NOVA SCOTIA
Environment and Climate Change

Comment Index

Little River Pumping and Transmission System Project, Richmond County

Comment Period End Date: February 3, 2026

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NOVA SCOTIA
Environment and Climate Change

Nova Scotia Mi'kmaq

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1	Kwilmu'kw Maw-Klusuaqn (KMK)	February 18, 2026
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1	Anonymous Public Comments	January 15, 2026
2	Anonymous Public Comments	January 18, 2026

NOVA SCOTIA
Environment and Climate Change

Barrington Place
1903 Barrington Street
Suite 2085
Halifax, Nova Scotia
Canada B3J 2P8

Date: January 16, 2026

To: Anthony Heggelin, Environmental Assessment Officer

From: Janet MacKinnon Executive Director SAS

Subject: **Little River Pumping and Transmission System Project – Richmond Country, Nova Scotia**

Scope of review:
This review focuses on the following mandate: Protected areas

List of Documents Reviewed:
WAPA Online mapping

Details of Technical Review:
No Protected areas in vicinity

Key Considerations: (provide in non-technical language)
No Comments

NOVA SCOTIA
Environment and Climate Change

Barrington Place
1903 Barrington Street
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Canada B3J 2P8

Date: February 3, 2026

To: Anthony Heggelin, Environmental Assessment Officer

From: Air Quality Unit

Subject: **Little River Pumping and Transmission System Project – Richmond Country, Nova Scotia**

Scope of review:
This review focuses on the following mandate: Air Quality

List of Documents Reviewed:

- *Little River Pumping and Transmission System Project EA Registration Document*
- *Appendix A-G*

Details of Technical Review:

The purpose of the proposed undertaking is to reinstate the Little River Transfer Pumphouse and water transmission pipeline to transfer water from the Little River Reservoir to Landrie Lake, and enhance yield at the Landrie Lake Industrial Water Utility. This project would support the proposed green hydrogen projects in the Point Tupper area and consist of building an intake structure, pumphouse, pumping and piping systems, controls, and a 2.75 km buried water pipeline along the existing right-of-way. Work could start on the project within two years of approval and construction is estimated to take approximately 16 months with an operational life of 50 to 100 years.

No baseline monitoring was undertaken, instead the baseline review relied on data from the National Air Pollution Surveillance (NAPS) monitoring station in Port Hawkesbury, approximately 3.5 km southeast of the Project, from 2017-2022. Existing air quality conditions indicate that the measured contaminants are well below their respective NS Ambient Air Quality Standards (AAQS) Schedule A limits.

Project activities will primarily interact with the atmospheric environment through fugitive dust and exhaust emissions. The closest receptors are well over 2 km from the Project; therefore it is not anticipated that the fugitive dust and exhaust emissions would impact the closest receptors or impact baseline air quality conditions beyond the local assessment area. The Proponent commits to implementing several mitigation measures as part of an Environmental Protection Plan (EPP) to minimize potential air quality impacts.

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

Key Considerations:

The Air Quality Unit notes the following key considerations:

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

NOVA SCOTIA
Environment and Climate Change

Barrington Place
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Halifax, Nova Scotia
Canada B3J 2P8

Date: February 3, 2026

To: Anthony Heggelin, Environmental Assessment Officer

From: Air Quality Unit

Subject: **Little River Pumping and Transmission System Project – Richmond Country, Nova Scotia**

Scope of review:
This review focuses on the following mandate: Noise

List of Documents Reviewed:

- *Little River Pumping and Transmission System Project EA Registration Document*
- *Appendix A-G*

Details of Technical Review:

The purpose of the proposed undertaking is to reinstate the Little River Transfer Pumphouse and water transmission pipeline to transfer water from the Little River Reservoir to Landrie Lake and enhance yield at the Landrie Lake Industrial Water Utility. This project would support the proposed green hydrogen projects in the Point Tupper area and consist of building an intake structure, pumphouse, pumping and piping systems, controls, and a 2.75 km buried water pipeline along the existing right-of-way. Work could start on the project within two years of approval and construction is estimated to take approximately 16 months with an operational life of 50 to 100 years.

No baseline noise monitoring was completed for the assessment, instead the Proponent cites a noise assessment completed in 2014 as part of the proposed Bear Head Lake LNG Project. The 2014 noise study assessed background noise at four locations approximately 7-10 km south and southeast of the proposed pumping station location. The 2014 background noise levels were below the daytime and evening permissible sound levels (PSLs) for a rural environment in the NSECC Guidelines for Environmental Noise Measurement and Assessment (GENMA). The background noise levels exceeded the nighttime PSLs for a rural environment at two locations. Given that the noise assessment was completed in 2014 and monitoring locations were approximately 7-10 km from the proposed pumping station location, it is possible the noise levels presented in this assessment are not representative of existing noise levels in the Project area.

The Proponent states that construction noise will be limited to daytime hours and equipment will be operated intermittently and in short durations. No substantial noise is expected during operation, aside from occasional use of a backup generator during power outages. No receptors are located within 2 km of the proposed pumping station location, therefore Project related noise is not expected to have an impact beyond the Project area.

Key Considerations:

The Air Quality Unit notes the following key considerations:

- The noise assessment from 2014 presented in the registration document may not be representative of existing conditions in the Project area.
- It is unclear how effective noise management and mitigation will be in the absence of a Noise Management Plan with a clear chain of responsibility for actions, including timely complaint resolution.

NOVA SCOTIA
Environment and Climate Change

Barrington Place
1903 Barrington Street
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Halifax, Nova Scotia
Canada B3J 2P8

Date: January 27, 2026

To: Anthony Heggelin, Environmental Assessment Officer

From: Environmental Health – Sustainability and Applied Sciences Division

Subject: **Little River Pumping and Transmission System Project – Richmond Country, Nova Scotia**

Scope of review:
This review focuses on the following mandate: Environmental Health

List of Documents Reviewed: EARD

Details of Technical Review:

The purpose of the proposed undertaking is to reinstate the Little River Transfer Pumphouse and water transmission pipeline to transfer water from the Little River Reservoir to Landrie Lake and enhance yield at the Landrie Lake Industrial Water Utility, located in Port Malcolm, Richmond County, Nova Scotia. This project reinstates the system by reinstating existing site access and constructing an intake structure, pumphouse, pumping and piping systems, controls and a 2.75 km buried water transmission pipeline constructed largely along the existing right-of-way. Work could start on the project within two years of approval and construction is estimated to take approximately 16 months with an operational life of 50 to 100 years.

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

Key Considerations:

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

Impact Assessment Agency of Canada | Agence d'évaluation d'impact du Canada

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January 29, 2026

Anthony Heggelin
Environmental Assessment Officer
Policy Division, Environmental Assessment Branch
Government of Nova Scotia
anthony.heggelin@novascotia.ca

SUBJECT : Little River Pumping and Transmission System Project

Dear Anthony Heggelin:

Thank you for the opportunity to review the registration document for the Little River Pumping and Transmission System Project (the project), received on January 6, 2026.

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

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

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

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

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

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

Samantha Zabudsky

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NOVA SCOTIA
Fisheries and Aquaculture

Armoyan Centre
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Date: February 3, 2026

To: Anthony Heggelin

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

Subject: Little River Pumping and Transmission System Project

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

List of Documents Reviewed:
- Little River Pumping and Transmission System Project EARD.
- Little River Pumping and Transmission System Project EARD Appendices

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

There are 20 aquaculture sites within 25km of the proposed project. Of these, 18 are marine shellfish sites and two (2) are marine finfish sites. There are zero rockweed leases within 25 km of the proposed project.

Sediment will be produced during the site preparation and construction phase of the project. Sediment causes turbidity in the water column, which can reduce oxygen levels for both finfish and shellfish. Settling sediment can obstruct feeding and destroy habitat by covering benthic substrates, smothering the benthic habitat/organisms, and impacting the nutrients available to shellfish bottom culture farms. High turbidity levels can also affect the ability of fish gills to absorb dissolved oxygen. Sediment can house pathogens and undesired microorganisms, increasing the risk of disease outbreaks among aquatic species. The results can range from reduced growth to morbidity. General mitigations were provided within the EARD to address sedimentation and reduce the risk of direct runoff, specifically a site-specific Erosion & Sediment Control Plan will be developed. Given the small-scale element of the project, risk to aquaculture sites within 25km of the operation is expected to be minimal, however, mitigations should be monitored to assure effectiveness.

There is no mention of power supply needs or possible disruptions in the EARD. If a power disruption is required during this project, outages should be planned whenever possible and adequate notice should be given to aquaculture site operators to allow back-up power sources to be utilized to prevent equipment disruptions.

Large amounts of water withdrawal can cause issues for aquaculture facilities by reducing the

resource available to aquatic animals. Water withdrawal can lead to degradation of water quality. When water levels are reduced it has a concentrating effect on all materials (nutrients, toxic chemicals, salinity, plankton, etc.) being carried by the water body and can increase water temperature. The mitigations provided, including route water quality monitoring, should result in reduced risk to aquaculture sites from these activities if applied appropriately.

Water discharge can contain excess nutrients and potential pollutants, and can result in nutrient enrichment, eutrophication, algal blooms, dissolved oxygen depletion, habitat degradation, and altered water quality in the receiving waters. Such impacts can disrupt aquatic ecosystems, harm aquatic species, and threaten the sustainability of aquaculture practices. Fluctuations in environmental conditions can generate cumulative stress and weaken the immune systems of aquatic animals, making them more susceptible to disease. These changes in water quality can reduce health, limit growth, or cause mortality of aquatic animals. The discharge structure at the proposed location is planned to be modified to enable controlled discharge at the Little River Reservoir. Further, mitigation measures include routinely monitoring the water quality at Little River Reservoir, which should show the effectiveness of the controlled discharge modification and result in minimal impacts to aquaculture operations.

Project proponent should be directed to the Department's Site Mapping Tool for more information on the location of the licenced aquaculture leases and rockweed leases in the area of their proposed project.

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

The Little River Pumping and Transmission System Project is not directly connected to any commercial fisheries in Little River or Landrie Lake. There are several commercial fisheries adjacent to Richmond County. Harvested species include but are not limited to: lobster, scallop, groundfish, crab, mackerel and herring. The *Fish Harvester Organization Support Act* - accredited association for this area is the Richmond County Fishermen's Association. The most lucrative fisheries in the area are lobster referred to as LFA (lobster fishing area) 29 and snow crab referred to as CFA (crab fishing area) 23. Both these fisheries occur in late spring to summer.

There are five (5) NS licensed buyers/processors located less than 50km from the project area: BST Lobster Sales Limited located in Aulds Cove; Premium Seafoods, Petit de Grat Packers and Clearwater are located in Isle Madame. Ocean Nutrition Canada Ltd., a marine-based supplement company is located in Mulgrave.

There are six (6) Mi'kmaw Nations within this geographical location. The two closest are Paqtnkek Mi'kmaw Nation and Potlotek Mi'kmaw Nation. Cape Breton has four (4) other Mi'kmaw communities who are all active in the communal commercial, moderate livelihood as well as food, social and ceremonial fisheries of both fresh and saltwater species.

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

The primary risk associated with this project is reduced streamflow and reservoir water levels during operational phases when water will be withdrawn from the lake. The hydrology report (Appendix C) discusses that Ecological Maintenance Flows (EMF) will be unable to be maintained for considerable time, notably during the summer and fall months, under modelled normal operating conditions.

The proponent highlighted in the EARD that they will identify EMF thresholds in consultation with DFO and will mitigate through modification of Little River Reservoir outlet to support EMF; levels may drop below EMF under periods of low flow.

The EARD highlights pages (5-41) fish population and habitat studies were done including measuring fish and photos taken of habitat (this data was not presented in the EARD).

Fish assessments in the reservoir used overnight minnow trap sets and 1-hour gill net sets using 1.5", 2", and 3" mesh (likely stretch measurement but not specified). Proponent included a summary table (5.3.1) of total number of fish captured for minnow traps and gill nets in Little River Reservoir; table is mislabeled with "Abundance" which implies some level of computation to enumerate population size. Effort data, for computation of catch per unit effort (relative abundance), and information on sampling depths was not provided. The 1-hour gill net sets may not fully represent the entire fish community structure within the lake—an overnight set would be more appropriate.

Electrofishing in the Little River 162 m downstream of Highway 104 resulted in no fish captured, but yielded observation of 5 eels avoiding capture. Given their length, eels are typically more susceptible to capture than other fishes and suggests electrofisher settings may have been insufficient to sample other species. The proponent states substrate in the electrofishing site *"...was predominantly cobble, with lesser amounts of gravel and small boulders."* (p 5-42), which typically corresponds to salmonid habitat.

Water quality parameters were not provided for Little River Reservoir or downstream in the electrofishing site. Temperature, dissolved oxygen, pH, profiles for the lake (1-meter increments) and at the electrofishing site would provide more insight into the system's ability to support fish and quality of potential sportfishing downstream.

Additionally, the bathymetric map (figure 5.3, p 5-21) is very hard to interpret. Typical bathymetric maps inform the reader how deep the waterbody is relative to the surface. This bathymetric map appears to display lakebed elevation relative to sea-level so shallow spots in the lake have higher elevation level than deep spots.

Key Considerations:
Potential risks to aquaculture leases from sediments and polluted waterways need to be monitored and mitigated appropriately to reduce risk. The applicant should be made aware of the aquaculture operations within the area and ensure mitigations are implemented appropriately.

The proponent will be required to comply with the current standards and regulations which pertain to several governing agencies and have stated they have proper mitigation and management measures in place. This should pose negligible risk to adjacent commercial marine fisheries activities and NSDFA's interests.

The key risk from a sportfishing context is a loss of fish habitat downstream of Little River Reservoir due to lack of flow. Given there is only 1.5 stream kilometers from highway 104 to the Port Malcolm Road at the estuary, the impact to local sportfishing is anticipated to be low.

Project proponent should also be made aware of:

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

NOVA SCOTIA
Department of Municipal Affairs

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DATE: January 30, 2026

TO: Anthony Heggelin, Environmental Assessment Officer

FROM: Dawn M. Sutherland, Provincial Director of Planning

SUBJECT: **LITTLE RIVER PUMPING AND TRANSMISSION SYSTEM PROJECT**

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

Documents Reviewed:
- Registration Document
- Appendices

Details of Technical Review:
The proponent for this project is the Town of Port Hawkesbury and the Municipality of the County of Richmond. The Project is situated in the Point Tupper area of Richmond County within the Landrie Lake and Little River watersheds. The municipalities collaborate to maintain the integrity of the public water supply. Land use planning and zoning fall under the jurisdiction of Richmond County, which has the following zoning in place within the Project area:

- General Industrial (M1) Zone: Located northwest of the reservoir.
- Heavy Industrial (M2) Zone: Located to the west and southwest of the reservoir, encompassing most of the Point Tupper Heavy Industrial Park.
- Open Space (OS) Zone: Surrounds Landrie Lake and much of the protected water area.
- Rural Development (RD) Zone: Covers the area east of Landrie Lake.

Lands within the protected area are largely undeveloped, and the current municipal zoning is appropriate to accommodate this Project. In terms of consultation with the municipal units involved, since the municipalities themselves are the proponent, this is not an element that requires review.

Statements of Provincial Interest:

Drinking Water:
Reasonably Consistent. The Landrie Lake watershed, designated as a Protected Water Area in 1971, covers 3,558 acres and includes Landrie Lake as well as the watersheds of Little River Reservoir, Beaver Dam Lake and MacIntyre Lake. Aside from temporary site preparation and construction impacts related to the new transmission pipe and pumping station upgrades, which will be carefully mitigated, the primary consideration for drinking water is withdrawal. This will be supported by a hydraulic connection

between Little River Reservoir and the Landrie Lake supply. Although Little River Reservoir is not a designated water supply source, the transfer station will ensure a safe yield for both drinking water and green energy purposes.

Agricultural Land:
Reasonably Consistent. No areas within the Project boundaries are zoned as agricultural.

Flood Risk:
Reasonably Consistent. The Project area is not subject to known flood hazards. Water levels in the reservoirs will be regularly monitored and adjusted to maintain balance between inflow and withdrawal.

Infrastructure:
Reasonably Consistent. The Project involves the Town of Port Hawkesbury's water utility reservoir; however, the Project will not affect the delivery of services to residents. The new infrastructure will help to support economic growth in the area and promote green energy production.

Housing:
Reasonably Consistent. The project does not affect housing. The area is a designated water supply and is sparsely populated.

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

Health Canada Santé Canada

Human Health Considerations in Impact Assessment

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

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

	Consideration	**Reference Document**
Receptor Location(s)		
Please ensure the registration document clearly identifies the locations of all receptors that may be impacted by the proposed project, including any receptors located along the transportation route, if applicable.	• It is important to clearly describe the location and distance from the proposed site(s) to all potential human receptors (permanent, seasonal or temporary), taking into consideration the different types of land uses (e.g. residential, recreational, industrial, etc.), and identifying all vulnerable populations (e.g. in schools, hospitals, retirement or assisted living communities). Note that the types of residents and visitors in a particular area will depend on land use, and may include members of the general public and/or members of specific population subgroups (Indigenous peoples, campers, hunters, etc.)	*Health Canada. 2023. Guidance for Evaluating Human Health Effects in Impact Assessment: Human Health Risk Assessment. Healthy Environments and Consumer Safety Branch, Health Canada, Ottawa, Ontario.* *https://publications.gc.ca/collections/collection_2024/sc-hc/H129-54-6-2023-eng.pdf*
	• If there is the potential that project-related activities could affect human receptors, impacts to human health should be considered.	

Atmospheric Environment		
Project impacts to the atmospheric environment include changes to air quality and noise, and can occur in both the construction, operation and decommissioning phases of the project. Project impacts to air quality are commonly caused by emissions from equipment or vehicles as well as by dust. Noise impacts are commonly caused by equipment as well as by activities such as blasting.	• If there are receptors that could be affected by project-related activities, impacts to the atmospheric environment should be considered. Changes to the atmospheric environment that may impact human health include: ○ impacts to air quality (dust or fumes including $PM_{2.5}$, NO_x, SO_x, PAHs) ○ increased noise from construction or operations	*Health Canada. 2023. Guidance for Evaluating Human Health Impacts in Impact Assessment: Noise. Healthy Environments and Consumer Safety Branch, Health Canada, Ottawa, Ontario* https://publications.gc.ca/collections/collection_2024/sc-hc/H129-54-3-2023-eng.pdf *Health Canada. 2023. Guidance for Evaluating Human Health Effects in Impact Assessment: Air Quality. Healthy Environments and Consumer Safety Branch, Health Canada, Ottawa, Ontario.* https://publications.gc.ca/collections/collection_2024/sc-hc/H129-54-1-2023-eng.pdf
	• If there are receptors who could be impacted by project-related noise, it may be necessary to inform receptors prior to loud activities, such as blasting.	
	• If there is the potential for impacts to human receptors from noise and/or air quality changes from the project, the proponent should consider establishing mitigation measures. If complaints are received additional mitigation measures may be required.	
Recreational and Drinking Water Quality		
The proponent should consider whether any nearby waterbodies are used for recreational (i.e. swimming, boating, or fishing) or drinking water purposes, as well as whether there are any drinking water wells in the area potentially impacted by the project. Nearby drinking and/or recreational water quality may be impacted by	• If there is the potential for impacts to drinking and/or recreational water quality from the project site, the proponent should consider establishing mitigation measures. If complaints are received additional mitigation measures may be required.	*Health Canada. 2023. Guidance for Evaluating Human Health Effects in Impact Assessment: Drinking and Recreational Water Quality. Healthy Environments and Consumer Safety Branch, Health Canada, Ottawa, Ontario.* https://publications.gc.ca/collections/collection_2024/sc-hc/H129-54-2-2023-eng.pdf

accidents or malfunctions, such as a fuel spill; by dust and increased sediment runoff; and by other chemical discharges to the environment. Additionally, wells in the area potentially impacted by the project may be impacted by activities such as blasting.	• The proponent should consider preparing a response plan in the event of an accident or malfunction with the potential to impact drinking and/or recreational water quality. Response plans should include a spill response kit, adequate spill response training, and a communication plan to notify all recreational and drinking water users in the impacted area as well as all relevant authorities. • In some cases, for projects that are likely to have an impact on drinking and/or recreational water quality, the proponent should consider conducting water monitoring prior to the start of the project (to establish a baseline). Monitoring would continue throughout the construction, operation and decommissioning phases of the project (as applicable) to monitor for any changes in water quality or quantity.	
Country Foods		
If there are plants or animals present in the area potentially impacted by the project that are consumed by humans, there may be potential for impacts to country foods. The proponent should consider all country foods that are hunted, harvested or fished from the area potentially impacted by the project. Impacts to country foods may occur from the release of contaminants into soil or water (including from an accident or spill) or from deposition of air borne contaminants.	• If there is the potential for impacts to country foods from the proposed project, the proponent should consider establishing mitigation measures. If complaints are received additional mitigation measures may be required. • The proponent should consider preparing a response plan in the event of an accident or malfunction with the potential to impact country foods. Response plans should include a spill response kit, adequate spill response training, and a communication plan to notify all potential consumers of country foods in the impacted area as well as all relevant authorities.	*Health Canada. 2023. Guidance for Evaluating Human Health Effects in Impact Assessment: Country Foods. Healthy Environments and Consumer Safety Branch, Health Canada, Ottawa, Ontario.* *https://publications.gc.ca/collections/collection_2024/sc-hc/H129-54-5-2023-eng.pdf*

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

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

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

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

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

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

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

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

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

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

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

Outlook

ECCC Comments: 26-NS-001 - Little River Pumping and Transmission System Project

From Fazeli,Maryam (elle | she, her) (ECCC) <Maryam.Fazeli@ec.gc.ca>
Date Mon 2026-02-02 2:02 PM
To Heggelin, Anthony J <Anthony.Heggelin@novascotia.ca>
Cc Roberts,Sydney (elle | she, her) (ECCC) <sydney.roberts@ec.gc.ca>

Hello Anthony,

Environment and Climate Change Canada (ECCC) has reviewed the Little River Pumping and Transmission System Project, submitted by Landrie Lake Water Utility, and offers the following recommendations for consideration.

General Comments:

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

2. ECCC notes that the Province of NS' Department of Natural Resources (NSDNR) holds technical expertise, jurisdiction, and management authority for birds not protected by the MBCA (e.g., raptors) and terrestrial species at risk (SAR) including bats, reptiles, amphibians, land-mammals, insects, plants, and lichen. ECCC advice on these species is derived from federal recovery strategies produced as per the SARA and are focused on species recovery. SAR are a shared responsibility between the federal government and the provinces and ECCC comments reflect this.

3. The Environmental Assessment Registration Document includes hedging and ambiguous wording, such as "where possible" and "to the extent practicable" when describing mitigation measures.

   ECCC recommends removing ambiguous wording from the Environmental Assessment (EA) and associated plans. If required, the EA should clearly describe commitments to mitigation measures to avoid/minimize potential effects of the Project on migratory birds and species at risk (SAR), and where effects cannot be avoided/minimized, a proposed plan to mitigate residual impacts should be described (e.g., monitoring plan, scheduling, buffers, offsetting measures, etc.).

Contingency plans identifying mitigation measures should be prepared to address all scenarios that may impact migratory birds and SAR during all times of the year and all project phases.

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

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

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

Specific Comments:

6. Quote (page 61) "*Information regarding wildlife in the vicinity of the PDA has been obtained from field surveys and through published sources including a review of the AC CDC database (AC CDC 2024, Appendix F); the Maritime Breeding Bird Atlas (MBBA; MBBA 2024), eBirds (Cornell University 2024), Important Bird Areas mapping (Bird Studies Canada 2024), and the provincial Significant Species and Habitats Database and other data available from the Provincial Landscape Viewer (GNS 2024a).*

    Quote (page 61) "*Field surveys included a dedicated breeding bird survey and incidental observations of other wildlife. A one-day breeding bird survey was conducted along the linear pipeline corridor targeting breeding songbirds…Evidence of breeding activity was gathered using the same criteria used by the MBBA."*

    Quote (page 62) "*Terrestrial Field surveys were completed along the proposed pipeline route June 26 and 27, 2024, during suitable survey conditions, with a focus on breeding birds the morning of June 26."*

    ECCC advises that the proponent has not provided sufficient information regarding the surveys that were conducted and their methodologies. Based on the information provided on the breeding bird surveys, the one-day survey window is likely insufficient to provide a baseline that is representative of the birds that may be present in the project area. ECCC advises that although the nesting period for most migratory birds in this nesting zone (C3) extends from mid-April to late August (see: Nesting periods - Canada.ca), breeding bird point count surveys should be completed multiple times between early June and early July to maximize the detection of singing passerines, given that as the season progresses, breeding passerines vocalize much less frequently, and in turn, their detectability decreases.

    ECCC advises that the Strait of Canso is an important migration area for many species of migratory birds including seabirds, shorebirds and waterfowl, and many species of shorebirds (e.g., Purple Sandpiper, Whimbrel, etc.) and waterfowl (eiders, scoters) may use the project area (lakes, waterbodies and wetlands) during migration or staging. It is not clear from the information provided whether the proponent conducted surveys during spring and fall

migration or for shorebirds and waterfowl that may be using the lakes and wetlands at various stages in their life cycles. This is important information to enable ECCC to assess the effects of the project on migratory birds and species at risk.

7. ECCC advises that species of migratory birds such as Common Nighthawk (listed as Special Concern on Schedule 1 of SARA), Eastern Whip-poor-will (listed as Threatened on Schedule 1 of SARA), Killdeer, Snipe, and American Woodcock may be found in the project area and may be attracted to previously cleared areas and industrial zones (see https://www.mba-aom.ca/pdfs/atlas_en_210-239.pdf#page=5) and may build their nests out in the open where they can be disturbed by activities.

   ECCC recommends that the proponent ensure that they are aware of the possibility of such species to become attracted to the project area once the area is cleared and should ensure that there are no species nesting in the area prior to construction. If any ground-nesters are observed, ECCC recommends employing the beneficial management practices outlined in Guidelines to avoid harm to migratory birds - Canada.ca, with particular focus on establishing appropriate buffers from nests.

8. Quote (page 61) "*Additional focus during this survey was given to identifying the nest cavities and breeding locations of Pileated Woodpeckers (Drycopus pileatus). Of the 18 species of migratory bird identified on Schedule 1 of the Migratory Bird Regulations 2022, Pileated Woodpecker is the only species with some potential to nest within the Assessment Area.*"

   ECCC advises that the proponent has not provided any information on the survey methodology that was used to survey for Pileated Woodpecker nest cavities and has not provided any results of these surveys (i.e., whether nesting cavities were or were not found).

   ECCC advises that since Pileated Woodpecker is listed on Schedule 1 of the *Migratory Bird Regulations* (2022), the nesting cavities of this species are protected year-round, including when they are not occupied by a migratory bird or viable egg. If a Pileated Woodpecker nesting cavity is ultimately abandoned, and a proponent wishes to destroy the unoccupied nest, they must submit a notification through the Abandoned Nest Registry, and if the nest remains unoccupied by Pileated Woodpeckers and other migratory bird species for 36 months, it may at that point be destroyed by cutting down the tree.

   A Pileated Woodpecker Cavity Identification Guide is available for reference at: Pileated Woodpecker Cavity Identification Guide .

   Further information on the *Migratory Bird Regulations, 2022* is available at:
   - Migratory Birds Regulations, 2022 (justice.gc.ca)
   - Fact sheet: Nest Protection under the Migratory Birds Regulations, 2022 - Canada.ca
   - Frequently Asked Questions: Migratory Birds Regulations, 2022 - Canada.ca

9. Quote (page 61) "*Bird SAR within this list include…Barn Swallow (Hirundo rustica)…*"

   Quote (page 62) "*No Barn Swallow nesting was evident on the existing pump house".*

   ECCC acknowledges that the ACCDC report (2024) indicates that Barn Swallow may be present in the project area. Barn Swallow (listed as Threatened on Schedule 1 of SARA) may nest on/in existing infrastructure (buildings, bridges) or on construction equipment, so ECCC recommends

that the proponent should re-survey any infrastructure prior to construction to ensure that a Barn Swallow has not built a nest since the original survey was completed.

10. Quote (page 74) "*Vegetation clearing will be completed outside the migratory bird nesting period of April 12 to August 27 (Zone C3; ECCC 2024c). Where activities may result in risk of harm to migratory bird nests during this period (e.g., limited vegetation clearing) or during the nesting period for other species (i.e., raptors), a qualified biologist will complete a pre-activity nest survey in accordance with federal guidelines (ECCC 2023).*"

    ECCC does not recommend the use of nest searches or pre-clearing surveys for active bird nests during the breeding season as a mitigation, given the difficulty associated with finding nests reliably and the high likelihood of disturbing nesting birds when searching. The proponent should consider the information provided at "Guidelines to avoid harm to migratory birds" (Guidelines to avoid harm to migratory birds - Canada.ca).

    However, nest searches may be carried out successfully by experienced observers using appropriate scientific methodology in the event that activities are proposed in simple habitats (often human-made settings) with only a few likely nesting areas or a small community of migratory birds. Examples of simple habitats include:

    - An urban park consisting mostly of lawns with a few isolated trees;
    - A vacant lot with few possible nest sites;
    - A previously cleared area where there is a lag between clearing and construction activities and where ground nesters may have been attracted to nest in clear areas or in stockpiles of soil; or
    - A structure such as a bridge, a beacon, a tower, or a building (often chosen as a nesting spot by robins, swallows, phoebes, Common Nighthawk, gulls, and others).

    Nest searches can also be considered when looking for:

    - Conspicuous nest structures (such as nests of Great Blue Heron, Bank Swallows, Chimney Swifts);
    - Cavity nesters in snags (such as woodpeckers, goldeneyes, nuthatches); or
    - Colonial-breeding species that can be located from a distance (such as a colony of terns or gulls).

    If clearing is required during the breeding season in more complex habitats than those noted above, the proponent should consider conducting an area search for evidence of nesting (e.g., presence of birds in breeding habitat through observation of singing birds, alarm calls, distraction displays) using non-intrusive methods to prevent disturbance to migratory birds. In the case of songbirds, for example, "point counts" (a technique to located singing territorial males) can provide a good indication of the presence of nests of these birds in an area. Please contact ECCC-CWS for further technical information about non-intrusive survey methods for non-songbird species (e.g., waterfowl, waterbirds, shorebirds). It is the proponent's responsibility to ensure that their activities comply with the MBCA and SARA.

11. Quote (page 15) "*The [Environmental Protection Plan] will serve as an umbrella document that includes standard and Project-specific mitigation, management plans (e.g., erosion and sediment control), and the Emergency Response and Contingency Plan (ERCP).*"

    Quote (page 76) "*A dedicated follow-up and monitoring program is not proposed for Wildlife and Wildlife Habitat.*"

ECCC recommends that if the proponent does not intend to develop a dedicated follow-up and monitoring program for "Wildlife and Wildlife Habitat", the proponent should ensure that any considerations for wildlife, including migratory birds and species at risk is included as part of the larger Environmental Protection Plan.

Additionally, ECCC advises that the proponent should be prepared in case of an accidental release of hazardous substances, particularly during construction and maintenance activities, to ensure that any potential negative effects on migratory birds and species at risk are avoided. Specifically, ECCC recommends that the proponent should include wildlife considerations as part of their Emergency Response and Contingency Plan (see additional beneficial management practices under "Fuel Leaks" below).

12. Quote (page 7-1) "*While the Project can result in adverse environmental effects (described in Section 5), these effects will be managed through the implementation of mitigation measures identified in this EARD and through subsequent permits and approvals, thereby reducing the Project's contribution to potential cumulative effects with these other undertakings.*"

    ECCC disagrees with the proponent's conclusion that the project will not contribute to cumulative effects on Valued Components, specifically migratory birds and species at risk that are moving through the Strait of Canso area or stopping over during migration.

    ECCC acknowledges that there are a number of developments in proximity to the project area that will contribute to cumulative effects on migratory birds and SAR, including the Point Tupper Heavy Industrial Park, the Point Tupper Wind Farm, and the proposed Bear Head Energy Green Hydrogen/Ammonia Project and the proposed EverWind Fuels Green Hydrogen/Ammonia Project. While the Little River Pumping and Transmission System Project may not contribute greatly to the amount of disturbance in the area, it is important to consider that when migratory birds and species at risk are moving through the area, they may be disturbed or displaced along their path, which may bring them into more frequent contact with the project and result in additional interactions.

Terrestrial Species at Risk

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

Bats

13. Quote (page 5-70) "*Listed bats (little brown myotis (Myotis lucifugus), Northern myotis (Myotis septentrionalis) and Tri-colored bat (Perimyotis subflavus)) were identified as location-sensitive species with records of observations or hibernaculum located within the study area.*"

    ECCC advises that that the populations of the three SARA-listed bat species (Little Brown Myotis, Northern Myotis, and Tri-colored Bat) are highly reduced in NS, primarily due to the introduction of White-nosed Syndrome (WNS), and therefore, they may be more difficult to detect (so low detections are not necessarily indicative of low presence). Any additional loss of SAR bat individuals, maternity roosts, and/or hibernacula remaining on the landscape can be biologically significant for these long-lived, k-selected species, and affect their recovery.

ECCC advises that per publicly available information, there are no records of hibernacula overlapping with the Project footprint, however, the Province of NS would have the most recent information and can confirm this statement. However, ECCC advises that the proponent has not provided any information on whether there is habitat suitable for maternity roosting, which is important for breeding bats and should not be removed if present. ECCC recommends that the proponent confirm whether there is any habitat suitable for maternity roosting in the Study Area (following protocols approved by the Province of NS) and manage activities accordingly to ensure that any such habitat remains undisturbed.

ECCC acknowledges that the majority of the mitigations proposed to avoid/minimize potential impacts on migratory birds should also be applicable to SAR-listed and COSEWIC-assessed bats.

However, it remains the Province of Nova Scotia's discretion whether sufficient information has been provided to inform their environmental assessment decision.

14. ECCC advises that the three species of migratory bats, the Eastern Red Bat (*Lasiurus borealis*), the Silver-haired Bat (*Lasionycteris noctivagans*), and the Hoary Bat (*Lasiurus cinereus*) that have been recently assessed as "Endangered" by COSEWIC, may be present in the Project Area. ECCC recommends that monitoring, mitigation measures, and adaptive management plans should consider these COSEWIC-assessed migratory bat species as though they are SARA-listed SAR, in the event that they become listed during the lifetime of the Project.

    ECCC acknowledges that the majority of the mitigations proposed to avoid/minimize potential impacts on migratory birds should also be applicable to SAR-listed and COSEWIC-assessed bats.

    However, it remains the Province of Nova Scotia's discretion whether sufficient information has been provided to inform their environmental assessment decision.

Vascular Plants

15. Quote (page 5-53) "*A total of 168 vascular plants were identified within the PDA and surrounding surveyed area (Appendix D). There were no vascular plant SAR or SOCC observed during field surveys, and none recorded within the PDA by the ACCDC (2024).*"

    ECCC advises that the Study Area overlaps with habitat that has been designated as critical habitat for Eastern Waterfan (SARA-listed as Threatened), as per Recovery Strategy and Action Plan for the Eastern Waterfan (Peltigera hydrothyria) in Canada, so the proponent should ensure that there are no Eastern Waterfan present in the project area prior to construction and develop appropriate mitigation measures to ensure that potential impacts are avoided and minimized.

    However, it remains the Province of Nova Scotia's discretion whether sufficient information has been provided to inform their environmental assessment decision.

Wetlands

16. Quote (page 5-52) "*Wetlands in Nova Scotia are protected by the provincial Environment Act… The Nova Scotia Wetland Conservation Policy (GNS 2011) provides context to legislation, regulations and operational policies designed to protect and guide management of wetlands in Nova Scotia. The policy establishes a specific goal of no loss of Wetlands of Special Significance and no net loss in area and function for other wetlands. The government considers the following to*

be [WSS] (NSE 2011)…Wetlands in designated protected water areas as described within Section 106 of the Environment Act."

Quote (page 5-53) "*Within the pipeline route a total of eight wetlands were encountered during field surveys (Appendix B); following PDA changes, seven of these wetlands are within the proposed PDA. Each field-delineated wetland has been classified by class and type according to the Canadian Wetland Classification System (CWCS)…All wetlands within the PDA are located within a provincially protected watershed, the Port Hawkesbury Designated Water Supply Area; therefore, these are all considered to be [Wetlands of Special Significance] under Section 106 of the Environment Act. However, no assessed wetlands were identified as WSS for high wetland function using WESP-AC…"*

ECCC advises that wetlands are important habitat for many species of shorebirds, including snipe species, and other species of migratory birds and avian species at risk that use these habitats throughout their life cycles, including breeding, migrating, staging and foraging. ECCC recommends the conservation of wetlands, especially in wetlands used by avian SAR and SOCC as part of their lifecycle (e.g., Olive-sided Flycatcher, Rusty Blackbird, Hudsonian Godwit, Lesser Yellowlegs, Greater Yellowlegs, Spotted Sandpiper, etc.).

ECCC acknowledges that per the information provided, the wetlands that may be impacted by the Project are considered "Wetlands of Special Significance" (specifically those within designated protected water areas) per NS' *Wetland Conservation Policy.*

ECCC advises that the disturbance to wetland areas and how they are managed remains the discretion of the Province of NS, however, given that wetland areas are important habitats for migratory birds, SAR and SOCC, ECCC recommends that the loss of wetlands in Nova Scotia should be avoided and a Wetland Management Plan should be developed that describes the measures that will be undertaken to avoid and/or minimize impacts on wetland habitats. In situations where avoidance is not possible, and residual adverse effects remain following the application of mitigation measures, ECCC recommends that the proponent implement compensation measures (such as offsetting). Additional guidance on compensation measures can be found at Operational Framework for Use of Conservation Allowances (ECCC, 2012). ECCC requests the opportunity to review any Wetland Management or Wetland Compensation Plans to ensure that considerations for migratory birds and species at risk are adequately addressed.

ECCC also recommends the following general measures:

- Developments on wetlands should be avoided;
- Hydrological function of the wetland should be maintained;
- Runoff from development should be directed away from wetlands;
- A 30-metre buffer from the high-water mark of any water body (1:100 Flood Zone) should be maintained in order to retain movement corridors for migratory birds. Please see https://www.canada.ca/en/environment-climate-change/services/avoiding-harm-migratory-birds/reduce-risk-migratory-birds.html for further information concerning buffer zones.

Applicable Legislation and Standard Advice

Fisheries Act

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

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

Migratory Birds Convention Act

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

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

Section 5.1 of the MBCA describes prohibitions related to depositing substances harmful to migratory birds:
"5.1 (1) No person or vessel shall deposit a substance that is harmful to migratory birds, or permit such a substance to be deposited, in waters or an area frequented by migratory birds or in a place from which the substance may enter such waters or such an area.
(2) No person or vessel shall deposit a substance to be deposited in any place if the substance, in combination with one or more substances, result in a substance – in waters or an area frequented by migratory birds or in a place from which it may enter such waters or such an area – that is harmful to migratory birds."

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

Species at Risk Act

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

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

General prohibitions only apply automatically:

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

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

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

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

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

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

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

ECCC provides the following recommendations:

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

birds/reduce-risk-migratory-birds.html). For beneficial management practices regarding how to avoid the incidental take of migratory bird nests and eggs, please refer to the Avoidance Guidelines (Website: https://www.canada.ca/en/environment-climate-change/services/avoiding-harm-migratory-birds/guidelines.html). The management plan should include processes to follow should an active nest be found at any time of the year.

Lighting

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

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

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

Fuel Leaks

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

ECCC recommend incorporating a Wildlife Emergency Response Plan into emergency response contingency plans for scenarios that may impact avifauna directly (injury or mortality e.g. polluting incident) or indirectly (collisions causing mortality, stranding due to light attraction).

For consideration in emergency response and contingency planning related to accidents and malfunctions, ECCC has prepared *Guidelines for Effective Wildlife Response Plans* (ECCC 2022) available online at: https://www.canada.ca/en/services/environment/wildlife-plants-species/national-wildlife-emergency-framework.html. Plans should include:

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

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

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

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

Stockpiles

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

For additional information on designing mitigation measures for Bank Swallow, refer to the following guidance: https://www.canada.ca/en/environment-climate-change/services/species-risk-public-registry/related-information/bank-swallow-sandpits-quarries.html.

Invasive Species

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

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

Noise Disturbance

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

ECCC recommends the following best management practices:

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

Please let me know if you have any questions.

Regards,

Maryam Fazeli
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Environment and Climate Change Canada / Government of Canada
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NOVA SCOTIA#
Natural Resources
Energy#

1701 Hollis St.
PO Box 698
Halifax, NS B3J 2T9

Date: February 3, 2026

To: Anthony Heggelin, Environmental Assessment Officer

From: Department of Natural Resources and Department of Energy

Subject: **Little River Pumping and Transmission System Project – Richmond Country, Nova Scotia**

Scope of review:

This review focuses on the following mandate: Authorities and approvals required from the Land Service Branch (The review does not include research or assessments, including existing uses and encumbrances, which will be required as part of the application processes for authorities and approvals required from Department of Natural Resources (NSDNR)), energy sector development, geoscience health and safety, mineral exploration, mineral development, abandoned mine openings, biodiversity, species at risk status and recovery, wildlife species and habitat management and conservation, including Old Growth Forest.

List of Documents Reviewed:

Land Services Branch:

- Environmental Assessment Registration Document
- Appendices A-F
- GIS shapefiles

Geoscience and Mines Branch:

- Environmental Assessment Registration Document
- Nova Scotia's Registry of Claims (NovaROC)
- Mineral Occurrence Database
- Drage, J., Tizzard, A., and White C.E. 2020. in Geoscience and Mines Branch, Report of Activities 2020-2021; Nova Scotia Department of Natural Resources and Renewables, Report ME 2021-002, p. 11-15. (NSDNR, 2021c.)
- OFM ME 2017-009: Bedrock Geology Map of the Port Hawkesbury Area, NTS 11F/11, Antigonish, Guysborough, Inverness and Richmond Counties, NS [1:50 000]
- NSDNR, Mineral Resources Branch (compiled) 2010: Geological resource atlas, mineral resource potential, northeastern area of Nova Scotia; NSDNR, Mineral Resources Branch, Open File Map ME 2010-4 (sheet 4 of 4), scale 1:250 000.

Wildlife Division:

- Environmental assessment registration document

Details of Technical Review:

Land Services Branch:

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

- Developing, operating, maintaining, and decommissioning a water transfer system comprised of new intake, pumping, and transmission infrastructure; and
- Installing and maintaining freshwater pipelines and supporting infrastructure.

Geoscience and Mines Branch:

A preliminary review of the **Little River Pumping and Transmission System Project** for the Landry Lake Water Utility c/o Town of Port Hawkesbury has been completed. The review notes that the geological characterization of the proposed site while briefly mentioned could be better defined to include geological maps that display relative location to the planned project development area. The proposed water transmission pipeline route is entirely underlain by the Margaree and Colindale Members of the Cumberland Group, a sequence of Carboniferous-age continental sedimentary rocks (sandstones, mudstones, conglomerates, and coal seams).

While the Proponent did not outline potential for acid rock drainage (ARD) in their application, the disturbance of soil and bedrock has the potential to create or worsen ARD conditions. The host bedrock geology is not recognized as being acid generating. According to the Mineral Resource Land-Use Atlas, there are no occurrences of sulphide-bearing slates within the Project Area (NSDNR, 2021c); therefore, an elevated risk of ARD is not expected.

The proponent does not anticipate requiring blasting bedrock however, it should be noted that several bedrock outcrops are present in the vicinity of the pipeline route and as a result, there is a possibility that the proponent encounters bedrock at shallow depths. Should blasting be required for construction and trenching, groundwater wells within 800 m must undergo an assessment in accordance with NSECC's Procedure for Conducting a Pre-Blast Survey (1993).

Mineral Occurrences

Several coal occurrences and workings including the Richmond (Little River) Coal Deposit are located 1 km north of the proposed pipeline route. In addition, salt and gypsum prospects and deposits are located within 3 km of the project area. Most of the pipeline route except for the western extent near Landrie Lake overlaps with mineral rights, specifically EL: 56240 held by Bear Head Energy. Bear Head Energy is named as one of the potential clients for future demand for the project, therefore it is not anticipated that the proposed project will result in any negative impacts to the nearby mineral

exploration licenses. The proposed project area is ranked from low to high, moving west to east along the pipeline route. The high mineral potential is associated with known coal and salt deposits.

Wildlife Division:

Wildlife and wetland survey methodologies were not provided, and effort appears to be minimal (1 day breeding bird surveys, 2 days vegetation surveys). Details of survey methodology are required to determine whether effort and coverage was sufficient to assess risk and develop appropriate mitigations. The impact of the project on wildlife and wildlife habitat cannot be assessed without understanding the survey method.

The proponent suggests that additional wetlands outside of the PDA that may be impacted by water level fluctuations will be assessed as part of their Surface Water Withdrawal Approval applications to ECC. Impact of water level fluctuations on wildlife habitat, in particular lichen and wetland associated species at risk (SAR) (e.g., Canada Warbler), should be assessed to determine appropriate mitigations.

Birds

The proponent completed breeding bird surveys on one day in one year (June 26, 2024); however, detailed survey methodology is required to determine whether survey effort was adequate to assess risk. NSDNR recommends two years of pre-construction bird survey data to assess risk and inform mitigations. More than one year and more than one day in a year are recommended to account for daily and annual variation in detection.

Species at Risk bird species were detected near but outside the Study Area, and suitable habitat exists within the project footprint.

SAR species documented near the project area include:

- Olive-sided Flycatcher (*Contopus cooperi*)
- Common Nighthawk (*Chordeiles minor*)
- Barn Swallow (*Hirundo rustica*)
- Evening Grosbeak (*Hesperiphona vespertina*)
- Canada Warbler (*Cardellina canadensis*)

The mitigations proposed by the proponent include conducting vegetation clearing outside the migratory bird nesting period of April 12 to August 27 (Zone C3; ECCC 2024c) and, where activities may result in risk of harm to migratory bird nests during this period (e.g., limited vegetation clearing) or during the nesting period for other species (i.e., raptors), a qualified biologist will complete a pre-activity nest survey in accordance with federal guidelines (ECCC 2023). If an active bird nest is found during construction, beneficial management practices should be followed, including applying an appropriate setback and timing restriction, and NSDNR and/or Canadian Wildlife Service (ECCC) should be consulted, as appropriate.

Old Growth

To properly evaluate potential impacts on Old-Growth Forest, all stands within the Assessment Area and particularly those intersected by the pipeline route with an Old-Growth potential rating of 7 or higher should be field-assessed for Old-Growth characteristics.

Herptiles
The EARD suggests that Wood Turtle (*Glyptemys insculpta*) habitat is limited. Documented Wood Turtle occurrences occur near the project area, and due to changes to the PDA in the EARD, some wetlands were not field-verified. Field verification of habitat suitability for, and occurrence of, Wood Turtle and other at-risk herpetofauna is required to assess risk and develop appropriate mitigations. Mitigations should also be developed for road maintenance, to ensure turtles are not attracted to gravel piles for breeding.

Bats
Listed bat species - Little Brown Myotis (*Myotis lucifugus*), Northern Myotis (*Myotis septentrionalis*), and Tri-colored Bat (*Perimyotis subflavus*) - are identified as location-sensitive Species at Risk, with known records in the study area. The EARD references a 2008 assessment of abandoned mine openings approximately 1 km north of Little River Reservoir, concluding they were flooded and likely not hibernacula.

Lichen
Potentially suitable Boreal Felt Lichen (BFL, *Erioderma pedicellatum*) habitat exists outside of the project development area adjacent to Landrie Lake. The Boreal Felt Lichen Recovery Plan identifies hydrological changes and wetland alteration as activities likely to destroy critical habitat. Lichen surveys carried out by a NSDNR-approved lichenologist are required to assess risk and develop appropriate mitigations. Impacts of Lake Landrie water withdrawal on hydrology of BFL habitat should be assessed and appropriate mitigations developed, where necessary, prior to development. This assessment of habitat impacts should include delineation and functional assessment of wetlands within and adjacent to predicted BFL habitat.

Without baseline lichen data, potential impacts on BFL and other rare lichens cannot be properly assessed.

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

Land Services Branch:
No further comments.

Energy Sector Development Division (Hydrogen Export Lead)
Landrie Lake Water Utility's Little River Pumping and Transmission System project is intended to supply water, a needed input, to multiple proposed projects that will produce green hydrogen and its derivatives primarily for an export market.

Green hydrogen and green hydrogen derivatives that are produced using clean electricity can help Nova Scotia grow its economy, reduce emissions and become a leader in clean energy exports.

The development of export focused green hydrogen projects can be a catalyst for Nova Scotia to build a domestic market that would contribute to de-carbonization. The Province's *Green Hydrogen Action Plan* recognizes that green hydrogen projects will

make the best use of the Province's natural resources and support sustainable prosperity and the achievement of Nova Scotia's climate change goals.

Geoscience and Mines Branch

Consider including a geophysical environment item in future applications to highlight presence of existing geohazards or mineral resources and include plans to manage or mitigate if encountered.

Should blasting be required during construction and trenching phases, groundwater wells within 800 m must undergo an assessment in accordance with NSECC's Procedure for Conducting a Pre-Blast Survey (1993).

The Area is ranked high for mineral potential.

Wildlife Division:

Based upon a review of the information in the addendum, the following recommendations for conditions of approval are provided:

- Obtain all permits necessary to undertake the project as required under legislation related to wildlife, species at risk, watercourses and wildlife habitat alterations.
- Provide digital way points and/or shapefiles for all flora and fauna surveys and incidental observations, including for all observations of Species at Risk and Species of Conservation Concern to NSDNR (those species listed and/or assessed as at risk under the Species at Risk Act, Endangered Species Act, COSEWIC, as well as all S1, S2 and S3 species). Data should adhere to the format prescribed in the NSDNR Template for Species Submissions for EAs and is to be provided within two months of collection.
- Evaluate the presence of old-growth forest in areas with a predicted score of 7 or higher within the PDA and provide mitigation as required per the Old-Growth Forest Policy.
- Ensure all wildlife survey effort and coverage meet NSDNR guidelines.
    - Detailed bird survey methodology and an additional year of pre-construction bird surveys are required to assess risk and develop appropriate mitigations.
    - Conduct targeted herpetofauna surveys at wetlands and associated riparian habitat within the project area.
- Lichen surveys conducted by a NSDNR-approved lichenologist following current provincial SAR lichen survey protocols should be completed within the modelled BFL predicted habitat directly adjacent to Landrie Lake; potential impacts of hydrological changes due to water level fluctuations on BFL habitat should be assessed.

Environment and Climate Change

Barrington Place
1903 Barrington Street
Suite 2085
Halifax, Nova Scotia
Canada B3J 2P8

Date: February 3, 2026

To: Anthony Heggelin, Environmental Assessment Officer

From: Climate Change Division - Lori Skaine, Executive Director

Subject: **Little River Pumping and Transmission System Project – Richmond Country, Nova Scotia**

Scope of review:
This review focuses on the following mandate: Climate change adaptation and mitigation

List of Documents Reviewed:
Plain Language Summary and Environmental Assessment Registration Document

Details of Technical Review:

Adaptation

- Section *8.1 Climate and Meteorological Conditions* reviews climate normals (1981-2010) from the Environment & Climate Change Canada weather station at Deming, approximately 40 km from the Project site. Future climate change trends are discussed, though specific climate projections for the Project site are not referenced.

- Section *8.1 Climate and Meteorological Conditions* also provides a suitable overview of the potential effects of extreme temperatures, heavy precipitation, winds, and storms on Project activities, including the potential for delays or interruptions; loss of electrical power; damage to site access, infrastructure, and equipment; flooding, erosion, or washout of site features and roads; and the potential effects of these impacts on surface water resources, fish, fish habitat, and wetlands. Proposed mitigation measures include designing the Project to withstand extreme weather, monitoring weather forecasts prior to extreme events, taking appropriate preventative measures, and conducting inspections following significant precipitation events.

- Section *8.3 Wildfires* notes that the likelihood of a wildfire near the Project is relatively low, citing a total of six wildfires in Richmond County between 2016-2021 totalling 2.5 ha burned (vs. 2,611 ha burned in the province over this same period). However, the period from 2022-2025 saw over 33,500 ha burned provincially; in Richmond County in 2025, three fires burned 17.79 ha. Provincial fire protection systems may still be adequate for mitigating wildfire risk to the Project, though the likelihood of wildfire impacts could be higher in the future than demonstrated during the 2016-2021 timeframe.

Mitigation

- The primary sources of greenhouse gas (GHG) emissions associated with the project are expected to be released from the operation of equipment, machinery, and trucks.

- During operation, the main source would be from the occasional use of the backup generator. As such, operation-related releases of GHGs are expected to be in the low range (10,000 t CO_2e or less per year).

- During decommissioning and abandonment, GHG emissions are expected to be similar to, or less than, the emissions associated with construction.

- The proposed mitigation steps identified in Section 5.1.4 of the EA registration document are appropriate and include the reduction of exhaust emissions from equipment and vehicles through routine maintenance to keep vehicles in good working order.

- While the projected emissions are expected to be low, the proponent has not presented a quantified estimate of GHG emissions.

Key Considerations: (provide in non-technical language)

Adaptation
We suggest the proponent consider reviewing projected climate data for the project location, available through the national climate data portal (ClimateData.ca). Local climate projections may be helpful for informing infrastructure design or operational demands, including accounting for escalating wildfire risk in a changing climate. The proponent may also wish to consider using a risk assessment framework to assess climate risks and plan adaptation measures.

Mitigation
The proponent is encouraged to quantify GHG emissions for various stages of the project and determine opportunities for reducing emissions.

NOVA SCOTIA
Communities, Culture, Tourism and Heritage
Special Places Protection

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Date: February 3, 2026

To: Anthony Heggelin, Environmental Assessment Officer

From: Beth Lewis, Director of Special Places Protection

Subject: **Little River Pumping and Transmission System Project – Richmond Country, Nova Scotia**

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

List of Documents Reviewed:
EA Document, HRP Final Report for A2024NS103 – Landrie Lake Water Utility ARIA

Details of Technical Review (Archaeology):

The final report for HRP A2024NS103 concluded that no areas of moderate to high archaeological potential, significant archaeological features, or cultural materials were identified during the assessment, and the proposed development area was ascribed low potential for encountering protected archaeological resources.

Stantec archaeologists recommended that the water utility and access road will not require any future additional mitigation. If the boundaries of the PDA change or expand, then then another ARIA will need to be completed.

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

The EA document covers the background and field content as presented in the ARIA report. Appendix G is the ARIA report approval letter from CCTH. We have no concerns with the information included.

Details of Technical Review (Geology):

The bedrock geology in the project is mapped as Carboniferous, Early Pennsyvlanian, Port Hood Formation. Although rare, important fossil vertebrates have been recovered from the Port Hood Formation in the past, including *Romeriscus* in 1967. Extensive excavations of the bedrock may provide valuable opportunity to examine detailed geology of this area and although rare, new fossils may be encountered that could be significant.

Barid and Carroll (1967) Romeriscus, the Oldest Known Reptile. 1967
https://www.science.org/doi/10.1126/science.157.3784.56

Key Considerations: (provide in non-technical language):
New fossils may be encountered that could be significant.
Significant palaeontology resources are not expected to be encountered at this site.

NOVA SCOTIA
Environment and Climate Change

Barrington Place
1903 Barrington Street
Suite 2085
Halifax, Nova Scotia
Canada B3J 2P8

Date: February 3, 2026

To: Anthony Heggelin, Environmental Assessment Branch, ECC

From: ICE - LIFT

Subject: **Little River Pumping and Transmission System Project – Richmond Country, Nova Scotia – Environmental Assessment**

Scope of review:

The scope of the EARD involves the transfer of water between basins; water withdrawal and changes to water chemistry due to water withdrawal(s), are not within the scope of the EARD.

Table 3.4.1 page 33 of 142 of document *Little River Pumping and Transmission System Project Environmental Assessment Registration Details of Technical Review & Appendices*:

- *"The scope of the EARD involves the transfer of water between basins; water withdrawal at Landrie Lake is not in scope."*
- *"The scope of the EARD involves the transfer of water between basins; changes to water chemistry due to water withdrawal from Landrie Lake is not within the scope of the EARD."*

List of Documents Reviewed:

- *Little River Pumping and Transmission System Project Environmental Assessment Registration* Details of Technical Review & *Appendices*.
- *Potlotek First Nation Little River Pumping and Transmission System Project.*

The activities outlined and described, within the Project Scope and supporting EA document **"***Little River Pumping and Transmission System Project Environmental Assessment Registration"*, are mitigatable and can be effectively managed under standard approvals e.g. Wetland and Watercourse Alteration Applications.

Key Considerations: (provide in non-technical language)

The proponent did not provide sufficient information to fully characterise and understand individual reservoirs, watershed characteristics, safe yields, water quality, risks to surface and groundwater, etc. However, the details and risks outlined above, can be managed under Surface Water Withdrawal Approval(s) and/or Amendments.

Fisheries and Oceans Canada | Pêches et Océans Canada

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

Date: February 3, 2026

To: Anthony Heggelin, Environmental Assessment Officer, EA Branch

From: Donald Sam, Hydro and Flows, Regulatory Review Biologist, Fish and Fish Habitat Protection Program

Subject: Little River Pumping and Transmission System Project, Richmond County, Nova Scotia

Scope of review:

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

DFO's review focused on the impacts of the works outlined in the Little River Pumping and Transmission System Project Environmental Assessment document to potentially result in:

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

Recommendations:

DFO makes the following recommendations to the proponent:

- Section 3 of the EARD discusses engagement and consultation activities, which have taken place to date in relation to the proposed project. It is noted that the proponent has conducted early engagement with the KMK. We also recommend engagement with Millbrook and Sipekne'katik First Nations on the proposed project.

- Mitigation measures within the EARD make reference to the installation of cofferdams with the capability of holding back a 1:2-year return rainfall event. The proponent is encouraged to increase the capability of cofferdams to withstand potential flows that may result from storm events during construction activities in order to reduce the likelihood of cofferdam failure. Failure of a cofferdam has a high potential to result in the harmful alteration, disruption, or destruction of fish habitat resulting from sediment deposition.

- When describing EMFs within the EARD, the proponent uses an EMF based on 75% of the median monthly flow statistic. DFO uses the monthly 70%Q50 and 10% Mean Annual

Canada

Flow values (whichever is greater) as a reference point to determine the potential for a work, undertaking or activity to result in the harmful alteration, disruption or destruction (HADD) of fish habitat. If the proponent is proposing to release flows in a given month lower than these reference points, then the proponent should submit an application for *Fisheries Act* authorization and all information required as part of that process to the Program for regulatory review.

- Tables 5.3.1 and 5.3.2 of the EARD describe the type and abundance of fish caught during gillnet and minnow trap surveys. Brook trout are absent from the species present within the watershed in these tables. The proponent should be informed that DFO has conducted surveys within the watershed and have confirmed the presence of Brook Trout below the dam.

- Upgrading of the existing water control structure at Little River Lake will require that accommodations for fish passage also be provided at the site. Refer to DFO's website, (https://www.dfo-mpo.gc.ca/pnw-ppe/index-eng.html), for further information on DFO's regulatory review process and for further measures to protect fish and fish habitat.

This information can be provided through the NSECC watercourse and/or wetland alteration approval process(es), and/or through submission of a DFO '*Request for Review*' application to DFO to allow DFO staff to conduct a regulatory review of the project. This review will identify potential impacts to fish and fish habitat and determine if an authorization under the *Fisheries Act* and/or a *Species at Risk* permit is required.

Environment and Climate Change

Barrington Place
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Halifax, Nova Scotia
Canada B3J 2P8

Date: February 3, 2026

To: Anthony Heggelin, Environmental Assessment Officer

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

Subject: **Little River Pumping and Transmission System Project – Richmond Country, Nova Scotia**

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

List of Documents Reviewed:
EARD; Drawings; Appendices; GIS files

Details of Technical Review:

Groundwater:
The Project involves the installation of a 900 mm diameter high-density polyethylene (HDPE) water transmission pipeline, approximately 2.75 kilometres (km) in length, to connect the Little River reservoir to Landrie Lake. The proposed pipeline will generally follow the alignment of the former system, which was decommissioned in the 1990s.

As stated in the EARD, Project activities are not predicted to interact with groundwater resources. There are no groundwater users in the area, and the Project is not anticipated to intersect aquifers or groundwater supplies.

Surface Water:
Reservoir storage estimates for Landrie Lake and Little River Reservoir are reasonably reliable, as they are based on recent bathymetric data.

The sustainable yield assessment for the Landrie Lake and Little River Reservoirs relies on hydrologic and reservoir modelling tools (HEC-RAS and HEC-ResSim), with historical rainfall data from Environment Canada's Sydney Airport Station used as the primary inflow input. It is unclear if these models were validated against historical inflow or water-level observations, nor if a sensitivity analysis was completed. This lack of validation introduces uncertainty in the estimated yields, particularly during prolonged low-flow or drought periods. Therefore, the model results should be viewed as planning-level estimates rather than guaranteed withdrawal capacities. While the modelling provides a useful framework for establishing initial operating ranges, actual withdrawal decisions should be informed by real-time site conditions (e.g., ongoing monitoring).

The proponent has committed to using the habitatsuitability methods defined by Fisheries and Oceans Canada (DFO) to estimate the required Ecological Maintenance Flow (EMF) to the Little River Reservoir outlet, based on channel morphology, hydraulic function, and the habitat needs of aquatic species specific to Little River. Final EMF thresholds will be established in consultation with DFO. Nonetheless, substantial upstream water diversions have the potential to alter downstream hydrology, sediment transport, water quality, and both aquatic and riparian habitats, which may reduce ecological integrity and increase vulnerability during lowflow periods or dry conditions. Because the EMF focuses on fish and fish habitat, additional assessments may be required to understand any effects on other aquatic species and ecological function. However, given the short distance between the reservoir and the ocean (~1km), and the likely influence of the ocean (e.g., tides) on Little River downstream of the reservoir, the potential impacts on other species and ecological function of the river are expected to be low.-suitability methods defined by Fisheries and Oceans Canada (DFO) to estimate the required Ecological Maintenance Flow (EMF)-flow periods

The EARD states that the Little River Reservoir will be operated to supplement water levels in Landrie Lake. Large-scale water transfers of this nature can influence water quality in the receiving lake by altering temperature, dissolved oxygen and water chemistry. They may also introduce non-native or invasive species to the receiving lake. These changes could affect the integrity, productivity, and overall ecological function of Landrie Lake. The EARD does not appear to have examined or assessed this likelihood or the associated potential impacts.

The proponent commits to developing a drought contingency plan to enact water saving measures and phased demand reduction based on the threshold associated with the lake levels, with priority supply maintained to municipal water users.

Wetlands:

The EARD identified eight wetlands during the field studies with seven of the wetlands within the Project Development Area (PDA). All of these wetlands are considered Wetlands of Special Significance (WSS) since they are within the Port Hawkesbury Designated Water Supply Area. Within the PDA, the proponent has stated that 0.97 ha of wetland will be directly altered by the project. It is unclear at this time what wetlands will be indirectly impacted, and monitoring will be required during the permitting stage. As stated in the EARD, most of the wetlands will be restored following construction since the wetlands are within or adjacent to the previously disturbed pipeline route. Some wetlands, however, will not be restored due to access requirements.
The EARD states, “Wetland delineations and functional assessment were not completed for wetlands adjacent to Landrie Lake or Little River Reservoir (outside the PDA) as the change in lake level, as a result of the Project, is assumed to be within the historical lake level fluctuations”. As part of satisfying submission requirements for a water withdrawal approval, the proponent intends on identifying potential indirect impacts to wetlands adjacent to Landrie Lake and Little River Reservoir. If any impacts are anticipated a wetland alteration permit application is required.

Key Considerations:

Groundwater:

As stated in the EARD, Project activities are not predicted to interact with groundwater resources. There are no groundwater users in the area, and the Project is not anticipated to intersect aquifers or groundwater supplies.

Surface Water:

The proponent should consider developing an ongoing, risk-based monitoring program to inform actual water withdrawals and to support regular updates to the hydrological and reservoir models. Such a program would improve model prediction accuracy and strengthen long-term water-withdrawal planning. In addition to ongoing monitoring of reservoir water levels and withdrawal rates, the monitoring program could incorporate, but not be limited to, the following elements:

- Defining indicators for operational decision-making;
- Supporting the establishment of clear operational thresholds (e.g., minimum reservoir levels, downstream flow indicators) that trigger staged reductions or suspension of water withdrawals during low-flow or dry conditions;
- Adding downstream monitoring during high-risk periods, such as low flows, dry conditions, or drought events, to detect emerging ecological or hydrological effects;
- Using monitoring results to support adaptive water-withdrawal management, allowing withdrawal rates to be adjusted if unanticipated impacts are observed;
- Conducting regular or periodic reviews and refinements of the hydrological and reservoir models as new monitoring data become available, thereby improving confidence in future yield estimates and supporting long-term planning.

The proponent should consider a supplemental assessment to help verify that the EMF study with focus on fish and fish habitat is robust enough to support evaluating downstream impacts below the Little River Reservoir and to support planning mitigation measures for the proposed water diversion.

It is recommended that the proponent assess the potential water quality effects of transferring water from the Little River Reservoir to Landrie Lake. This assessment could examine the likelihood of mixing at the discharge location, the expected mixing behavior within Landrie Lake, and the potential for changes in temperature, dissolved oxygen and water chemistry. It is also recommended that the proponent evaluate the risk of introducing non-native or invasive species as a result of the water transfer. Completing these assessments can help identify any risks to lake integrity, ecological function, and impacts to treatment efficacy at the municipal supply plant which can support the development of appropriate monitoring and mitigation measures.

It is recommended that the proponent broaden the proposed drought contingency plan into a more comprehensive water use management plan. This plan could include a clear prioritization framework that outlines the hierarchy of water users, particularly during periods of low flow or water scarcity.

Wetlands:

The proponent has proposed direct alteration to seven wetlands (WL2-WL8); all considered WSS. The proponent is required to submit a Wetland Alteration Approval Application for review and approval for any proposed wetlands to be directly or indirectly altered and complete any necessary compensation and monitoring. The proponent should utilize Nova Scotia's Wetland Alteration Application's Guided Template for the permit applications.

NOVA SCOTIA
Public Works

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Canada B3J 2N2

Date: January 28, 2026

To: Anthony Heggelin, Environmental Assessment Officer

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

Subject: **Landrie Lake Water Utility Little River Pumping and Transmission System Project, Port Malcolm, Richmond County, Nova Scotia**

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

List of Documents Reviewed:
Little River Pumping and Transmission System Project Environmental Assessment

Details of Technical Review:
The Proponent has identified a requirement to re-activate a water pumping station that was decommissioned in the early 1990's in Richmond County. There will be new infrastructure construction, as well as potential water transmission pipeline impacts along the existing right-of-way required for this project. Also, as part of this process, the original access road that was used will be re-activated and upgraded to support the water pump station reactivation/reconstruction. The access road is off Highway 104, which has Controlled Access Designation on this section.

The following comments are offered for the Little River Pumping and Transmission System Project EA registration document:

1. The Proponent will need to confirm with the District Director that this access road will continue to be available for this purpose due to the Controlled Access Designation on Highway 104.

2. Upon confirmation of the access usage, the Proponent must ensure that the access road is properly gated at all times.

3. The Proponent has identified a requirement to upgrade the existing access road to support the project, as well as new infrastructure construction for both the pumphouse and the water transmission pipeline along the right-of-way. This will require completion of a Working Within Highway Right-of-Way (WWHROW) Permit (Table 1.5.1 Key Environmental Approvals/Permits, page 1-4). This permit is available from the Area Manager.

4. Any temporary workplaces created on Highway 104, or other Department-owned infrastructure, as a result of this access road upgrade or other construction activities will need to comply with the appropriate section of the Nova Scotia Temporary Workplace Traffic Control Manual (NSTWTCM). Any required traffic control plans will need to be supplied by the Proponent and be approved by the Area Manager prior to start of work.

5. There is no mention of the anticipated traffic volumes required, both during the construction and operation phases of this project. This information must be supplied by the Proponent.

6. The pipeline crossing occurs beneath a bridge that is on the Five-Year Highway Improvement Plan for upgrade within the next few years. To ensure that these two projects do not interfere with each other, the Proponent should reach out to the Department with their estimated construction timelines.

Key Considerations: (provide in non-technical language)

1. The Proponent must confirm use of the access road with the District Director.
2. Once approved, the access road is to remain properly gated.
3. The Proponent must obtain a Working Within Highway Right-of-Way Permit from the Area Manager.
4. Construction on provincially owned roads must comply with the Nova Scotia Traffic Control Manual and be approved by the Area Manager.
5. The Proponent must clarify expected traffic volumes for this project.
6. The Proponent should communicate with NSDPW regarding construction of the pipeline beneath a nearby bridge.

Kwilmu'kw Maw-klusuaqn Negotiation Office
Mi'kmaq Rights Initiative
Our Rights. Our Future.

75 Treaty Trail
Truro, NS B6L 1W3

Tel (902) 843 3880 **Fax** (902) 843 3882
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February 18, 2026

Anthony Heggelin
Environmental Assessment Officer
Environmental Assessment Branch
Nova Scotia Environment and Climate Change
anthony.heggelin@novascotia.ca

Mr. Heggelin,

Re: Consultation with the Mi'kmaq of Nova Scotia on the Little River Pumping and Transmission System Project

I write in response to your letter dated January 13, with respect to consultation under the *Terms of Reference for a Mi'kmaq-Nova Scotia-Canada Consultation Process* (ToR) as ratified on August 31, 2010, on the above noted project. We wish to proceed with Consultation.

The Landrie Lake Water Utility is proposing to reinstate the Little River Transfer Pumphouse and water transmission pipeline, to transfer water from the Little River Reservoir to Landrie Lake, in the Point Tupper area of Richmond County. Project impacts include demolition of the existing pumping station, vegetation clearing and grubbing, upgrades to the site access road, construction of an intake structure and pumphouse, and installation of a 2.75-kilometre buried water transmission pipeline.

The Kwilmu'kw Maw-Klusuaqn (KMK) would like to highlight that this proposed project is a substantial undertaking with the amount of water that is required for this transmission project. While this project has been screened at the "minimal level", this proposed project has potential to cause adverse environmental effects. The proposed increase in water withdrawals from 36 million liters per day (MLD) to 55.7 MLD represents a substantial escalation and significantly increases the risk of impacts to residential drinking water supplies and local watershed flow regimes. This is especially concerning given the region's increasing frequency of drought-like conditions experienced during the past summer.

Our office is also concerned about the long-term environmental impacts of this project. The lifespan of this project is forecasted to be in operation for up to 100 years. With multiple wetlands and watercourses being adjacent to the withdrawal site and several species such as American Eel, Atlantic Salmon and blueberries all being mentioned in the Mi'kmaq Ecological Knowledge Study (MEKS) and Environmental Assessment Registration Document (EARD), our office questions if this project is environmentally stable for these species significant to the

Mi'kmaq of Nova Scotia through these long-term operations. These long-term environmental impacts are compounded by the effects of climate change our province has experienced over the last number of years.

This project also consists of the reconstruction of an abandoned road and the installation of a new buried pipeline along the right of way. The construction of this project also includes a forecasted ~16-month construction period. This all contributes to habitat disruption, increased sediment and erosion to the local environment and disturbance to local wildlife.

Given the scale and duration of this project, any required monitoring program should be co-developed with the Unama'ki Institute of Natural Resources (UINR) to ensure appropriate integration of Mi'kmaq knowledge and stewardship principles. Further clarification is required regarding offsetting and habitat compensation initiatives, including opportunities for Mi'kmaw participation and co-development.

The Archaeology Research Division of Kwilmu'kw Maw-klusuaqn (KMK-ARD) has reviewed Archaeological Resource Impact Assessment (ARIA) A2024NS103, prepared for the Little River Pumping and Transmission System Project by Stantec Consulting Ltd. in May 2025. According to the ARIA report, the Project Area "mainly consists of previously developed lands along the utility route between the Little River Reservoir and Landrie Lake" (A2024NS103: 1). The Project Area was ascribed "low archaeological potential due to either sloping, saturated, or rocky conditions or a combination of these conditions" (A2024NS103: 12). No archaeological resources were identified during the field reconnaissance, and the ARIA recommended that the Project Area be cleared of any requirement for further archaeological investigation.

The Maw-lukutijik Saqmaq (Assembly of Nova Scotia Mi'kmaw Chiefs) does not support clearances without subsurface data. Mi'kmaw archaeological sites have developed since time immemorial and may not be identifiable from the surface character of the current landscape. For example, as noted in the ARIA report, the shorelines of present Landrie Lake and Little River Reservoir have resulted from the damming of Seacoal Brook and Little River, respectively, and are not representative of the landscape used and occupied by Mi'kmaw ancestors. KMK-ARD consistently recommends that subsurface testing be undertaken to confirm the presence, or lack of presence, of Mi'kmaw cultural belongings. Negative tests and negative evidence are considered relevant and important data in addressing concerns for the presence, protection, and management of Mi'kmaw archaeological and cultural heritage.

The Project Area is located near an area of significant past Mi'kmaw use and occupancy, as shown on H.W. Crawley's 1827 map of Cape Breton. These lands, at the mouth of River Inhabitants and leading toward Lennox Passage, should be understood as evidence of Mi'kmaw cultural significance and sensitivity for the region. Although areas of disturbance associated with

a former water pipeline and abandoned rail line were observed during the field reconnaissance, prior development impacts are not sufficient to detract from an area's cultural significance. While ancestral belongings no longer in their primary contexts, such as those disturbed by previous construction, may have diminished scientific value, they continue to hold cultural relevance for current Mi'kmaw communities and generations to come.

This proponent has done a minimal effort in engaging meaningfully with the Mi'kmaq of Nova Scotia. Letters to the local Mi'kmaw communities via e-mail for a project with such a significant footprint is not sufficient. More outreach and engagement attempts would have been beneficial for local harvesters and community members who may be impacted by this project. Community engagement sessions, additional follow-up e-mails and offers for site visits all may have been beneficial prior to the EARD being finalized.

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

Yours in Recognition of Mi'kmaw Rights and Title,

Director of Consultation
Kwilmu'kw Maw-Klusuaqn

C.C.:
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February 23, 2026

Anthony Heggelin
A/ Environmental Assessment Officer
Nova Scotia Department of Environment and Climate Change
1903 Barrington Street, Suite 2085
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RE: Engagement with the Mi'kmaq of Nova Scotia on the Little River Pumping and Transmission System Project - *Sipekne'katik Governance Initiative Review*

Dear Mr. Heggelin;

This letter provides initial feedback from the Sipekne'katik First Nation (hereafter, "Sipekne'katik") Consultation Department regarding the engagement letter addressed to Chief Wilbert Marshall regarding the proposed Little River Pumping and Transmission System Project and received on July 23, 2025.

Before engaging in any further discussion regarding the proposed project, please note that Sipekne'katik formally terminated its participation in the August 31, 2010, Mi'kmaq-Nova Scotia-Canada Consultation Terms of Reference (TOR) upon withdrawing from the Kwilmu'kw Maw'klusuaqn Negotiation Office (KMKNO) several years ago. As such, Sipekne'katik follows its own community-based consultation protocol, the **Sipekne'katik Governance Initiative (SGI)**, which applies to all projects contemplated in the Province of Nova Scotia. This approach aligns with the recognition and affirmation of Aboriginal and Treaty Rights under **Section 35** of the *Constitution Act* (1982), and with the legal framework established by the Supreme Court of Canada concerning the Duty to Consult. The SGI protocol is not optional; it reflects Sipekne'katik's inherent and constitutionally protected right and authority to govern its own affairs and to ensure the protection of its **traditional** and **unceded** lands, waters, resources, and Treaty Rights. This mandate is **substantive** and **legally enforceable**.

We also wish to emphasize that Sipekne'katik's traditional territory is extensive and does not conform to the Province's adjacency-based approach. The Peace and Friendship Treaties of the 18th century affirm the rights of all Mi'kmaq to access and utilize natural resources within their traditional territories. These treaties are grounded in principles of shared use and stewardship, not geographic proximity. The Province's reliance on adjacency within its consultation and land management processes undermines these rights by excluding Mi'kmaq communities that may not

hold reserve lands adjacent to Crown land, yet maintain longstanding relationships with and rights over broader areas of Mi'kma'ki. This approach perpetuates colonial systems (*e.g.,* reserves system, the Centralization Policy, etc.) imposed on Indigenous peoples to restrict their access to lands and resources. Accordingly, the proponent should have engaged directly with Sipekne'katik First Nation regarding potential traditional land use in the project area, as it has done with KMKNO, to ensure that **all** Mi'kmaq perspectives are meaningfully included in decision-making processes.

Following a thorough review, Sipekne'katik First Nation has determined that the proposed project is unlikely to significantly impede the exercise of its Aboriginal and Treaty Rights. However, given the potential impacts on local resources, all proposed mitigation and monitoring measures must be fully implemented.
The SGI team requires full access to all contingency plans and to all documentation produced as part of the surface water withdrawal application, including assessments of sustainable yield and the site-specific fish habitat simulation model. The team also expects to receive regular updates on project progress, including timely notification of any changes to project scope or design. In the event of any archaeological discoveries (including cultural artifacts or remains) during ground disturbance, all work must cease immediately, and the SGI consultation team must be notified without delay.

As a final reminder, the SGI team wants to clarify and restate that the proposed project is located in Mi'kma'ki, the ancestral territory of the Mi'kmaq. The Band has Treaty and Aboriginal Rights regarding lands, waterways and natural resources that it has used, benefited from, and occupied since time immemorial. **No activities associated with the project shall infringe upon the exercise of these Rights.**

Respectfully,

Marine Courtois (she/her/elle)
Senior Marine Biologist & Environmental Lead, on behalf of the SGI
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CC:
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Outlook

Pumping from Little River Reservoir

From

Date Thu 2026-01-15 11:35 AM

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

Note that there is a wood turtle population in and around the stream that empties into Landrie Lake just footsteps from the proposed pipeline outlet location. In spring the turtles move upstream into the wetland on the north side of Highway 104 and can occasionally be seen crossing the highway. Photos available upon request.

As climate heating accelerates, drought appears to be emerging as a feature of Nova Scotian summers. The drilled well of at least one household within the Little River Watershed ran dry this past summer. That home is on Beaver Lake. The expectation that Landrie Lake and Little River watersheds - two relatively small watersheds - will be able to sustainably deliver 2,500,000 US gallons of water PER DAY (as per the MOU between Landrie Lake Water Utility and Everwind signed on Sept. 9, 2022) without considerable harm to the ecosystems and household water supplies within them seems to me something very close to magical thinking.

Richmond County

Comments:

Note that there is a wood turtle population in and around the stream that empties into Landrie Lake just footsteps from the proposed pipeline outlet location. In spring the turtles move upstream into the wetland on the north side of Highway 104 and can occasionally be seen crossing the highway.

As climate heating accelerates, drought is emerging as a feature of Nova Scotia summers. The drilled well of at least one household within the Little River Watershed ran dry this past summer. That home is on Beaver Lake.
The expectation that Landrie Lake and Little River watersheds - two relatively small watersheds - will be able to sustainably deliver 2,500,000 US gallons of water PER DAY (as per the MOU between Landrie Lake Water Utility and Everwind signed on Sept. 9, 2022) without considerable harm to the ecosystems and household water supplies within them seems extremely unlikely.

Name:

Email:

City/Town

Pomquet

Postal Code

B2G 2L4

Attachment(s):

Yes, I agree (must be selected to proceed)

Uploaded document(s)

No documents to display.