

The Policy also acknowledges significant uncertainty and data gaps, including the absence of a modern, high-resolution provincial wetland inventory and limited systematic tracking of cumulative wetland loss. Despite this uncertainty, Nova Scotia has adopted a precautionary approach, with the stated objective of preventing net loss of wetland area and function, particularly in landscapes where wetlands have already experienced historic decline.

In this context, remaining wetlands in Nova Scotia carry heightened ecological importance. Project-level wetland alterations therefore cannot be assessed in isolation but must be evaluated against a backdrop of historic loss, ongoing development pressure, and increasing climate-related stressors affecting hydrology and ecosystem function.

Against this policy and ecological backdrop, the Salt Springs Project proposes direct and indirect alterations to multiple wetlands within the Project footprint. The Environmental Assessment Registration Document (EARD) identifies 18 wetlands in the Local Assessment Area, with six wetlands proposed to be directly altered, resulting in the permanent loss or modification of approximately 0.9 hectares of wetland area (EARD, Wetlands Assessment, pp. 61–66).

The proponent characterizes these wetlands as small, fragmented, or of limited ecological value, and concludes that wetland-related effects will not be significant with the application of standard mitigation and compensation measures (EARD, pp. 64–66). This framing understates the importance of the affected wetlands by focusing narrowly on size and footprint, rather than on function, connectivity, and cumulative context.

The EARD relies heavily on post-disturbance compensation to offset wetland loss, consistent with provincial permitting requirements. However, the assessment does not demonstrate that proposed compensation will replace lost wetland functions—such as flood attenuation, groundwater interaction, and downstream water quality regulation—within relevant timeframes, or at all. Nor does it account for the ecological time lag associated with wetland creation or restoration, during which lost functions are not replaced (EARD, pp. 66–67).

The assessment also treats wetlands as largely discrete features, rather than as components of a connected hydrological system. Several of the identified wetlands are hydrologically linked to nearby watercourses and forested habitats, yet the EARD does not meaningfully assess how alterations may affect downstream conditions, seasonal flow patterns, or cumulative watershed function (EARD, pp. 62–65).

Notably, the EARD does not situate Project-related wetland loss within a broader regional or watershed-scale context. There is no assessment of cumulative wetland alteration in Pictou County, nor of how incremental losses from infrastructure, energy, and industrial development may collectively erode wetland function over time. This omission is particularly consequential given the acknowledged uncertainty and historic wetland loss identified in provincial policy.

**From an approval perspective, this approach is inadequate. Small, repeated wetland losses—each deemed acceptable in isolation—are a well-documented pathway to significant cumulative environmental degradation. When viewed through the lens of climate change, increasing flood risk, and declining ecological resilience, the loss or degradation of even relatively small wetlands can have outsized impacts.**

Given the Project's permanent alteration of wetland features, the reliance on compensation rather than avoidance, and the absence of a meaningful cumulative effects framework, the wetland-related effects of the Salt Springs Project warrant more comprehensive scrutiny. Approving the Project at this stage would foreclose the opportunity to assess whether proposed wetland losses are consistent with the precautionary intent of Nova Scotia's Wetland Conservation Policy.

## **6. Endangered Species**

The Salt Springs Project is proposed in a landscape that includes wetlands, forested habitat, riparian areas, and disturbed open land capable of supporting a range of species listed under Nova Scotia's *Endangered Species Act*. These species are not abstract or obscure; they include plants and animals widely recognized by the public and that serve as indicators of ecosystem integrity, climate stress, and cumulative land-use pressure.

Despite this context, the Environmental Assessment Registration Document (EARD) approaches species at risk largely through a project-footprint screening exercise, relying on limited field surveys and desktop reviews to conclude that residual effects will not be significant once standard mitigation measures are applied (EARD, Species at Risk Assessment, pp. 69–75). This approach is insufficient. Species at risk considerations extend beyond direct mortality or vegetation removal within a narrowly defined footprint. They include habitat suitability, connectivity, hydrological integrity, cumulative disturbance, and long-term viability—all of which are relevant to the Salt Springs Project and not adequately addressed in the EARD. We have included some species, below, to illustrate these points.

Black ash (*Fraxinus nigra*) is a wetland-dependent tree species listed as Threatened in Nova Scotia and experiencing significant regional decline. It is strongly associated with forested wetlands, floodplains, seepage areas, and poorly drained soils—habitat types identified within and adjacent to the Project footprint (EARD, Wetlands Assessment, pp. 61–66). Even where mature individuals are not confirmed during site-specific surveys, alterations to wetland hydrology, soil compaction, drainage patterns, and groundwater connectivity can reduce habitat suitability and regeneration potential over time. The EARD does not meaningfully assess these indirect effects, nor does it evaluate how incremental wetland loss and alteration may affect the long-term persistence of wetland-dependent plant species (EARD, pp. 62–67).

The mainland moose population in Nova Scotia is listed as Endangered and is widely recognized as a symbol of forest and wetland ecosystem health. Moose rely on large, connected landscapes that include wetlands, bogs, riparian areas, and adjacent forest cover for foraging, thermoregulation, and movement. While the EARD does not assert the presence of moose within the immediate Project footprint, it does not assess how incremental wetland loss, forest clearing, access development, and habitat fragmentation contribute to broader regional pressures on moose habitat (EARD, Species at Risk Assessment, pp. 69–74). For a species already in steep decline, cumulative landscape-level effects are often more consequential than isolated site disturbances.

The wood turtle (*Glyptemys insculpta*) is listed as Threatened federally and provincially and is strongly associated with clean rivers, floodplains, wetlands, and adjacent upland habitat. The EARD relies on limited survey results and standard mitigation measures to conclude that effects on reptiles are unlikely (EARD, Species at Risk Assessment, pp. 71–74). However, this approach does not adequately address indirect effects such as changes to water flow, sedimentation, habitat connectivity, or increased disturbance that may arise from wetland alteration and associated infrastructure over time.

The Canada warbler (*Cardellina canadensis*), listed as a species of concern under N.S. ESA and threatened under SARA, is a migratory songbird strongly associated with forested wetlands, riparian thickets, and moist understory conditions. These habitat features overlap with wetland and forest types identified within the Project area. The EARD relies on the absence of detections during surveys to conclude that effects on migratory birds and species at risk will not be significant (EARD, pp. 70–73). However, Canada warblers exhibit seasonal variability and patchy distribution, and their dependence on specific habitat conditions makes them particularly sensitive to fragmentation and wetland alteration.

The monarch butterfly (*Danaus plexippus*), listed as Special Concern in Canada, is one of the most publicly recognized species at risk and a widely understood indicator of cumulative habitat loss. Monarchs rely on milkweed and nectar sources often found in wetland margins, open disturbed areas, and transitional habitats—areas frequently affected by infrastructure development. Although monarchs may not be the focus of site-specific surveys, their inclusion underscores that incremental habitat alteration across landscapes is a primary driver of species decline.

Taken together, these species illustrate why at this stage, project approval is not warranted, or at the least, premature. The EARD's reliance on limited surveys, absence of detections, and standard mitigation measures does not address uncertainty, cumulative habitat loss, or long-term ecosystem function.

## **7. Water, Hydrology, and Cold-Water Fish Habitat and Impact on Atlantic Salmon**

Freshwater systems in Nova Scotia are increasingly stressed by climate change, land-use pressure, and historic habitat alteration. Rising air temperatures, more frequent summer drought conditions, and altered precipitation patterns are contributing to lower summer baseflows and higher stream temperatures, placing growing pressure on cold-water-dependent aquatic species. In this context, the integrity of wetlands, groundwater systems, and connected watercourses has become increasingly critical to maintaining watershed resilience.

Wetlands play a vital role in regulating hydrology and water temperature. Through groundwater recharge, baseflow maintenance, flood attenuation, and thermal buffering, wetlands help sustain stream flows and moderate temperature extremes during periods of low precipitation and high heat. These functions are particularly important during summer months, when aquatic ecosystems are most vulnerable to thermal stress. Alterations to wetlands and surrounding soils can therefore have downstream effects that extend well beyond the immediate project footprint.

The Environmental Assessment Registration Document (EARD) identifies multiple wetlands and at least one watercourse within the Local Assessment Area and acknowledges that several wetlands will be permanently altered or removed because of the Project (EARD, Wetlands Assessment, pp. 61–66). However, the assessment treats these features as isolated elements, focusing on direct footprint impacts and regulatory compliance, rather than evaluating how wetland alteration may affect hydrological connectivity, groundwater contribution, or downstream thermal regimes.

Atlantic salmon are sensitive to water temperature and flow conditions and are widely recognized as a sentinel species for watershed health. Across much of Nova Scotia, Atlantic salmon populations have experienced significant declines, driven by a combination of habitat loss, altered hydrology, warming waters, and cumulative development pressure. As climate change progresses, the persistence of remaining salmon populations increasingly depends on access to cold-water refugia—localized areas of cooler water sustained by groundwater inputs, wetlands, shaded tributaries, and intact riparian zones.

Cold-water refugia are not always mapped, visibly distinct, or confined to clearly identified fish habitat within a project footprint. They often occur downstream of

wetlands, seepage areas, and groundwater discharge zones that moderate stream temperatures during critical periods. Incremental changes to upstream wetlands, soils, and drainage patterns can therefore reduce the availability or effectiveness of these refugia, even where direct in-stream works are limited or absent.

The EARD concludes that effects on fish and fish habitat are unlikely to be significant, on the basis that no direct fish habitat is affected within the Project footprint and that standard mitigation measures will be applied (EARD, Aquatic Environment Assessment, pp. 67–69). This conclusion does not adequately account for indirect or downstream effects, nor does it assess how wetland alteration may influence baseflow, groundwater contribution, or stream temperature at locations supporting cold-water species.

The Project involves vegetation clearing, soil disturbance, wetland alteration, and the introduction of new impervious and compacted surfaces, all of which can influence surface runoff, infiltration, and groundwater movement (EARD, Project Description, pp. 21–24). While each of these effects is treated as minor or mitigable in isolation, the EARD does not assess their combined influence on watershed-scale hydrology, particularly under future climate conditions.

Notably, the EARD does not evaluate how Project-related hydrological changes may interact with existing wetland loss and drainage in the region, the increasing frequency of summer low-flow conditions, rising water temperatures, or other existing or proposed developments within the watershed.

**This omission is significant. For Atlantic salmon and other cold-water species, risk is rarely attributable to a single project alone. Instead, it arises from the accumulation of small hydrological changes over time, each of which incrementally reduces habitat suitability and resilience. Approvals that focus narrowly on footprint impacts are ill-suited to capturing this dynamic.**

Given the acknowledged uncertainty, the climate sensitivity of cold-water systems, and the cumulative nature of hydrological impacts, approval is not warranted, since it precludes a meaningful evaluation of how incremental wetland and hydrological changes may interact with climate change to affect Atlantic salmon and the broader health of freshwater ecosystems.

## **8. Cumulative Effects**

Cumulative effects are a central issue raised by the Salt Springs Project. While individual components of the Project are repeatedly characterized in the Environmental Assessment Registration Document (EARD) as small, localized, or mitigable, the assessment consistently evaluates those effects in isolation rather than examining how they interact over time, across environmental components, and within a broader regional and climatic context.

This siloed approach understates risk. The Project's potential effects on greenhouse gas emissions, air quality, wetlands, species at risk, water resources, and human health are interconnected and mutually reinforcing. When viewed together, they raise legitimate questions about whether approving additional fossil fuel infrastructure in this region is

consistent with long-term environmental protection, climate resilience, and public interest objectives.

The EARD repeatedly concludes that Project-related effects are not significant because they fall below regulatory thresholds or affect small areas (EARD, pp. 45–75). This framing fails to account for the reality that significant environmental degradation often occurs incrementally, through the accumulation of many individually minor decisions.

For example, the permanent alteration of approximately 0.9 hectares of wetlands is treated as acceptable in isolation, despite acknowledged historic wetland loss in Nova Scotia and the increasing importance of remaining wetlands for flood attenuation, groundwater recharge, and climate resilience (EARD, Wetlands Assessment, pp. 61–66). Similarly, modest increases in air pollutant emissions are deemed insignificant without assessing how repeated episodic emissions—particularly of PM<sub>2.5</sub> from peaking operation—may contribute to cumulative exposure and long-term health risk (EARD, Air Quality Assessment, pp. 45–52).

Climate change is not treated in the EARD as a cumulative risk multiplier. Rising temperatures, increasing frequency of extreme heat events, altered precipitation patterns, and summer low-flow conditions all increase the sensitivity of ecosystems and communities to additional disturbance. Wetland loss, hydrological alteration, fossil fuel combustion, and air pollution have greater consequences under future climate conditions than under historic baselines.

The Project's greenhouse gas emissions are assessed without reference to the cumulative implications of long-lived fossil fuel infrastructure in a jurisdiction that has committed to a net-zero electricity system (EARD, Project Description and Climate Discussion, pp. 21–24).

Cumulative effects are particularly evident in the context of biodiversity loss. Species at risk such as Black ash, mainland moose, wood turtle, Canada warbler, and monarch butterfly are not threatened by a single project alone, but by progressive habitat loss, fragmentation, and degradation across landscapes. The EARD relies heavily on site-specific surveys and mitigation measures to conclude that effects are unlikely, without examining how incremental wetland alteration, forest clearing, access development, and hydrological change interact at the regional scale (EARD, Species at Risk Assessment, pp. 69–75).

The EARD's cumulative effects analysis is particularly weak with respect to water resources. Wetlands, groundwater systems, and surface watercourses function as interconnected networks. Incremental changes to upstream wetlands and soils can reduce baseflows, increase water temperatures, and diminish cold-water refugia relied upon by Atlantic salmon and other cold-water species downstream. By concluding that effects on fish and fish habitat are unlikely because no direct in-stream works occur within the Project footprint, the EARD avoids assessing watershed-scale cumulative risk, particularly under climate change (EARD, Aquatic Environment Assessment, pp. 67–69).

The Salt Springs Project is not being proposed in isolation. It is advancing within a broader regional context that includes other proposed and existing energy infrastructure developments drawing on the same landscapes, airsheds, watersheds, and communities.

Most notably, the Salt Springs Project is one of two proposed 300-MW fossil gas-fired generation facilities advanced within Pictou County during the same planning period.

Sierra Club Canada Foundation has also submitted comments to the Department regarding the Marshdale Project, which raises many of the same underlying issues related to need, alternatives, greenhouse gas emissions, air quality, wetlands, species at risk, and cumulative effects. While each project must be assessed on its own record, their concurrent advancement underscores the risk of piecemeal decision-making in the absence of a broader system-level assessment.

**Even if one accepted the proponent's asserted need for the Project (which Sierra Club does not), the decision to site new fossil fuel infrastructure on greenfield land compounds cumulative environmental harm and underscores why screening-level assessment is inadequate. Greenfield siting results in permanent loss of intact land, wetlands, and associated ecological functions, adding to historic and ongoing landscape fragmentation that is not captured through project-by-project review.**

From a cumulative effects perspective, the concern is not whether this individual project causes significant impacts in isolation, but whether repeated approval of energy infrastructure incrementally erodes ecological resilience and normalizes irreversible land-use change.

Evaluating the Salt Springs Project without regard to parallel proposals risks underestimating cumulative effects that only become apparent when multiple projects are considered together, including increased fossil fuel lock-in, compounded wetland and habitat loss, incremental air pollution, and added pressure on climate-sensitive watersheds. For the Minister, the existence of parallel projects addressing the same asserted system need reinforces the importance of a review capable of examining combined and interacting effects, rather than approval decisions made in isolation.

Cumulative effects are therefore not an ancillary concern in this case; they are the lens through which the Project's significance must be understood. The EARD's fragmented treatment of effects across valued components does not provide a sufficient basis for concluding that the Project's impacts are insignificant when considered together.

## **9. Conclusion and Recommendation**

The Minister's role is not to accept assertions made in the EARD at face value, but to assess whether the proponent has demonstrated that the designated project is justified, considering its environmental, health, and climate impacts.

The question before the Minister, then, is whether the Project's full range of potential effects is sufficiently understood to justify its approval. On the record before the Department, that threshold has not been met.

As demonstrated throughout this submission, the EARD relies on asserted need rather than demonstrated necessity, dismisses reasonable alternatives without comparative analysis, understates fossil fuel lock-in and lifecycle greenhouse gas emissions, and treats human health, wetlands, water, species at risk, and climate change as discrete issues rather than interacting system-level risks.

Approving the Salt Springs Project at this stage would pre-judge questions that go to the heart of the public interest, including climate compatibility, cumulative environmental degradation, long-term human health risk, and Nova Scotia's responsibilities with respect to biodiversity and fish habitat.

**For these reasons, Sierra Club Canada Foundation respectfully recommends that the Minister not approve the Salt Springs Project.**

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**Fast Acting Natural Gas Power Generation Facility – Salt Springs & Marshdale**

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@gmail.com>

**Date** Sun 2026-02-08 10:08 PM

**To** Minister, Env <Minister.Environment@novascotia.ca>; ministre-minister@ec.gc.ca <ministre-minister@ec.gc.ca>

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

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**From:**

South Lake Ainslie, N.S.

February 8, 2026

**To:**  
Hon. Timothy Halman  
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)

Hon. Julie Dabrusin

Minister Environment

House of Commons

Ottawa, Ontario K1A 0A6

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

**Re:**

Re: Fast Acting natural Gas Power Generation Facility – Marshdale

I am writing this letter to express my concern with pushing ahead with these natural power gas power generation facility.

The cost of these installations plus long-term maintenance need to be more closely scrutinized. I do not think we need these plants at this time. There needs to be more research done to determine if there are better alternatives for power generation.

Why is our province pursuing the building of gas plants when they will be contributing to greenhouse gas and possible health concerns in the specific areas in which they are operating. They will be major users of fossil fuels. I believe we need to get off fossil fuel!!

Look at other alternatives for backup: Existing Coal Fired Power, Wind, buying from other suppliers (Hydro Quebec).

Build batteries at a fraction of the price of these plants as a backup system. It is a know fact that there is only a requirement for significant backup for only 5-7 days a year. Look at alternatives rather than building such an expensive system that the public will end up paying for while the oil and gas industry are the ones that stand to gain the most – not the private citizens

These EA's are biased and incomplete. Stop this development.

**[Draft] Re: Concerns Regarding Proposed Natural Gas Power Generation Facilities in Pictou County**  
CRM:0842166

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From

Draft saved Fri 2026-02-13 1:01 PM

To Minister, Env <Minister.Environment@novascotia.ca>

----- Original Message -----

-----, -----, -----@bellaliant.com>;

**Received:** Tue Jan 27 2026 16:18:19 GMT-0400 (Atlantic Standard Time)

**To:** Premier's Office <premier@novascotia.ca>; Marco MacLeod MLA <info@marcomacleod.com>; ECO/OP - Premier <premier@novascotia.ca>;

**Subject:** Fw: Concerns Regarding Proposed Natural Gas Power Generation Facilities in Pictou County

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FYI

Forwarding to Minister, as requested by sender.

Also copying Minister assistant.

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---

@gmail.com>

**Sent:** Tuesday, January 27, 2026 4:03 PM

@bellaliant.com>

**Subject:** Re: Concerns Regarding Proposed Natural Gas Power Generation Facilities in Pictou County

Thank you for getting back to me. I appreciate you taking the time to respond.

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.

For these reasons, I felt it necessary to bring this matter directly to your attention. I have submitted formal statements to both the Impact Assessment Agency of Canada and Nova Scotia Impact Assessment; however, given the extremely short submission timelines, limited consultation, and lack of transparency from the IESO, I believe it is important that these concerns be clearly communicated at the ministerial level.

I respectfully ask that you relay these concerns to the Minister of Energy. If there is any additional information I can provide, or if you have any questions, please do not hesitate to reach out. I recognize this is a lengthy email, and I appreciate your time and consideration.

Sincerely,

On Fri, Jan 23, 2026 at 12:03 PM

How are you?

Sorry for the delayed response.

I appreciate the email, I learned a few things about the salmon population. I've fished over the years, but never salmon. Glad to hear we have a healthy population in the West River.

What is your main concern about the power generation facility re: salmon population health? Is it a catastrophic event may occur and harm the river? Or do you think regular operations would be detrimental to the salmon stock? I'm interested in the answer.

Here are the channels to connect with to register your concerns:

**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/fangpggf-salt-springs/> and <https://novascotia.ca/nse/ea/fangpggf-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).**

I encourage you to reach out through these channels, so those making decisions here your input.

Take care.

---

[@gmail.com](#)>

**Sent:** January 16, 2026 2:58 PM

**To:** [info@marcomacleod.com](mailto:info@marcomacleod.com); [@bellaliant.com](mailto:bellaliant.com)

**Subject:** Concerns Regarding Proposed Natural Gas Power Generation Facilities in Pictou County

Hi There,

I am a Stellarton resident and professional Marine Ecologist. I am writing to both of you regarding my concerns over the IESO proposal to construct two "fast-acting natural gas power generation facilities" in Pictou County. I'm sure you both are aware of the proposals but I am not sure whether you are aware of the potential impact these systems will have on critical Atlantic salmon habitat. A species that is not only extremely important to the people of Pictou County but also federally protected. While currently listed federally as "Threatened" as of Dec 5th 2025 COSEWIC has recommended the

Southern Gulf of St. Lawrence sub-species to be listed as Endangered in Northern Nova Scotia as it already has been in the Bay of Fundy.

As proposed, one facility would be constructed in Marshdale, near the upper East River, with a second facility proposed for Salt Springs along the West River.

While both proposed sites raise concerns regarding potential ecosystem impacts, the Salt Springs proposal is of particular concern to myself and fellow conservationists. The proposed location is situated at the confluence of Eight Mile and Six Mile brooks, just a few hundred meters from Salt Springs Provincial Park and the mainstem of the West River. Both tributaries provide critical Atlantic salmon habitat a species that is federally protected in Canada. Six and Eight Mile brooks as well as the West River system as a whole are home to one of the few remaining healthy salmon population in Nova Scotia. Eight Mile Brook specifically is one of the few remaining cold-water tributaries in the West River system an attribute that has been especially important in sustaining fish stocks during recent summers and is fundamental to the success of the rivers' salmon population moving forward. There is a strong argument to be had that Eight Mile brook is the single most important tributary and stretch of Atlantic salmon habitat in the West River and one of the most important stretches in the province.

In addition to its ecological significance, the stretch of river from Salt Springs Provincial Park to the bridge on Eight Mile Brook is arguably the most heavily used section of the West River by fly anglers and Indigenous harvesters. Every fall people from around our province and beyond come to our County to peruse salmon as people here have done for millennia. This proposal risks ending this longstanding tradition in one of the very few places we have left.

I recognize the importance of power generation and that this is an opportunity for some economic growth in our community but I do not understand why this has to come at the expense of our wildlife, Provincial parks and culture. According to the assessment conducted by STRUM Consulting this area was picked due to its "low ecological importance" and proximity to the Maritimes Pipeline, that is an absolutely ridiculous statement there are only ten scheduled salmon rivers in this province and this is one of them, how can that be of low ecological importance? As an ecologist I can inform you that it is not. All the while a few kilometers to the East is the Middle River which does not have salmon anymore (thanks to it being damned at its mouth while a precious PC government was in power.) The Middle River is also intersected by the Maritimes Pipeline. Could this not be an alternative that allows for the power generation systems to be constructed without risking the existence of an endangered species? These seems like an easy win for the Province.

Please hear my concerns regarding this issue as I am far from the only person who feels this way. I am more than happy to speak further about this or provide recent study data to highlight the rivers' importance. I see a real opportunity here for the province to do the right thing ecologically speaking without having to compromise any economic output and still reach our energy generation goals.

Thank you for your time,

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**Re: Do Not Approve Nova Scotia Natural Gas Plants' EAs**

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... , @ns.sympatico.ca>  
**Date** Sun 2026-02-08 9:31 PM  
**To** Minister, Env <Minister.Environment@novascotia.ca>; ministre-minister@ec.gc.ca <ministre-minister@ec.gc.ca>  
**Cc** claudiachendermla@gmail.com <claudiachendermla@gmail.com>; info@iainrankin.ca <info@iainrankin.ca>; gpns@greenpartyns.ca <gpns@greenpartyns.ca>

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**Submission for EAs for natural gas plants for Marshdale and Saltspring Nova Scotia**

**NS Minister of Environment: Timothy Halman:**  
**Federal Minister of Environment: Julie Dabrusin:**

**Dear Ministers of Environment:**

I write to ask that you do not approve the two EAs for Nova Scotia's proposed gas plants.

Over the past 25 years my work as a volunteer, employee and business developer has been dedicated to broadening public understanding and informing public policy to reduce reliance on fossil fuels and thereby associated greenhouse gas emissions / air emissions to reduce the impact of climate change. This has included being a board member (EAC, NSEN, Renewable Energy Industry Association of NS, Clean Energy Now, Nova Scotia Environmental Network, Friends of Halifax Common).

Here are SOME of many reasons that Nova Scotia's newly formed Independent Energy System Operator's (IESO) effort to build new gas plants in Nova Scotia must be rejected:

- These gas plants unnecessarily lock the province & citizens into the fossil fuel cycle for at least 40 years. There is no role for new gas plants in a climate crisis-we are already consistently failing to meet our goals to reduce emissions.
- Nova Scotians strongly oppose fracking and supported a moratorium that the Premier undemocratically removed. These plants will rely on either imported fracked gas or the development of an NS fracking industry which no one wants. In any case we know nothing about the future source, availability, security or price of the fuel.
- Gas extraction is immensely damaging to the environment, requires and pollutes huge amounts of water - NS is a province filled with watercourses, lakes and one where many rural dwellers rely on individual wells or small water courses. Water security is a problem as we experienced in 2025

with a record drought and in both 2024 and 2025 with a record loss of homes and forests from out of control wild fires.

- Burning Gas is harmful to public health and environment because of both climate / ghg gases and air pollution.
- These plants will industrialize otherwise very rural settings and pollute the environs with air, light, noise and traffic pollution.
- Many better, cheaper options to continue an energy transition exist that need to be advanced first. These included but are not limited to the following:
  1. Retain an existing coal fired generating plant to act as a back-up. It's paid for, can fulfill this role and the fuel is more readily transported and stored.
  2. Expand the existing battery backup capacity-there is federal money available for this.
  3. Negotiate a deal with Hydro Quebec for whatever amount of firm power is available this year, and negotiate to add to this as future power becomes available. Importing electricity from Quebec was meant to be an outcome of the New Brunswick - Nova Scotia grid interconnect update. Why hasn't there already been an agreement negotiated?
  4. Expand on-shore wind capacity with a publicly owned business-this could use public lands such as the Cape Breton highlands, to operate publicly owned wind farms instead of subsidizing privately owned utilities.
  5. Expand solar farms with publicly owned businesses. Better to operate publicly owned solar than subsidize privately owned utilities.
- Stop anticipating ever expanding electricity needs / demands and work to reduce these more broadly within our society. For example:
  1. Change building codes to: a. ensure higher energy efficiency standards; to regulate the use of low embodied carbon materials / low global warming potential (GWP) for use in construction; b. require solar installation for all new buildings; c. protect right to light for solar installations. Provide subsidies for energy efficiency and solar retrofits for existing buildings. Regulate demolitions to reduce waste of buildings and their materials and associated embodied carbon. Improve public education on climate change to improve awareness and support for reduction of energy consumption.
  2. Change transportation to ensure better more efficient means that does not rely on fossil fuels- commuter rail, rural bus service, wide adoption of EVs (these can potentially be part of a battery back up strategy as is being tested in some jurisdictions).

We are long past the time when we can ignore the urgency of pursuing an energy transition away from fossil fuels. Why would our provincial or our federal governments and the NS Minister of Energy and the IESO lock Nova Scotians into a huge undisclosed monetary debt to take us in the wrong direction without even undertaking a full analysis of the need and the available better, cheaper options?

Twenty years ago NSPI executives and government bureaucrats within the Nova Scotia Department of Energy would speak of reducing reliance on fossil fuels by picking the low-hanging fruit such as energy efficient / LED lightbulbs. Could it be that many of the same personalities are still operating within the government and universities such that there is no awareness of how far advanced many other countries are in their efforts to shift their reliance on fossil fuels? Or that renewables are better for the environment and for the economy?

We cannot anticipate what the energy future will be, but we are obliged to work to ensure that fossil fuels play an ever diminishing role in it. That includes not constructing expensive new gas plants.

Thank you,

---  
Vice-president, Black River Wind Ltd.

## Gas Plants

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**Date** Sun 2026-02-01 10:51 AM

**To** Ministre-minister@ec.gc.ca <Ministre-minister@ec.gc.ca>; Minister, Env  
<Minister.Environment@novascotia.ca>

 1 attachment (405 KB)

The Environmental Assessments for the Proposed Marshdale and Saltspring Gas Plants In Nova Scotia Should be Summarily Dismissed, and the Projects Cancelled .pdf;

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

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Dear Mr. Halman

..... submission purporting that the construction these two new fast acting natural gas turbines is ill conceived, unnecessary, not thoroughly thought out, and will saddle the people of NS with debt and pollution for 4 decades. I find his arguments compelling and urge you to publicly address and counter all of them before you proceed and that you examine the alternatives more thoroughly.

Sincerely

.....  
Granville Ferry, NS