NOVA SCOTIA
Environment and Climate Change

Comment Index

Ocean Lake Wind Project, Guysborough County

Comment Period End Date: June 22, 2026

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Outlook

OCEAN LAKE WIND PROJECT – ENVIRONMENTAL ASSESSMENT

From Maclean, Lachlan (HC/SC) <Lachlan.Maclean@hc-sc.gc.ca>
Date Mon 2026-05-25 11:27 AM
To Environment Assessment Web Account <EA@novascotia.ca>

Unclassified / Non classifié

Hi Anthony,

As per your email regarding the Ocean Lake Wind Project, please identify any specific project-related human health issues where you are looking for Health Canada's advice or guidance.

As you know, HC's role in Impact/Environmental Assessment is founded in statutory obligations under the Canadian Impact Assessment Act, and its knowledge and expertise can be called upon by reviewing bodies (e.g., Impact Assessment Agency of Canada, review panels, Indigenous groups and/or other jurisdictions). In the absence of such a request from one of the above noted groups, HC is unable to carry out a comprehensive review of the project.

However, HC can accommodate specific requests for human health advice and guidance related to provincial environmental assessments within a reasonable timeframe. Health Canada currently possesses expertise in the following areas related to human health:

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

To help with your review of human health impacts, I have attached a document of common human health considerations in project reviews including links to Health Canada's guidance documents.

Let me know if you want to discuss anything further.

Thanks,
Lauchie

Lachlan MacLean, Ph.D., P.Geo.
Environmental Specialist

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#NOVA SCOTIA
Environment and Climate Change

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

Date: June 3, 2026

To: Anthony Heggelin, Environmental Assessment Officer

From: Air Quality Unit

Subject: **Ocean Lake Wind Project, Guysborough County, Nova Scotia**

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

List of Documents Reviewed:

- *Ocean Lake Wind Energy project EA Registration Document – Appendix C*
- *Appendix D – I*
- *Drawing 3.1P – 8.1*

Details of Technical Review:

The purpose of the proposed undertaking is to construct and operate a wind power project (the Project) with up to 158 turbines capable of generating up to 1,264 megawatts (MW) of renewable electricity to support the production of Certified Green hydrogen and ammonia and other industrial uses in Nova Scotia. The Project also includes other infrastructure such as access roads, electrical lines, one or more substations, laydown yards, and buildings. The Project intends to begin construction in 2029 and is expected to be operational for 35 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 33 km northeast of the Project, from 2021-2025. Existing air quality conditions indicate that most of 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 during the construction phase. The Project area is vegetated, which may help to reduce the travel distance of fugitive dust emissions from the Project.

The proponent states there are five non-participating receptors within the local assessment area for air quality impacts, however only two of these receptors are identified in section 7.1.5 of the registration document. The proponent states these five receptors are more than 100 m from the Project footprint and outside of the area for which fugitive dust and exhaust emissions could potentially have an impact.

The Proponent states they will implement mitigation measures to minimize air quality impacts on nearby receptors. The registration document lists several proposed mitigations

that could be used during the construction phase; these mitigations are appropriate and would reduce impacts if they are employed.

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

Key Considerations:

The Air Quality Unit notes the following key consideration:

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

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Environment and Climate Change

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Date: June 3, 2026

To: Anthony Heggelin, Environmental Assessment Officer

From: Air Quality Unit

Subject: **Ocean Lake Wind Project, Guysborough County, Nova Scotia**

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

List of Documents Reviewed:

- *Ocean Lake Wind Energy project EA Registration Document – Appendix C*
- *Appendix D – I*
- *Drawing 3.1P – 8.1*

Details of Technical Review:
The purpose of the proposed undertaking is to construct and operate a wind power project (the Project) with up to 158 turbines capable of generating up to 1,264 megawatts (MW) of renewable electricity. The Project also includes other infrastructure such as access roads, electrical lines, one or more substations, laydown yards, and buildings. The Project intends to begin construction in 2029 and is expected to be operational for 35 years.

Noise impacts were assessed by WSP Canada Inc. Data from the NS Topographic Database and satellite/aerial imagery were used to identify nearby receptors. In total, 383 potential receptors were identified within 2.1 km of the study area and included in the noise model.

Expected noise levels produced during the construction phase were not modelled or presented in the registration document. It is unclear whether construction related noise will impact nearby receptors.

Operational noise levels from 143 turbines (15 of the potential turbine locations were not modelled) were assessed using the CadnaA noise modelling software. The assessment included a baseline noise level of 35 dBA, which is based on Health Canada guidance, and a ground attenuation factor of 0.7. The use of this ground attenuation factor is a less conservative approach than would be recommended, which may lead to an underestimation of impacts on receptors. Of the receptors modelled, 16 had a predicted impact of 39.5 – 40 dBA. When rounding to the nearest decibel (which is standard practice), these 16 receptors are predicted to experience noise at the 40 dBA limit. Another 37 receptors were predicted to experience noise at 39 dBA. The modelling results were achieved with all turbines using serrated trailing edge (STE) blades and operating at full power level.

Low frequency noise was assessed according to the NSECC Guideline for Environmental Noise Measurement and Assessment (GENMA). No low frequency tonal components were identified.

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

Key Considerations:
The Air Quality Unit notes the following key considerations:

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

NOVA SCOTIA
Department of Municipal Affairs

1505 Barrington St.
PO Box 216
Halifax, NS B3J 2M4
Novascotia.ca

DATE: May 26, 2026

TO: Anthony Heggelin, Environmental Assessment Officer

FROM: Dawn M. Sutherland, Provincial Director of Planning, Land Use Planning

SUBJECT: **OCEAN LAKE WIND PROJECT, GUYSBOROUGH COUNTY, NOVA SCOTIA**

Scope of Review:
This review focuses on the following mandates: Statements of Provincial Interest and engagement with municipalities.

List of Documents Reviewed:
Environmental Assessment Registration Document – Ocean Lake Wind Project

Details of Technical Review:
The Proponents engaged with the Municipality of the District of Guysborough regularly to advise on the Project.

- *Drinking Water:* Reasonably consistent. In the EA documents, the proponents state that Landrie Lake Watershed, Richmond County, is the closest water supply. There are, however, two drinking watersheds in Guysborough: Wilkins Lake (near Canso) and Grant Lake (near Mulgrave). None of these water supplies is in close proximity to the study area.
- *Agricultural Land:* Reasonably consistent. There is no land with high agricultural potential in close proximity to the study area.
- *Flood Risk*: Reasonably consistent. There are no flood risk areas identified in the SPI in the study area.
- *Infrastructure:* Reasonably consistent. There is no municipal servicing in this area.
- *Housing:* Reasonably consistent. Housing is permitted in the surrounding zones; however, MPS Policy 11.1.2 ensures separation distances from residential uses are considered during the Development Agreement process to avoid land use conflicts.

Key Considerations:
The proponent should continue to engage with the Municipality of the District of Guysborough as the project moves forward.

Date: April 21, 2026

To: Anthony Heggelin, Environmental Assessment Officer

From: Department of Health and Wellness – Environmental Health

Subject: **Ocean Lake Wind Project, Guysborough County Nova Scotia**

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

List of Documents Reviewed: EARD

Details of Technical Review:

The purpose of the proposed undertaking is to construct and operate a wind power project with up to 158 turbines capable of generating up to 1,264 megawatts (MW) of renewable electricity. The Project also includes other infrastructure such as access roads, electrical lines, one or more substations, laydown yards, and buildings. Each wind turbine will have a height of approximately 221.7 metres to the tip of the blade and individually produce up to 8 MW. The Project is located near the communities of New Harbour, Goldboro, Larry's River, Lundy and Roachvale in the Municipality of the District of Guysborough, in Guysborough County, Nova Scotia. The Project intends to begin construction in 2029 and is expected to be operational for 35 years

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

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

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

Key Considerations:

As noted in the EARP changes to layout, turbine model or specifications, or advancement of optional turbine locations, may require updated sound and shadow flicker monitoring to ensure compliance with applicable thresholds.

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: June 1, 2026

To: Anthony Heggelin, Environmental Assessment Officer

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

Subject: Ocean Lake Wind Project, Guysborough 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 Ocean Lake Wind Project Environmental Assessment Registration Document (EARD) to potentially result in:

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

List of Documents Reviewed:

- Environmental Assessment Registration Document:
  - ocean-lake-ea-registration-document-appendix-c.pdf
  - Appendix B (Engagement)
  - Appendix G (Groundwater Wells)
  - Appendix H (ACCDC Report)
  - Appendix I (Surface Water and Fish & Fish Habitat Photo Log)
  - Appendix J (Wetlands Characteristics & Photo Log)
  - Drawings 9.1 (Freshwater Desktop Review), 9.2 (Wet Area Mapping), 9.3 A-Q (Field Assessment Results), 9.4 (Aquatic Environment LAA and RAA), and 9.5 (Wetlands Desktop Review)

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Technical Comments:

Risk Assessment: Site-Preparation and Construction Schedule	
Identify Gap/Risk	The EARD describes site preparation activities, including clearing, grading, and installation of erosion and sediment control (ESC) measures in Section 3.6.1, but does not clearly indicate when site preparation and construction will occur within the overall project schedule (Section 3.7, Table 3.4). Site preparation undertaken too far in advance of construction activities (e.g., clearing occurring in 2029–2030 ahead of construction extending through 2034) may increase the duration of exposed soils and disturbed areas, resulting in elevated risks of erosion, sedimentation, and potential impacts to fish and fish habitat. While Section 3.6.1 describes the installation of ESC measures during site preparation, the effectiveness of these measures is dependent on phased implementation aligned with construction timing. ESC mitigation measures are described at a general level in Sections 7.1.5 and 9.1.5, including stabilization, phased grading, and runoff control, but additional detail is required to demonstrate how these measures will be implemented in a manner that minimizes risk over the duration of site disturbance.
Can it be addressed in another permit/approval or with a T&C?	The identified gap can be addressed during the NSECC watercourse and/or wetland alteration approval process(es) and DFO regulatory review process. Works, undertakings, or activities (WUAs) associated with this project in or near water that may result in potential harmful impacts on fish or fish habitat will require DFO regulatory review to avoid, mitigate or offset those impacts.
Define/provide detail	For WUAs that may result in potential harmful impacts on fish or fish habitat, additional information will be required as part of the DFO regulatory review process, including detailed information on the proposed WUAs, a detailed description of the fish and fish habitat found at the location of the proposed WUAs, a detailed description on the likely effects of the proposed WUAs on fish and fish habitat, and a detailed description of the measures and standards that will be implemented to avoid and mitigate potential harmful impacts on fish and fish habitat. It is recommended that the proponent align site preparation with construction activities, use phased clearing to improve coordination with the construction work, and ensure erosion and sediment control plans are developed, implemented, and include contingency measures for storm events.
Risk Assessment: Blasting Near Water	
Identify	The EARD identifies that blasting may be required during site preparation and construction (Section 3.6.1). However, while Section

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Gap/Risk	9.1.5 acknowledges the risk of fish injury or mortality from pressure waves exceeding 100 kPa, it does not provide project-specific blast design, modelling, or a monitoring framework to demonstrate how this will be avoided or mitigated. In addition, the document does not specify setback distances from fish habitat or outline specific mitigation and monitoring measures necessary to protect fish and fish habitat. A detailed Blasting Management Plan aligned with established guidance is required to avoid and mitigate impacts to fish and fish habitat.
Can it be addressed in another permit/approval or with a T&C?	The identified gap can be addressed during the NSECC watercourse and/or wetland alteration approval process(es) and DFO regulatory review process. WUAs associated with this project in or near water that may result in potential harmful impacts on fish or fish habitat will require DFO regulatory review to avoid, mitigate or offset those impacts.
Define/provide detail	For WUAs that may result in potential harmful impacts on fish or fish habitat, additional information will be required as part of the DFO regulatory review process, including detailed information on the proposed WUAs, a detailed description of the fish and fish habitat found at the location of the proposed WUAs, a detailed description on the likely effects of the proposed WUAs on fish and fish habitat, and a detailed description of the measures and standards that will be implemented to avoid and mitigate potential harmful impacts on fish and fish habitat. It is recommended that the proponent develop a blasting management plan that includes peak overpressure/impulse limits at wetted habitats, charge per delay controls, monitoring, and contingency measures consistent with DFO's *Guidelines for the Use of Explosives In or Near Canadian Fisheries Waters*.
Risk Assessment: Watercourse Crossing Designs and Fish Passage	
Identify Gap/Risk	The EARD identifies approximately 149 watercourses and an estimated 120 forecasted crossings (Section 9.1), but does not provide site-specific crossing designs or demonstrate that fish passage will be maintained. While Section 9.1.5 indicates that crossings will be designed in accordance with NSECC standards and incorporate buffers and in-water work timing windows, the absence of detailed design information - such as structure type, dimensions, and design flows - limits the ability to assess whether there is a risk of harmful alteration, disruption or destruction (HADD) of fish habitat, including impacts to fish passage.
Can it be addressed in	The identified gap can be addressed during the NSECC watercourse and/or wetland alteration approval process(es) and DFO regulatory

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another permit/approval or with a T&C?	review process. WUAs associated with this project in or near water that may result in potential harmful impacts on fish or fish habitat will require DFO regulatory review to avoid, mitigate or offset those impacts.
Define/provide detail	For WUAs that may result in potential harmful impacts on fish or fish habitat, additional information will be required as part of the DFO regulatory review process, including detailed information on the proposed WUAs, a detailed description of the fish and fish habitat found at the location of the proposed WUAs, a detailed description on the likely effects of the proposed WUAs on fish and fish habitat, and a detailed description of the measures and standards that will be implemented to avoid and mitigate potential harmful impacts on fish and fish habitat. It is recommended that the proponent complete a crossings' register with information on final designs (e.g., clear-span bridge, open-bottom arch, embedded culvert), crossing coordinates, bankfull width/depth, gradient, habitat type, likely fish use/seasonality, and clear site-specific photographs documenting existing channel morphology, bank conditions, substrate, flow characteristics, riparian features, and any existing structures. Each crossing submission should further describe fish-habitat type upstream of the crossing, at the crossing, and downstream of the crossing, and the species in the watershed that may utilize the crossing and its surrounding habitat. It is also recommended that the proponent prioritize open-bottom or clear-span structures for fish-bearing streams. Crossings should not hinder the movement of fish species which are likely to migrate within the watershed.
Risk Assessment: Wetland Alterations	
Identify Gap/Risk	The EARD identifies impacts to a large number of wetlands within the Project area (Section 9.2), along with measurable areas of wetland habitat subject to alteration. The EARD recognizes wetlands as contributing to hydrological regulation and water quality, but the benefits and functional linkages between these wetlands and fish habitat (direct or indirect) are not clearly indicated. Although WESP-AC functional assessments are referenced (Table 9.13), the supporting data and assessment connecting wetland function to aquatic habitat are limited, constraining the ability to fully assess effects on fish and fish habitat, including indirect effects.
Can it be addressed in another permit/approval	The identified gap can be addressed during the NSECC watercourse and/or wetland alteration approval process(es) and DFO regulatory review process. WUAs associated with this project in or near water that may result in potential harmful impacts on fish or fish habitat will require DFO regulatory review to avoid, mitigate or offset those

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or with a T&C?	impacts.
Define/provide detail	For WUAs that may result in potential harmful impacts on fish or fish habitat, additional information will be required as part of the DFO regulatory review process, including detailed information on the proposed WUAs, a detailed description of the fish and fish habitat found at the location of the proposed WUAs, a detailed description on the likely effects of the proposed WUAs on fish and fish habitat, and a detailed description of the measures and standards that will be implemented to avoid and mitigate potential harmful impacts on fish and fish habitat.
Risk Assessment: Sediment, Erosion, and Water Quality	
Identify Gap/Risk	The EARD identifies sedimentation risks associated with extensive road construction and watercourse crossings (Sections 3.5.2 and 9.1), however mitigation measures are described at a high-level, and are not clearly linked to site-specific conditions or identified high-risk areas. Although ESC measures, such as buffers, swales, sediment control structures, and monitoring are outlined in Sections 9.1.5, site-level implementation details are not provided. In addition, Section 15.1 identifies erosion and sediment control failure as a potential accident or malfunction scenario, indicating that residual risk remains and that further detail is required to demonstrate how risks will be effectively managed. Furthermore, while general mitigation measures are presented, there is insufficient detail regarding how monitoring will be conducted to confirm effectiveness of mitigation measures.
Can it be addressed in another permit/approval or with a T&C?	The identified gap can be addressed through the NSECC watercourse and/or wetland alteration approval process(es), as well as through the DFO regulatory review process. Works, undertakings, or activities (WUAs) associated with this project that occur in or near water and may result in potential harmful impacts to fish or fish habitat will require review by DFO to ensure impacts are avoided, mitigated, or offset in accordance with applicable regulatory requirements.
Define/provide detail	For WUAs that may result in potential harmful impacts to fish or fish habitat, additional information will be required as part of the DFO regulatory review process. This includes detailed information on the proposed WUAs, a description of the fish and fish habitat present at each location, an assessment of the likely effects of the proposed works on fish and fish habitat, and a detailed description of the measures and standards that will be implemented to avoid and mitigate potential impacts. Additional detail should also demonstrate how mitigation will be applied at a site-specific level, consistent with the scale and risk profile of the Project, and how monitoring, adaptive

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	management, and contingency measures will be implemented to ensure the protection of fish and fish habitat.

Summary of Recommendations: (provide in non-technical language)

DFO recommends the proponent:

- Align site preparation with construction activities, use phased clearing to improve coordination with the construction work, and ensure erosion and sediment control plans are developed, implemented, maintained, and include contingency measures for storm events.
- Develop site-specific erosion and sediment control plans for watercourse crossings and high-risk areas that includes monitoring and adaptive management / contingency measures.
- Develop a blasting management plan that includes peak overpressure/impulse limits at wetted habitats, charge per delay controls, monitoring, and contingency measures consistent with DFO's *Guidelines for the Use of Explosives In or Near Canadian Fisheries Waters*.
- Develop a complete crossing package (crossings register and finalized designs) that includes detailed information on the proposed watercourse crossing and wetland alteration designs, detailed descriptions of the fish and fish habitat (direct and indirect) found at the location of the proposed WUAs, detailed descriptions on the likely effects of the proposed WUAs on fish and fish habitat (including potential impacts on species at risk, and direct and indirect impacts on fish habitat), and detailed descriptions of the measures and standards that will be implemented to avoid and mitigate potential harmful impacts on fish and fish habitat.
- Provide further information on the potential impacts of the project on fish habitat associated with changes in wetland function (e.g., hydrology, water quality), along with measures that could be used to mitigate those impacts.
- Consider open bottom structures, such as clear span bridges and open bottom arch culverts for fish bearing watercourse crossings rather than closed bottom structures, where possible; and
- Refer to DFO's website, https://www.dfo-mpo.gc.ca/pnw-ppe/index-eng.html, for further information on DFO's regulatory review process and for further measures to protect fish and fish habitat.

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

Canada

ReferralsMaritimes@dfo-mpo.gc.ca prior to the submission of applications for preliminary discussions on regulatory information requirements under of the *Fisheries Act* and *Species at Risk Act*.

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#NOVA SCOTIA
Environment and Climate Change

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Halifax, Nova Scotia
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Date: June 3, 2026

To: Anthony Heggelin, Environmental Assessment Officer

From: Water Resource Management Branch

Subject: **Ocean Lake Wind Energy Project, Guysborough County, Nova Scotia**

Scope of review:

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

List of Documents Reviewed:

Environmental Assessment Review Document, Appendices, Drawings, GIS Files

Details of Technical Review:

Surface Water

The project proposes the construction of a 158-turbine wind farm across 22,055 ha in Guysborough County, Nova Scotia—land that is currently used primarily for managed forestry. It is unclear whether forestry operations will continue once the wind farm is operational, although the EARD refers to "ongoing forestry activities." This distinction is important, as forestry generally has greater impacts on surface water quality and quantity than wind energy development. A transition from forestry to wind energy would likely result in long-term benefits for surface waters, despite the short-term impacts associated with construction. However, if forestry continues alongside the project, surface waters will be exposed to the combined effects of both land uses, increasing the potential for cumulative impacts.

Aquatic environments in the area appear particularly sensitive to changes in water quality. Field measurements identified very acidic conditions (pH 4.4–4.8), along with relatively warm summer water temperatures (17–19 °C in July), which are expected to increase further in August and September. Despite these challenging conditions, the presence of species such as American eel and brook trout indicates that these systems currently provide important habitat. Any further degradation in water quality—such as increases in sediment, temperature, or contaminants—could place additional stress on these species. While a threatened mollusk, the brook floater, was observed approximately 1 km from the study area, there does not appear to be a direct hydrological connection to project components, so the population should not be impacted by this project.

A key driver of potential impact is the scale of infrastructure required. The project plans to build approximately 128 km of new roads and upgrade an additional 42 km of existing roads, although

42% of access routes will follow existing corridors. These works will require an estimated 120 watercourse alterations (70 new crossings and 50 upgrades), each of which introduces the potential to alter natural flow patterns. Changes in flow direction, volume, or timing can affect downstream environments, including wetlands and lakes that depend on stable hydrology.

To address these risks, the project has committed to developing a stormwater management plan to maintain pre-construction flow patterns to the extent possible. Maintaining hydrological function will also depend on minimizing disturbance to wetlands, which act as natural water storage and flow-regulating features within the landscape. Where wetland alteration is unavoidable, constructing compensation wetlands within the same sub-catchments can help offset increased runoff and maintain overall watershed function.

Watercourse alterations also introduce the risk of erosion and sedimentation. Higher flow velocities at crossings, particularly in areas already noted to have low bank stability, can mobilize sediments from stream beds and banks. This can increase turbidity, reduce water clarity, and degrade habitat quality for aquatic species. Fine sediments may also settle downstream in lower-energy environments, smothering benthic organisms and altering substrate conditions.

These risks are expected to be mitigated through the design and construction of appropriately sized watercourse crossings that account for both current flow conditions and anticipated increases due to climate change. The EARD commits to implementing best management practices for watercourse alterations and to developing a site-specific erosion and sedimentation control plan for the construction phase. Together, these measures are intended to limit sediment mobilization at the source and reduce downstream impacts.

Beyond construction-related effects, ongoing operations present lower but persistent risks to freshwater systems. These include minor sediment inputs from road maintenance, increased chloride levels associated with winter de-icing, and the potential for accidental spills or leaks of fuels and turbine fluids. To manage these longer-term risks, mitigation measures should focus on operational practices. These could include minimizing the use of de-icing salts, particularly avoiding bulk applications designed for extended periods. and implementing monitoring and alert systems to quickly detect and respond to fluid leaks. The project's commitments to spill prevention, contingency planning, and response protocols further reduce the likelihood that such incidents would result in significant impacts to freshwater environments.

Finally, the overall scale of the project increases the importance of these mitigation measures. The study area includes more than 200 lakes and 149 identified watercourse segments, and project activities will also influence downstream environments beyond those directly assessed. While individual impacts may be small, the density of roads and turbines is higher than typically observed in wind projects, increasing the overall level of risk. As such, the effectiveness of the proposed mitigation measures, particularly those related to hydrology, erosion control, and operational management, will be critical in ensuring that impacts to freshwater systems remain limited.

Groundwater

Surficial geology in the study area predominantly consists of stony till plain ranging from 2 to 20 meters in thickness. Other surficial geological features in the study area consist of hummocky ground moraine, kame fields, esker systems, marine and organic deposits. Bedrock geology, which is exposed in some areas, consists of the Goldenville and Halifax formations. According to the EARD, there are occurrences of sulphide-bearing slates in the Halifax Formation within the Study Area. When disturbed and exposed to air or water, rocks that contain sulphide minerals can result in acid rock drainage (ARD). The EARD notes that the presence and location of sulphide-bearing minerals and the likelihood of ARD will be confirmed following the results of a geotechnical investigation. Groundwater risk mapping indicates most of the study area is considered high risk for arsenic and manganese, with some areas in the eastern portions categorised as medium risk. The study area is predominantly low risk for uranium and medium risk in the eastern and northern sections.

Residences in the vicinity of the study area rely on groundwater from private wells. The EARD identified 73 water wells within 2 km of the Study Area, based on the Well Logs Database. Six of these water supply wells are within 800 meters of the assessment area, where the greatest disturbance may occur. Construction activities, primarily blasting, can affect the quality and quantity of the surrounding groundwater supply, depending on proximity to drinking water wells and the extent of the disturbance. Blasting can mobilize metals in groundwater or alter local groundwater flow. The EARD notes that if blasting is required, the Proponent will conduct a pre-blast survey of wells within 800 m of the blast site. It was also noted that if demonstrable changes in groundwater quantity or quality to a well are detected due to Project activities, an alternative water supply, of equal or better quantity/quality than that impacted will be provided to the landowner.

The EARD noted potential for hazardous spills resulting from fuel and other on-site chemicals during construction and operation activities, which can adversely impact groundwater quality. Mitigation measures were proposed, including locating fuel storage and refueling a minimum of 30 meters from any well, proper storage of fuel and chemicals, maintaining spill kits, and training workers on spill response procedures.

Wetlands

A total of 502 wetlands were identified within the Assessment Area, including 349 that were field-verified and 153 that were modeled using GIS. Of these, Wetland Ecosystem Services Protocol for Atlantic Canada (WESP-AC) assessments were completed for only 336 wetlands.

According to the *Guide to Preparing an EA Registration Document for Wind Power Projects in Nova Scotia* (Nova Scotia Government, 2021), functional assessments should be completed for all wetlands within the project site. As only 336 of the 502 identified wetlands were assessed, the

evaluation of potential project impacts to wetlands is incomplete, limiting the ability to fully understand project-related risks.

The 153 wetlands identified through GIS modeling were not field-verified, meaning their functions, habitat characteristics, and supported species could not be fully evaluated. This introduces additional uncertainty, as these wetlands may provide important ecological functions that have not been captured in the assessment.

The project is estimated to directly impact 339 wetlands. Among these, three wetlands have been identified as having the potential to qualify as Wetlands of Special Significance, indicating a higher potential ecological value.

To address these impacts, the EARD commits to developing a site-specific, post-construction wetland monitoring plan. This plan is intended to support adaptive management and help maintain ecological integrity over time; however, its effectiveness will depend on addressing the current data gaps and ensuring that all affected wetlands are appropriately understood and monitored.

Key Considerations:

Surface Water

The aquatic environments of the study area appear to support sensitive fish species despite existing acidic conditions. As a result, even relatively small declines in water quality or changes to habitat conditions could have disproportionate effects on the species they support.

The project introduces several interconnected risks associated with land use change, road construction, watercourse alterations, and the handling of hazardous fluids. These activities may lead to impacts such as altered hydrology, erosion and sedimentation, and potential contamination from spills or road maintenance practices.

To mitigate these risks, the EARD committed to developing a surface water management plan and erosion and sediment control plan. A few more mitigative measures could be considered to further reduce the risk and scale of degrading surface water quality and quantity, including:

- creating a salt management plan for winter road maintenance.
- planning wetland compensations to absorb the impacts to hydrology of altering wetlands.
- monitoring and creating contingency plans for leaks of turbine fluids, and
- considering the impact of climate change on peak flows when designing watercourse crossings.

Groundwater

Potential impacts to groundwater quality or quantity are expected to be intermittent, short-term, and not significant. The EARD notes that if blasting is required, a pre-blast survey will be conducted for wells within 800 m of the blast site, and an alternate water supply will be provided to impacted landowners, if required. The EARD identified six water supply wells within 800 m of

the study area, based on the well logs database. The number and location of water supply wells would need to be verified in the field prior to conducting the pre-blast survey. The Proponent would benefit from having a complaint resolution procedure in place prior to construction.

The EARD states the Proponent will assess for elevated sulphide potential, limit the project footprint to existing disturbed areas, and use existing roads. If sulphide-bearing materials or other geological hazards are identified, a site-specific mitigation plan will be developed.

As noted in the EARD, mitigation measures related to fuel and chemical storage and handling should be in place to prevent accidental release to the environment. Appropriate spill response plans should also be in place to ensure spills are addressed promptly.

If the project requires a water source, either groundwater or surface water, that exceeds 23,000 liters per day for more than 2 weeks, a separate water withdrawal approval will be required.

Wetlands

Direct and indirect impacts to wetlands are anticipated to occur as a result of the construction and operation of the project.

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

#
#NOVA SCOTIA
Environment and Climate Change

Barrington Place
1903 Barrington Street
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Canada B3J 2P8

Date: June 2, 2026

To: Anthony Heggelin, Environmental Assessment Officer

From: Climate Change Division – Lori Skaine, Executive Director

Subject: **Ocean Lake Wind Project, Guysborough County, Nova Scotia**

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

List of Documents Reviewed:
Environmental Assessment Registration Document

Details of Technical Review:

Adaptation
Section 14.0 *Effects of the Environment on the Undertaking* describes climate-related hazards that may impact Project infrastructure, operations, or personnel, including increased air temperature, changes in precipitation, sea level rise, severe weather events, and wildfire. Sufficient and appropriate historical and projected climate data are referenced in identifying these climate hazards. Potential impacts are assessed for each hazard and measures to mitigate climate change risks are proposed, such as regular inspections and maintenance of infrastructure, sizing culverts for anticipated increased precipitation events, training personnel on the importance of regular breaks and hydration during heat events, and developing a fire safety plan for potential wildfire events.

Mitigation

- The project will have a total installed capacity of up to 1,264 MW, consisting of up to 158 onshore wind turbine generators. It will be capable of producing approximately 3,875,424 megawatt-hours per year (MWh/year).

- The primary sources of greenhouse gas (GHG) emissions for the project, as described in *Section 7.2.5* of the EA registration document, occur during the construction phase and total 496,551.56 t CO_2e. These emissions are largely attributable to site development, concrete foundations, and turbine assembly.

- The operations phase is estimated to generate 7,138.11 t CO_2e from wind turbine maintenance over the project's 35-year lifespan. The proponent projects annual GHG emission reductions of 1,936,565.18 t CO_2e (using 2025 as the baseline year). After subtracting operational and construction emissions, the net GHG emission reduction is estimated to be 67,276,341.82 t CO_2e (conservative estimate without considering the provincial commitment to removing coal from the

energy grid by 2030 and for the provincial GHG emissions to be net-zero by 2050).

- The proponent does not quantify decommissioning emissions, assuming that by 2060 most construction and heavy transport equipment will be zero-emissions.

Key Considerations: (provide in non-technical language)

Adaptation
The proponent may wish to continue referencing climate change projections in the design and planning stages to guide operational thresholds for long-term project sustainability.

Mitigation

- The proposed mitigation steps identified in Section 7.2.5 of the EA registration document are appropriate and include use of locally sourced materials, utilization, where possible, of the shortest construction and transport routes, reduction of double handling of materials, regular maintenance, personnel training, and the disposal of hazardous materials in compliance with local requirements.

- Considering grid emissions intensity is expected to decline over time, we suggest the proponent to present avoided emissions as a range aligned with the provincial commitment to removing coal from the energy grid by 2030 and for the provincial GHG emissions to be net-zero by 2050 using a small set of transparent scenarios (e.g., 2025 intensity held constant, declining intensity aligned with legislated policies, and a faster decarbonization scenario).

- The proponent's construction phase emissions are primarily driven by steel and concrete. Where feasible and particularly in cases where procurement choices may reduce embodied emissions, we suggest the proponent complement their quantified life cycle GHG estimates with procurement information showing (i) whether major suppliers are subject to carbon constraint requirements (e.g., output based pricing systems/emissions trading systems or equivalent), and (ii) any supplier-specific verified embodied carbon documentation (e.g., environmental product declarations) used to inform procurement decisions.

#

Date: June 2, 2026

To: Anthony Heggelin, Environmental Assessment Officer

From: Sylvie Poirier, Regional Environmental Advisor, Transport Canada

Subject: **Ocean Lake Wind Project, Guysborough County, Nova Scotia**

Scope of review:
This review focuses on the following mandate: Transport Canada (TC)

- *Canadian Navigable Waters Act (CNWA)*
- *Aeronautics Act*

List of Documents Reviewed:

Ocean Lake Wind Project EA Registration Document

Details of Technical Review:

Review for potential requirements under the two Acts listed above.

Key Considerations: (provide in non-technical language)

Our comments and specialist information provided herein are meant to inform the Proponent of possible TC regulatory requirements, as well as the eventual decision of the provincial Minister of Environment and Climate Change.

***Canadian Navigable Waters Act* (CNWA):**
TC's Navigation Protection Program (NPP) administers the *Canadian Navigable Waters Act* (CNWA). The proposed access roads and transmission lines appear to potentially involve non-scheduled waterways per the CNWA and the Proponent should consider the following as these project components may require CNWA approval(s).

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

Major Works Order
https://laws-lois.justice.gc.ca/eng/regulations/SOR-2019-320/index.html

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

Minor Works Order
https://laws.justice.gc.ca/eng/regulations/SOR-2021-170/index.html

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

Minor Works Order
https://laws-lois.justice.gc.ca/eng/regulations/SOR-2021-170/index.html

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

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

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

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

The application process, the public resolution process and process for publishing a notification of a Minor Work can be accessed at the following link:
External Submission Site for the Navigation Protection Program
(create an account first if needed)

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

Canadian Navigable Waters Act
https://www.tc.gc.ca/eng/programs-632.html
https://www.tc.gc.ca/eng/canadian-navigable-waters-act.html

Navigation Protection Program, Transport Canada
http://www.tc.gc.ca/eng/programs-621.html

NPP Contact Coordinates:

Navigation Protection Program | Programme de protection de la navigation

Transport Canada - Atlantic Region / Heritage Court, 6th Floor, 95 Foundry Street, Moncton, N.B. E1C 5H7 |
Transports Canada - Région de l'Atlantique / Place Héritage, 6e étage - 95 rue Foundry, Moncton, N.-B. E1C 5H7
Tel | Tél. : 506-851-3113 / Fax | Téléc. : 506-851-7542
Email / Courriel : NPPATL-PPNATL@tc.gc.ca

Transport Canada Transports Canada Canada

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

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

Aeronautics Act

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

Further information regarding the AAF and how to submit it can be found at: https://tc.canada.ca/en/aviation/general-operating-flight-rules/marking-lighting-obstacles-air-navigation

***Impact Assessment Act* (IAA)**

The Proponent indicates that the Project does not fall within the criteria on the *Physical Activities Regulations* under the *Impact Assessment Act* (IAA) and is therefore not considered a Designated Project. Further, the Proponent mentions the project does not occur on federal lands. As such, TC would not have any Section 82 IAA requirements for this project.

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

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1801 rue Hollis
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June 2, 2026

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

SUBJECT : Ocean Lake Wind Project

Dear Anthony Heggelin:

Thank you for the opportunity to review the registration document for the Ocean Lake Wind Project (the project), received on May 7, 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 Ocean Lake Wind Project, the Impact Assessment Agency of Canada (IAAC) is of the opinion that, as proposed, the project does not appear to be described in the Regulations. As such, the proponent would not be expected to submit an Initial Project Description of a designated project. If the project changes from what has been described in its provincial registration, the proponent is advised to contact IAAC if, in their view, any proposed project activities may be described in the Regulations.

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

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

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

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

Kevin Cassell

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NOVA SCOTIA
Fisheries and Aquaculture

Armoyan Centre
1800 Argyle Street
Suite 603
Halifax NS B3J 3N8

Date: June 3, 2026

To: Anthony Heggelin, Environmental Assessment Officer, Environment & Climate Change

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

Subject: Ocean Lake Wind Project, Guysborough County

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

List of Documents Reviewed:
- Ocean Lake Wind Project Environmental Assessment Registration Document.pdf (EARD)

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.

There are two (2) rockweed aquaculture leases and 17 marine shellfish sites within 25km of the proposed project.

Sediment is likely to be generated during the road construction and site preparation phases. Sediment can cause turbidity in the water column, which can affect the ability of marine plants to obtain adequate sunlight for growth, reducing oxygen levels for shellfish. Settling sediment can obstruct feeding and destroy habitat by covering benthic substrates, smothering the benthic habitat, and impacting the nutrients available to shellfish bottom cultures. High turbidity levels can also affect the ability of fish gills to absorb dissolved oxygen. Sediment can house pathogens and undesired microorganisms, increasing the risk of disease outbreaks among aquatic species. The results can range from reduced growth to morbidity.

The EARD indicates the following mitigations will be taken to reduce sediment (via fugitive dust) including, but limited to: minimizing the footprint of disturbance to an extent that is practicable; conducting grading and site preparations in phases, to minimize disturbed soil areas until just prior to construction; stabilizing exposed soil surfaces by sloping or using vegetation, stone, soil, or geotextiles, to prevent dust and airborne particles; compacting and/or ridging disturbed soil to prevent dust formation; ceasing dust-generating construction activities during dry periods when winds are high (when practical); wetting aggregate and soil stockpiles to control dust; designing storage areas and material stockpiles with prevailing wind directions in mind; and washing down vehicles and equipment to remove accumulated mud/dirt on undercarriages, tracks, or wheel wells.

These general mitigation measures should help to lower risks to the local aquaculture sites and rockweed leases, if applied appropriately. The applicant should be made aware of the rockweed harvesting and aquaculture operations within the area and refer to the Site Mapping Tool that identifies the sites and operators within their area. It is recommended that any proposed mitigation measures to minimize pollutants and/or emissions be monitored for efficacy, however, the proponent has stated in the submitted EARD that "No monitoring programs are proposed."

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

The impacts of the project on water are more related to removal of plants and watercourse changes (via activities such as culvert installation), rather than water discharge or water withdrawal. Changes in water quality or quantity may be due to activities during road construction (sedimentation and vegetation removal). In addition to the previous mitigation measures mentioned, the EARD states that the proponent plans to develop and implement an *Erosion and Sedimentation Control Plan,* that would minimize the impacts of the project on water quality and quantity.

Marine Fisheries:

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

The Ocean Lake Wind Project area is near the communities of Larrys River, New Harbour, Goldboro, Lundy and Roachvale in Guysborough County. The project as explained in the submitted EARD appears to pose negligible impacts to NSDFA's marine fishery interests. Ocean lake is located approximately 28 kms east by northeast of Larrys River, and Roachvale is approximately 36kms north of the project area.

Assessment:

- There are two (2) marine fishery buyers and/or processors located in Guysborough County, where the proposed wind project is located. Tor Bay Fisheries is located approximately 6kms northeast of Larrys River, and Schrader's Fisheries LTD is in Larrys River. Roachvale is located approximately 30 kms Northwest of Larrys River.
- Regarding the local commercial marine harvesting sector, lobster is the most lucrative fishery near the proposed project. The waters adjacent to the project area are known as Lobster Fishing Area (LFA), 31b, and the lobster fishing season opened on April 9th, 2026, for two (2) months. The season usually opens on April 19th; however, this year it opened 10 days earlier as part of a five (5) year pilot project, to address conservation concerns.
- With regards to impacts to Indigenous communities, there are Food, Social or Ceremonial (FSC) activities within the waters in LFA 31b, however there are no communal commercial lobster licenses issued to conduct a Moderate Livelihood Fishery (MLF) at this time. Millbrook First Nations in Truro is located approximately 215kms west by northwest from Larrys River.

Since there is limited to no connectivity between the project site and the marine environment, there should be negligible impacts to these marine fishery interests.

Inland Fisheries:

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

The scale of this project is large. In the submitted EARD the project proponent highlights 129km of new road construction, in addition to 94km of existing roads. This will involve 70 new watercourse crossings and upgrades to 50 existing crossings. There are 74 named and 128 unnamed water bodies within the project's study area and an additional 60 named and 166 unnamed lakes within 5km (section 9.1.3 of the EARD). There are 714 water courses within the study area and 1,124 watercourses within 5 km of the study area (section 9.1.3 of the EARD).

The proponent states in the EARD that project activities may interact with up to 120 watercourses. Project activities could impact the surface water (table 9.7 of the EARD) and therefore would also affect fish and fish habitat. The most notable impacts would be changes to surface flows and sedimentation resulting in negative impacts to water quality and which would negatively affect native sportfish (brook trout) identified within the study area.

The proponent states in the EARD that they will develop and implement a *Surface Water Management Plan*, *Erosion and Sediment Control Plan*, *Blasting Management Plan*, and a site-specific *Contingency Plan* to mitigate potential impacts to fish. Additional plans and mitigations are planned be put in place for activities where watercourse alteration is required.

Given the scale of development in an undeveloped area, if the mitigation plans as stated in the EARD are not followed or are ineffective to prevent sedimentation and/or habitat loss, local brook trout populations could be negatively impacted.

This project could be beneficial for sportfishing in the region, provided the road systems remain ungated, which would improve public access to the numerous lakes in the area.

Key Considerations: (provide in non-technical language)
Risks to aquaculture sites from sediments should be monitored and mitigated appropriately. The applicant should be made aware of the aquaculture operations and rockweed leases within the area so mitigations can be incorporated appropriately. Please refer them to the Site Mapping Tool - Government of Nova Scotia, Canada, to identify the leases and operators within their area.

Based on the activities proposed in the EARD, due to the appearance of no connectivity to the marine environment, there should be negligible risk to the adjacent commercial marine fishery activities and NSDFA's marine fishery interests.

This project could have positive impact for brook trout sportfishing, as it could increase access to the currently inaccessible lakes within the project area. Given the large number of watercourses and stream crossings, special attention is required to ensure the mitigation plans are followed and monitored for efficacy to mitigate erosion, and sedimentation issues are mitigated to maintain healthy sportfish populations.

Project proponent should also be made aware of:

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

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

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Date: June 1, 2026

To: Anthony Heggelin, Environmental Assessment Officer

From: Beth Lewis, Director of Special Places Protection

Subject: **Ocean Lake Wind Project, Guysborough County**

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

List of Documents Reviewed:
EA Document.
Final Report for HRP A2026NS044 – Wind Farm 2 Project, Screening & Reconnaissance, ARIA 2026

Details of Technical Review (Archaeology):

The ARIA for the Ocean Lake Wind Farm project was a desktop only study conducted by Cultural Resource Management Group Limited (CRM Group). No field work was conducted. Numerous areas of elevated archaeological potential were identified on the potential modeling, and CRM Group recommended that:

1. Through engagement with Special Places, it is recommended that planning initiatives for the Ocean Lake Wind Project ensure that site-specific archaeological assessments, including ground-truthing of the predictive model, take place prior to project-related development. The goal of this assessment would be to determine the need for sub-surface archaeological testing and/or the timely application of mitigative archaeological measures, developed through further engagement with Special Places.
2. In the event that archaeological deposits or human remains are encountered during activities associated with other components of the EA for this project, all work in the associated area(s) should be halted and immediate contact made with Special Places (John Cormier: 902-424-4542).

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

The EA Document aligns with these recommendations, that fieldwork and ground-truthing of areas of elevated archaeological potential should be undertaken to assess the need for further mitigative archaeological work.

I have no concerns at this time, and will await the outcome of any future fieldwork programs for the Ocean lake Project.

Details of Technical Review (Geology):

The bedrock geology of the project area is mapped as Cambrian/Ordovician Goldenville Formation. If the project involved excavation of bedrock geology there would not likely be significant palaeontology resources encountered.

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

No palaeontological concerns.

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B6L 2R2

Agriculture

Date: June 2, 2026

To: Anthoney Heggelin, Environmental Assessment Officer

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

Subject: Ocean Wind Lake Wind Project, communities of New Harbour, Goldboro, Larry's River, Lundy and Roachvale in Guysborough County, Nova Scotia

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

No agricultural impacts are anticipated given that:

- There is no agriculture activity, mapped agricultural land or registered farm identified within the project area. The closest farm is a greenhouse operation 2.7 km from the project site (3.6 km from a turbine).
- Within the 2 km buffer there are 21 agricultural fields belonging to long term crops such as Christmas trees (63%) and inactive agriculture (32%).
- The closest Christmas tree field is 1.1 km from a proposed turbine location, which is outside the 888 m setback requirement.

Outlook

Ocean Lake Wind Project Environmental Assessment - Environment and Climate Change Canada Comments

From Zwicker,Stephen (ECCC) <stephen.zwicker@ec.gc.ca>
Date Tue 2026-06-02 4:12 PM
To Environment Assessment Web Account <EA@novascotia.ca>
Cc Byrne,Mary Alliston (elle | she, her) (ECCC) <MaryAlliston.Byrne@ec.gc.ca>; RCF Surveiller / FCR Tracker (ECCC) <FCR_Tracker@EC.GC.CA>

Good afternoon,
Environment and Climate Change Canada (ECCC) has reviewed the Environmental Assessment Registration Document (EARD) for the Ocean Lake Wind Project located Guysborough County, Nova Scotia and we offer the following comments:

References

- ECCC 2025. *Nesting Periods.* https://www.canada.ca/en/environment-climate-change/services/avoiding-harm-migratory-birds/general-nesting-periods/nesting-periods.html
- ECCC 2007a. *Recommended Protocols for Monitoring Impacts of Wind Turbines on Birds.* Prepared by Canadian Wildlife Service. https://publications.gc.ca/collections/collection_2013/ec/CW66-364-2007-eng.pdf
- ECCC 2007b. *Wind Turbines and Birds A Guidance Document for Environmental Assessment.* Prepared by Canadian Wildlife Service. https://publications.gc.ca/collections/collection_2013/ec/CW66-363-2007-eng.pdf
- Frick et al. 2026. *A global decision framework for reducing bat fatalities at wind energy facilities.* Ecological Solutions and Evidence 7(1). https://doi.org/10.1002/2688-8319.70189
- RGI [Renewables Grid Initiative] 2024a. *Avian-Power Line Collision: Overview of Risk Factors & Effectiveness of Wire Markers [Brochure].* https://renewables-grid.eu/fileadmin/user_upload/Nature/Wire_Marker_Brochure_Digital.pdf
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- Calvert et al. 2013. *A synthesis of human-related avian mortality in Canada.* Avian Conservation and Ecology 8(2): 11. https://ace-eco.org/vol8/iss2/art11/
- Mahon et al. 2019. *Additive and interactive cumulative effects on boreal landbirds: winners and losers in a multi-stressor landscape.* Ecological Applications 29(5). https://doi.org/10.1002/eap.1895
- Rioux et al. 2013. *Avian mortalities due to transmission line collisions: a review of current estimates and field methods with an emphasis on applications to the Canadian electric network.* Avian Conservation and Ecology 8(2): 7. https://ace-eco.org/vol8/iss2/art7/

General Comments

1. Based on the information provided, ECCC does not have any permits (or authorizations) or approvals in relation to the proposed project. The advice provided by ECCC is intended to support Nova Scotia Environment and Climate Change (NS ECC) Environmental Assessment review process. The Proponent is responsible for identifying measures which ensure their compliance with the federal Migratory Birds Convention Act (MBCA) and the Species at Risk Act (SARA).

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

3. The proponent should clearly commit to implementing 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 scenarios that may impact migratory birds and SAR during all of times of the year and all project phases.

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

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

Specific Comments

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

7. ECCC notes that the project area provides potential breeding habitat for several waterfowl species and serves as an important migration and staging area for waterfowl. Although ECCC does not have breeding waterfowl data within the project area, CWS has an Eastern Waterfowl Survey plot ~17 km Northeast and ~17km Northwest of the study area in similar habitat. Based on these data, it is expected that the following species will be breeding in the project area: American Black Duck, Canada Goose, Mallard, Ring-necked Duck, American Green-winged Teal, Common Merganser, Hooded Merganser,

Wood Duck. Other non-waterfowl species such as Common Loon, Spotted Sandpiper, and yellowlegs species (Greater and Lesser).

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

Although the loss of this habitat alone may not result in population-level effects, cumulative impacts should be assessed in relation to other existing and proposed wind projects in the region, as well as ongoing provincial wetland loss. In particular, cumulative effects (see Mahon, 2019) associated with the nearby Goldboro Gold Project, NSF Renewable Energy Park, Melford International Terminal, Aulds Cove Wind Project, Goose Harbour Lake Wind Farm Project, Setapuktuk Wind Project, Upper Afton Wind Project, and other developments should be evaluated.

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

Precautionary Approach

8. Based on ECCC 2007b, the level of concern for this project is “Category 4”, given that the project is located in proximity to known areas of importance for migratory birds (e.g., Country Island Complex IBA and Country Island NWA), and is considered “very large” (ECCC 2007b, Section 6.0) project size/extent (1,264 MW; 158 turbines; 1,716 ha clearing footprint). This level of concern may warrant additional measures to mitigate potential impacts to birds and bats during spring and fall migration periods when the project is operational.

   Based on the level of concern for the project (Category 4), ECCC recommends that the proponent follow the precautionary principle and identify operational mitigation measures as part of the EA commitments and implement them such that impacts to migratory birds and bats will be avoided *before* they occur. Additionally, ECCC recommends that the proponent develop adaptive management plan(s) and undertake post-construction monitoring to monitor residual effects (ECCC 2007a, ECCC 2007b).

Avian SAR and SOCC

9. ECCC advises that avian SAR listed under the *Species at Risk Act* (SARA) may occur in the Project area, including but not limited to:
   - **Bank Swallow** (SARA-listed Threatened)
   - **Barn Swallow** (SARA-listed Threatened)
   - **Barrow’s Goldeneye** (SARA-listed Special Concern)
   - **Bobolink** (SARA-listed Threatened)
   - **Buff-breasted Sandpiper** (SARA-listed Special Concern)
   - **Canada Warbler** (SARA-listed Threatened)
   - **Chimney Swift** (SARA-listed Threatened)
   - **Common Nighthawk** (SARA-listed Threatened)
   - **Eastern Meadowlark** (SARA-listed Threatened)

- **Eastern Wood-pewee** (SARA-listed Special Concern)
- **Evening Grosbeak** (SARA-listed Special Concern)
- **Harlequin Duck, Eastern population** (SARA-listed Special Concern)
- **Lesser Yellowlegs** (COSEWIC-assessed Threatened)
- **Olive-sided Flycatcher** (SARA-listed Threatened)
- **Piping Plover** (SARA-listed Endangered)
- **Red Crossbill** (SARA-listed Threatened)
- **Roseate Tern** (SARA-listed Endangered)
- **Rusty Blackbird** (SARA-listed Special Concern)
- **Short-billed Dowitcher** (COSEWIC-assessed Threatened)
- **Short-eared Owl** (SARA-listed Special Concern)
- **Savannah Sparrow, *princeps* subspecies** (SARA-listed Special Concern)

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

- be consistent with best available information including any Recovery Strategy, Action Plan or Management Plan in a final or proposed version; and
- respect the terms and conditions of the *Species at Risk Act* (SARA) regarding protection of individuals, residences, and critical habitat of Extirpated, Endangered, or Threatened species.

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

<u>Common Nighthawk</u>

10. Quote (pg. 300): *"The common nighthawk observations were made in open habitats (e.g. open wetlands and harvested areas) throughout the Study Area in July and August 2024 and represent individuals that were flying and/or foraging overhead"* Quote (pg. 301): *"Common nighthawk is also presumed to breed within the Study Area based on the results of the targeted nightjar surveys..."*

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

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

    ECCC offers the following recommendations:

    - Undertake a habitat suitability assessment for this species and clarify whether areas with suitable breeding habitat will be avoided during micro siting of turbines.
    - Develop measures to deter birds from nesting in work areas, such as covering exposed areas or stockpiles when not in use and minimizing the delay between clearing and subsequent construction activities.
    - Identify other targeted mitigation measures to avoid and minimize impacts on Common Nighthawk and its habitat;

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

Pileated Woodpecker

11. ECCC offers the following general recommendations regarding Pileated Woodpecker nesting cavities, which are protected year-round under Schedule 1 of the *Migratory Birds Regulations*:
    - Review and understand proponents' responsibilities under the amended *Migratory Bird Regulations* (MBR 2022).
    - Conduct a survey to identify suitable nesting habitat within the area planned for vegetation clearing.
    - Inspect identified suitable nesting trees for any Pileated Woodpecker cavities and determine occupancy; Note: In the Maritimes, ECCC recommends surveying during the second half of June to confirm nesting. By that time, the nestlings are large and loud and may be heard before the cavity can be seen.
    - Notify the ECCC Minister through the Abandoned Nest Registry if any abandoned cavities are found on trees that require removal.
    - Monitor occupancy of cavity(ies) over the next 36 months prior to removal and establish a vegetated buffer around the tree. Note: it is important that the nest itself remains intact, and we strongly encourage the Proponent to maintain as much surrounding vegetation as possible to preserve the woodpecker's habitat. If the construction activities are expected to extend during the breeding season, then actions must be taken to ensure that the nesting woodpecker is not disturbed by the construction activities.

    For more information on the amended nest protections under the MBR 2022, frequently asked questions on how these protections apply to migratory birds, including Pileated Woodpecker, and your responsibilities for reporting abandoned nests, please visit the following:
    - Nest Protection Fact Sheet: https://www.canada.ca/en/environment-climate-change/services/avoiding-harm-migratory-birds/fact-sheet-nest-protection-under-mbr-2022.html
    - MBR 2022 FAQ: https://www.canada.ca/en/environment-climate-change/services/migratory-bird-permits/faq-migratory-birds-regulations-2022.html.

Nest Sweeps

12. The following mitigation measure regarding clearing activities is listed on page 323: *"Adhere to ECCC guidelines on clearing windows for nesting migratory birds, where practicable. If vegetation and tree clearing activities during the nesting/breeding season cannot be avoided, nest sweeps will be conducted by a qualified avian biologist."*

    Nests in complex habitats (e.g., forests, wetlands) are difficult to locate, and adult birds avoid approaching their nests in a manner that would attract predators to their eggs or

young. In many circumstances, disturbance and/or harm to migratory birds is still likely to occur even when nest sweeps are conducted prior to vegetation clearing activities.

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

For additional information, see "Vegetation Clearing" standard recommendations below.

Transmission Lines

13. The EARD does not include sufficient measures to avoid potential effects of transmission and collector ("power") lines on migratory birds.

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

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

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

Post-Construction Monitoring Plan

14. Quote (pg. 324): *"A detailed Post Construction Avian Monitoring Plan will be developed and submitted to NSECC and NSNR for review."*

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

    Please refer to *Recommended Protocols for Monitoring Impacts of Wind Turbines on Birds* (ECCC 2007a) and *Wind Turbines and Birds A Guidance Document for Environmental Assessment* (ECCC 2007b) for include guidance on developing post-construction monitoring programs for wind energy development projects in Canada.

Cumulative Effects

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

Non-avian SAR and SOCC

16. ECCC advises that avian SAR listed under the *Species at Risk Act* (SARA) may occur in the Project area, including but not limited to:
    - **Little Brown Myotis** (SARA-listed Endangered)
    - **Northern Myotis** (SARA-listed Endangered)
    - **Tri-coloured Bat** (SARA-listed Endangered)
    - **Hoary Bat** (COSEWIC-assessed Endangered)
    - **Silver-haired Bat** (COSEWIC-assessed Endangered)
    - **Eastern Red Bat** (COSEWIC-assessed Endangered)
    - **Monarch** (SARA-listed Endangered)
    - **Blue Felt Lichen** (SARA-listed Species Concern)
    - **Boreal Felt Lichen** (SARA-listed Endangered)
    - **Frosted Glass Whiskers – Atlantic Population** (SARA-listed Special Concern)
    - **White-rimmed Shingle Lichen** (COSEWIC-assessed Threatened)
    - **Wood Turtle** (SARA-listed Threatened)

    For projects undergoing environmental assessment, ECCC recommends that adverse effects of the project on SAR and their Critical Habitat are identified, and, if the project is carried out, that mitigation measures are taken to avoid or lessen those effects. We recommend that mitigation measures:
    - be consistent with best available information including any Recovery Strategy, Action Plan or Management Plan in a final or proposed version; and
    - respect the terms and conditions of the *Species at Risk Act* (SARA) regarding protection of individuals, residences, and critical habitat of Extirpated, Endangered, or Threatened species.

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

Bats

17. Quote (pg. 269-270) "*Migratory bat activity was higher than resident bat activity during the fall migration season, which may indicate that some southern migration occurs through the Study Area. Resident bat activity was higher during the summer maternity season (June and July), which may indicate that resident bats are feeding, roosting, and potentially raising pups (i.e. maternity roosting) in the area throughout the summer"*

    ECCC notes that the following SAR/SOCC bat species/groups were detected during baseline monitoring (pg. 262): Myotis species (i.e., Little brown myotis and/or Northern myotis; SARA-listed Endangered), Tri-coloured Bat (SARA-listed Endangered), Hoary bat (COSEWIC-assessed Endangered), Silver-haired bat (COSEWIC-assessed Endangered), and Eastern red bat (COSEWIC-assessed Endangered).

    The populations of the three SARA-listed bat species (Little Brown Myotis, Northern Myotis, and Tricolored Bat) are highly depressed in NS, primarily due to introduction of White-nosed Syndrome (WNS), and therefore few acoustic detections are expected. Any additional loss of SAR bat individuals, maternity roosts, or and/or hibernacula remaining on the landscape can be biologically significant for these long-lived, k-selected species, and affect their recovery. Additionally, the three "migratory" bats, which have been assessed by COSEWIC as Endangered, are highly vulnerable to mortality due to wind turbines.

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

    Quote (pg 265): "*This indicates that turbines have generally been sited away from areas with higher levels of recorded bat activity".* ECCC advises that bat detectors have a detection radius of 30-40m under ideal conditions, therefore, the locations sampled are not representative of the bat activity at the turbine locations; more detectors (>60%) were placed >500m from turbine locations, and only a few within 100m.

    Additionally, ECCC notes that the proponent's two years of surveys had sufficient spatial coverage, however, the first year missed the beginning of the migration period, while the second year missed the full migratory period; this baseline sampling does not accurately inform collision risk. Missing the beginning of the migratory period in the first year resulted in missing the breeding period (June and July) to inform maternity roosting activity. ECCC recommends targeted surveys (i.e. strategic detector placement), focusing on features such as suitable maternity roosting habitat, hibernacula, and features that facilitate movement (river valleys, coastlines, ridgelines, edges). The former can identify high-risk periods (i.e., migration timing through the site) which can inform operational mitigation; the latter information is useful for micro-siting decisions (e.g., turbine placement) that can aid in avoidance of impacts. Baseline surveys help understand if and when bats are present, and targeted surveys are needed to understand how the landscape is shaping their behavior, which is what ultimately drives impact prediction and mitigation.

Additionally, ECCC notes that the mitigation measures provided on page 277-278 do not include operational mitigations to prevent bat-turbine collisions. ECCC recommends including EA commitments to mitigation measures for minimizing potential impacts to SARA and COSEWIC-listed Endangered migratory bat species during the project's operational phase *before* impacts occur, such as increasing cut-in speeds, curtailments, altering the pitch/feathering the blades during high-risk collision periods (e.g., during migration or swarming or when wind velocity is low) (Frick et al. 2026). ECCC encourages the proposed approach of using motion lights, but also recommends having lights downward pointing and longer wavelengths.

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

Monarch

18. Quote (pg. 242): "*...swamp milkweed, a vascular plant that supports the monarch butterfly (SARA and ESA Endangered), was identified during the flora surveys completed for the Project indicating suitable habitat is available in the Study Area (the specific location of the species occurrence is not available)*".

    ECCC recommends that the Proponent avoid disturbance or clearing of milkweed from late May through September to prevent harm to Monarch eggs, larvae, and chrysalises. Seasonal restrictions and habitat protection measures should be incorporated into the Terrestrial Habitat and Wildlife Management Plan. ECCC recommends referencing the *Monarch (Danaus plexippus): management plan 2016* to inform the development of mitigation measures for this species: https://www.canada.ca/en/environment-climate-change/services/species-risk-public-registry/management-plans/monarch-2016.html

Lichen

19. Quote (pg. 212): "*No evidence of boreal felt lichen, a SAR known to occur in the Study Area, was observed during flora surveys, including targeted surveys of potential habitat polygons".*

    ECCC recommends that the proponent conduct an epiphytic lichen survey of the area due to the overlap of Boreal Felt Lichen (SARA-listed Endangered, Schedule 1 Critical Habitat. Critical habitat is defined as the habitat that is necessary for the survival and recovery of a listed wildlife species. One of the three previously documented occurrences is noted to be within the SMP 300-500m restricted zone, where clearing is proposed for new road and turbine pad. Any clearing within the 500m radius must consider cumulative disturbance and restocking conditions if prior clearing has occurred. The Amended Recovery Strategy for the Boreal Felt Lichen (Erioderma pedicellatum), Atlantic Population, in Canada [Final version] (2020) is available at: https://species-registry.canada.ca/index-en.html#/species/702-71#recovery_strategies ECCC will defer to the Province of Nova Scotia for application of SMP requirements and habitat management decisions.

National Wildlife Area (NWA): Country Island

20. Quote (pg. 280): "*The closest IBA is the Country Island Complex (NS028), a series of islands off the coast between the communities of Tor Bay and Drum Head".*

    ECCC notes that within Country Island Complex IBA is the Country Island National Wildlife Area (NWA). Under the Canada Wildlife Act, this NWA is protected and managed in accordance with the Wildlife Area Regulations. Of note, this NWA is a significant area for wildlife and is particularly important as a breeding colony (and critical habitat) for the Roseate Tern (SARA-listed Endangered), a breeding colony for Leach's Storm-Petrel (COSEWIC-assessed Threatened), nesting colony for Common and Arctic Terns, and a stop-over for migrating shorebirds and songbirds. ECCC reiterates recommendations related to avian mortalities due to wind turbines. Further information on the Country Island NWA can be found on ECCC's Country Island National Wildlife Area website: https://www.canada.ca/en/environment-climate-change/services/national-wildlife-areas/locations/country-island.html

Wetland

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

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

    Quote (pg. 157): "*Drone-assisted wet area modelling was employed to identify predicted wetlands (PWL) within the Assessment Area where field-delineation was not completed*". ECCC recommends that any drone-assisted wetland modelling should be field-verified prior to any alternations.

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

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

Applicable Legislation and Standard Advice

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.
- Lights should point downward with a shield to prevent bleeding into surrounding areas

Effects of Construction/Operations on Migratory Birds – Stranded Birds

Due to the propensity of seabirds from nearby colonies to be attracted to light, it is possible that migratory birds may be attracted to and potentially be stranded on the site. ECCC-CWS recommends that a site monitoring plan be developed for the migratory bird breeding season as well as the spring and fall migration periods and implemented while floodlights are being used during nighttime hours. A site monitoring plan could include protocols such as dusk and dawn site inspections to look for stranded birds that may have landed on site, and/or inclusion of migratory bird searches into standard occupational health and safety daily inspections, etc. ECCC-CWS recommends, at minimum, daily searches during early morning hours, particularly during early September to late November, to search for migratory birds that may become stranded on-site.

Should birds become stranded on the project site, both during construction and operations phases, the proponent is recommended to adhere to Procedures for handling and documenting stranded birds encountered on infrastructure offshore Atlantic Canada (attached; it should be noted that this reference document has been developed for offshore vessels and may require modification for use on an onshore facility). ECCC-CWS should be notified if bird stranding incidents occur. A seabird handling permit will be required to implement the instructions in this reference document and the proponent must be advised that such a permit would have to be in place prior to the initiation of proposed activities. Please note that MBCA permit applications can be obtained from ECCC-CWS via email at scf-atlpermis-cws-atlpermits@ec.gc.ca .

If any birds are found stranded on-site, the proponent should immediately contact ECCC-CWS for further instructions. The contact is Sabina Wilhelm (ECCC-CWS Marine Issues Biologist) at sabina.wilhelm@ec.gc.ca or 709-764-1957.

Bird Mortality Events

ECCC-CWS Atlantic has a new email account dedicated to receiving notification of a migratory bird mortality events of 10 or more birds in one event, or an individual species at risk during a single event related to collisions with wind energy infrastructure in Atlantic Canada. This will assist proponents in receiving prompt ECCC-CWS advice to support them in adaptive management mitigation measures. The new inbox for reporting a bird mortality event is SCF ATL Évaluation d'Impact / CWS ATL Impact Assessment (ECCC) address is: SCFATLEvaluationImpact-CWSATLImpactAssessment@ec.gc.ca ; or by calling the CWS Main Office (Sackville) 506-364-5044.

Notification should occur even if the formal post-construction bird monitoring program has ended, and should include specific details about the event (e.g., name and location of the wind farm, number of mortalities, species, map showing turbines and associated infrastructure and locations of collisions, meteorological conditions during previous night(s), details of lights at the site, any other factor which may have influenced the event). Staff and contractors should be instructed that if a mortality event (as described above) occurs, the area around each wind turbine should be assessed more closely to better evaluate the extent of the event, even if this is not described in their wind farm's "regular" post-construction bird monitoring protocol, or if the formal post-construction bird monitoring program has ended. ECCC-CWS recommends a mitigation protocol in case of high mortality (e.g. ability to shut down problem turbines during poor visibility, during peak migration times, etc.).

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 regarding the above advice.

Stephen Zwicker

Environmental Assessment Coordinator, Environmental Protection Operations Directorate
Environment and Climate Change Canada / Government of Canada
stephen.zwicker@ec.gc.ca / Tel: Cell: 902-402-7145

Coordonnateur, Évaluations environnementales, Direction des activités de protection de l'environnement
Environnement et Changement climatique Canada / Gouvernement du Canada
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#
#NOVA SCOTIA
Environment and Climate Change

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

Date: June 2, 2026

To: Anthony Heggelin, Environmental Assessment Officer

From: NSECC, Compliance

Subject: **Ocean Lake Wind Project, Guysborough County, Nova Scotia**

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

List of Documents Reviewed:

- Ocean lake Wind Project, Environmental Assessment Registration Document (EARD)

Details of Technical Review:

- Approval(s) will be required if vegetation management requires herbicide use.
- If shallow water tables are encountered during the construction of foundations, a Groundwater Management Plan may be needed if construction of these structures go below the seasonal water table.
- The Proponent will develop and implement a Surface Water Management Plan, Erosion and Sedimentation Control Plan, Blasting management Plan and a Site-Specific Contingency Plan.
- A site-specific post-construction wetland monitoring plan will be developed to facilitate adaptive management and contribute to the safeguarding of ecological integrity and environmental stability. This will be submitted as part of the Wetland Alteration Approval Application.

Key Considerations: (provide in non-technical language)

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

NOVA SCOTIA
Public Works

1672 Granville Street
Halifax, Nova Scotia
Canada B3J 3Z8

Date: June 1, 2026

To: Anthony Heggelin, Environmental Assessment Officer

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

Subject: **Ocean Lake Wind Project, Guysborough County, Nova Scotia**

Scope of review:

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

List of Documents Reviewed:

EverWind NS Holdings Ltd. And Membertou Development Corporation, Ocean Lake Wind Project, Environmental Assessment

Details of Technical Review:

The Proponent is planning to build up to 158 turbines for the Ocean Lake Wind Project in Guysborough County.

1. The Proponent has identified that a Traffic Management Plan (TMP), Work Within Highway Right of Way (WWHROW), and an Over-Weight Moves Special Move Permit (SMP) may be required for this project. Early consideration with Nova Scotia Department of Public Works (NSDPW) would be beneficial to identify potential impacts to provincially owned roads and structures.
    a. The Proponent has mentioned that the final transportation route and Traffic Management Plan details will be determined through a future study. Exact transportation routes are required for the route analysis, including routes from the receiving/unloading port to the Project site. This should include all provincially owned roads, bridges, culverts or other load-bearing structures that may be impacted.
    b. The TMP should clearly identify the specific roads, time windows and traffic control measures proposed for construction traffic and oversize/overweight movements.
    c. Section 15.4 of the registration document references the development of a TMP and assessment of site access routes including bridges, culverts, baseline traffic levels and high-risk areas. It would be beneficial for the TMP to consider the impact of construction traffic on emergency response times,

particularly along Larry's River Road and other primary corridors serving Guysborough Memorial Hospital and local fire stations.

d. For the SMP, the Proponent must contact the NSDPE contacts, Darcey MacBain and Devon Pinks (Darcey.MacBain@novascotia.ca and Devon.Pinks@novascotia.ca) to assess the next steps.
e. The Proponent mentions modifying existing access roads and creating new ones. Any new or modified access points connecting to provincially owned roads will require a WWHROW permit which is available from the NSDPW Area Manager.

2. The document references potential road modifications and temporary traffic control measures including guardrail removal, road or bridge upgrades, access restrictions, signage, road markers, speed limits, cones, and other devices. Any proposed work affecting provincially owned road infrastructure must be reviewed by the local NSDPW Area Manager. Traffic Control Plans must comply with the Nova Scotia Temporary Workplace Traffic Control Manual, as applicable. Preparation of Traffic Control Plans are the sole responsibility of the Proponent.

3. Table 2.2, Provincial Regulatory Requirements (page 5) should confirm the anticipated timeframes and locations of any blasting activities. The Proponent must communicate this with the local Area Manager so that potential impacts to provincially owned roads can be minimized, and appropriate mitigation measures can be considered.

4. Regarding table 3.2 Summary of Minimum Setbacks and Separation Distances (page 9) and specifically the setback category for Public Roads. The table notes the distance as being "as per municipal requirements." This should be confirmed with the Area Manager as to what (if any) corresponding setback distances there are for any provincially owned roads.

Key Considerations: (provide in non-technical language)

1. The Proponent should communicate with NSDPW regarding the TMP, WWHROW and the SMP as soon as possible.
    a. Finalize transportation routes, identifying all roads and structures.
    b. Consider impact on emergency response time.
    c. Contact the NSDPW SMP contacts.
    d. Request a WWHROW from the local NSDPW Area Manager.

2. The local Area Manager must review work plans that will impact provincially owned road infrastructure and TCPs must comply with the Nova Scotia Temporary Workplace Traffic Control Manual.

3. The Proponent should communicate any blasting activities with local Area Manager.

4. Confirm setbacks for provincially owned roads with the local Area Manager.

#
#NOVA SCOTIA
Environment and Climate Change

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

Date: June 5th, 2026

To: Anthony Heggelin, Environmental Assessment Officer

From: Protected Areas – Sustainability and Applied Science

Subject: **Ocean Lake Wind Project, Guysborough County, Nova Scotia**

Scope of review:

This review focuses on the following mandate: Protected Areas

List of Documents Reviewed:

EA registration document and appendices

Details of Technical Review:

Project was reviewed to assess potential impacts to protected areas

Key Considerations: (provide in non-technical language)

The project entirely surrounds one existing Nature Reserve (Loon Lake Nature Reserve).

The project is located adjacent to two existing wilderness areas (Bonnet Lake Barrens, Guysborough Headlands, and Ogden Round Lake), one pending wilderness area (Isaacs Harbour River) and one pending nature reserve (Chedabucto Fault).

The project proposes 7 turbines within close proximity to existing or pending protected areas.

Ecological features within protected areas may be impacted by the presence of adjacent turbines. Protected areas and the species that use them interact extensively with surrounding landscapes including through wildlife movement, shared ecological processes and flow of resources, including water. Potential impacts include increased tree blow down and loss of interior habitat within a protected area resulting from adjacent forest clearing.

The project proposes 129 km of new roads and upgrades to 94 km of existing roads. Approximately 2.3 kilometers of road are located immediately adjacent to a protected

area

Ecological features within protected areas may be impacted by the presence of an adjacent roads. Potential impacts include siltation and disruption of natural water flows, and impacts resulting from human activities facilitated by roads, such as increased hunting and fishing pressure, potential introduction of invasive species and elevated forest fire risk.

Heggelin, Anthony J

From: Land Use <LandUse@navcanada.ca>
Sent: June 2, 2026 9:17 AM
To: Heggelin, Anthony J
Cc: bridget.tutty@novascotia.ca
Subject: RE: Reminder - OCEAN LAKE WIND PROJECT – ENVIRONMENTAL ASSESSMENT – COMMENTS DUE WEDNESDAY JUNE 3, 2026

Hello,

NAV Canada received the email below regarding comments for the Ocean Lake Wind Project. We are currently unable to locate a file for this project in our system.

NAV Canada Land Use assessments are only conducted to determine if impacts exist to Canada's air navigation procedures and infrastructure. For an assessment to be completed, we require the specific heights and coordinates of all proposed turbines.

Can you please confirm your NAV Canada file number for this project, if one was received?
If you have not made a formal submission to NAV Canada Land Use, please provide your proposal via our Land Use Portal so we can begin our assessment.

Best regards,

Caleb McCarty
Land Use Specialist
NAV CANADA | Aeronautical Information Management (AIM)
landuse@navcanada.ca
1611 Tom Roberts Avenue, Ottawa, ON K1V 1E5
www.navcanada.ca

NOVA SCOTIA#
Natural Resources
Energy

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

Date: June 3, 2026

To: Anthony Heggelin, Environmental Assessment Officer

From: Department of Natural Resources and Department of Energy

Subject: **Ocean Lake Wind Project, Guysborough County, Nova Scotia**

Scope of review:

This review focuses on the following mandates authorities and approvals required from the Department of Natural Resources (DNR) concerning Crown lands, wildlife species, Species at Risk, associated habitat including wetlands, Old Growth Forest, mineral exploration, health and safety, mineral development, and abandoned mine openings. The review also includes the Department of Energy's comments concerning onshore wind for hydrogen.

The review does not include Crown land research or assessments, including existing uses and encumbrances, which will be required as part of the application processes for authorities and approvals required from DNR.

List of Documents Reviewed:

Crown lands:

- Environmental Assessment Registration Document, including Plain Language Summary
- Appendices A to R
- Drawings 2.1 to 16.1
- GIS shapefiles

Habitat, Flora, and Fauna

- Ocean Lake Wind Project Environmental Assessment Registration Document, including Plain Language Summary
- Appendices A, H, K, L, M, N, O, and R
- GIS shapefiles

Geoscience and Mines:

- Environmental Assessment Registration Document – Ocean Lake Wind Project

- Nova Scotia's Registry of Claims (NovaROC)
- Mineral Occurrence Database
- Drillhole Database
- Abandoned Mine Openings Database
- DP ME 43, Version 2, 2006, Digital Version of Nova Scotia DNR Map ME 2000-1, Geological Map of the Province of Nova Scotia, scale 1:500 000, Compiled by J. D. Keppie, 2000

Details of Technical Review:

Crown lands:

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

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

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

Note: the EA indicates the wind is being developed for green hydrogen, ammonia and other industrial uses. Other industrial uses is not consistent with the Request for Application associated with these Crown lands; access to Crown lands is contingent on its use for green hydrogen.

Habitat, Flora, and Fauna:

Construction and operation activities of the proposed wind project will increase access, cause disturbance, and remove and fragment habitat in ways that will negatively affect native flora and fauna, including species at risk and associated habitat in the study area (e.g., moose, lichens, birds and bats). The project footprint overlaps forest stands protected by the Nova Scotia Old Growth Policy. The project is also likely to cause bird and bat mortality through collision with turbine blades. Collision risk is notable since the project proposes 158 turbines sited along a coastal bird/bat migratory path and among several provincial parks, wilderness areas, and nature reserves. Country Island National Wildlife Area, located 7 km south of the study area, also provides important migratory stop-over and nesting habitat for diverse and at-risk bird species and breeding habitat for 25%–37.5% of Canada's Roseate Terns.

The proposed creation of 129 km of new road will nearly double road density in the study

area, causing it to exceed a proponent-acknowledged moose-sensitivity threshold. Road construction through remote wilderness creates habitat fragmentation, reduces connectivity, increases public access, and can lead to unintended impacts (e.g., wildfire or poaching) as well as loss of habitat in the direct construction footprint (approximately 1700 hectares). In addition, cumulative effects can be expected due to other development projects in this region of Nova Scotia.

Avoidance is the preferred action to reduce impacts, followed by preemptive mitigating measures developed in consultation with DNR and ECCC-CWS. Increasing turbine blade visibility, altering cut-in speeds during migratory periods, and stricter precautions for turbines near coastal bird/bat migration paths can help reduce collision mortalities. Technologies for avian detection and turbine blade feathering can also enable real-time responses to reduce mortality risk. Installing access restrictions, implementing strategic wetland conservation or restoration, and DNR consultation could provide tactics to reduce wildfire risk associated with increased access in remote areas of the province.

The proponent has taken some steps to minimize disturbance (e.g., maximize use of existing roads) but has not considered additional impacts associated with cumulative effects. The project will adversely affect wildlife and wildlife habitat, but more severe consequences to wildlife and habitat are predicted due to climate change if greenhouse gas emissions are not curbed. Wind farm-facilitated green hydrogen and ammonia production through projects like this one is considered a ‘highly recommended’ climate action by climate experts.

Geoscience and Mines:

A preliminary review of the Ocean Lake Wind Project has been completed**.** The review notes that the bedrock geological characterization provided by the Proponent of the proposed site is appropriate. The Study Area and Project Footprint are mostly underlain by Goldenville Formation (sandstone turbidites and slate) and Halifax Formation (slate, siltstone, and minor sandstone), with Devonian muscovite biotite monzogranitic intrusions.

It is recommended the Proponent refer to detailed scale bedrock geology maps where available for use in site planning as the provincial scale map is too coarse for project specific land-use planning. However, there is no recent detailed scale geology map for the Study Area currently available.

The Proponent lists the underlying geology as low risk for karst topography. The Proponent recognizes the presence of sulphide-bearing slates within the Study Area and will perform a geotechnical evaluation to determine the likelihood of acid rock drainage (ARD). Proposed mitigation measures should geohazards be encountered for ARD and erosion and sedimentation are in place. The Proponent will also develop and implement an erosion and sediment control plan.

The Proponent identified a total of 46 abandoned mine openings (AMOs) within the Study Area. Field verification by the Proponent confirmed a number of these openings had been appropriately backfilled and marked with warning signage, while others appeared to lack adequate closure measures and/or signage. The Proponent acknowledges that mitigation measures may be necessary if construction activities disturb unsecured or poorly characterized AMOs. The DNR Geoscience and Mines Branch requests that the Proponent

report any undocumented abandoned mine openings to the Mineral Management Division.

Mineral Occurrences

The proposed Study Area is ranked high for mineral potential for 60-70% of the area, with the rest being medium-low to the SE**.** The Study Area contains nine mapped mineral occurrences (Au, Mo), as well as approximately 400 diamond drill holes.

The Study Area overlaps with over 30 existing exploration licenses, with most overlapping the project footprint. Mineral exploration investment on these licences has been significant, in the range of $5M-$10M over the past 5 years. The Study Area also partially overlaps an existing mineral lease along its southwestern extent. The EA registration document cites the Province's 2021 Mineral Resource Land Use Atlas as the source for identifying mineral exploration licenses within the Study Area. For future reviews, proponents should reference the Nova Scotia Mineral Rights Database for current mineral rights information as licences are regularly being updated.

Due to the mineral rights held within the proposed area, consideration should be given to concurrent mineral exploration activities.

Key Considerations: (provide in non-technical language)

Crown lands:

No comment

Habitat, Flora, and Fauna:

Additional wildlife surveys, planning, and mitigation measures are required to minimize impacts on the terrestrial environment and comply with provincial and federal legislation.

Additional Surveys and Data

DNR recommends that the proponent:

- Conduct another year of pre-construction surveys for moose, bats, and birds.
- Ensure lichen surveys are completed by an approved specialist.
- Continue to provide precise locations and data for all flora and fauna observations, including Species at Risk, to DNR.
- Survey results and monitoring reports should be submitted to the DNR.

Wildlife Management Planning

DNR recommends that the proponent:

- Develop a Wildlife Management Plan in consultation with DNR and Department of Environment Climate Change Canada-Canadian Wildlife Service.
- Include Species at Risk monitoring programs and response procedures.
- Implement measures to reduce impacts on wildlife, including construction timing and road management practices.
- Consider additional mitigation options such as higher turbine cut-in speeds or blade painting to reduce bat & bird mortality.

Legal Requirements
DNR recommends that the proponent obtain all necessary permits and authorizations as required under legislation related to wildlife and species at risk, watercourses, and wildlife habitat alterations, including the Provincial Wetlands of Special Significance Policy and Old-Growth Forest Policy.

It is the responsibility of the proponent to ensure compliance with federal and provincial legislation and regulations regarding wildlife, species at risk, and associated habitat.

Geoscience and Mines:

The Study Area is subject to significant and active mineral exploration interest, including existing exploration licences, a mineral lease, numerous drillholes, and documented mineral occurrences. The concentration and extent of this activity indicate a substantive, ongoing exploration, and mineral development potential within the area.

Given the density of exploration activity and mapped mineral potential, the proposed permanent infrastructure and ground disturbance have the potential to materially restrict access to existing exploration targets and to sterilize near-surface mineralization. Such impacts could adversely affect future exploration and development opportunities, thereby increasing costs and complexity for future mineral work in the area.

DNR recommends that the proponent undertake a review through NovaRoc to identify Exploration Licenses that may be affected by the proposed project. The Proponent should also describe measures that will be implemented to avoid, minimize, or mitigate sterilization of known mineral targets and confirm plans to notify and engage affected mineral rights holders. The proponent is advised to contact the Registry of Mineral and Petroleum Titles if assistance is required in identifying applicable rights holders and overlapping interests.

Given the extent of overlapping mineral interests and the potential for permanent sterilization of mineral resources, the Proponent may consider a phased or adaptive development approach that allows for further assessment, engagement with rights holders, and avoidance of high-value exploration areas prior to construction of permanent infrastructure.

Energy Sector Development:

Ocean Lake Wind Project is an onshore wind project that is intended to provide renewable energy to EverWind Fuels to produce green hydrogen and its derivatives primarily for an export market.

Green hydrogen and its 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.

It was noted that from a socio-economic perspective, the information provided is related to the entirety of EverWind's Phase 1 projects, not this project specifically. It is unclear what the anticipated economic impact of the Ocean Lake Wind project would be.

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

75 Treaty Trail
Truro, NS B6L 1W3

Tel (902) 843 3880 **Fax** (902) 843 3882
Toll Free 1 888 803 3880
Email info@mikmaqrights.com
www.mikmaqrights.com

June 16, 2026

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

Re: Consultation with the Mi'kmaq of Nova Scotia on Ocean Lake Wind Project, Guysborough County, NS.

Mr. Heggelin,

I write in response to your letter dated May 14, 2026, with respect to the *Terms of Reference for a Mi'kmaq-Nova Scotia-Canada Consultation Process* (ToR), ratified on August 31, 2010, regarding the above-noted project. We wish to proceed with Consultation.

The proposed project, an onshore wind facility of up to 158 turbines with a capacity of approximately 1,264 megawatts, represents a significant development within Mi'kma'ki, the unceded and traditional territory of the Mi'kmaq. Kwilmu'kw Maw-klusuaqn (KMK) acknowledges the importance of renewable energy development and recognizes the potential benefits associated with Mi'kmaw ownership and participation. However, this proposed project is forecasted to be the largest onshore wind project in Nova Scotia, with a project footprint of 785 hectares of disturbance footprint on Crown land and has the potential to adversely affect the exercise of Mi'kmaq Section 35 rights.

Although the Environmental Assessment Registration Document (EARD) states that the project "will not result in significant adverse residual effects," the project is substantial in scale. It is predominantly located on Crown land, has a construction schedule spanning more than five years, and includes clearing of forested areas, turbine pad construction, access road development, and electrical infrastructure. The project may disrupt habitat for moose, birds, and other harvested species. New roads and infrastructure may also increase access to previously less-accessible areas, creating additional pressures on wildlife and harvesting areas. Although these types of effects are commonly assessed by Nova Scotia Environment and Climate Change (NS-ECC), impacts characterized as "not significant" under the environmental assessment process may still interfere with the meaningful exercise of Mi'kmaq rights, including hunting, fishing, and gathering.

With respect to cumulative effects, KMK has significant concerns regarding the absence of a robust, regionally scoped cumulative effects assessment in the EARD for the Ocean Lake Wind Project. This project represents an unprecedented scale of development within Guysborough County and within Mi'kma'ki more broadly. However, it is not being considered in isolation. Multiple large-scale onshore wind projects, associated transmission infrastructure, and ongoing resource development activities, including forestry and land use changes, have been approved or are under active consideration within the same geographic region.

The Ocean Lake Wind Project on a stand-alone basis fails to account for the combined and cumulative effects of these developments on Mi'kmaq rights, land use, and environmental integrity. In particular, the current framework does not adequately address how overlapping project footprints, access roads, turbine arrays, and transmission corridors may collectively impact:

- The meaningful exercise of Treaty-protected rights, including hunting, fishing, and gathering.
- Wildlife movement, habitat availability, and species relied upon by Mi'kmaq harvesters.
- Landscape connectivity and access to traditionally used areas.
- The cultural integrity of the broader landscape, including areas not formally identified as archaeological sites.

While the project alone represents unprecedented scale, its impacts cannot be meaningfully understood in isolation. The absence of a comprehensive cumulative effects assessment that incorporates overlapping wind projects, transmission infrastructure, and other land uses undermines the province's ability to determine whether the combined effects of development will result in meaningful interference with the exercise of Mi'kmaq Treaty rights. Incremental, project-by-project approvals risk producing a pattern of progressive land-use change that, in aggregate, erodes access to lands, species, and cultural landscapes essential to Mi'kmaq rights and practices. In these circumstances, KMK maintains that the Crown lacks a sufficient evidentiary basis to conclude that approval of the Ocean Lake Wind Project, when considered cumulatively, would be consistent with its constitutional obligations. KMK again requests a cumulative effects study that considers all proposed, approved, and reasonably foreseeable industrial developments in Guysborough County. The large-scale industrial use of Crown land for a 35-year period should be treated as a long-term land allocation rather than a minor or temporary use.

With respect to Mainland Moose, KMK has significant concerns regarding the potential impacts of the Ocean Lake Wind Project on a species at risk in Nova Scotia, particularly given that the project is located within a recognized Mainland Moose movement corridor. The scale and

footprint of the project risk contributing to habitat fragmentation, increased human access, and displacement of moose from critical movement and use areas. Features such as roads are of particular concern, as they can alter predator dynamics, increase disturbance, and reduce the effectiveness of corridors that are essential for maintaining population connectivity and genetic viability. While the EARD may conclude that project-specific impacts are not significant, KMK emphasizes that even incremental disruption within a key corridor may have disproportionate effects on an already vulnerable population, particularly when considered alongside other regional developments. KMK therefore stresses that a precautionary, corridor-level assessment is required, incorporating Mi'kmaq knowledge and ensuring that project design and mitigation measures demonstrably maintain the functional integrity of Mainland Moose habitat and movement pathways.

With respect to watercourses and wetlands, KMK has concerns regarding the potential impacts of the Ocean Lake Wind Project on watercourses and water bodies, particularly in relation to the adequacy and application of buffer zones. The scale of the project, including extensive road construction, turbine foundations, and associated infrastructure, presents risks of sedimentation, erosion, and alteration of natural drainage patterns, which may affect the quality and function of nearby aquatic environments. While regulatory buffer zones are intended to mitigate impacts, KMK emphasizes that standard setback distances may not be sufficient given the cumulative footprint and terrain disturbances associated with large-scale wind developments. Buffer effectiveness can also be compromised by slope, soil conditions, and construction practices, potentially resulting in downstream impacts on fish habitat and water quality, which are directly tied to Mi'kmaq Treaty rights. KMK therefore requests clear evidence that buffer zones have been site-specifically designed, conservatively applied, and supported by ongoing monitoring and adaptive management to ensure that the integrity of watercourses and associated ecosystems is fully protected over the life of the project.

The Archaeology Research Division of Kwilmu'kw Maw-klusuaqn (KMK-ARD) has reviewed the documentation for the Ocean Lake Wind Project EARD, including Section 12 of the EARD, the Mi'kmaq Ecological Knowledge Study (MEKS), and the Archaeological Resource Impact Assessment (ARIA) (A2026NS044) prepared by CRM Group Ltd. The ARIA used a predictive model to identify high-potential areas based on background research, engagement, potential historic structures and roads, and proximity to water. At this time, the project's infrastructure has not been finalized; therefore, the model addresses the entire area where project-related ground impacts may occur, totalling 195.5 square kilometres. To date, no fieldwork or subsurface testing has been completed.

Given the scale of the project, including up to 158 turbine locations, it would be premature to conclude that there will be no impact on community members' exercise of Section 35 rights,

even where there is a history of mining in the area. At this time, ARD supports the recommendation that "planning initiatives for the Ocean Lake Wind Project ensure that site-specific archaeological assessment, involving ground truthing of the potential model, take place prior to Project-related developments" (A2026NS044: 41). CRM Group describes the goal of the assessment as determining any requirement for subsurface archaeological testing and/or the timely application of mitigative archaeological measures developed through further engagement with Special Places (A2026NS044: 41). The MEKS reports recent and historic Mi'kmaq use within the Study Area (April 2026, 15). We emphasize that whenever a landscape has been used for hunting, fishing, and harvesting, whether aquatic or terrestrial, there is a possibility that cultural heritage remains may also be present. Any time there is a watercourse, named or unnamed, regardless of size or velocity, and whether terracing is present or not, there is a heightened probability of encountering Mi'kmaw archaeological heritage. Smaller streams or rivers were, and sometimes continue to be, used by Mi'kmaq on journeys by foot because they provide clear routes of travel, fresh water, plants to harvest, and aquatic resources or animals drawn to the water. This is consistent with the ARIA's recognition that "[a]rchaeological resources are not randomly distributed across the landscape. Oral and written history and past archaeology have revealed that they have patterns in their distribution that correlate with a complex array of cultural factors and environmental influences" (A2026NS044: 7).

The Assembly of Nova Scotia Mi'kmaw Chiefs expects a high level of archaeological diligence with evidence-based decisions grounded in an understanding of the subsurface environmental data. The Maw-lukutijik Saqmaq (Assembly of Nova Scotia Mi'kmaw Chiefs) expects subsurface data, adequate to eliminate concern for presence, protection, and management of Mi'kmaw archaeological and cultural heritage as part of assessment of potential in advance of any development. Without subsurface testing, the *evidence* of a lack of concern in impact areas does not exist. Disturbance is defined, for archaeological purposes, as the dislocation of soils and/or sediments, such as that by heavily treaded or tracked vehicles, as well as purposeful excavation by heavy equipment.

We consider any construction project that may exist in proximity to a water course or wetland to have elevated potential for encountering Mi'kmaw belongings, regardless of size or record of traditional use, such as animal or plant harvesting. The implications of the landscape outweigh the lack of historical information. The lack of archaeological evidence may reflect a lack of study.

Given the scale of the project, KMK requests final confirmation of proposed turbine locations, a project schedule and work plan, and ongoing updates regarding areas of high archaeological potential following ground truthing. KMK also requests to be kept informed when subsurface testing may commence in relation to construction activity areas, including turbine locations, roads, laydown areas, and areas identified as high potential in the ARIA.

With respect to Mi'kmaw engagement, it is encouraging that Membertou First Nation is an equity partner through Membertou Development Corporation. However, one community's participation does not constitute approval by all Mi'kmaw communities. While these partnerships are encouraged, they do not reduce the proponent's responsibility to engage meaningfully with affected Mi'kmaw communities. Given the scale of this project, additional engagement is needed with Mi'kmaw communities, particularly the nearby community of Paqtnkek Mi'kmaw Nation.

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

KMK does not represent the communities of Millbrook and Sipekne'katik First Nations. Please contact Consultation Manager at KMK, with any questions.

Yours in Recognition of Mi'kmaw Rights and Title,

[redacted]

Director of Consultation
Kwilmu'kw Maw-Klusuaqn

C.C.:

Kwilmu'kw Maw-klusuaqn
Kwilmu'kw Maw-klusuaqn
Gillian DesRoche, Nova Scotia Office of L'nu Affairs
Doreen Mackley, Nova Scotia Environment and Climate Change
Greg Stewart, Nova Scotia Environment and Climate Change
Sean Gillis, Nova Scotia Environment and Climate Change

About the submission

FORM NAME	# SUBMISSION ID	SUBMISSION DATE
Environmental Assessment - Project Comments	3bf3ccbe	14/05/2026 07:47

SUBMISSION STATUS

SUBMITTED

Submission details

Panel

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Select a Project:

Ocean Lake Wind Project, Guysborough County

Comments:

To Whom It May Concern,

I am writing to formally express my opposition to the proposed wind farm development on Crown land in Guysborough County(Ocean Lake Wind Farm).

While I recognize the importance of renewable energy and reducing emissions, I believe this project raises serious concerns that have not been adequately addressed. Crown land is public land that should be managed carefully for the long-term benefit of all residents, wildlife, and future generations. Industrial-scale wind development in this area could result in irreversible environmental and community impacts.

My concerns include:

- Destruction and fragmentation of wildlife habitat, including

risks to birds, bats, and other sensitive species;
- Negative effects on forests, wetlands, waterways, and biodiversity;
- Industrialization of natural public spaces currently used for recreation, tourism, hunting, fishing, and cultural activities;
- Insufficient consultation with local residents, Indigenous communities, and stakeholders;
- Potential impacts on nearby property values, quality of life, and rural character;
- Concerns regarding noise, shadow flicker, road construction, and long-term maintenance obligations;
- Lack of transparency regarding environmental assessments, economic benefits, and decommissioning plans.

Crown land belongs to the public and should not be permanently altered for private industrial development without overwhelming evidence that the benefits outweigh the environmental and social costs. At this time, I do not believe that standard has been met.

I respectfully request that decision-makers reject this proposal, pause approvals until comprehensive independent studies are completed, and ensure meaningful public consultation before any further action is taken.

I also urge the government to prioritize responsible energy planning that protects environmentally sensitive areas and respects the interests of local communities.

Thank you for considering my concerns. I ask that this letter be included in the public record regarding this proposal.

Sincerely,

Name:

Email:

City/Town

Guysborough County

Postal Code

B0H 1S0

Attachment(s):

Please note:

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

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

Uploaded document(s)

No documents to display.

Outlook

Ocean Lake Wind Project

From : @lanepes.com>
Date Fri 2026-05-29 3:42 PM
To Environment Assessment Web Account <EA@novascotia.ca>

You don't often get email from @lanepes.com. Learn why this is important

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

As I look at the map of the proposed wind farm development, it sickens me. Approval of this project will alter thousands of acres of wilderness – and for what purpose? To feed power to Everwind's hydrogen plant that will likely never be built. I've been to several hydrogen conferences in the US and the common theme is that there is no market for hydrogen. The thought that everything that is now run on fossil fuels will be converted to hydrogen is silly. Hydrogen cannot flow through existing O&G pipelines and appliances. The metal/welds become embrittled and will fail. Therefore all the current O&G infrastructure will have to be replaced with hydrogen compatible alloys and welding procedures. It ain't gonna happen! Everwind knows this as well as anybody else in the hydrogen space – so what's their game? I'm not sure but I would wager it's all about fleecing the province and investors of money. In the meantime they destroy what is now a beautiful part of NS. Please deny this application. Thanks.

Antigonish, NS

About the submission

FORM NAME	# SUBMISSION ID	SUBMISSION DATE
Environmental Assessment - Project Comments	6472e399	08/06/2026 18:13

SUBMISSION STATUS

SUBMITTED

Submission details

Panel

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Select a Project:

Ocean Lake Wind Project, Guysborough County

Comments:

Hello: I feel this is a Great opportunity for Guysborough and all of Nova Scotia. Only common sense to produce as much hydro power as possible locally.

Name:

Email:

@gmail.com

City/Town

Country harbour

Postal Code

B0H 1J0

Attachment(s)

Attachment(s):

Please note:

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

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

Uploaded document(s)

No documents to display.

About the submission

FORM NAME	# SUBMISSION ID	SUBMISSION DATE
Environmental Assessment - Project Comments	034b4925	09/06/2026 08:31

SUBMISSION STATUS

SUBMITTED

Submission details

Panel

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Select a Project:

Ocean Lake Wind Project, Guysborough County

Comments:

Commentary in Support of the Ocean Lake Wind Farm Project:

To the Review Panel,

I am writing to express support for the Ocean Lake Wind Farm project. Being transparent, — as President of A.W. Leil Cranes & Equipment, a Nova Scotia company involved in heavy lifting and infrastructure construction since 1958, our organization would likely participate in a project of this scale. As such, we have a direct interest in seeing major construction projects proceed in Nova Scotia.
That said, my support is not based solely on that potential benefit.

From an industry and provincial perspective, projects like Ocean Lake are a meaningful opportunity to advance several important priorities:

1. Economic and Regional Impact: Large-scale infrastructure

developments generate significant economic activity. Beyond the direct construction phase, they drive demand across engineering, transportation, trades, and local supply chains. This type of investment contributes to regional stability and helps sustain local businesses for the long term - well past the construction phase.

2. Workforce Retention and Development: We, along with other construction trades, continue to face challenges retaining skilled trades and experienced operators. Projects of this scope provide high-quality employment opportunities that help keep our workforce (and young people joining the workforce) in the region, while also supporting training and development for the next generation from their apprenticeship all the way into their journeyperson status.

3. Energy Diversification and Long-Term Planning: While no single project is without impact, renewable energy developments are an important part of reducing reliance on imported fuels and strengthening long-term energy resilience. Wind energy, in particular, is a resource that Nova Scotia is well-positioned to develop responsibly.

4. Capability and Safety: The successful execution of a project like this relies on experienced contractors and strong safety practices. Atlantic Canada has a proven track record in complex construction and logistics, and this project aligns with the capabilities that exist within the local industry.

I recognize that there are valid concerns that must be carefully considered, including environmental effects, land use, and community impact. These issues deserve thorough evaluation and appropriate mitigation measures where required.

However, on balance, I believe the Ocean Lake Wind Farm represents a positive step forward for the province when approached with proper oversight and responsible development practices.

Thank you for the opportunity to provide input as part of this review process.

Respectfully,

President
A.W. Leil Cranes & Equipment

Name:

Email:

@awleil.com

City/Town

Dartmouth

Postal Code

B3B 1W1

Attachment(s):

Please note:

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

Uploaded document(s)

No documents to display.

About the submission

FORM NAME	# SUBMISSION ID	SUBMISSION DATE
Environmental Assessment - Project Comments	16d7548e	10/06/2026 10:03

SUBMISSION STATUS

SUBMITTED

Submission details

Panel

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Select a Project:

Ocean Lake Wind Project, Guysborough County

Comments:

I would like to offer my support for the Ocean Lake Wind Project on behalf of AML Painting Limited.

Our company provides industrial blasting and protective coating services throughout Nova Scotia, and we have seen the positive impact that large industrial projects can have on local businesses and workers. When projects of this size move forward, the benefits extend far beyond the project site itself and create opportunities for contractors, suppliers, tradespeople, and local communities.

As a Nova Scotia business owner, I believe continued investment in major infrastructure and energy projects is important for the long-term growth of our province. These projects help create employment, support local companies, and encourage future investment in our region.

I appreciate the opportunity to provide my comments and ask that the potential economic benefits of this project be considered during the Environmental Assessment process.

Thank you for your time.

Regards,

President
AML Painting Limited

Name:

Email:

City/Town

SYDNEY

Postal Code

B1M 1A3

Attachment(s):

Please note:

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

Uploaded document(s)

No documents to display.

About the submission

FORM NAME	# SUBMISSION ID	SUBMISSION DATE
Environmental Assessment - Project Comments	94b68f24	16/06/2026 09:14

SUBMISSION STATUS

SUBMITTED

Submission details

Panel

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Select a Project:

Ocean Lake Wind Project, Guysborough County

Comments:

I live in Cutlers Brook in Guysborough and my parents own a cottage that we spend a lot of time at in the summer on Fougere Farm Lake near Larry's River, and always have for about 30+ years. The closest turbines to our cottage would be within 2km and I support the wind farm development. This province has an embarrassing GDP and we need to stop saying no to anything and everything in our backyards. This province is too small to oppose every project for that silly reason (NIMBY), and we need to start relying on our own natural resources and quit forcing every other province to exploit their resources while we sit back and get stipends from them.
One thing I will mention is there are 2 small lakes (Twin Lakes) directly SE of Fougere Farm Lake that my dad and I like to fish on pretty often. We just ask that there is careful disturbance to the east of those ponds, looks like an access road would skirt around them. They've actually been dammed up by beavers and the water levels are very low, and after last years drought. We also have neighbours on Farm Lake that like to fish Double Farm Lake. Thanks for your consideration!

Name:

Email:

City/Town

Guysborough

Postal Code

B0H 1N0

Attachment(s):

Please note:

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

Uploaded document(s)

No documents to display.

About the submission

FORM NAME	# SUBMISSION ID	SUBMISSION DATE
Environmental Assessment - Project Comments	214cd598	16/06/2026 23:06

SUBMISSION STATUS

SUBMITTED

Submission details

Panel

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Select a Project:

Ocean Lake Wind Project, Guysborough County

Comments:

EverWind have consulted with local communities within the development area. Based on the input received the overall footprint of the project has been condensed.
The Ocean Lake Windfarm will make a meaningful economic impact on the host local governments- helping enhance public services and positively impact residential and commercial property taxes.

Name:

Email:

City/Town

Guysborough

Postal Code

B0H 1N0

Attachment(s):

Please note:

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

Uploaded document(s)

No documents to display.

About the submission

FORM NAME	# SUBMISSION ID	SUBMISSION DATE
Environmental Assessment - Project Comments	3711a799	19/06/2026 12:49

SUBMISSION STATUS

SUBMITTED

Submission details

Panel

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Select a Project:

Ocean Lake Wind Project, Guysborough County

Comments:

As the owner of an industrial supply business that has been in Point Tupper for over 50 years, we welcome the possible economic value of such a project. Our area can certainly use an injection of the benefits that come from the construction and operation of a project of this size.
The Strait Area offers natural advantages not found in other areas and is a perfect location for this type of endeavour.

Name:

OWNER, STRAIT SUPPLIES LIMITED

Email:

City/Town

RIVER BOURGEOIS

Postal Code

B9A 1Z1

Attachment(s):

Please note:

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

Uploaded document(s)

No documents to display.

About the submission

FORM NAME	# SUBMISSION ID	SUBMISSION DATE
Environmental Assessment - Project Comments	c480fdc4	20/06/2026 08:29

SUBMISSION STATUS

SUBMITTED

Submission details

Panel

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Select a Project:

Ocean Lake Wind Project, Guysborough County

Comments:

I am writing as someone who lives here, uses the outdoors, and cares deeply about what this part of Guysborough County still represents. for me the woods, lakes, trails, old roads, wetlands, and hunting areas are not just scenery on a map. They are part of everyday life. This is where people hunt, fish, walk, ride ATVs, forage, watch wildlife, teach kids about the outdoors, and go to get away from noise and pressure. This land is not empty. It is used, known, and valued by local people.

My concern with the proposed Ocean Lake Wind Project is that the assessment does not seem to fully understand what would be lost if this area is turned into a large industrial wind site. It is not enough to say that access may technically remain open. A trail can still exist on paper but no longer feel safe, peaceful, useful, or remote.

Hunting is one of my biggest concerns. The assessment needs to clearly explain how turbines, substations, maintenance yards, construction zones, laydown areas, roads, and other project infrastructure would affect firearm use. Nova Scotia rules restrict firearm discharge near dwellings, places of

business, woods operations, and similar areas. If wind project infrastructure or active work zones are treated that way, then large areas could become practically unusable for rifle hunting.

Even if hunting is not officially banned, it may no longer be realistic. Hunters would have to know where every turbine, work area, maintenance crew, road, warning zone, ice-risk area, and restricted area is. That is not simple for local families, and it is even harder for visiting hunters. The project should be required to map how much land would actually remain usable for hunting after all practical safety buffers are included.

I am also concerned about trails and informal access. Around here, outdoor use is not limited to marked trails. People use old woods roads, hunting paths, ATV routes, snowmobile routes, shoreline access points, and long-established ways through the forest. A new turbine road network could cut through these areas, change drainage, fragment habitat, increase traffic, and permanently change how people and wildlife move through the land.

Once roads are widened, ditched, blasted, gravelled, and connected to turbine pads, the land does not simply go back to normal. The character of the place changes.

Ice throw is another issue that needs to be treated seriously. Worker safety plans are not enough. Workers can be trained and warned. Local people walking, hunting, riding, or exploring with their children do not have the same information. If the public is still allowed into the area, then people need clear, reliable, public safety information that ordinary residents can actually use.

The project should include public ice-risk mapping, clear warning systems, trail-specific risk information, and real closure procedures. A sign at the entrance is not enough.

There is also the bigger issue of family life and rural character. Many people live here because this area still feels quiet, natural, dark, and remote. Losing the horizon to turbines, aviation lights, industrial roads, traffic, and constant infrastructure would change the feeling of this place.

For people who spend real time outdoors, that is not a minor visual issue. It affects where families walk, where children can safely explore, where people hunt, where wildlife moves, and whether the area still feels like actual forest.

This also matters economically. Guysborough County's rural character is part of its value. It matters to hunters, anglers, tourists, seasonal visitors, cottage owners, retirees, small businesses, and people looking for quiet land. If the area becomes less attractive because it feels industrialized, that should be considered a real impact.

Before any approval is considered, I believe the project should be required to provide:

A detailed hunting impact map showing turbines, roads, substations, work zones, possible firearm-discharge buffers, ice-risk areas, and the land that would realistically remain usable for hunting.

A full trail and recreation assessment covering ATV use, snowmobiling, walking, hunting, fishing, foraging, informal trails, and family outdoor use.

A public safety plan for ice throw, construction, maintenance activity, closures, traffic, and emergency access.

A quality-of-life assessment that looks at loss of rural character, horizon impacts, lighting, noise, industrialization, and loss of remoteness.

A tourism and local-business assessment focused on outdoor recreation, hunting tourism, retirement appeal, recreational land value, and the long-term attractiveness of the area.

A binding restoration plan explaining which roads and trails will be removed, restored, or kept, and how habitat fragmentation and public access impacts will be repaired after construction and at end of life.

In my view, this project should not be approved unless these issues are properly studied and answered. Local people should not be asked to accept the permanent transformation of their hunting grounds, trails, family recreation areas, views, and rural way of life based only on vague promises that access will remain available.

The question is not whether people can still technically enter the land. The real question is whether the land will still function as forest, hunting ground, recreation space, and home for the people who live here.

Right now, I do not believe the assessment answers that question properly.

Name:

Email:

City/Town

Isaacs Harbour

Postal Code

B0H 1L0

Attachment(s):

enviro.pdf
23.96 KB

Please note:

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Yes, I agree (must be selected to proceed)

Uploaded document(s)

Total Documents: 1

enviro.pdf

Public Comment on the Ocean Lake Wind Project
Hunting, Recreation, Family Life, and Local Quality of Life

To: Nova Scotia Environment and Climate Change
Re: Ocean Lake Wind Project Environmental Assessment
From:
Date: 2026-06-20

I am writing as someone who lives here, uses the outdoors, and cares deeply about what this part of Guysborough County still represents. I am 35 years old, and for me the woods, lakes, trails, old roads, wetlands, and hunting areas are not just scenery on a map. They are part of everyday life.

This is where people hunt, fish, walk, ride ATVs, forage, watch wildlife, teach kids about the outdoors, and go to get away from noise and pressure. This land is not empty. It is used, known, and valued by local people.

My concern with the proposed Ocean Lake Wind Project is that the assessment does not seem to fully understand what would be lost if this area is turned into a large industrial wind site. It is not enough to say that access may technically remain open. A trail can still exist on paper but no longer feel safe, peaceful, useful, or remote.

Hunting is one of my biggest concerns. The assessment needs to clearly explain how turbines, substations, maintenance yards, construction zones, laydown areas, roads, and other project infrastructure would affect firearm use. Nova Scotia rules restrict firearm discharge near dwellings, places of business, woods operations, and similar areas. If wind project infrastructure or active work zones are treated that way, then large areas could become practically unusable for rifle hunting.

Even if hunting is not officially banned, it may no longer be realistic. Hunters would have to know where every turbine, work area, maintenance crew, road, warning zone, ice-risk area, and restricted area is. That is not simple for local families, and it is even harder for visiting hunters. The project should be required to map how much land would actually remain usable for hunting after all practical safety buffers are included.

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Once roads are widened, ditched, blasted, gravelled, and connected to turbine pads, the land does not simply go back to normal. The character of the place changes.

Ice throw is another issue that needs to be treated seriously. Worker safety plans are not enough. Workers can be trained and warned. Local people walking, hunting, riding, or exploring with their children do not have the same information. If the public is still allowed into the area, then people need clear, reliable, public safety information that ordinary residents can actually use.

The project should include public ice-risk mapping, clear warning systems, trail-specific risk information, and real closure procedures. A sign at the entrance is not enough.

There is also the bigger issue of family life and rural character. Many people live here because this area still feels quiet, natural, dark, and remote. Losing the horizon to turbines, aviation lights, industrial roads, traffic, and constant infrastructure would change the feeling of this place.

For people who spend real time outdoors, that is not a minor visual issue. It affects where families walk, where children can safely explore, where people hunt, where wildlife moves, and whether the area still feels like actual forest.

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In my view, this project should not be approved unless these issues are properly studied and answered. Local people should not be asked to accept the permanent transformation of their hunting grounds, trails, family recreation areas, views, and rural way of life based only on vague promises that access will remain available.

The question is not whether people can still technically enter the land. The real question is whether the land will still function as forest, hunting ground, recreation space, and home for the people who live here.

Right now, I do not believe the assessment answers that question properly.

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FORM NAME	# SUBMISSION ID	SUBMISSION DATE
Environmental Assessment - Project Comments	36ec77c2	20/06/2026 09:07

SUBMISSION STATUS

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Panel

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Select a Project:

Ocean Lake Wind Project, Guysborough County

Comments:

I am submitting this comment to oppose conditional environmental assessment approval for the Ocean Lake Wind Project as currently filed. My objection is not a general objection to renewable energy. It is an objection to this Environmental Assessment Registration Document because it contains material gaps, deferred studies, weak assumptions, and unsupported conclusions on public safety, water, wetlands, mainland moose, recreation, tourism, greenhouse-gas accounting, and end-of-life remediation.
The Minister should not grant conditional approval on the present record. At minimum, the proponent should be required to provide additional information, revise the EA, and re-submit a complete assessment before any approval is considered.
1. Basic project facts
The official Nova Scotia EA page states that the project was registered on May 13, 2026, is located in Guysborough County near New Harbour, Goldboro, Larry's River, Lundy, and Roachvale, and would include up to 158 turbines, access roads, electrical lines, substations, laydown yards, and

buildings. Each turbine is described as approximately 221.7 m to blade tip, with total capacity up to 1,264 MW. The project is expected to begin construction in 2029 and operate for 35 years.

Source: Government of Nova Scotia, Ocean Lake Wind Project EA page, https://novascotia.ca/nse/ea/ocean-lake-wind/

"up to 158 proposed wind turbines"

"support the production of Certified Green hydrogen and ammonia"

Source: Ocean Lake Wind Project EA Registration Document, Executive Summary, PDF page i.

2. Requested decision

I request that the Minister refuse conditional approval or require a revised EA with additional information before any decision. The current EA should not be accepted as sufficient because several central risk areas are either incompletely modelled, treated as future permitting issues, or dismissed through generic best-management practices rather than project-specific proof.

Specific requests are listed at the end of this submission.

3. Greenhouse-gas claims and exported ammonia

The EA's greenhouse-gas benefit claim is one of the largest claimed benefits of the project, but the accounting logic is weak. The EA calculates a baseline based on Nova Scotia Power's conventional electricity generation and claims an annual reduction of 1,936,565.18 tCO2e/year, and a 35-year reduction of 67,276,341.82 tCO2e. The EA also says those projections do not consider Nova Scotia's coal phase-out by 2030 or the net-zero 2050 target, and calls the lifetime reduction a best-case scenario. This means the claimed benefit is not a firm project effect; it is an assumed avoided-emissions scenario.

"Following the commissioning of the Project, the annual GHG emission reduction is expected to be 1,936,565.18 tCO2e."

"this lifespan emissions reduction is an estimate of a best-case GHG reduction scenario"

Source: Ocean Lake EA Registration Document, Climate Change section, PDF pages 90-91.

The project is described by the proponent as supporting Certified Green hydrogen and ammonia. If the electricity is used mainly to produce hydrogen/ammonia for export or industrial use, the EA should not assume that the power

directly replaces fossil generation on the Nova Scotia grid. It may instead create a large new industrial load. Any downstream avoided emissions from ammonia used elsewhere must be separated from Nova Scotia's territorial emissions inventory and from the project's own actual emissions.

Canada's official explanation of consumption-based indicators states that national inventories account for emissions from human activities in a country, while production-based accounting includes emissions from exported products but does not account for imported-consumed products. GHG Protocol guidance also states that avoided emissions should be reported separately from inventory emissions and should not be deducted from scope inventories.

Source: Environment and Climate Change Canada, Greenhouse gas emissions from a consumption perspective, https://www.canada.ca/en/environment-climate-change/services/environmental-indicators/greenhouse-gas-emissions-consumption-perspective.html; GHG Protocol, Scope 3 FAQ and Inventory and Project Accounting, https://ghgprotocol.org/scope-3-frequently-asked-questions-0 and https://ghgprotocol.org/blog/inventory-and-project-accounting

Therefore the EA should be required to separate: Nova Scotia territorial emissions; project lifecycle emissions; grid-displacement emissions, if any; and global avoided-emissions claims from exported ammonia. It should also identify ownership and retirement of environmental attributes, power purchase arrangements, ammonia lifecycle carbon intensity, shipping emissions, and anti-double-counting controls. Without this, the "green energy" claim risks overstating Nova Scotia emission reductions and allowing another jurisdiction or buyer to claim the same benefit.

4. The EA does not model the full 158-turbine project for sound and shadow flicker

The project seeks approval for up to 158 turbines, but the sound and shadow flicker assessments model only 143 turbine locations. The EA says 15 optional turbine locations are retained and would be modelled later if advanced. This is not sufficient for approval of a 158-turbine project. Compliance should be demonstrated before approval, not after approval.

after approval.
"The current modelled layout includes 143 turbine locations"
"15 turbine locations ... have not been modelled for noise emissions"
Source: Ocean Lake EA Registration Document, Sound section, PDF pages 93-94.
"The current modelled layout ... includes 143 turbine locations"
"Fifteen optional turbine locations are retained"
Source: Ocean Lake EA Registration Document, Shadow Flicker section, PDF page 98.
This is especially important because sound, flicker, ice throw, trail access, tourism, and wildlife impacts depend on the actual final turbine layout. A conditional approval based on a partial model would shift risk to the public and to later permitting processes.
5. Falling ice and public safety for forest users, children, hunters, foragers, ATV riders, and snowmobilers
The EA's ice-risk logic is inadequate for a publicly accessible working forest. The EA calculates a maximum theoretical ice throw distance of 470.1 m from turbines and then says the nearest potential receptor is 717.0 m away. That appears to treat receptors as fixed buildings or mapped receptor points. It does not properly address mobile public users: children, hunters, foragers, ATV riders, snowmobilers, hikers, trappers, dog walkers, and local residents moving through Crown land.
"the maximum theoretical throwing distance ... is 470.1 m"
"the nearest potential receptor located 717.0 m from a turbine"
Source: Ocean Lake EA Registration Document, Turbine Icing section, PDF pages 356-357.
The EA also states that no gates are proposed, only signage on access roads warning about hazards including ice throw. That is not a public safety plan. It leaves ordinary users to guess where the danger zone is on icy days. A child or hunter in the woods cannot know turbine status, icing conditions, wind direction, whether a turbine is shut down, or whether ice is shedding.
"No gates to restrict access are proposed"
Source: Ocean Lake EA Registration Document, Operations section, PDF pages 19-20.
A 470.1 m radius around one turbine covers about 69

hectares. Across up to 158 turbines the gross hazard area would be approximately 109 km2 before overlap. If the hazard zones overlap, meaningful winter access may be functionally removed from large portions of the project area during icing conditions. The EA does not provide a map showing all 470.1 m ice-risk radii overlaid on ATV routes, snowmobile trails, informal paths, hunting/foraging areas, parking/access points, and recreational travel corridors.
The project should not be approved until the proponent provides a public ice-safety plan that includes mapped exclusion zones around every turbine, real-time public warning systems, trail-specific risk analysis, signage at actual access points and trail intersections, condition-based closures, responsibility and liability clarity, and proof that safe public access remains meaningful during icing periods.
6. Wetlands, water features, and the unrealistic 30 m setback
The EA repeatedly uses qualified language for water and wetland setbacks. The table of setbacks says 30 m from watercourses and wetlands "where possible" or otherwise where authorized by NSECC. In a wetland-heavy project area with turbine pads, roads, collector lines, substations, laydown yards, and borrow areas, this is not a hard setback. It is a flexible intention.
"30 m from watercourses, where possible"
"30 m from wetlands, where possible"
Source: Ocean Lake EA Registration Document, Siting/setbacks table, PDF page 9.
The scale of the physical disturbance makes that concern more serious. The EA uses a conservative estimate of 30 m wide corridors for roads, road upgrades, collector lines, and a 100 m by 100 m area around turbine locations. It identifies a Study Area of 22,055 ha, an Assessment Area of 2,534 ha, a Clearing Footprint of 1,716 ha, and a Project Footprint of 785 ha.
Source: Ocean Lake EA Registration Document, Areas of Study, PDF page 8.
The EA also states that approximately 46 ha of wetland habitat may be directly impacted, equal to 24.9% of the delineated and predicted wetland habitat within the assessed portion of the LAA. That is not a minor local impact. The EA further admits that detailed characterization and functional assessment results were not collected for predicted wetlands,

and that some areas were not assessed through drone-assisted wet area modelling due to recent design changes.
“approximately 46 ha”
“approximately 24.9%”
Source: Ocean Lake EA Registration Document, Wetlands effects assessment, PDF page 187.
“Detailed characterization and functional assessment results were not collected for the PWLs”
“some areas were not assessed through drone-assisted wet area modelling”
Source: Ocean Lake EA Registration Document, Wetlands field assessment, PDF pages 161-162.
The EA should not be approved until all wetlands, wetland functions, groundwater connections, watercourse crossings, and buffer intrusions are fully mapped and assessed. Future permitting is not an adequate substitute for a complete EA decision.
7. Private wells, groundwater, blasting, arsenic, manganese, fluids, and road salt
The EA acknowledges groundwater concerns. It states that naturally occurring trace metals including iron, arsenic, and manganese can be associated with the underlying bedrock regions, and that risk mapping shows the Study Area is primarily in a high-risk or medium-risk region for arsenic and manganese in bedrock wells. It also acknowledges that blasting may mobilize metals in groundwater or affect groundwater quantity.
“iron, arsenic, and manganese”
“High Risk” and Medium Risk”
Source: Ocean Lake EA Registration Document, Geophysical environment / groundwater, PDF pages 105-108.
This is a serious rural-resident issue. Private wells are not replaceable in a practical sense just because a contingency plan says alternative water can be supplied if damage is proven. Baseline testing should not be optional or reactive. It should include all wells within an evidence-based radius from blasting, roads, foundations, laydown yards, substations, and maintenance areas, with post-construction and post-blast monitoring and an enforceable compensation/replacement mechanism.
The EA also acknowledges road-salt risks to wetlands,

herpetofauna, and large mammals. It states road salt may harm wetland microbial and vegetative communities, and that deer and moose are attracted to road salt, increasing collision risk. The proposed response is generic. There is no clear chloride budget, no wetland chloride monitoring network, no salt-free or low-salt zones, and no wildlife-attraction mitigation.

"road salt ... may result in indirect adverse effects"

"deer and moose are also known to be attracted"

Source: Ocean Lake EA Registration Document, Wetlands and Terrestrial Fauna sections, PDF pages 189 and 250.

The EA's hazardous-material mitigation is similarly generic. It proposes designated containers, secondary containment "where possible," inspections, 30 m setbacks for refuelling and lubrication, off-site servicing "where practicable," and spill kits. In a wetland-heavy landscape with shallow groundwater concerns, "where possible" and "where practicable" are not enforceable prevention standards.

"secondary containment in storage areas (where possible)"

"Complete equipment servicing off-site, where practicable"

Source: Ocean Lake EA Registration Document, General Hazardous Material Spills, PDF page 360.

8. Mainland moose, road density, disease, poaching, and habitat fragmentation

Mainland moose should be treated as a central issue, not a secondary wildlife concern. The EA states that mainland moose, listed as endangered under Nova Scotia's Endangered Species Act, has been recorded within 5 km of the Study Area and that NSNR confirmed the Study Area is within core habitat. The EA also acknowledges that mainland moose threats include habitat loss and fragmentation, and that renewable energy projects are described in the Mainland Moose Recovery Plan as a medium-level threat because wind projects usually require road networks and forest habitat loss.

"within core habitat"

"Renewable energy projects ... medium level threat"

Source: Ocean Lake EA Registration Document, Terrestrial Fauna / Mainland Moose, PDF pages 233 and 243.

The road-network issue is particularly serious. The EA states that road density above 0.6 km/km2 has been shown to affect habitat selection by moose, and that the southeastern part of the Study Area has the lowest pre-existing road density and

will see the greatest increase in road density due to the project. That is not a negligible change for an endangered species in core habitat.
“Road placement and density are the main drivers”
“will see the greatest increase in road density”
Source: Ocean Lake EA Registration Document, Mainland Moose habitat fragmentation, PDF pages 246-247.
The EA also admits possible indirect effects from increased deer access because deer carry brainworm and winter tick, and admits increased human access may increase poaching risk. It then dismisses these risks because deer and access already exist and because staff presence may deter poaching. That is not a robust mitigation plan.
“new and upgraded roads will increase access for white-tailed deer”
“land clearing and road development ... increase the risk of poaching”
Source: Ocean Lake EA Registration Document, Mainland Moose disease and poaching, PDF page 251.
The proponent should be required to provide a mainland-moose-specific road/access plan, road-density analysis before and after construction, no-new-access zones, seasonal restrictions around breeding and calving periods, deer-access mitigation, poaching-prevention measures, and mandatory long-term monitoring. The current EA says the project may be required to complete monitoring for mainland moose in cumulative-effects discussion; that should be mandatory before approval.
9. Trails, hunting, foraging, ATV/OHV use, and public access are not properly protected
The EA acknowledges existing recreational use and direct engagement with the Ocean Lake Riders ATV Club, including trail maps showing overlap with the project. It also acknowledges that ATV/OHV use, hunting, and trapping are part of the local land-use issue. However, it concludes land-use impacts are negligible and proposes no monitoring.
“brought trail maps to discuss overlap with the Project”
Source: Ocean Lake EA Registration Document, Stakeholder engagement, PDF pages 52 and 62.
“ATV/OHV use, hunting, and trapping”
“No monitoring is proposed”

Source: Ocean Lake EA Registration Document, Land Use mitigation and monitoring, PDF page 342.

This is a major weakness. A new and upgraded road network does not simply improve access. It can destroy or sever long-established informal trails, wildlife paths, hunting routes, foraging areas, snowmobile routes, and quiet backcountry use. It can also create new hazards from industrial traffic, blasting, road salt, dust, icing, signage-only safety zones, and condition-based restrictions.

The EA should include a mapped trail and wildlife-movement impact assessment showing all existing roads, informal trails, ATV/snowmobile routes, hunting access points, foraging areas, wetland crossings, deer/moose corridors, and community-use paths overlaid with all proposed roads, road upgrades, collector lines, turbine pads, laydown areas, substations, borrow pits, and ice-risk zones. It should also identify how each trail or path will be kept open, relocated, restored, or compensated for.

A specific omission is lawful rifle hunting and firearm-safety conflict in proximity to turbines, substations, collector infrastructure, new roads, construction areas, maintenance crews, other recreational users, and ice-risk zones. This is not a technical comment about firearm use; it is a land-use and public-safety issue. Hunting in rural forest is not an abstract activity. It depends on safe access, clear knowledge of occupied work areas, sightlines, separation from roads and workers, and confidence that hunters are not being pushed into smaller overlapping areas with ATV riders, foragers, children, maintenance traffic, and construction activity.

The EA's conclusion that hunting and trapping impacts are negligible does not answer whether lawful hunting can continue safely once the landscape is divided by turbine pads, access roads, substations, collector corridors, maintenance routes, signage, construction closures, and 470.1 m ice-throw risk areas. If the practical result is that large portions of traditional hunting ground become unsafe, unclear, restricted, or legally risky, then the impact is not negligible.

There is also an unassessed legal/practical hunting-access issue. Nova Scotia's Firearm and Bow Regulations prohibit discharging a firearm loaded with a rifle cartridge, single ball, or slug within 402 m of a dwelling, playground, golf course,

athletic field, woods operation, place of business, agricultural building, or public building other than a school. The EA does not state whether turbines, substations, maintenance buildings, laydown yards, active work areas, construction zones, or recurring maintenance operations will be treated by the proponent or regulators as a "place of business" or similar protected place for firearm-discharge purposes.

If the proponent claims turbine infrastructure is a place of business, or if it otherwise does not explicitly permit lawful hunting in close proximity to its infrastructure and accept the associated risk of incidental damage, then the practical loss of hunting land could be very large. A 402 m radius around one turbine covers about 0.51 km2, or about 51 hectares. Across up to 158 turbines, the gross area would be about 80 km2 before overlap. Even with overlap, the exclusion effect could remove a substantial portion of the project lands from practical rifle hunting, especially when combined with substations, roads, workers, maintenance traffic, construction closures, ice-throw zones, and public-safety uncertainty.

This cannot be dismissed as a minor access issue. A hunter cannot safely or lawfully use a landscape if every turbine, work area, and maintenance location may create a moving or fixed exclusion zone. The EA should quantify how much land remains practically huntable during construction, operation, icing conditions, maintenance, and decommissioning, and should state whether the proponent will seek to restrict firearm discharge near turbines or other infrastructure.

Source: Nova Scotia Firearm and Bow Regulations, s. 11(2), as published by Nova Scotia Justice; Ocean Lake EA Registration Document, Land Use mitigation and monitoring, PDF page 342.

The proponent should be required to provide a hunting and firearm-safety access plan prepared with local hunters, trappers, ATV/OHV clubs, land users, and appropriate provincial authorities. That plan should map all hunting-access areas, expected safety buffers around workers and infrastructure, temporary and permanent closures, notification methods, liability responsibilities, and alternative access routes. It should also explain how conflicts among hunters, children, foragers, ATV riders, maintenance crews, and construction contractors will be prevented in practice, not merely addressed through general signage.

merely addressed through general signage.

10. Tourism, retirement appeal, local business, and land value

The EA treats tourism and recreation as a sub-part of land use, not as a full tourism and rural-economy impact study. The EA states that baseline recreation and tourism are considered jointly, and recognizes that the region's natural and cultural offerings are assets to locals and tourists. Yet the effects conclusion still says land-use impact is negligible, no change in land value is expected, and no monitoring is proposed.

"the region's natural and cultural offerings are an asset"

"No monitoring is proposed"

Source: Ocean Lake EA Registration Document, Recreation and Tourism / Land Use monitoring, PDF pages 335 and 342.

The EA's assumption that turbines are compatible with ground-based recreation is too broad for this setting. The affected area is valued for quiet, scenery, wilderness access, hunting, fishing, foraging, ATV/snowmobile trails, coastal tourism, retirement properties, seasonal residences, and rural quality of life. The EA does not provide a visitor survey, business-impact analysis, retirement/residential-attractiveness analysis, viewscape-based tourism analysis, property-value monitoring plan, or post-construction tourism monitoring. Local businesses that rely on scenery, quiet, wilderness access, trails, accommodations, food service, outfitting, retirement relocation, and seasonal visitors may be affected by the perceived industrialization of the area. The proponent should be required to provide a standalone tourism, recreation, property-value, and rural-business impact assessment before approval.

The EA also underestimates direct personal quality-of-life impacts for rural residents. For me, the issue is not only whether a visitor still technically can enter the area. I live here because of the horizon line, the sense of remoteness, the quiet rural character, and the feeling that the surrounding landscape is still primarily natural rather than industrial. A project with turbines approximately 221.7 m to blade tip, aviation lighting, new roads, substations, maintenance traffic, and visible industrial infrastructure can permanently change that relationship with the land.

Losing the horizon line and the remote rural feeling is a real

impact, even if it is difficult to price. It affects why people live here, retire here, visit here, buy property here, operate small local businesses here, and use the woods for hunting, foraging, trail riding, and quiet recreation. The EA should not dismiss this as a minor visual issue or treat it only as a tourism subtopic. It should assess rural amenity, sense of place, visual intrusion, night lighting, perceived industrialization, and property-value/livability impacts from the perspective of residents who chose this area specifically because it is not industrialized.

The proponent should be required to provide viewscape analysis from local homes, roads, trails, coastal viewpoints, beaches, community areas, and commonly used recreational areas, including daytime turbine visibility and nighttime aviation-light visibility. The assessment should include cumulative visual effects, not only individual viewpoints, and should consider whether the project changes the identity of the area from rural wilderness/coastal community to industrial energy landscape.

11. Fire, drought, hurricanes, and emergency response

The EA addresses natural hazards and accidents, but the assessment is not adequate for the recent drought-prone reality of rural eastern Nova Scotia. The project would introduce tall turbines, substations, collector systems, roads, maintenance activity, vehicles, electrical equipment, lubricants, and potential ignition sources into a forested and wetland landscape. The EA discusses fires and wildfire risk, but much of the response is framed as future planning, training, site orientation, equipment, and discussions with local fire departments.

This does not prove that local volunteer departments can safely or effectively respond to turbine fires, substation fires, brush fires, access-road blockages, storm-damaged infrastructure, or simultaneous regional emergencies during drought, hurricane, or extreme-wind events. The EA should include a site-specific emergency-response capacity assessment, not only general commitments.

Required information should include: emergency access modelling during construction and operation; water-source availability during drought; response times; equipment limitations; mutual-aid capacity; communication coverage; evacuation and public-warning procedures; turbine and

substation fire scenarios; transformer-fluid fire/spill scenarios; hurricane debris/failure scenarios; road washout scenarios; and liability/cost responsibility for local fire departments and residents.

12. Old-growth forest, bat data, bird data, and unresolved technical quality issues

The EA identifies additional weaknesses that support refusing conditional approval. It states that eight old-growth stands were confirmed and seven intersect the Assessment Area in locations planned for roads, upgrades, or turbines. It then defers confirmation of impacts and further surveys to Crown lands permitting and detailed design. That is another example of approval being requested before impacts are fully resolved.

"eight stands were confirmed to be old-growth"

"Seven of the eight ... intersect with the Assessment Area"

Source: Ocean Lake EA Registration Document, Old-growth forest discussion, PDF page 223.

Bat data quality also appears weak. The EA states that in 2023 each of 23 detectors lost between one and 75 nights of data, with an average of 30 nights lost. This is significant missing data for a wind project where bat mortality and operational curtailment can be key issues.

"between one and 75 nights of data loss"

Source: Ocean Lake EA Registration Document, Bat monitoring, PDF page 259.

Bird acoustic identification also raises concern. The EA states that out of a subset of 2,479 detections manually verified by Strum scientists, 508, or 20%, were correctly identified by Nighthawk. This should trigger caution in relying on automated identification results without stronger validation.

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The document also contains quality-control issues, including pages showing "May x, 2026" and inconsistent proponent naming such as EverWind Fuels NS Holdings Ltd. instead of the name used on the official EA page. These are not the main environmental issue, but they reinforce concern that the filing needs closer review.

13. End-of-life remediation and financial security

The decommissioning section is too weak for a 35-year

industrial project. The EA says decommissioning plans will be provided before decommissioning, foundations will be decommissioned to approximately 1 m below grade, power systems will be recycled where practicable, and roads will either be removed or remain depending on lease/easement agreements.

"to approximately 1 m below surface grade"

"Access roads will either be removed or remain"

Source: Ocean Lake EA Registration Document, Decommissioning, PDF page 20.

That is not a full remediation plan. The EA does not appear to provide binding financial security sufficient to remove turbines, foundations, roads, culverts, collector lines, substations, pads, gravel, contaminated soils, and waste at end of life. It also does not provide measurable restoration standards for wetlands, hydrology, wildlife corridors, informal trails, or public recreational access.

The project should not be approved without a binding decommissioning and remediation plan backed by financial security, with clear standards for full infrastructure removal, road removal unless specifically justified, culvert removal or long-term maintenance, invasive-species control, wetland hydrology restoration, soil decompaction, revegetation with appropriate native species, and public trail/wildlife-corridor restoration.

14. Specific information and conditions required before approval

- A revised full-project layout assessment modelling all 158 turbines, not only 143, for sound, shadow flicker, ice risk, wildlife, trails, wetlands, and viewscape impacts.
- A greenhouse-gas accounting revision separating territorial Nova Scotia emissions, lifecycle project emissions, grid displacement, exported-ammonia avoided emissions, shipping emissions, and environmental-attribute ownership/retirement.
- A public ice-safety assessment with 470.1 m hazard radii mapped around every turbine and overlaid on all roads, trails, ATV/OHV routes, snowmobile routes, hunting/foraging areas, parking/access points, residences, camps, and public-use areas.
- A public access and children's safety plan that does not rely only on signs, including real-time warnings, closures,

marked safe routes, liability clarity, and emergency contacts.

- A complete wetland and watercourse assessment before approval, including all predicted wetlands, functional assessments, drone/WAM gaps, watercourse crossings, buffer intrusions, and wetland hydrology effects.
- A private-well protection plan with baseline testing, post-blast and post-construction monitoring, enforceable replacement/compensation rules, and transparent public reporting.
- A chloride/road-salt management plan with salt budgets, no-salt/low-salt zones, wetland chloride monitoring, and wildlife-attraction mitigation.
- A binding hazardous-materials plan with enforceable setbacks, secondary containment, refuelling/maintenance restrictions, spill mapping, wetland-specific response plans, and independent reporting.
- A mainland-moose-specific mitigation and monitoring plan addressing road density, habitat connectivity, calving/breeding periods, deer access, brainworm/winter tick risk, poaching, and cumulative impacts.
- A trail, hunting, foraging, and recreation impact assessment prepared with local users, including maps of existing informal trails and wildlife paths, and a binding continuity/restoration plan.
- A lawful hunting and firearm-safety/access assessment addressing safe separation from turbines, substations, roads, workers, construction areas, maintenance crews, public users, and ice-risk zones, prepared with local hunters and relevant provincial authorities. This must explicitly address whether project infrastructure will be treated as a place of business or otherwise create 402 m rifle-discharge exclusion areas, and must quantify the total land area effectively removed from practical hunting access.
- A tourism, retirement appeal, property-value, and rural-business impact assessment with baseline and post-construction monitoring.
- A rural quality-of-life and viewscape assessment addressing loss of horizon line, nighttime aviation lighting, sense of remoteness, quiet enjoyment, perceived industrialization, and impacts on why residents, retirees, tourists, and small businesses value the area.
- A site-specific wildfire, drought, hurricane, and

- A site-specific wildfire, drought, hurricane, and emergency-response capacity assessment including volunteer fire department capacity, water supply, access during storms, turbine/substation fire scenarios, and costs/liability.
- A binding decommissioning/remediation plan with financial security posted before construction and with measurable restoration outcomes.

15. Conclusion

The current EA does not justify conditional approval. It repeatedly relies on future studies, later permitting, generic best practices, signage, engagement, and unproven assumptions. The scale of this project, the wetland-heavy landscape, the core mainland-moose habitat, the public recreational use of the forest, the private-well risks, the drought/fire/hurricane context, and the export-oriented hydrogen/ammonia purpose all require a higher standard of proof before approval.

I respectfully request that the Minister refuse approval as submitted, or require a revised and complete EA addressing the deficiencies above before any conditional approval is considered.

Name:

Email:

City/Town

Goldboro

Postal Code

B0H 1L0

Attachment(s):

Wind Project Environmental Assessment.pdf

640.85 KB

Please note:

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

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

Uploaded document(s)

Total Documents: 1

Wind Project Environmental Assessment.pdf

Public Comment Opposing Conditional Approval
Ocean Lake Wind Project Environmental Assessment

Draft submission to Nova Scotia Department of Environment and Climate Change

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

Re: Ocean Lake Wind Project, EverWind NS Holdings Ltd. and Membertou Development Corporation

Submission deadline: June 22, 2026

Dear Environmental Assessment Branch,

I am submitting this comment to oppose conditional environmental assessment approval for the Ocean Lake Wind Project as currently filed. My objection is not a general objection to renewable energy. It is an objection to this Environmental Assessment Registration Document because it contains material gaps, deferred studies, weak assumptions, and unsupported conclusions on public safety, water, wetlands, mainland moose, recreation, tourism, greenhouse-gas accounting, and end-of-life remediation.

The Minister should not grant conditional approval on the present record. At minimum, the proponent should be required to provide additional information, revise the EA, and re-submit a complete assessment before any approval is considered.

1. Basic project facts

The official Nova Scotia EA page states that the project was registered on May 13, 2026, is located in Guysborough County near New Harbour, Goldboro, Larry's River, Lundy, and Roachvale, and would include up to 158 turbines, access roads, electrical lines, substations, laydown yards, and buildings. Each turbine is described as approximately 221.7 m to blade tip, with total capacity up to 1,264 MW. The project is expected to begin construction in 2029 and operate for 35 years.

> *Source: Government of Nova Scotia, Ocean Lake Wind Project EA page, https://novascotia.ca/nse/ea/ocean-lake-wind/*
>
> *"up to 158 proposed wind turbines"*
>
> *"support the production of Certified Green hydrogen and ammonia"*
>
> *Source: Ocean Lake Wind Project EA Registration Document, Executive Summary, PDF page i.*

2. Requested decision

I request that the Minister refuse conditional approval or require a revised EA with additional information before any decision. The current EA should not be accepted as sufficient

because several central risk areas are either incompletely modelled, treated as future permitting issues, or dismissed through generic best-management practices rather than project-specific proof.

Specific requests are listed at the end of this submission.

3. Greenhouse-gas claims and exported ammonia

The EA's greenhouse-gas benefit claim is one of the largest claimed benefits of the project, but the accounting logic is weak. The EA calculates a baseline based on Nova Scotia Power's conventional electricity generation and claims an annual reduction of 1,936,565.18 tCO2e/year, and a 35-year reduction of 67,276,341.82 tCO2e. The EA also says those projections do not consider Nova Scotia's coal phase-out by 2030 or the net-zero 2050 target, and calls the lifetime reduction a best-case scenario. This means the claimed benefit is not a firm project effect; it is an assumed avoided-emissions scenario.

> *"Following the commissioning of the Project, the annual GHG emission reduction is expected to be 1,936,565.18 tCO2e."*
>
> *"this lifespan emissions reduction is an estimate of a best-case GHG reduction scenario"*
>
> *Source: Ocean Lake EA Registration Document, Climate Change section, PDF pages 90-91.*

The project is described by the proponent as supporting Certified Green hydrogen and ammonia. If the electricity is used mainly to produce hydrogen/ammonia for export or industrial use, the EA should not assume that the power directly replaces fossil generation on the Nova Scotia grid. It may instead create a large new industrial load. Any downstream avoided emissions from ammonia used elsewhere must be separated from Nova Scotia's territorial emissions inventory and from the project's own actual emissions.

Canada's official explanation of consumption-based indicators states that national inventories account for emissions from human activities in a country, while production-based accounting includes emissions from exported products but does not account for imported-consumed products. GHG Protocol guidance also states that avoided emissions should be reported separately from inventory emissions and should not be deducted from scope inventories.

> *Source: Environment and Climate Change Canada, Greenhouse gas emissions from a consumption perspective, https://www.canada.ca/en/environment-climate-change/services/environmental-indicators/greenhouse-gas-emissions-consumption-perspective.html; GHG Protocol, Scope 3 FAQ and Inventory and Project Accounting, https://ghgprotocol.org/scope-3-frequently-asked-questions-0 and https://ghgprotocol.org/blog/inventory-and-project-accounting*

Therefore the EA should be required to separate: Nova Scotia territorial emissions; project lifecycle emissions; grid-displacement emissions, if any; and global avoided-emissions claims from exported ammonia. It should also identify ownership and retirement of environmental attributes, power purchase arrangements, ammonia lifecycle carbon intensity, shipping emissions, and anti-double-counting controls. Without this, the "green energy"

claim risks overstating Nova Scotia emission reductions and allowing another jurisdiction or buyer to claim the same benefit.

4. The EA does not model the full 158-turbine project for sound and shadow flicker

The project seeks approval for up to 158 turbines, but the sound and shadow flicker assessments model only 143 turbine locations. The EA says 15 optional turbine locations are retained and would be modelled later if advanced. This is not sufficient for approval of a 158-turbine project. Compliance should be demonstrated before approval, not after approval.

> *"The current modelled layout includes 143 turbine locations"*
>
> *"15 turbine locations ... have not been modelled for noise emissions"*
>
> *Source: Ocean Lake EA Registration Document, Sound section, PDF pages 93-94.*
>
> *"The current modelled layout ... includes 143 turbine locations"*
>
> *"Fifteen optional turbine locations are retained"*
>
> *Source: Ocean Lake EA Registration Document, Shadow Flicker section, PDF page 98.*

This is especially important because sound, flicker, ice throw, trail access, tourism, and wildlife impacts depend on the actual final turbine layout. A conditional approval based on a partial model would shift risk to the public and to later permitting processes.

5. Falling ice and public safety for forest users, children, hunters, foragers, ATV riders, and snowmobilers

The EA's ice-risk logic is inadequate for a publicly accessible working forest. The EA calculates a maximum theoretical ice throw distance of 470.1 m from turbines and then says the nearest potential receptor is 717.0 m away. That appears to treat receptors as fixed buildings or mapped receptor points. It does not properly address mobile public users: children, hunters, foragers, ATV riders, snowmobilers, hikers, trappers, dog walkers, and local residents moving through Crown land.

> *"the maximum theoretical throwing distance ... is 470.1 m"*
>
> *"the nearest potential receptor located 717.0 m from a turbine"*
>
> *Source: Ocean Lake EA Registration Document, Turbine Icing section, PDF pages 356-357.*

The EA also states that no gates are proposed, only signage on access roads warning about hazards including ice throw. That is not a public safety plan. It leaves ordinary users to guess where the danger zone is on icy days. A child or hunter in the woods cannot know turbine status, icing conditions, wind direction, whether a turbine is shut down, or whether ice is shedding.

“No gates to restrict access are proposed”

Source: Ocean Lake EA Registration Document, Operations section, PDF pages 19-20.

A 470.1 m radius around one turbine covers about 69 hectares. Across up to 158 turbines the gross hazard area would be approximately 109 km2 before overlap. If the hazard zones overlap, meaningful winter access may be functionally removed from large portions of the project area during icing conditions. The EA does not provide a map showing all 470.1 m ice-risk radii overlaid on ATV routes, snowmobile trails, informal paths, hunting/foraging areas, parking/access points, and recreational travel corridors.

The project should not be approved until the proponent provides a public ice-safety plan that includes mapped exclusion zones around every turbine, real-time public warning systems, trail-specific risk analysis, signage at actual access points and trail intersections, condition-based closures, responsibility and liability clarity, and proof that safe public access remains meaningful during icing periods.

6. Wetlands, water features, and the unrealistic 30 m setback

The EA repeatedly uses qualified language for water and wetland setbacks. The table of setbacks says 30 m from watercourses and wetlands “where possible” or otherwise where authorized by NSECC. In a wetland-heavy project area with turbine pads, roads, collector lines, substations, laydown yards, and borrow areas, this is not a hard setback. It is a flexible intention.

“30 m from watercourses, where possible”

“30 m from wetlands, where possible”

Source: Ocean Lake EA Registration Document, Siting/setbacks table, PDF page 9.

The scale of the physical disturbance makes that concern more serious. The EA uses a conservative estimate of 30 m wide corridors for roads, road upgrades, collector lines, and a 100 m by 100 m area around turbine locations. It identifies a Study Area of 22,055 ha, an Assessment Area of 2,534 ha, a Clearing Footprint of 1,716 ha, and a Project Footprint of 785 ha.

Source: Ocean Lake EA Registration Document, Areas of Study, PDF page 8.

The EA also states that approximately 46 ha of wetland habitat may be directly impacted, equal to 24.9% of the delineated and predicted wetland habitat within the assessed portion of the LAA. That is not a minor local impact. The EA further admits that detailed characterization and functional assessment results were not collected for predicted wetlands, and that some areas were not assessed through drone-assisted wet area modelling due to recent design changes.

“approximately 46 ha”

“approximately 24.9%”

Source: Ocean Lake EA Registration Document, Wetlands effects assessment, PDF page 187.

“Detailed characterization and functional assessment results were not collected for the PWLs”

“some areas were not assessed through drone-assisted wet area modelling”

Source: Ocean Lake EA Registration Document, Wetlands field assessment, PDF pages 161-162.

The EA should not be approved until all wetlands, wetland functions, groundwater connections, watercourse crossings, and buffer intrusions are fully mapped and assessed. Future permitting is not an adequate substitute for a complete EA decision.

7. Private wells, groundwater, blasting, arsenic, manganese, fluids, and road salt

The EA acknowledges groundwater concerns. It states that naturally occurring trace metals including iron, arsenic, and manganese can be associated with the underlying bedrock regions, and that risk mapping shows the Study Area is primarily in a high-risk or medium-risk region for arsenic and manganese in bedrock wells. It also acknowledges that blasting may mobilize metals in groundwater or affect groundwater quantity.

“iron, arsenic, and manganese”

“High Risk” and Medium Risk”

Source: Ocean Lake EA Registration Document, Geophysical environment / groundwater, PDF pages 105-108.

This is a serious rural-resident issue. Private wells are not replaceable in a practical sense just because a contingency plan says alternative water can be supplied if damage is proven. Baseline testing should not be optional or reactive. It should include all wells within an evidence-based radius from blasting, roads, foundations, laydown yards, substations, and maintenance areas, with post-construction and post-blast monitoring and an enforceable compensation/replacement mechanism.

The EA also acknowledges road-salt risks to wetlands, herpetofauna, and large mammals. It states road salt may harm wetland microbial and vegetative communities, and that deer and moose are attracted to road salt, increasing collision risk. The proposed response is generic. There is no clear chloride budget, no wetland chloride monitoring network, no salt-free or low-salt zones, and no wildlife-attraction mitigation.

“road salt ... may result in indirect adverse effects”

“deer and moose are also known to be attracted”

Source: Ocean Lake EA Registration Document, Wetlands and Terrestrial Fauna sections, PDF pages 189 and 250.

The EA’s hazardous-material mitigation is similarly generic. It proposes designated containers, secondary containment “where possible,” inspections, 30 m setbacks for refuelling and lubrication, off-site servicing “where practicable,” and spill kits. In a wetland-heavy landscape with shallow groundwater concerns, “where possible” and “where

practicable” are not enforceable prevention standards.

“secondary containment in storage areas (where possible)”

“Complete equipment servicing off-site, where practicable”

Source: Ocean Lake EA Registration Document, General Hazardous Material Spills, PDF page 360.

8. Mainland moose, road density, disease, poaching, and habitat fragmentation

Mainland moose should be treated as a central issue, not a secondary wildlife concern. The EA states that mainland moose, listed as endangered under Nova Scotia’s Endangered Species Act, has been recorded within 5 km of the Study Area and that NSNR confirmed the Study Area is within core habitat. The EA also acknowledges that mainland moose threats include habitat loss and fragmentation, and that renewable energy projects are described in the Mainland Moose Recovery Plan as a medium-level threat because wind projects usually require road networks and forest habitat loss.

“within core habitat”

“Renewable energy projects ... medium level threat”

Source: Ocean Lake EA Registration Document, Terrestrial Fauna / Mainland Moose, PDF pages 233 and 243.

The road-network issue is particularly serious. The EA states that road density above 0.6 km/km2 has been shown to affect habitat selection by moose, and that the southeastern part of the Study Area has the lowest pre-existing road density and will see the greatest increase in road density due to the project. That is not a negligible change for an endangered species in core habitat.

“Road placement and density are the main drivers”

“will see the greatest increase in road density”

Source: Ocean Lake EA Registration Document, Mainland Moose habitat fragmentation, PDF pages 246-247.

The EA also admits possible indirect effects from increased deer access because deer carry brainworm and winter tick, and admits increased human access may increase poaching risk. It then dismisses these risks because deer and access already exist and because staff presence may deter poaching. That is not a robust mitigation plan.

“new and upgraded roads will increase access for white-tailed deer”

“land clearing and road development ... increase the risk of poaching”

Source: Ocean Lake EA Registration Document, Mainland Moose disease and poaching, PDF page 251.

The proponent should be required to provide a mainland-moose-specific road/access plan, road-density analysis before and after construction, no-new-access zones, seasonal restrictions around breeding and calving periods, deer-access mitigation, poaching-

prevention measures, and mandatory long-term monitoring. The current EA says the project may be required to complete monitoring for mainland moose in cumulative-effects discussion; that should be mandatory before approval.

9. Trails, hunting, foraging, ATV/OHV use, and public access are not properly protected

The EA acknowledges existing recreational use and direct engagement with the Ocean Lake Riders ATV Club, including trail maps showing overlap with the project. It also acknowledges that ATV/OHV use, hunting, and trapping are part of the local land-use issue. However, it concludes land-use impacts are negligible and proposes no monitoring.

> *"brought trail maps to discuss overlap with the Project"*
> *Source: Ocean Lake EA Registration Document, Stakeholder engagement, PDF pages 52 and 62.*
>
> *"ATV/OHV use, hunting, and trapping"*
>
> *"No monitoring is proposed"*
> *Source: Ocean Lake EA Registration Document, Land Use mitigation and monitoring, PDF page 342.*

This is a major weakness. A new and upgraded road network does not simply improve access. It can destroy or sever long-established informal trails, wildlife paths, hunting routes, foraging areas, snowmobile routes, and quiet backcountry use. It can also create new hazards from industrial traffic, blasting, road salt, dust, icing, signage-only safety zones, and condition-based restrictions.

The EA should include a mapped trail and wildlife-movement impact assessment showing all existing roads, informal trails, ATV/snowmobile routes, hunting access points, foraging areas, wetland crossings, deer/moose corridors, and community-use paths overlaid with all proposed roads, road upgrades, collector lines, turbine pads, laydown areas, substations, borrow pits, and ice-risk zones. It should also identify how each trail or path will be kept open, relocated, restored, or compensated for.

A specific omission is lawful rifle hunting and firearm-safety conflict in proximity to turbines, substations, collector infrastructure, new roads, construction areas, maintenance crews, other recreational users, and ice-risk zones. This is not a technical comment about firearm use; it is a land-use and public-safety issue. Hunting in rural forest is not an abstract activity. It depends on safe access, clear knowledge of occupied work areas, sightlines, separation from roads and workers, and confidence that hunters are not being pushed into smaller overlapping areas with ATV riders, foragers, children, maintenance traffic, and construction activity.

The EA's conclusion that hunting and trapping impacts are negligible does not answer whether lawful hunting can continue safely once the landscape is divided by turbine pads, access roads, substations, collector corridors, maintenance routes, signage, construction

closures, and 470.1 m ice-throw risk areas. If the practical result is that large portions of traditional hunting ground become unsafe, unclear, restricted, or legally risky, then the impact is not negligible.

There is also an unassessed legal/practical hunting-access issue. Nova Scotia's Firearm and Bow Regulations prohibit discharging a firearm loaded with a rifle cartridge, single ball, or slug within 402 m of a dwelling, playground, golf course, athletic field, woods operation, place of business, agricultural building, or public building other than a school. The EA does not state whether turbines, substations, maintenance buildings, laydown yards, active work areas, construction zones, or recurring maintenance operations will be treated by the proponent or regulators as a "place of business" or similar protected place for firearm-discharge purposes.

If the proponent claims turbine infrastructure is a place of business, or if it otherwise does not explicitly permit lawful hunting in close proximity to its infrastructure and accept the associated risk of incidental damage, then the practical loss of hunting land could be very large. A 402 m radius around one turbine covers about 0.51 km2, or about 51 hectares. Across up to 158 turbines, the gross area would be about 80 km2 before overlap. Even with overlap, the exclusion effect could remove a substantial portion of the project lands from practical rifle hunting, especially when combined with substations, roads, workers, maintenance traffic, construction closures, ice-throw zones, and public-safety uncertainty.

This cannot be dismissed as a minor access issue. A hunter cannot safely or lawfully use a landscape if every turbine, work area, and maintenance location may create a moving or fixed exclusion zone. The EA should quantify how much land remains practically huntable during construction, operation, icing conditions, maintenance, and decommissioning, and should state whether the proponent will seek to restrict firearm discharge near turbines or other infrastructure.

Source: Nova Scotia Firearm and Bow Regulations, s. 11(2), as published by Nova Scotia Justice; Ocean Lake EA Registration Document, Land Use mitigation and monitoring, PDF page 342.

The proponent should be required to provide a hunting and firearm-safety access plan prepared with local hunters, trappers, ATV/OHV clubs, land users, and appropriate provincial authorities. That plan should map all hunting-access areas, expected safety buffers around workers and infrastructure, temporary and permanent closures, notification methods, liability responsibilities, and alternative access routes. It should also explain how conflicts among hunters, children, foragers, ATV riders, maintenance crews, and construction contractors will be prevented in practice, not merely addressed through general signage.

10. Tourism, retirement appeal, local business, and land value

The EA treats tourism and recreation as a sub-part of land use, not as a full tourism and rural-economy impact study. The EA states that baseline recreation and tourism are

considered jointly, and recognizes that the region's natural and cultural offerings are assets to locals and tourists. Yet the effects conclusion still says land-use impact is negligible, no change in land value is expected, and no monitoring is proposed.

> *"the region's natural and cultural offerings are an asset"*
>
> *"No monitoring is proposed"*
>
> *Source: Ocean Lake EA Registration Document, Recreation and Tourism / Land Use monitoring, PDF pages 335 and 342.*

The EA's assumption that turbines are compatible with ground-based recreation is too broad for this setting. The affected area is valued for quiet, scenery, wilderness access, hunting, fishing, foraging, ATV/snowmobile trails, coastal tourism, retirement properties, seasonal residences, and rural quality of life. The EA does not provide a visitor survey, business-impact analysis, retirement/residential-attractiveness analysis, viewscape-based tourism analysis, property-value monitoring plan, or post-construction tourism monitoring.

Local businesses that rely on scenery, quiet, wilderness access, trails, accommodations, food service, outfitting, retirement relocation, and seasonal visitors may be affected by the perceived industrialization of the area. The proponent should be required to provide a standalone tourism, recreation, property-value, and rural-business impact assessment before approval.

The EA also underestimates direct personal quality-of-life impacts for rural residents. For me, the issue is not only whether a visitor still technically can enter the area. I live here because of the horizon line, the sense of remoteness, the quiet rural character, and the feeling that the surrounding landscape is still primarily natural rather than industrial. A project with turbines approximately 221.7 m to blade tip, aviation lighting, new roads, substations, maintenance traffic, and visible industrial infrastructure can permanently change that relationship with the land.

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This does not prove that local volunteer departments can safely or effectively respond to turbine fires, substation fires, brush fires, access-road blockages, storm-damaged infrastructure, or simultaneous regional emergencies during drought, hurricane, or extreme-wind events. The EA should include a site-specific emergency-response capacity assessment, not only general commitments.

Required information should include: emergency access modelling during construction and operation; water-source availability during drought; response times; equipment limitations; mutual-aid capacity; communication coverage; evacuation and public-warning procedures; turbine and substation fire scenarios; transformer-fluid fire/spill scenarios; hurricane debris/failure scenarios; road washout scenarios; and liability/cost responsibility for local fire departments and residents.

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>
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>
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The document also contains quality-control issues, including pages showing "May x, 2026" and inconsistent proponent naming such as EverWind Fuels NS Holdings Ltd. instead of the name used on the official EA page. These are not the main environmental issue, but they reinforce concern that the filing needs closer review.

13. End-of-life remediation and financial security

The decommissioning section is too weak for a 35-year industrial project. The EA says decommissioning plans will be provided before decommissioning, foundations will be decommissioned to approximately 1 m below grade, power systems will be recycled where practicable, and roads will either be removed or remain depending on lease/easement agreements.

> *"to approximately 1 m below surface grade"*
>
> *"Access roads will either be removed or remain"*
>
> *Source: Ocean Lake EA Registration Document, Decommissioning, PDF page 20.*

That is not a full remediation plan. The EA does not appear to provide binding financial security sufficient to remove turbines, foundations, roads, culverts, collector lines, substations, pads, gravel, contaminated soils, and waste at end of life. It also does not provide measurable restoration standards for wetlands, hydrology, wildlife corridors, informal trails, or public recreational access.

The project should not be approved without a binding decommissioning and remediation plan backed by financial security, with clear standards for full infrastructure removal, road removal unless specifically justified, culvert removal or long-term maintenance, invasive-species control, wetland hydrology restoration, soil decompaction, revegetation with appropriate native species, and public trail/wildlife-corridor restoration.

14. Specific information and conditions required before approval

- A revised full-project layout assessment modelling all 158 turbines, not only 143, for sound, shadow flicker, ice risk, wildlife, trails, wetlands, and viewscape impacts.
- A greenhouse-gas accounting revision separating territorial Nova Scotia emissions, lifecycle project emissions, grid displacement, exported-ammonia avoided emissions, shipping emissions, and environmental-attribute ownership/retirement.
- A public ice-safety assessment with 470.1 m hazard radii mapped around every turbine

and overlaid on all roads, trails, ATV/OHV routes, snowmobile routes, hunting/foraging areas, parking/access points, residences, camps, and public-use areas.

- A public access and children's safety plan that does not rely only on signs, including real-time warnings, closures, marked safe routes, liability clarity, and emergency contacts.

- A complete wetland and watercourse assessment before approval, including all predicted wetlands, functional assessments, drone/WAM gaps, watercourse crossings, buffer intrusions, and wetland hydrology effects.

- A private-well protection plan with baseline testing, post-blast and post-construction monitoring, enforceable replacement/compensation rules, and transparent public reporting.

- A chloride/road-salt management plan with salt budgets, no-salt/low-salt zones, wetland chloride monitoring, and wildlife-attraction mitigation.

- A binding hazardous-materials plan with enforceable setbacks, secondary containment, refuelling/maintenance restrictions, spill mapping, wetland-specific response plans, and independent reporting.

- A mainland-moose-specific mitigation and monitoring plan addressing road density, habitat connectivity, calving/breeding periods, deer access, brainworm/winter tick risk, poaching, and cumulative impacts.

- A trail, hunting, foraging, and recreation impact assessment prepared with local users, including maps of existing informal trails and wildlife paths, and a binding continuity/restoration plan.

- A lawful hunting and firearm-safety/access assessment addressing safe separation from turbines, substations, roads, workers, construction areas, maintenance crews, public users, and ice-risk zones, prepared with local hunters and relevant provincial authorities. This must explicitly address whether project infrastructure will be treated as a place of business or otherwise create 402 m rifle-discharge exclusion areas, and must quantify the total land area effectively removed from practical hunting access.

- A tourism, retirement appeal, property-value, and rural-business impact assessment with baseline and post-construction monitoring.

- A rural quality-of-life and viewscape assessment addressing loss of horizon line, nighttime aviation lighting, sense of remoteness, quiet enjoyment, perceived industrialization, and impacts on why residents, retirees, tourists, and small businesses value the area.

- A site-specific wildfire, drought, hurricane, and emergency-response capacity assessment including volunteer fire department capacity, water supply, access during

storms, turbine/substation fire scenarios, and costs/liability.

- A binding decommissioning/remediation plan with financial security posted before construction and with measurable restoration outcomes.

15. Conclusion

The current EA does not justify conditional approval. It repeatedly relies on future studies, later permitting, generic best practices, signage, engagement, and unproven assumptions. The scale of this project, the wetland-heavy landscape, the core mainland-moose habitat, the public recreational use of the forest, the private-well risks, the drought/fire/hurricane context, and the export-oriented hydrogen/ammonia purpose all require a higher standard of proof before approval.

I respectfully request that the Minister refuse approval as submitted, or require a revised and complete EA addressing the deficiencies above before any conditional approval is considered.

Sources reviewed

- Government of Nova Scotia, Ocean Lake Wind Project EA page: https://novascotia.ca/nse/ea/ocean-lake-wind/
- Ocean Lake Wind Project EA Registration Document - Appendix C: https://novascotia.ca/nse/ea/ocean-lake-wind/ocean-lake-ea-registration-document-appendix-c.pdf
- Environment and Climate Change Canada, Greenhouse gas emissions from a consumption perspective: https://www.canada.ca/en/environment-climate-change/services/environmental-indicators/greenhouse-gas-emissions-consumption-perspective.html
- GHG Protocol, Scope 3 Frequently Asked Questions: https://ghgprotocol.org/scope-3-frequently-asked-questions-0
- GHG Protocol, Inventory and Project Accounting: A Comparative Review: https://ghgprotocol.org/blog/inventory-and-project-accounting

About the submission

FORM NAME	# SUBMISSION ID	SUBMISSION DATE
Environmental Assessment - Project Comments	d66dfc0f	20/06/2026 15:40

SUBMISSION STATUS

SUBMITTED

Submission details

Panel

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

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

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

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

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

Select a Project:

Ocean Lake Wind Project, Guysborough County

Comments:

I am writing to express serious concern about the proposed Ocean Lake Wind Project and the way its assessment treats local outdoor use, hunting, recreation, and quality of life for families who live in and rely on this landscape.
This area is not empty land. For many local families, the woods, lakes, wetlands, trails, and back roads are part of daily life. They are where we hunt, fish, forage, walk, ride ATVs, teach children about the outdoors, watch wildlife, and experience the quiet rural character that makes this part of Guysborough County special. These uses are not casual or occasional. They are part of how families here live, raise children, spend time together, and remain connected to the land.
The Nova Scotia Environmental Assessment project list identifies the Ocean Lake Wind Project as registered by EverWind NS Holdings Ltd. and Membertou Development Corporation on May 13, 2026. My concern is that the assessment does not adequately consider how a large industrial wind project would change the practical use of the forest for ordinary local people.

The project should not be assessed only by asking whether public access is technically still possible. A road or trail can remain legally open and still become unattractive, unsafe, fragmented, or unsuitable for its traditional use. Hunting and outdoor recreation depend on more than legal access. They depend on remoteness, quiet, safe movement, intact habitat, predictable wildlife patterns, safe firearm-use conditions, functioning trails, and the feeling of being in real forest rather than inside an industrial energy site.

1. Hunting access and firearm-use impacts

One major concern is hunting. The assessment should clearly explain whether turbines, substations, maintenance buildings, active work zones, laydown areas, access roads, and other project infrastructure would be treated as places of business, woods operations, or similar protected locations under Nova Scotia firearm rules.

Nova Scotia's Firearm and Bow Regulations prohibit discharging a firearm loaded with a rifle cartridge, single ball, or slug within 402 metres of a dwelling, playground, golf course, athletic field, woods operation, place of business, agricultural building, or public building other than a school. The same regulation gives a 182 metre rule for shotgun shot, bows, and crossbows around those listed places.

This matters because, if the proponent or regulators treat project infrastructure or work areas as protected business/work zones, the practical hunting impact could be far larger than the assessment admits. A 402 metre buffer around each turbine or work area would remove a large area from practical rifle hunting. Even if hunting is not formally banned, many hunters may no longer be able to safely or confidently use the land.

This is especially true for visiting hunters, families with children, and people who do not have detailed local knowledge of every turbine, road, active maintenance area, warning sign, seasonal closure, or icing condition. The impact is not just a matter of whether hunting remains legal in theory. The question is whether hunting remains practical, safe, understandable, and attractive in real life.

The assessment should be required to map and quantify how much land remains practically usable for hunting after accounting for turbines, substations, laydown areas, maintenance yards, roads, active construction areas, crews,

possible discharge buffers, and ice-risk zones. Without that map, the claim that recreational use will continue is incomplete.

2. Trails, informal access, and established local use

I am also concerned about trail systems and informal access. Rural outdoor use is not limited to officially marked trails. Local people use old woods roads, ATV routes, hunting paths, shoreline approaches, foraging areas, snowmobile routes, and long-established informal ways through the forest.

A major new turbine road network can cut across these routes, change drainage, fragment wildlife movement, increase traffic, bring maintenance activity into previously quiet areas, and turn familiar backcountry into an industrial grid.

The impact is not just temporary construction inconvenience. Once roads are widened, ditched, gravelled, blasted, and connected to turbine pads and substations, the land does not simply return to the way it was. Wildlife trails, hunting patterns, and family recreation routes can be permanently changed.

The assessment should include a full map of existing formal and informal recreational routes, known ATV and snowmobile use, hunting access, fishing access, foraging areas, and wildlife travel corridors, overlaid with all proposed project infrastructure.

3. Ice throw and public safety for ordinary forest users

Ice throw is another serious public-access concern. Worker safety plans are not enough. Workers can receive training, internal notices, personal protective equipment, and site-specific instructions. Local families, children, hunters, foragers, and ATV users do not have the same control or information.

If people are allowed to continue entering the forest, they need to know where it is actually safe to be during icing conditions. A sign at an access road is not a real protection plan for a child, a hunter, or a family walking through the woods.

The proponent should be required to provide public ice-risk mapping, trail-specific risk analysis, and real-time warning or closure procedures that ordinary residents can understand and rely on. If the safe areas are so limited during winter icing conditions that practical recreation is no longer possible, that must be acknowledged as a real impact.

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4. Family life, children, and loss of rural character

The project also raises concerns for families raising children in a rural area. Many people choose to live here because their children can grow up close to woods, water, wildlife, quiet, darkness, and open horizons. That is not just scenery. It is part of the value of rural life.

Losing the horizon line to turbines, aviation lights, industrial roads, traffic, maintenance activity, and constant visual reminders of large infrastructure changes how a place feels. It reduces the sense of remoteness and peace that many families depend on.

For an outdoors-oriented family, this is not an abstract visual concern. It affects where children can safely explore, where families can walk, where people can hunt, where they can teach outdoor skills, and whether the area still feels like wilderness. The assessment should not dismiss these concerns as minor simply because they are hard to measure.

5. Tourism, local business, retirement appeal, and property value

There is also a local economic side. Guysborough County's rural appeal matters to tourism, small businesses, seasonal visitors, hunters, anglers, retirees, cottage owners, and people looking for quiet land.

If the area becomes less attractive because it feels industrialized, that can affect more than personal preference. It can affect local businesses, land values, tourism potential, and future settlement decisions.

The assessment should include a serious review of how the project may affect the area's attractiveness for outdoor tourism, hunting tourism, retirement living, recreational property ownership, and small rural businesses.

6. The assessment must not reduce recreation to simple legal access

The current assessment appears to treat recreation and land use too narrowly. It should not be enough to say people can still access the land if the experience, safety, wildlife, trails, and rural character are fundamentally changed.

A forest can remain legally open while no longer functioning as the same forest for the families who use it. That distinction matters deeply to residents who depend on the woods not as a postcard, but as part of daily life.

Requested requirements before any approval

- A detailed hunting-access impact map showing all project infrastructure, possible firearm-discharge buffers, active work zones, maintenance areas, roads, and remaining practical hunting areas.
- A trail and recreation impact assessment covering ATV use, snowmobiling, walking, hunting, fishing, foraging, informal trails, and family outdoor use.
- A public safety plan for ice throw, maintenance activity, construction, closures, and emergency access that protects ordinary public users, not only workers.
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- A binding restoration plan explaining which roads and trails will be removed, restored, or kept, how habitat fragmentation will be repaired, and how public access will be protected after construction and at end of life.

Conclusion

In my view, the project should not be approved unless these issues are properly studied and addressed. The people who live here should not be asked to accept the permanent transformation of their hunting grounds, trails, family recreation areas, views, and rural way of life based on vague assurances that access will remain available.

Name:

Email:

City/Town

Seal Harbour

Postal Code

B0H 1T0

Attachment(s):

496.61 KB

Please note:

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

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

Uploaded document(s)

Total Documents: 1

Public Comment on the Ocean Lake Wind Project

Hunting, Recreation, Family Life, and Local Quality of Life

To: Nova Scotia Environment and Climate Change

Re: Ocean Lake Wind Project Environmental Assessment

Date: 2026-06-20

I am writing to express serious concern about the proposed Ocean Lake Wind Project and the way its assessment treats local outdoor use, hunting, recreation, and quality of life for families who live in and rely on this landscape.

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Sources cited

1. Nova Scotia Environment and Climate Change, Environmental Assessment Projects: Ocean Lake Wind Project. https://novascotia.ca/nse/ea/projects.asp
2. Nova Scotia Firearm and Bow Regulations, s. 11. https://novascotia.ca/just/regulations/regs/wifire.htm

Heggelin, Anthony J

From: @icloud.com>
Sent: June 20, 2026 2:35 PM
To: EA@novascotia.ca
Subject: Ocean Lake Wind Farm

[You don't often get email from @icloud.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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

Hello,
The proposal for this project is using too much crown land, creating too many roads and totally changing the current wilderness environment. It will be detrimental to wildlife ruining their habitat. As well residents will loose access to these areas and changing a way of life. All to produce wind that has no benefit to the province of Nova Scotia. There are no substantial benefits for the Guysborough county. The proposed amount of wind turbines is too many for the area.

Thank you,

Sent from my iPhone

About the submission

FORM NAME	# SUBMISSION ID	SUBMISSION DATE
Environmental Assessment - Project Comments	c78be469	21/06/2026 19:48

SUBMISSION STATUS

SUBMITTED

Submission details

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Select a Project:

Ocean Lake Wind Project, Guysborough County

Comments:

I am submitting this response regarding the Ocean Lake Wind Project proposed by EverWind NS Holdings Ltd. and Membertou Development Corporation. My concern is that the Environmental Assessment does not adequately demonstrate that local emergency services, volunteer fire departments, access roads, firefighting water supply, equipment, manpower, or training are sufficient for the scale and type of risk being introduced.
This project should not be assessed as a normal rural development. It is a very large industrial wind project proposed in forested, rural terrain, with difficult access and limited existing emergency infrastructure. Ocean Lake alone proposes up to 158 turbines capable of generating up to 1,264 MW, with each turbine approximately 221.7 metres to blade tip and a 35-year operating life. [1]
The central issue is not whether wind turbines can be operated safely under ideal conditions. The issue is whether the EA proves that emergency response can realistically work in this location, with these roads, this terrain, this level of local equipment, and this cumulative turbine count. In my view, it

does not.

2. Cumulative context: Ocean Lake cannot be assessed in isolation

EverWind identifies the Guysborough Wind Projects as three new large-scale onshore wind farms: Setapuktuk Wind Project, Ocean Lake Wind Project, and Wind Farm 3. EverWind describes these as Phase 2 of its renewable energy buildout to power the Point Tupper Green Fuels Project. [4]

Setapuktuk has already received environmental assessment approval. The Province states that Setapuktuk includes 54 eight-MW turbines and 432 MW of generation, with construction expected to begin in late 2026 and operations expected in mid-2028. [5]

Ocean Lake proposes up to 158 turbines. If Wind Farm 3 is assumed at approximately 100 turbines, the combined EverWind buildout in this area would be approximately 312 turbines. The EA should therefore include a cumulative emergency-response analysis for all three projects, not only project-by-project analysis.

Project Known / assumed turbine count Status Emergency-response relevance

Setapuktuk 54 EA approved Adds confirmed industrial wind risk and construction/operation burden in the same municipal emergency-response environment.

Ocean Lake Up to 158 EA under review Subject of this response; large dispersed site with forest roads, wildfire exposure, and limited public water-infrastructure detail.

Wind Farm 3 Assumed 100 Not assessed here; assumed for cumulative planning Reasonable emergency planning should consider the buildout as a whole because fire departments, roads, mutual aid, and provincial resources are shared.

Total Approx. 312 Cumulative assumption Risk becomes a municipal/regional emergency planning issue, not just a single-project issue.

This cumulative context is critical. The same rural volunteer fire system, same road network, same mutual-aid capacity, same EHS and RCMP support, same municipal emergency management structure, and same provincial wildfire resources could be required for more than one industrial wind site.

3. Existing emergency services are present, but adequacy is not demonstrated

The Municipality of the District of Guysborough states that emergency services include fire protection, Emergency Health Services, RCMP, and municipal Emergency Management Organization capacity. It also states that the district is served by nine volunteer fire departments, three RCMP detachments, and EHS stations in Guysborough, Canso, and Country Harbour. [6]

That confirms the existence of emergency services. It does not prove that those services are equipped, staffed, trained, or positioned to handle a remote industrial turbine fire, a construction fire, a tanker-shuttle operation on narrow gravel roads, a worker rescue deep inside the site, or a drought-season wildfire caused or worsened by project activity.

The MODG Director of Emergency Services job description itself states that emergencies are rising in Nova Scotia, that Guysborough County is not immune, and that there is a drain on volunteer fire departments and community groups. It also describes the need to improve resilience, preparedness, training, documentation, mutual aid, fire master planning, and emergency response capabilities. [7] This supports the point that emergency capacity is already a recognized planning issue, not something that should be assumed adequate without proof.

The public record I found does not show a complete, official, current inventory of firefighter availability, off-road firefighting vehicles, wildland firefighting equipment, tanker-shuttle capacity, dry hydrants, radio coverage, SCBA capacity, high-angle rescue capability, turbine-specific training, or response-time modelling. In my local observation, our community fire equipment is ordinary rural volunteer fire equipment. It is not off-road or woods-ready equipment designed for deep industrial forest access, long private gravel road networks, large turbine fires, or wind-driven wildfire response.

4. Publicly visible fire equipment appears mainly structural/rural, not industrial off-road/wildland-ready

Public apparatus listings must be treated cautiously because they are not a formal MODG real-time fleet audit. However, they are useful as an external check. Public listings identify pumpers, pumper/tankers, tankers, and rescue vehicles for nearby departments such as Harbourview, Larry's River, Erinville, Chedabucto/Queensport, Three Top, and Milford.

Haven. [8]

A separate public apparatus listing for Harbourview identifies pumper/tanker-style apparatus at stations including Drum Head, Isaac's Harbour, New Harbour West, and Country Harbour. [9] A public listing for Larry's River identifies a rescue, a tanker, and a new pumper/tanker ordered in June 2024. [10]

These are valuable rural emergency assets, but the public listings do not demonstrate a specialized off-road or woods-ready response fleet for a large turbine road network. I have seen no public evidence of dedicated brush trucks, UTV/side-by-side firefighting units, tracked units, off-road water carriers, project-funded wildland equipment caches, dedicated industrial fire trailer packages, or permanent fire-water infrastructure inside the project. If such resources exist or are planned, they should be disclosed in the EA record.

Emergency service item	What public sources show	Why this remains insufficient for EA approval
Volunteer fire departments	Nine volunteer fire departments serve MODG. [6]	Presence of departments is not the same as proof of staffing, turnout, training, access, water supply, or turbine-specific capability.
Nearest fire departments	Ocean Lake EA identifies Larry's River and Harbourview as about 12 km from the Study Area, with Milford Haven also nearby. [2]	Distance to the Study Area boundary is not response time to a specific turbine deep inside a private gravel road network.
Apparatus	Public listings show mainly pumpers, pumper/tankers, tankers, and rescue vehicles. [8]-[10]	Those vehicles may be suitable for roads and ordinary rural response, but the EA does not prove off-road, woods-road, or wildland-industrial capability.
Water supply	The EA says first responders will be engaged on access to water. [2]	Engagement is not a mapped, funded, permanent fire-water plan with hydrants, dry hydrants, cisterns, fill points, flow rates, and winter access.
Training	The EA offers orientation, mapping, and a wind farm tour for Larry's River and Harbourview. [2]	Orientation is not the same as documented training for turbine fires, high-angle rescue, electrical hazards, wildland fire, tanker shuttles,

and unified command.

5. Road layout and access: the EA does not prove emergency passability

The Ocean Lake EA states that the project includes approximately 223 km of roads, including 129 km of newly constructed roads and 94 km of existing roads. [2] This is a very large internal access network. The EA also states that only 42% of access roads follow existing routes, meaning the majority of the road network is new or newly constructed for the project. [2]

From the plans, these appear to be unpaved industrial access roads, not paved public roads. Even if engineered to carry turbine construction loads, dirt or gravel roads impose slower practical travel speeds on fire apparatus, tankers, ambulances, rescue trucks, and mutual-aid vehicles. Response-time modelling should not use normal highway speed once vehicles enter the project road network.

A conservative emergency model should assume approximately 20-40 km/h on internal gravel roads under good conditions, and less during rain, snow, freeze-thaw, fog, heavy dust, darkness, post-hurricane debris, or washout conditions. This matters because the emergency response could require a long drive after the first unit reaches the project entrance.

I have also seen no clear systematic plan for passing bays, emergency pull-offs, staging areas, tanker shuttle turnarounds, or two-way traffic control points. If the roads are narrow, a pumper, tanker, ambulance, construction truck, contractor pickup, crane support vehicle, or evacuee vehicle may not be able to pass safely. A single stuck or disabled vehicle could block access or evacuation.

6. No clear hydrant, dry hydrant, cistern, or fire-water commitment

I have seen no plan in the EA materials that commits to installing additional hydrants, dry hydrants, cisterns, firefighting ponds, permanent water tanks, or mapped tanker-fill points throughout the project area.

The EA fire mitigation language says the proponent will continue to engage with first responders on site access and access to water. [2] That is not enough. Engagement about water is not the same as a fire-water system.

Rural fire response depends heavily on water supply. Without

hydrants, dry hydrants, cisterns, fill points, mapped drafting sites, winter access, and tanker-shuttle modelling, firefighters may be limited to defensive operations. A turbine fire may have to burn out. A construction fire or vegetation fire may spread before enough water arrives. A wildfire could exceed local capacity quickly during drought or high wind.

7. Construction-phase emergency risk

The construction phase should be treated as a high-consequence, medium-to-high-likelihood emergency period. Construction would include clearing, grubbing, road building, heavy equipment, fuel handling, electrical work, cranes, laydown areas, concrete works, and extensive truck traffic. These activities introduce ignition sources and access conflicts across a large forested site.

During dry summer or drought conditions, machinery, smoking, hot work, electrical equipment, fuel handling, and vehicle traffic can become ignition sources. During spring thaw or heavy rain, road surfaces may deteriorate. During hurricane season, fallen trees, washouts, damaged culverts, flooding, and power or communication disruptions can delay emergency response.

The EA recognizes fire as an accident or malfunction that could affect the atmosphere, terrestrial environment, and socio-economic environment during all project phases. [2] That statement should lead to a detailed fire-response capacity study, not merely a future contingency plan.

8. Operation-phase turbine fire, wildfire, and ice risk

The EA states that wind farm fires are most often caused by lightning strikes, mechanical and hydraulic faults, and electrical installation failure. It cites a fire rate estimated between 1-in-2,000 and 1-in-15,000 turbines, or 0.05% to 0.007% chance of fire. [2]

For a single turbine, that may sound rare. But the cumulative risk changes when hundreds of turbines are proposed in the same emergency-response environment. Using the EA's own range and a cumulative assumption of 312 turbines, the rough annual probability of at least one turbine fire somewhere in the combined buildout is approximately 2.1% to 15.6% per year. Over a 35-year operating life, that corresponds roughly to a 52% to 99.7% chance of at least one turbine fire somewhere within the cumulative buildout. These

figures are not a prediction that any specific turbine will burn; they show that turbine fire is a foreseeable planning scenario at this scale.

Local volunteer fire departments cannot realistically extinguish a nacelle fire more than 100 metres in the air. The likely response is defensive: isolate the area, shut down equipment if possible, keep people away, protect exposures, prevent spread, and wait for the fire to burn out if it cannot be safely attacked. The most serious community risk is not only the turbine itself, but burning debris, blade material, oil or grease, smoke, and ignition of surrounding forest.

The EA also recognizes wildfire risk during all project phases and states that a substantial portion of the project footprint is surrounded by forest cover. It further states that modelling suggests wildfire risk in the Acadian forest region will increase moderately under climate change as a result of warmer and drier conditions. [2] This is directly relevant to emergency planning for a large industrial wind site in forested terrain.

The EA calculates a maximum theoretical ice-throw distance of 470.1 m for the modelled turbine and says this presents risk to workers near turbines during operations. [2] Ice risk also affects road access and emergency response conditions. Emergency vehicles may face slow travel, poor traction, blocked access, and higher risk during winter response.

9. Estimated response time, manpower, and damage

The EA does not provide a detailed public response-time model to each turbine cluster. The following estimates are therefore not official response times; they are conservative planning estimates based on rural volunteer response reality, the stated fire hall distances, the very large internal road network, and the likely slow travel speeds on gravel or dirt access roads.

Scenario Likely first arrival Likely initial manpower Damage / consequence

Incident near a public road or project entrance Approx. 15-30 minutes 6-12 firefighters initially, depending on volunteer turnout Potentially manageable if access is clear and water is available.

Incident deep inside project road network Approx. 30-60+ minutes 6-12 initially; more only after mutual aid Delayed access; limited water; tanker shuttle and staging may

be difficult.
Bad winter road, heavy rain, fog, darkness, dust, or post-hurricane debris 60-120+ minutes possible Low initial turnout may be further delayed Access failure or slow access could allow escalation before crews arrive.
Turbine nacelle fire Arrival may be possible, direct suppression unlikely Defensive command, evacuation control, exposure protection Likely total turbine loss; possible debris, smoke, oil/composite fire, and forest ignition.
Construction equipment or fuel fire during drought Highly variable Initial rural response likely insufficient for major spread Could begin as equipment loss and escalate to wildfire if not contained quickly.
Wind-driven wildfire started inside project area Local initial response possible; full control may require provincial resources Local departments alone likely insufficient for major event Potential multi-day response, road closures, evacuation pressure, smoke impacts, and large forest loss.
Damage from a single turbine nacelle fire would likely include the loss of the turbine itself, potential blade or debris hazards, electrical and oil-related hazards, smoke, and possible ignition of surrounding vegetation. Direct asset loss could be in the millions of dollars per turbine. Community damage could become far greater if a fire spreads into forest during drought or high wind.
10. Required conditions before approval
- A full municipal emergency-response capacity study covering Ocean Lake, Setapuktuk, and Wind Farm 3 cumulatively.
- A complete list of responding fire departments and mutual-aid departments.
- A current apparatus inventory, including whether any units are actually off-road capable or woods-road capable.
- Realistic volunteer firefighter availability and daytime turnout modelling.
- Training requirements and funding for turbine fires, electrical incidents, high-angle rescue, industrial fire, wildland fire, tanker shuttles, and unified command.
- A mapped fire-water plan showing hydrants, dry hydrants, cisterns, ponds, lakes, drafting points, tanker-fill points, winter access, and expected water-delivery rates.
- Road access plans showing road widths, grades,

- Road-access plans showing road widths, grades, bridge/culvert load ratings, passing bays, turnarounds, emergency pull-offs, staging areas, gate procedures, signage, and snow-clearing standards.
- Response-time modelling to each turbine cluster using conservative gravel-road speeds and seasonal/weather assumptions.
- Communication coverage mapping for radio and cellular service, including dead zones.
- A construction-phase emergency plan for fuel storage, hot work, heavy equipment fires, worker injuries, traffic accidents, blasting/excavation incidents, and wildfire ignition.
- An operation-phase emergency plan for nacelle fire, blade failure, tower failure, ice throw, electrical fire, wildfire, hurricane damage, and post-storm access.
- A clear statement of what local volunteer departments are expected to do, what EverWind's own emergency team will do, and what equipment and training the proponent will fund.

11. Requested decision

I ask that the Ocean Lake Wind Project not be approved unless and until a complete, public, independently reviewed emergency-response capacity assessment is provided. The assessment must address road access, water supply, off-road capability, manpower, training, response times, seasonal constraints, drought, hurricanes, wildfire risk, and cumulative municipal emergency-service burden.

Without this information, the EA does not prove that emergency response is adequate. It simply assumes that existing rural emergency services can absorb the risk. That assumption is not acceptable for a 158-turbine project, and it is especially not acceptable when viewed as part of a possible 312-turbine cumulative buildout.

Respectfully submitted,

Name:

Email:

City/Town

Drum Head

Postal Code

B0H 1L0

Attachment(s):

526.46 KB

Please note:

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

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

Uploaded document(s)

Total Documents: 1

Environmental Assessment Response Letter

Ocean Lake Wind Project - Emergency Response, Fire Access, Water Supply, and Cumulative Risk

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

Re: Ocean Lake Wind Project, Guysborough County, Nova Scotia

Date: 20.06.2026

Main conclusion

The EA does not demonstrate that local volunteer emergency services, existing road access, firefighting water supply, equipment, staffing, or training are sufficient for the scale and cumulative risk of the proposed wind buildout.

To: Nova Scotia Department of Environment and Climate Change

Re: Environmental Assessment Comments - Ocean Lake Wind Project, Guysborough County

Date: 20.06.2026

1. Purpose of this submission

I am submitting this response regarding the Ocean Lake Wind Project proposed by EverWind NS Holdings Ltd. and Membertou Development Corporation. My concern is that the Environmental Assessment does not adequately demonstrate that local emergency services, volunteer fire departments, access roads, firefighting water supply, equipment, manpower, or training are sufficient for the scale and type of risk being introduced.

This project should not be assessed as a normal rural development. It is a very large industrial wind project proposed in forested, rural terrain, with difficult access and limited existing emergency infrastructure. Ocean Lake alone proposes up to 158 turbines capable of generating up to 1,264 MW, with each turbine approximately 221.7 metres to blade tip and a 35-year operating life. [1]

The central issue is not whether wind turbines can be operated safely under ideal conditions. The issue is whether the EA proves that emergency response can realistically work in this location, with these roads, this terrain, this level of local equipment, and this cumulative turbine count. In my view, it does not.

2. Cumulative context: Ocean Lake cannot be assessed in isolation

EverWind identifies the Guysborough Wind Projects as three new large-scale onshore wind farms: Setapuktuk Wind Project, Ocean Lake Wind Project, and Wind Farm 3. EverWind describes these as Phase 2 of its renewable energy buildout to power the Point Tupper Green Fuels Project. [4]

Setapuktuk has already received environmental assessment approval. The Province states that Setapuktuk includes 54 eight-MW turbines and 432 MW of generation, with construction expected to begin in late 2026 and operations expected in mid-2028. [5]

Ocean Lake proposes up to 158 turbines. If Wind Farm 3 is assumed at approximately 100 turbines, the combined EverWind buildout in this area would be approximately 312 turbines. The EA should therefore include a cumulative emergency-response analysis for all three projects, not only project-by-project analysis.

Project	Known / assumed turbine count	Status	Emergency-response relevance
Setapuktuk	54	EA approved	Adds confirmed industrial wind risk and construction/operation burden in the same municipal emergency-response environment.
Ocean Lake	Up to 158	EA under review	Subject of this response; large dispersed site with forest roads, wildfire exposure, and limited public water-infrastructure detail.
Wind Farm 3	Assumed 100	Not assessed here; assumed for cumulative planning	Reasonable emergency planning should consider the buildout as a whole because fire departments, roads, mutual aid, and provincial resources are shared.
Total	**Approx. 312**	**Cumulative assumption**	**Risk becomes a municipal/regional emergency planning issue, not just a single-project issue.**

This cumulative context is critical. The same rural volunteer fire system, same road network, same mutual-aid capacity, same EHS and RCMP support, same municipal emergency management structure, and same provincial wildfire resources could be required for more than one industrial wind site.

3. Existing emergency services are present, but adequacy is not demonstrated

The Municipality of the District of Guysborough states that emergency services include fire protection, Emergency Health Services, RCMP, and municipal Emergency Management Organization capacity. It also states that the district is served by nine volunteer fire departments, three RCMP detachments, and EHS stations in Guysborough, Canso, and Country Harbour. [6]

That confirms the existence of emergency services. It does not prove that those services are equipped, staffed, trained, or positioned to handle a remote industrial turbine fire, a construction fire, a tanker-shuttle operation on narrow gravel roads, a worker rescue deep inside the site, or a drought-season wildfire caused or worsened by project activity.

The MODG Director of Emergency Services job description itself states that emergencies are rising in Nova Scotia, that Guysborough County is not immune, and that there is a drain on volunteer fire departments and community groups. It also describes the need to improve resilience, preparedness, training, documentation, mutual aid, fire master planning, and emergency response capabilities. [7] This supports the point that emergency capacity is already a recognized planning issue, not something that should be assumed adequate without proof.

The public record I found does not show a complete, official, current inventory of firefighter

availability, off-road firefighting vehicles, wildland firefighting equipment, tanker-shuttle capacity, dry hydrants, radio coverage, SCBA capacity, high-angle rescue capability, turbine-specific training, or response-time modelling. In my local observation, our community fire equipment is ordinary rural volunteer fire equipment. It is not off-road or woods-ready equipment designed for deep industrial forest access, long private gravel road networks, large turbine fires, or wind-driven wildfire response.

4. Publicly visible fire equipment appears mainly structural/rural, not industrial off-road/wildland-ready

Public apparatus listings must be treated cautiously because they are not a formal MODG real-time fleet audit. However, they are useful as an external check. Public listings identify pumpers, pumper/tankers, tankers, and rescue vehicles for nearby departments such as Harbourview, Larry's River, Erinville, Chedabucto/Queensport, Three Top, and Milford Haven. [8]

A separate public apparatus listing for Harbourview identifies pumper/tanker-style apparatus at stations including Drum Head, Isaac's Harbour, New Harbour West, and Country Harbour. [9] A public listing for Larry's River identifies a rescue, a tanker, and a new pumper/tanker ordered in June 2024. [10]

These are valuable rural emergency assets, but the public listings do not demonstrate a specialized off-road or woods-ready response fleet for a large turbine road network. I have seen no public evidence of dedicated brush trucks, UTV/side-by-side firefighting units, tracked units, off-road water carriers, project-funded wildland equipment caches, dedicated industrial fire trailer packages, or permanent fire-water infrastructure inside the project. If such resources exist or are planned, they should be disclosed in the EA record.

Emergency service item	What public sources show	Why this remains insufficient for EA approval
Volunteer fire departments	Nine volunteer fire departments serve MODG. [6]	Presence of departments is not the same as proof of staffing, turnout, training, access, water supply, or turbine-specific capability.
Nearest fire departments	Ocean Lake EA identifies Larry's River and Harbourview as about 12 km from the Study Area, with Milford Haven also nearby. [2]	Distance to the Study Area boundary is not response time to a specific turbine deep inside a private gravel road network.
Apparatus	Public listings show mainly pumpers, pumper/tankers, tankers, and rescue vehicles. [8]-[10]	Those vehicles may be suitable for roads and ordinary rural response, but the EA does not prove off-road, woods-road, or wildland-industrial capability.
Water supply	The EA says first responders will be engaged on access to water. [2]	Engagement is not a mapped, funded, permanent fire-water plan with hydrants, dry hydrants, cisterns, fill points, flow rates, and winter access.
Training	The EA offers orientation, mapping, and a wind farm tour for Larry's River and Harbourview. [2]	Orientation is not the same as documented training for turbine fires, high-angle rescue, electrical hazards, wildland fire, tanker shuttles, and unified command.

5. Road layout and access: the EA does not prove emergency passability

The Ocean Lake EA states that the project includes approximately 223 km of roads, including 129 km of newly constructed roads and 94 km of existing roads. [2] This is a very large internal access network. The EA also states that only 42% of access roads follow existing routes, meaning the majority of the road network is new or newly constructed for the project. [2]

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one turbine fire somewhere in the combined buildout is approximately 2.1% to 15.6% per year. Over a 35-year operating life, that corresponds roughly to a 52% to 99.7% chance of at least one turbine fire somewhere within the cumulative buildout. These figures are not a prediction that any specific turbine will burn; they show that turbine fire is a foreseeable planning scenario at this scale.

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Scenario	Likely first arrival	Likely initial manpower	Damage / consequence
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Incident deep inside project road network	Approx. 30-60+ minutes	6-12 initially; more only after mutual aid	Delayed access; limited water; tanker shuttle and staging may be difficult.
Bad winter road, heavy rain, fog, darkness, dust, or post-hurricane debris	60-120+ minutes possible	Low initial turnout may be further delayed	Access failure or slow access could allow escalation before crews arrive.
Turbine nacelle fire	Arrival may be possible, direct suppression unlikely	Defensive command, evacuation control, exposure protection	Likely total turbine loss; possible debris, smoke, oil/composite fire, and forest ignition.
Construction equipment or fuel fire during drought	Highly variable	Initial rural response likely insufficient for major spread	Could begin as equipment loss and escalate to wildfire if not contained quickly.
Wind-driven wildfire started inside project area	Local initial response possible; full control may require provincial resources	Local departments alone likely insufficient for major event	Potential multi-day response, road closures, evacuation pressure, smoke impacts, and large forest loss.

Damage from a single turbine nacelle fire would likely include the loss of the turbine itself, potential blade or debris hazards, electrical and oil-related hazards, smoke, and possible ignition of surrounding vegetation. Direct asset loss could be in the millions of dollars per turbine. Community damage could become far greater if a fire spreads into forest during drought or high wind.

10. Required conditions before approval

- A full municipal emergency-response capacity study covering Ocean Lake, Setapuktuk, and Wind Farm 3 cumulatively.
- A complete list of responding fire departments and mutual-aid departments.
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- Road-access plans showing road widths, grades, bridge/culvert load ratings, passing bays, turnarounds, emergency pull-offs, staging areas, gate procedures, signage, and snow-clearing standards.
- Response-time modelling to each turbine cluster using conservative gravel-road speeds and seasonal/weather assumptions.
- Communication coverage mapping for radio and cellular service, including dead zones.

- A construction-phase emergency plan for fuel storage, hot work, heavy equipment fires, worker injuries, traffic accidents, blasting/excavation incidents, and wildfire ignition.

- An operation-phase emergency plan for nacelle fire, blade failure, tower failure, ice throw, electrical fire, wildfire, hurricane damage, and post-storm access.

- A clear statement of what local volunteer departments are expected to do, what EverWind's own emergency team will do, and what equipment and training the proponent will fund.

11. Requested decision

I ask that the Ocean Lake Wind Project not be approved unless and until a complete, public, independently reviewed emergency-response capacity assessment is provided. The assessment must address road access, water supply, off-road capability, manpower, training, response times, seasonal constraints, drought, hurricanes, wildfire risk, and cumulative municipal emergency-service burden.

Without this information, the EA does not prove that emergency response is adequate. It simply assumes that existing rural emergency services can absorb the risk. That assumption is not acceptable for a 158-turbine project, and it is especially not acceptable when viewed as part of a possible 312-turbine cumulative buildout.

Respectfully submitted,

Sources

The following sources were used for the factual statements in this submission. Statements about local equipment not being off-road or woods-ready are presented as local observation and a concern arising from the lack of public proof of specialized capability, not as an official fire-service inventory.

[1] Nova Scotia Department of Environment and Climate Change, Ocean Lake Wind Project EA page: https://novascotia.ca/nse/ea/ocean-lake-wind/

[2] Ocean Lake Wind Project Environmental Assessment Registration Document - Appendix C, May 2026: https://novascotia.ca/nse/ea/ocean-lake-wind/ocean-lake-ea-registration-document-appendix-c.pdf

[3] Ocean Lake Wind Project drawings, Drawings 2.1-3.1G: https://novascotia.ca/nse/ea/ocean-lake-wind/ocean-lake-drawings-2.1-3.1g.pdf

[4] EverWind, Guysborough Wind Projects: https://everwindfuels.com/projects/guysborough-wind-projects/

[5] Nova Scotia News Release, Setapuktuk Wind Project EA approval, November 24, 2025: https://news.novascotia.ca/en/2025/11/24/wind-project-receives-environmental-assessment-approval

[6] Municipality of the District of Guysborough, Fire / EMO: https://modg.ca/home-and-property/your-municipal-services/fire-emo

[7] Municipality of the District of Guysborough, Director of Emergency Services job description: https://modg.ca/sites/default/files/pdfs/DirectorofEmergencyServices.pdf

[8] Firefighters of Nova Scotia, list of fire departments and apparatus in Nova Scotia: https://firefightersofnovascotia.weebly.com/list-of-fire-departments-and-apparatus-in-ns.html

[9] Harbourview Fire Department apparatus listing: https://fire.fandom.com/wiki/Harbourview_Fire_Department

[10] Larry's River and District Fire Department apparatus listing: https://fire.fandom.com/wiki/Larry%27s_River_and_District_Fire_Department

Public Comment Opposing Conditional Approval
Ocean Lake Wind Project Environmental Assessment

Draft submission to Nova Scotia Department of Environment and Climate Change

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

Re: Ocean Lake Wind Project, EverWind NS Holdings Ltd. and Membertou Development Corporation

Submission deadline: June 22, 2026

Dear Environmental Assessment Branch,

I am submitting this comment to oppose conditional environmental assessment approval for the Ocean Lake Wind Project as currently filed. My objection is not a general objection to renewable energy. It is an objection to this Environmental Assessment Registration Document because it contains material gaps, deferred studies, weak assumptions, and unsupported conclusions on public safety, water, wetlands, mainland moose, recreation, tourism, greenhouse-gas accounting, and end-of-life remediation.

The Minister should not grant conditional approval on the present record. At minimum, the proponent should be required to provide additional information, revise the EA, and re-submit a complete assessment before any approval is considered.

1. Basic project facts

The official Nova Scotia EA page states that the project was registered on May 13, 2026, is located in Guysborough County near New Harbour, Goldboro, Larry's River, Lundy, and Roachvale, and would include up to 158 turbines, access roads, electrical lines, substations, laydown yards, and buildings. Each turbine is described as approximately 221.7 m to blade tip, with total capacity up to 1,264 MW. The project is expected to begin construction in 2029 and operate for 35 years.

> *Source: Government of Nova Scotia, Ocean Lake Wind Project EA page, https://novascotia.ca/nse/ea/ocean-lake-wind/*
>
> *"up to 158 proposed wind turbines"*
>
> *"support the production of Certified Green hydrogen and ammonia"*
>
> *Source: Ocean Lake Wind Project EA Registration Document, Executive Summary, PDF page i.*

2. Requested decision

I request that the Minister refuse conditional approval or require a revised EA with additional information before any decision. The current EA should not be accepted as sufficient

because several central risk areas are either incompletely modelled, treated as future permitting issues, or dismissed through generic best-management practices rather than project-specific proof.

Specific requests are listed at the end of this submission.

3. Greenhouse-gas claims and exported ammonia

The EA's greenhouse-gas benefit claim is one of the largest claimed benefits of the project, but the accounting logic is weak. The EA calculates a baseline based on Nova Scotia Power's conventional electricity generation and claims an annual reduction of 1,936,565.18 tCO2e/year, and a 35-year reduction of 67,276,341.82 tCO2e. The EA also says those projections do not consider Nova Scotia's coal phase-out by 2030 or the net-zero 2050 target, and calls the lifetime reduction a best-case scenario. This means the claimed benefit is not a firm project effect; it is an assumed avoided-emissions scenario.

> *"Following the commissioning of the Project, the annual GHG emission reduction is expected to be 1,936,565.18 tCO2e."*
>
> *"this lifespan emissions reduction is an estimate of a best-case GHG reduction scenario"*
>
> *Source: Ocean Lake EA Registration Document, Climate Change section, PDF pages 90-91.*

The project is described by the proponent as supporting Certified Green hydrogen and ammonia. If the electricity is used mainly to produce hydrogen/ammonia for export or industrial use, the EA should not assume that the power directly replaces fossil generation on the Nova Scotia grid. It may instead create a large new industrial load. Any downstream avoided emissions from ammonia used elsewhere must be separated from Nova Scotia's territorial emissions inventory and from the project's own actual emissions.

Canada's official explanation of consumption-based indicators states that national inventories account for emissions from human activities in a country, while production-based accounting includes emissions from exported products but does not account for imported-consumed products. GHG Protocol guidance also states that avoided emissions should be reported separately from inventory emissions and should not be deducted from scope inventories.

> *Source: Environment and Climate Change Canada, Greenhouse gas emissions from a consumption perspective, https://www.canada.ca/en/environment-climate-change/services/environmental-indicators/greenhouse-gas-emissions-consumption-perspective.html; GHG Protocol, Scope 3 FAQ and Inventory and Project Accounting, https://ghgprotocol.org/scope-3-frequently-asked-questions-0 and https://ghgprotocol.org/blog/inventory-and-project-accounting*

Therefore the EA should be required to separate: Nova Scotia territorial emissions; project lifecycle emissions; grid-displacement emissions, if any; and global avoided-emissions claims from exported ammonia. It should also identify ownership and retirement of environmental attributes, power purchase arrangements, ammonia lifecycle carbon intensity, shipping emissions, and anti-double-counting controls. Without this, the "green energy"

claim risks overstating Nova Scotia emission reductions and allowing another jurisdiction or buyer to claim the same benefit.

4. The EA does not model the full 158-turbine project for sound and shadow flicker

The project seeks approval for up to 158 turbines, but the sound and shadow flicker assessments model only 143 turbine locations. The EA says 15 optional turbine locations are retained and would be modelled later if advanced. This is not sufficient for approval of a 158-turbine project. Compliance should be demonstrated before approval, not after approval.

> *"The current modelled layout includes 143 turbine locations"*
>
> *"15 turbine locations ... have not been modelled for noise emissions"*
>
> *Source: Ocean Lake EA Registration Document, Sound section, PDF pages 93-94.*
>
> *"The current modelled layout ... includes 143 turbine locations"*
>
> *"Fifteen optional turbine locations are retained"*
>
> *Source: Ocean Lake EA Registration Document, Shadow Flicker section, PDF page 98.*

This is especially important because sound, flicker, ice throw, trail access, tourism, and wildlife impacts depend on the actual final turbine layout. A conditional approval based on a partial model would shift risk to the public and to later permitting processes.

5. Falling ice and public safety for forest users, children, hunters, foragers, ATV riders, and snowmobilers

The EA's ice-risk logic is inadequate for a publicly accessible working forest. The EA calculates a maximum theoretical ice throw distance of 470.1 m from turbines and then says the nearest potential receptor is 717.0 m away. That appears to treat receptors as fixed buildings or mapped receptor points. It does not properly address mobile public users: children, hunters, foragers, ATV riders, snowmobilers, hikers, trappers, dog walkers, and local residents moving through Crown land.

> *"the maximum theoretical throwing distance ... is 470.1 m"*
>
> *"the nearest potential receptor located 717.0 m from a turbine"*
>
> *Source: Ocean Lake EA Registration Document, Turbine Icing section, PDF pages 356-357.*

The EA also states that no gates are proposed, only signage on access roads warning about hazards including ice throw. That is not a public safety plan. It leaves ordinary users to guess where the danger zone is on icy days. A child or hunter in the woods cannot know turbine status, icing conditions, wind direction, whether a turbine is shut down, or whether ice is shedding.

“No gates to restrict access are proposed”

Source: Ocean Lake EA Registration Document, Operations section, PDF pages 19-20.

A 470.1 m radius around one turbine covers about 69 hectares. Across up to 158 turbines the gross hazard area would be approximately 109 km2 before overlap. If the hazard zones overlap, meaningful winter access may be functionally removed from large portions of the project area during icing conditions. The EA does not provide a map showing all 470.1 m ice-risk radii overlaid on ATV routes, snowmobile trails, informal paths, hunting/foraging areas, parking/access points, and recreational travel corridors.

The project should not be approved until the proponent provides a public ice-safety plan that includes mapped exclusion zones around every turbine, real-time public warning systems, trail-specific risk analysis, signage at actual access points and trail intersections, condition-based closures, responsibility and liability clarity, and proof that safe public access remains meaningful during icing periods.

6. Wetlands, water features, and the unrealistic 30 m setback

The EA repeatedly uses qualified language for water and wetland setbacks. The table of setbacks says 30 m from watercourses and wetlands “where possible” or otherwise where authorized by NSECC. In a wetland-heavy project area with turbine pads, roads, collector lines, substations, laydown yards, and borrow areas, this is not a hard setback. It is a flexible intention.

“30 m from watercourses, where possible”

“30 m from wetlands, where possible”

Source: Ocean Lake EA Registration Document, Siting/setbacks table, PDF page 9.

The scale of the physical disturbance makes that concern more serious. The EA uses a conservative estimate of 30 m wide corridors for roads, road upgrades, collector lines, and a 100 m by 100 m area around turbine locations. It identifies a Study Area of 22,055 ha, an Assessment Area of 2,534 ha, a Clearing Footprint of 1,716 ha, and a Project Footprint of 785 ha.

Source: Ocean Lake EA Registration Document, Areas of Study, PDF page 8.

The EA also states that approximately 46 ha of wetland habitat may be directly impacted, equal to 24.9% of the delineated and predicted wetland habitat within the assessed portion of the LAA. That is not a minor local impact. The EA further admits that detailed characterization and functional assessment results were not collected for predicted wetlands, and that some areas were not assessed through drone-assisted wet area modelling due to recent design changes.

“approximately 46 ha”

“approximately 24.9%”

Source: Ocean Lake EA Registration Document, Wetlands effects assessment, PDF page 187.

“Detailed characterization and functional assessment results were not collected for the PWLs”

“some areas were not assessed through drone-assisted wet area modelling”

Source: Ocean Lake EA Registration Document, Wetlands field assessment, PDF pages 161-162.

The EA should not be approved until all wetlands, wetland functions, groundwater connections, watercourse crossings, and buffer intrusions are fully mapped and assessed. Future permitting is not an adequate substitute for a complete EA decision.

7. Private wells, groundwater, blasting, arsenic, manganese, fluids, and road salt

The EA acknowledges groundwater concerns. It states that naturally occurring trace metals including iron, arsenic, and manganese can be associated with the underlying bedrock regions, and that risk mapping shows the Study Area is primarily in a high-risk or medium-risk region for arsenic and manganese in bedrock wells. It also acknowledges that blasting may mobilize metals in groundwater or affect groundwater quantity.

“iron, arsenic, and manganese”

“High Risk” and Medium Risk”

Source: Ocean Lake EA Registration Document, Geophysical environment / groundwater, PDF pages 105-108.

This is a serious rural-resident issue. Private wells are not replaceable in a practical sense just because a contingency plan says alternative water can be supplied if damage is proven. Baseline testing should not be optional or reactive. It should include all wells within an evidence-based radius from blasting, roads, foundations, laydown yards, substations, and maintenance areas, with post-construction and post-blast monitoring and an enforceable compensation/replacement mechanism.

The EA also acknowledges road-salt risks to wetlands, herpetofauna, and large mammals. It states road salt may harm wetland microbial and vegetative communities, and that deer and moose are attracted to road salt, increasing collision risk. The proposed response is generic. There is no clear chloride budget, no wetland chloride monitoring network, no salt-free or low-salt zones, and no wildlife-attraction mitigation.

“road salt ... may result in indirect adverse effects”

“deer and moose are also known to be attracted”

Source: Ocean Lake EA Registration Document, Wetlands and Terrestrial Fauna sections, PDF pages 189 and 250.

The EA’s hazardous-material mitigation is similarly generic. It proposes designated containers, secondary containment “where possible,” inspections, 30 m setbacks for refuelling and lubrication, off-site servicing “where practicable,” and spill kits. In a wetland-heavy landscape with shallow groundwater concerns, “where possible” and “where

practicable” are not enforceable prevention standards.

“secondary containment in storage areas (where possible)”

“Complete equipment servicing off-site, where practicable”

Source: Ocean Lake EA Registration Document, General Hazardous Material Spills, PDF page 360.

8. Mainland moose, road density, disease, poaching, and habitat fragmentation

Mainland moose should be treated as a central issue, not a secondary wildlife concern. The EA states that mainland moose, listed as endangered under Nova Scotia’s Endangered Species Act, has been recorded within 5 km of the Study Area and that NSNR confirmed the Study Area is within core habitat. The EA also acknowledges that mainland moose threats include habitat loss and fragmentation, and that renewable energy projects are described in the Mainland Moose Recovery Plan as a medium-level threat because wind projects usually require road networks and forest habitat loss.

“within core habitat”

“Renewable energy projects ... medium level threat”

Source: Ocean Lake EA Registration Document, Terrestrial Fauna / Mainland Moose, PDF pages 233 and 243.

The road-network issue is particularly serious. The EA states that road density above 0.6 km/km2 has been shown to affect habitat selection by moose, and that the southeastern part of the Study Area has the lowest pre-existing road density and will see the greatest increase in road density due to the project. That is not a negligible change for an endangered species in core habitat.

“Road placement and density are the main drivers”

“will see the greatest increase in road density”

Source: Ocean Lake EA Registration Document, Mainland Moose habitat fragmentation, PDF pages 246-247.

The EA also admits possible indirect effects from increased deer access because deer carry brainworm and winter tick, and admits increased human access may increase poaching risk. It then dismisses these risks because deer and access already exist and because staff presence may deter poaching. That is not a robust mitigation plan.

“new and upgraded roads will increase access for white-tailed deer”

“land clearing and road development ... increase the risk of poaching”

Source: Ocean Lake EA Registration Document, Mainland Moose disease and poaching, PDF page 251.

The proponent should be required to provide a mainland-moose-specific road/access plan, road-density analysis before and after construction, no-new-access zones, seasonal restrictions around breeding and calving periods, deer-access mitigation, poaching-

prevention measures, and mandatory long-term monitoring. The current EA says the project may be required to complete monitoring for mainland moose in cumulative-effects discussion; that should be mandatory before approval.

9. Trails, hunting, foraging, ATV/OHV use, and public access are not properly protected

The EA acknowledges existing recreational use and direct engagement with the Ocean Lake Riders ATV Club, including trail maps showing overlap with the project. It also acknowledges that ATV/OHV use, hunting, and trapping are part of the local land-use issue. However, it concludes land-use impacts are negligible and proposes no monitoring.

> *"brought trail maps to discuss overlap with the Project"*
> *Source: Ocean Lake EA Registration Document, Stakeholder engagement, PDF pages 52 and 62.*
>
> *"ATV/OHV use, hunting, and trapping"*
>
> *"No monitoring is proposed"*
> *Source: Ocean Lake EA Registration Document, Land Use mitigation and monitoring, PDF page 342.*

This is a major weakness. A new and upgraded road network does not simply improve access. It can destroy or sever long-established informal trails, wildlife paths, hunting routes, foraging areas, snowmobile routes, and quiet backcountry use. It can also create new hazards from industrial traffic, blasting, road salt, dust, icing, signage-only safety zones, and condition-based restrictions.

The EA should include a mapped trail and wildlife-movement impact assessment showing all existing roads, informal trails, ATV/snowmobile routes, hunting access points, foraging areas, wetland crossings, deer/moose corridors, and community-use paths overlaid with all proposed roads, road upgrades, collector lines, turbine pads, laydown areas, substations, borrow pits, and ice-risk zones. It should also identify how each trail or path will be kept open, relocated, restored, or compensated for.

A specific omission is lawful rifle hunting and firearm-safety conflict in proximity to turbines, substations, collector infrastructure, new roads, construction areas, maintenance crews, other recreational users, and ice-risk zones. This is not a technical comment about firearm use; it is a land-use and public-safety issue. Hunting in rural forest is not an abstract activity. It depends on safe access, clear knowledge of occupied work areas, sightlines, separation from roads and workers, and confidence that hunters are not being pushed into smaller overlapping areas with ATV riders, foragers, children, maintenance traffic, and construction activity.

The EA's conclusion that hunting and trapping impacts are negligible does not answer whether lawful hunting can continue safely once the landscape is divided by turbine pads, access roads, substations, collector corridors, maintenance routes, signage, construction

closures, and 470.1 m ice-throw risk areas. If the practical result is that large portions of traditional hunting ground become unsafe, unclear, restricted, or legally risky, then the impact is not negligible.

There is also an unassessed legal/practical hunting-access issue. Nova Scotia's Firearm and Bow Regulations prohibit discharging a firearm loaded with a rifle cartridge, single ball, or slug within 402 m of a dwelling, playground, golf course, athletic field, woods operation, place of business, agricultural building, or public building other than a school. The EA does not state whether turbines, substations, maintenance buildings, laydown yards, active work areas, construction zones, or recurring maintenance operations will be treated by the proponent or regulators as a "place of business" or similar protected place for firearm-discharge purposes.

If the proponent claims turbine infrastructure is a place of business, or if it otherwise does not explicitly permit lawful hunting in close proximity to its infrastructure and accept the associated risk of incidental damage, then the practical loss of hunting land could be very large. A 402 m radius around one turbine covers about 0.51 km2, or about 51 hectares. Across up to 158 turbines, the gross area would be about 80 km2 before overlap. Even with overlap, the exclusion effect could remove a substantial portion of the project lands from practical rifle hunting, especially when combined with substations, roads, workers, maintenance traffic, construction closures, ice-throw zones, and public-safety uncertainty.

This cannot be dismissed as a minor access issue. A hunter cannot safely or lawfully use a landscape if every turbine, work area, and maintenance location may create a moving or fixed exclusion zone. The EA should quantify how much land remains practically huntable during construction, operation, icing conditions, maintenance, and decommissioning, and should state whether the proponent will seek to restrict firearm discharge near turbines or other infrastructure.

Source: Nova Scotia Firearm and Bow Regulations, s. 11(2), as published by Nova Scotia Justice; Ocean Lake EA Registration Document, Land Use mitigation and monitoring, PDF page 342.

The proponent should be required to provide a hunting and firearm-safety access plan prepared with local hunters, trappers, ATV/OHV clubs, land users, and appropriate provincial authorities. That plan should map all hunting-access areas, expected safety buffers around workers and infrastructure, temporary and permanent closures, notification methods, liability responsibilities, and alternative access routes. It should also explain how conflicts among hunters, children, foragers, ATV riders, maintenance crews, and construction contractors will be prevented in practice, not merely addressed through general signage.

10. Tourism, retirement appeal, local business, and land value

The EA treats tourism and recreation as a sub-part of land use, not as a full tourism and rural-economy impact study. The EA states that baseline recreation and tourism are

considered jointly, and recognizes that the region's natural and cultural offerings are assets to locals and tourists. Yet the effects conclusion still says land-use impact is negligible, no change in land value is expected, and no monitoring is proposed.

> *"the region's natural and cultural offerings are an asset"*
>
> *"No monitoring is proposed"*
>
> *Source: Ocean Lake EA Registration Document, Recreation and Tourism / Land Use monitoring, PDF pages 335 and 342.*

The EA's assumption that turbines are compatible with ground-based recreation is too broad for this setting. The affected area is valued for quiet, scenery, wilderness access, hunting, fishing, foraging, ATV/snowmobile trails, coastal tourism, retirement properties, seasonal residences, and rural quality of life. The EA does not provide a visitor survey, business-impact analysis, retirement/residential-attractiveness analysis, viewscape-based tourism analysis, property-value monitoring plan, or post-construction tourism monitoring.

Local businesses that rely on scenery, quiet, wilderness access, trails, accommodations, food service, outfitting, retirement relocation, and seasonal visitors may be affected by the perceived industrialization of the area. The proponent should be required to provide a standalone tourism, recreation, property-value, and rural-business impact assessment before approval.

The EA also underestimates direct personal quality-of-life impacts for rural residents. For me, the issue is not only whether a visitor still technically can enter the area. I live here because of the horizon line, the sense of remoteness, the quiet rural character, and the feeling that the surrounding landscape is still primarily natural rather than industrial. A project with turbines approximately 221.7 m to blade tip, aviation lighting, new roads, substations, maintenance traffic, and visible industrial infrastructure can permanently change that relationship with the land.

Losing the horizon line and the remote rural feeling is a real impact, even if it is difficult to price. It affects why people live here, retire here, visit here, buy property here, operate small local businesses here, and use the woods for hunting, foraging, trail riding, and quiet recreation. The EA should not dismiss this as a minor visual issue or treat it only as a tourism subtopic. It should assess rural amenity, sense of place, visual intrusion, night lighting, perceived industrialization, and property-value/livability impacts from the perspective of residents who chose this area specifically because it is not industrialized.

The proponent should be required to provide viewscape analysis from local homes, roads, trails, coastal viewpoints, beaches, community areas, and commonly used recreational areas, including daytime turbine visibility and nighttime aviation-light visibility. The assessment should include cumulative visual effects, not only individual viewpoints, and should consider whether the project changes the identity of the area from rural wilderness/coastal community to industrial energy landscape.

11. Fire, drought, hurricanes, and emergency response

The EA addresses natural hazards and accidents, but the assessment is not adequate for the recent drought-prone reality of rural eastern Nova Scotia. The project would introduce tall turbines, substations, collector systems, roads, maintenance activity, vehicles, electrical equipment, lubricants, and potential ignition sources into a forested and wetland landscape. The EA discusses fires and wildfire risk, but much of the response is framed as future planning, training, site orientation, equipment, and discussions with local fire departments.

This does not prove that local volunteer departments can safely or effectively respond to turbine fires, substation fires, brush fires, access-road blockages, storm-damaged infrastructure, or simultaneous regional emergencies during drought, hurricane, or extreme-wind events. The EA should include a site-specific emergency-response capacity assessment, not only general commitments.

Required information should include: emergency access modelling during construction and operation; water-source availability during drought; response times; equipment limitations; mutual-aid capacity; communication coverage; evacuation and public-warning procedures; turbine and substation fire scenarios; transformer-fluid fire/spill scenarios; hurricane debris/failure scenarios; road washout scenarios; and liability/cost responsibility for local fire departments and residents.

12. Old-growth forest, bat data, bird data, and unresolved technical quality issues

The EA identifies additional weaknesses that support refusing conditional approval. It states that eight old-growth stands were confirmed and seven intersect the Assessment Area in locations planned for roads, upgrades, or turbines. It then defers confirmation of impacts and further surveys to Crown lands permitting and detailed design. That is another example of approval being requested before impacts are fully resolved.

> *“eight stands were confirmed to be old-growth”*
>
> *“Seven of the eight ... intersect with the Assessment Area”*
>
> *Source: Ocean Lake EA Registration Document, Old-growth forest discussion, PDF page 223.*

Bat data quality also appears weak. The EA states that in 2023 each of 23 detectors lost between one and 75 nights of data, with an average of 30 nights lost. This is significant missing data for a wind project where bat mortality and operational curtailment can be key issues.

> *“between one and 75 nights of data loss”*
>
> *Source: Ocean Lake EA Registration Document, Bat monitoring, PDF page 259.*

Bird acoustic identification also raises concern. The EA states that out of a subset of 2,479 detections manually verified by Strum scientists, 508, or 20%, were correctly identified by

Nighthawk. This should trigger caution in relying on automated identification results without stronger validation.

> *"508 (20%) were correctly identified"*
>
> *Source: Ocean Lake EA Registration Document, Avifauna acoustic monitoring, PDF page 311.*

The document also contains quality-control issues, including pages showing "May x, 2026" and inconsistent proponent naming such as EverWind Fuels NS Holdings Ltd. instead of the name used on the official EA page. These are not the main environmental issue, but they reinforce concern that the filing needs closer review.

13. End-of-life remediation and financial security

The decommissioning section is too weak for a 35-year industrial project. The EA says decommissioning plans will be provided before decommissioning, foundations will be decommissioned to approximately 1 m below grade, power systems will be recycled where practicable, and roads will either be removed or remain depending on lease/easement agreements.

> *"to approximately 1 m below surface grade"*
>
> *"Access roads will either be removed or remain"*
>
> *Source: Ocean Lake EA Registration Document, Decommissioning, PDF page 20.*

That is not a full remediation plan. The EA does not appear to provide binding financial security sufficient to remove turbines, foundations, roads, culverts, collector lines, substations, pads, gravel, contaminated soils, and waste at end of life. It also does not provide measurable restoration standards for wetlands, hydrology, wildlife corridors, informal trails, or public recreational access.

The project should not be approved without a binding decommissioning and remediation plan backed by financial security, with clear standards for full infrastructure removal, road removal unless specifically justified, culvert removal or long-term maintenance, invasive-species control, wetland hydrology restoration, soil decompaction, revegetation with appropriate native species, and public trail/wildlife-corridor restoration.

14. Specific information and conditions required before approval

- A revised full-project layout assessment modelling all 158 turbines, not only 143, for sound, shadow flicker, ice risk, wildlife, trails, wetlands, and viewscape impacts.
- A greenhouse-gas accounting revision separating territorial Nova Scotia emissions, lifecycle project emissions, grid displacement, exported-ammonia avoided emissions, shipping emissions, and environmental-attribute ownership/retirement.
- A public ice-safety assessment with 470.1 m hazard radii mapped around every turbine

and overlaid on all roads, trails, ATV/OHV routes, snowmobile routes, hunting/foraging areas, parking/access points, residences, camps, and public-use areas.

- A public access and children's safety plan that does not rely only on signs, including real-time warnings, closures, marked safe routes, liability clarity, and emergency contacts.

- A complete wetland and watercourse assessment before approval, including all predicted wetlands, functional assessments, drone/WAM gaps, watercourse crossings, buffer intrusions, and wetland hydrology effects.

- A private-well protection plan with baseline testing, post-blast and post-construction monitoring, enforceable replacement/compensation rules, and transparent public reporting.

- A chloride/road-salt management plan with salt budgets, no-salt/low-salt zones, wetland chloride monitoring, and wildlife-attraction mitigation.

- A binding hazardous-materials plan with enforceable setbacks, secondary containment, refuelling/maintenance restrictions, spill mapping, wetland-specific response plans, and independent reporting.

- A mainland-moose-specific mitigation and monitoring plan addressing road density, habitat connectivity, calving/breeding periods, deer access, brainworm/winter tick risk, poaching, and cumulative impacts.

- A trail, hunting, foraging, and recreation impact assessment prepared with local users, including maps of existing informal trails and wildlife paths, and a binding continuity/restoration plan.

- A lawful hunting and firearm-safety/access assessment addressing safe separation from turbines, substations, roads, workers, construction areas, maintenance crews, public users, and ice-risk zones, prepared with local hunters and relevant provincial authorities. This must explicitly address whether project infrastructure will be treated as a place of business or otherwise create 402 m rifle-discharge exclusion areas, and must quantify the total land area effectively removed from practical hunting access.

- A tourism, retirement appeal, property-value, and rural-business impact assessment with baseline and post-construction monitoring.

- A rural quality-of-life and viewscape assessment addressing loss of horizon line, nighttime aviation lighting, sense of remoteness, quiet enjoyment, perceived industrialization, and impacts on why residents, retirees, tourists, and small businesses value the area.

- A site-specific wildfire, drought, hurricane, and emergency-response capacity assessment including volunteer fire department capacity, water supply, access during

storms, turbine/substation fire scenarios, and costs/liability.

- A binding decommissioning/remediation plan with financial security posted before construction and with measurable restoration outcomes.

15. Conclusion

The current EA does not justify conditional approval. It repeatedly relies on future studies, later permitting, generic best practices, signage, engagement, and unproven assumptions. The scale of this project, the wetland-heavy landscape, the core mainland-moose habitat, the public recreational use of the forest, the private-well risks, the drought/fire/hurricane context, and the export-oriented hydrogen/ammonia purpose all require a higher standard of proof before approval.

I respectfully request that the Minister refuse approval as submitted, or require a revised and complete EA addressing the deficiencies above before any conditional approval is considered.

Sources reviewed

- Government of Nova Scotia, Ocean Lake Wind Project EA page: https://novascotia.ca/nse/ea/ocean-lake-wind/
- Ocean Lake Wind Project EA Registration Document - Appendix C: https://novascotia.ca/nse/ea/ocean-lake-wind/ocean-lake-ea-registration-document-appendix-c.pdf
- Environment and Climate Change Canada, Greenhouse gas emissions from a consumption perspective: https://www.canada.ca/en/environment-climate-change/services/environmental-indicators/greenhouse-gas-emissions-consumption-perspective.html
- GHG Protocol, Scope 3 Frequently Asked Questions: https://ghgprotocol.org/scope-3-frequently-asked-questions-0
- GHG Protocol, Inventory and Project Accounting: A Comparative Review: https://ghgprotocol.org/blog/inventory-and-project-accounting

To Whom It May Concern

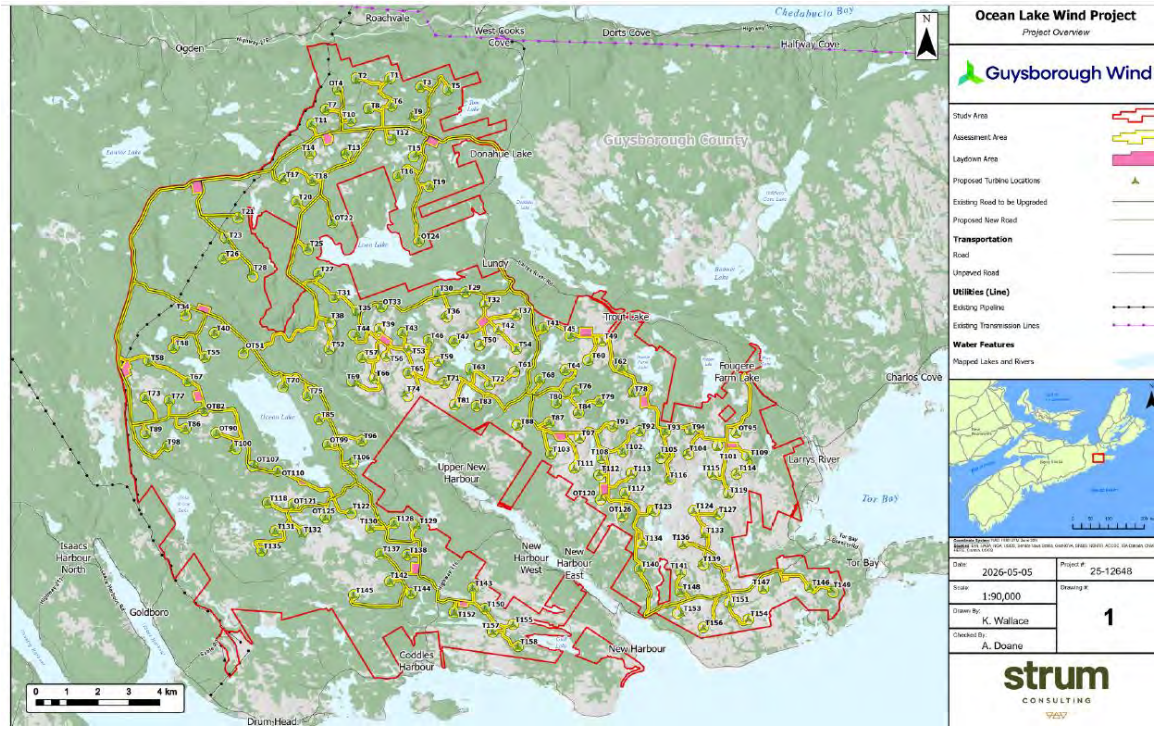
Comments and concerns related to the Ocean Lake Wind project

Date: June 22, 2026

1. Green energy production

The EA notes that the 1264 MW of power from 158 turbines will be used for green hydrogen and ammonia, local use and export. Is local use all in NS? How much will be used in NS for NS, and how much will be exported? The amount in each category should be clearly stated. Especially if much of the green energy production is shipped elsewhere, there should be consideration of environmental fees/bonding for future unknown effects of the projects. The turbine area is large (Att 1) – it should be compared to existing wind farms in terms of power, number of turbines, height, impacted area, etc. The EA notes that turbines are mainly on Crown Land. How many of the 158 are on private land?

Att 1 (from EA registration documents)



When one considers all the fossil fuels used in activities such as (but not limited to) building/production of turbines in China, shipping the turbines from China, site road clearing, forestry harvesting and trucking, movement of turbine parts on site, cranes for setting up and dealing with repairs during the operational life, maintenance activities and site decommissioning later, one should consider how ‘green’ this and other similar projects really are. For example, shipping from Dafeng port, Dafeng District, Yancheng, Jiangsu Province, China to Mulgrave NS is 63km on land in China, 23,200 km marine China to Mulgrave, then varied distances by land. Estimated minimum distance in NS is ~57 km Mulgrave to Cooks Cove, then additional distance to all the sites.

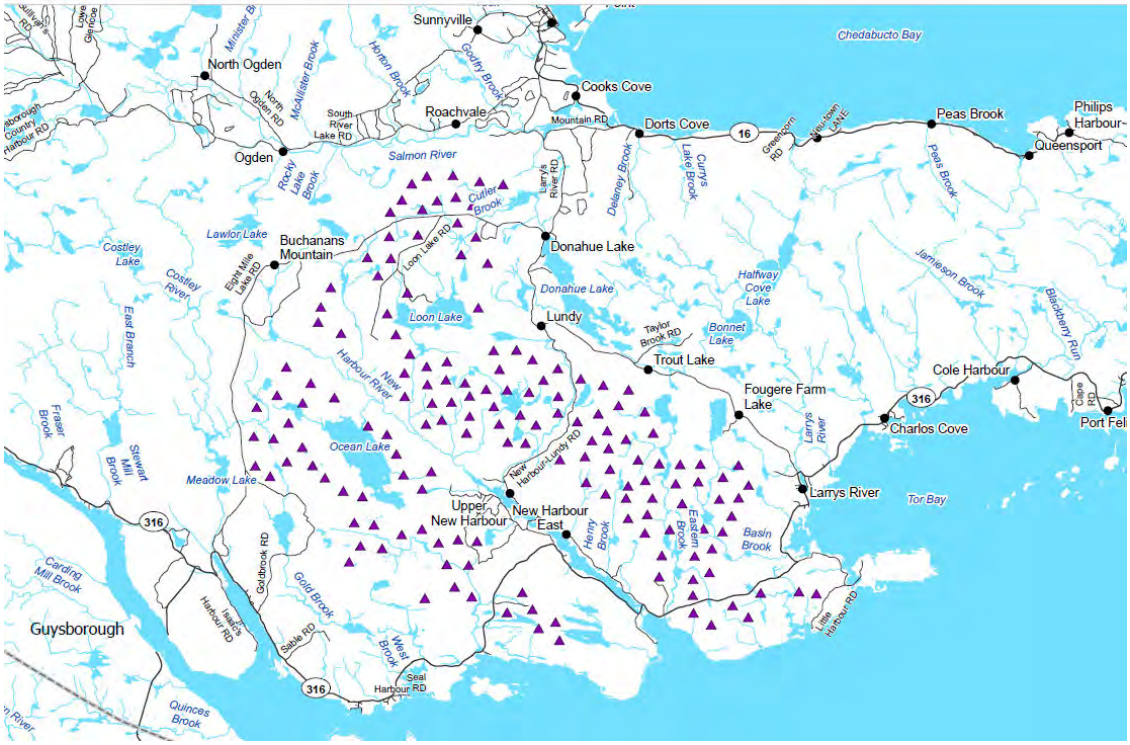
2. Life span

The estimated operational like span in the EA is 35 years, however, the Goldwind GWH182-8.0 MW turbine product declaration states a design service life of <u>>20 years, rated 25 years</u>:
https://www.epditaly.it/en/epd/goldwind-gwh170-7-2-gwh175-7-8-gwh182-8-0-wind-turbine/
This discrepancy should be addressed by the EA, as a 10 year shorter service life would have economic and other ramifications.

3. Land size

The project proposes a large number of turbines (158) of high capacity (8MW) and height over a large area of MODG. The land area of MODG is 2,116.86 km2 (817.32 sq mi). Based on a rough estimate from Google Earth of the area covered by turbines in the draft WSP layout in Att 2, the area containing turbines is ~235 km2, or ~10-11% of MODG. Although the permanent footprint is reported to be 785 ha (7.85 km2), this does NOT include temporary footprint components which would give a much higher value. Aesthetics and tourism could be adversely affected.

<u>Att 2 (EA registration document)</u>



4. Turbine data

Proposed hub height is 130m, total turbine height 221.7m (727 ft) (Att 3). If the proponent moves to concrete turbines, hub height would increase to 150m (Att 3), and presumably total height would increase to 241.7m (793 ft), or almost 800 ft. This would have more impact on noise, ground vibration, bird life and other factors. Would

additional assessment be required in this case? How do these tower heights and capacities compare to other existing and/or proposed wind projects in NS?

Att 3 (EA registration document)

The turbine model for the Project has not been finalized. However, for the purposes of the EA, the Proponent has selected the Goldwind GWH182-8.0 wind turbine generator as it is representative of the operating specifications of models being considered for the Project. Each turbine location, when constructed, will be comprised of a foundation, steel tower, rotor and blades, nacelle (including the rotor shaft and brake and gearbox system), and a cleared pad surrounding the turbine for construction and maintenance purposes. Table 3.3 shows the turbine characteristics of the Goldwind GWH182-8.0.

Table 3.3: Turbine Technical Specifications

Turbine Component	Turbine Specifications for Goldwind GWH182-8.0
Rated capacity	8.0 MW
Rotor diameter	183.4 m
Blade length	91.7 m
Hub height	130 m
Total turbine (tip) height	221.7 m
Cut-out wind speed	24.0 metres per second (m/s)
Number of blades	Three
Swept area	26,417 square metres (m^2)

Steel towers are the baseline consideration for the Project, however, the Proponent is considering concrete towers, manufactured on-site or nearby, to maximize local content and in response to international steel tariffs and other supply chain constraints. If a concrete tower configuration is selected, a greater hub height may be required, up to 150 m in height, to accommodate turbine design, structural engineering, and blade-to-tower clearance requirements associated with the selected tower and turbine configuration. Should this option be advanced, an updated Project Description will be submitted to NSECC, including updated noise and shadow flicker modelling and demonstration of setback compliance in accordance with the revised turbine height. It is expected that footprint-related effects would be unchanged.

5. Significant environmental impact (manufacturer)

The Goldwind EPD gives the following table for significant environmental impact categories (Att 4)

Att 4 (from https://www.epditaly.it/en/epd/goldwind-gwh170-7-2-gwh175-7-8-gwh182-8-0-wind-turbine/)

Table 4 Significant contribute processes for environmental impact categories

Impact indicator	Top 3 contributors
Global Warming potential-total	Tower manufacture, blade manufacture, foundation construction & wind turbine installation
Depletion potential of the stratospheric ozone layer (ODP)	Blade manufacture, foundation construction & wind turbine installation, electricity transmission network construction
Acidification potential, Accumulated Exceedance (AP)	Tower manufacture, Blade manufacture, foundation construction & wind turbine installation
Eutrophication potential, fraction of nutrients reaching freshwater end compartment (EP-freshwater)	Electricity transmission network construction, foundation construction & wind turbine installation, electrical control components production
Formation potential of tropospheric ozone (POCP)	Tower manufacture, Blade manufacture, foundation construction & wind turbine installation
Consumption of abiotic resources - minerals and materials	Production of Electrical control system components, production of drivetrain components, substation construction
Consumption of abiotic resources - fossil resources	Blade manufacture, tower manufacture, foundation construction & wind turbine installation
Water deprivation potential, deprivation-weighted water consumption (WDP)	Blade manufacture, tower manufacture, foundation construction & wind turbine installation

The above table notes water consumption as a potential issue. This issue does not seem to be addressed in the EA. Examples of water use may include, but are not limited to: dust suppression, temporary foreign worker housing (water and wastewater facilities), mix water for making concrete for the turbine bases (actual size not found in EA), additional water if a concrete tower configuration is selected, and potential firefighting needs (e.g., wildfires).
The estimated water needs through the life of the project and the proposed water sources should be documented. If possible, they should be obtained within the existing study area outlined in the EA. A Water Withdrawal Approval may be required from NSECC for part of the project. Watershed boundaries of proposed supplies should be verified, as there may be errors in some of the mapping. For example, although outside the study area, the secondary watershed boundary for Lawlor Lake is incorrect on Figure 9.1.

In addition, there are many small water supplies for homes, cottages, camps, seasonal dwellings in the study area, and many individuals along/near the current road network. These are mainly on drilled wells, dug wells, or springs, some on surface water for non-potable uses. The EA suggests that wells within 800m would have a pre-blast survey. The EA should have a Water Contingency Plan for potentially affected water supplies.

6. Setbacks
Turbine setbacks are not well documented on Table 3.2, especially from homes and buildings. A number are to be determined. For camps, the distance of 350 m seems low as compared to 550 m from the nearest noise receptor in Ontario:
https://www.ontario.ca/document/technical-guide-renewable-energy-approvals-0
'Setbacks for noise have been established in regulation for all land-based wind facilities generating ≥ 50kW and using one or more turbines with a sound power level ≥ 102 dBA or the greatest height of any wind turbine that forms part of the facility, excluding the length of any blades, is ≥ 70 m (subsection 54 (1) of O. Reg. 359/09).
*…**2.1. Minimum Setbacks***

All wind turbines that meet the criteria of subsection 54 (1) of O. Reg. 359/09 as described above, must be located at least 550 meters (m) from the nearest noise receptor. The only exception to this is if a turbine is located near a noise receptor where the ambient noise from road traffic is consistently greater than 40 dBA…'
The minimum setback of 550 m was developed by modeling propagation of turbine noise towards a receptor. Wind conditions, and other factors affecting sound propagation were selected to represent a worst-case scenario to give a conservative estimate of setbacks.

Att 5 (EA registration document)

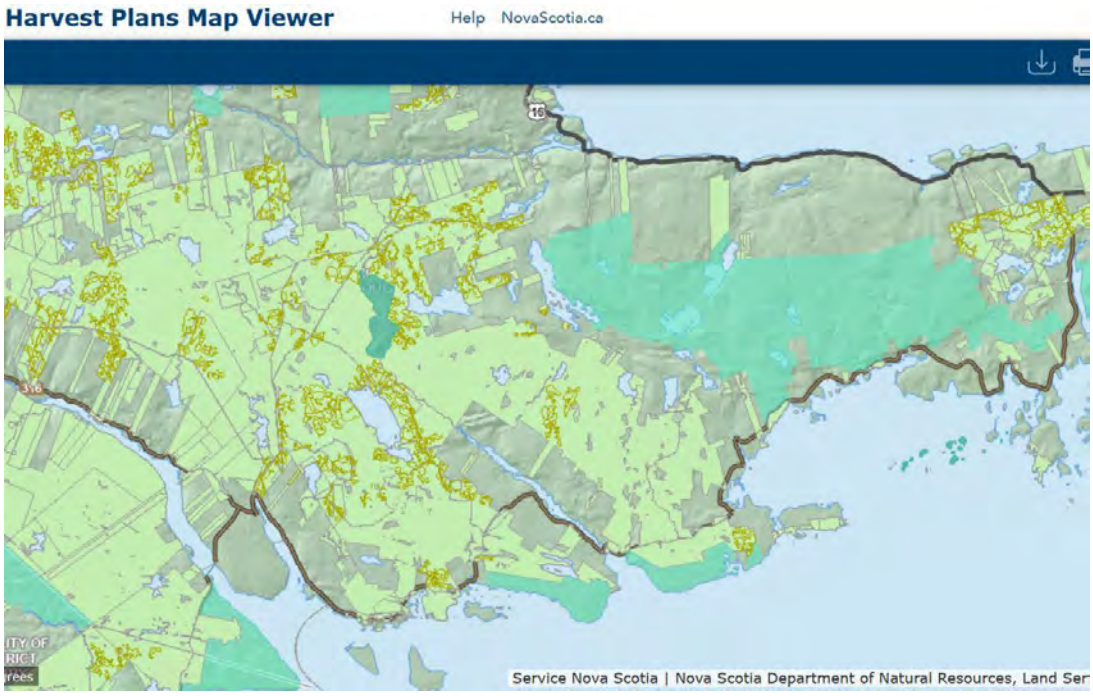
Table 3.2: Summary of Minimum Setbacks and Separation Distances

Setback Category	Distance	Relevant Regulators / Stakeholders
Watercourses	30 m from watercourses, where possible or otherwise where authorized by NSECC	NSECC
Wetlands	30 m from wetlands, where possible or otherwise where authorized by NSECC	NSECC, NSNR
Wetlands of Special Significance (WSS)	30 m from WSS, to be determined in consultation with NSECC	NSECC, NSNR
Old Growth Forests	100 m limited development buffer where practicable on Crown land	NSNR
Protected Areas	To be determined in consultation with NSECC, as appropriate	NSECC, NSNR
Rare Plants and Lichens	Species-specific (Section 10.1)	NSNR
Residential Dwellings (non-participating)	4.0 x Turbine Height	Nova Scotia Municipal Affairs (NSMA)
Camps (non-participating)	350 m	Proponent Commitment
External Property Boundaries (non-participating)	1.0 x Turbine Height	MODG
Public Roads	As per municipal requirements (minimum 1.0 x turbine height)	Proponent Commitment
Powerlines	1.0 x Turbine Height from non-Project-related powerlines	Proponent Commitment
Shadow Flicker	As necessary to meet shadow flicker guidelines based on shadow flicker modelling	NSECC
Sound/Noise	As necessary to meet sound / noise guidance based on sound modelling	NSECC

7. Road construction
The EA suggests that existing roads and previously cleared areas will be used - 129 km new roads, 94 km existing. New roads will have roads 6-12 m wide surface, 17-20 m with ditching and grading.

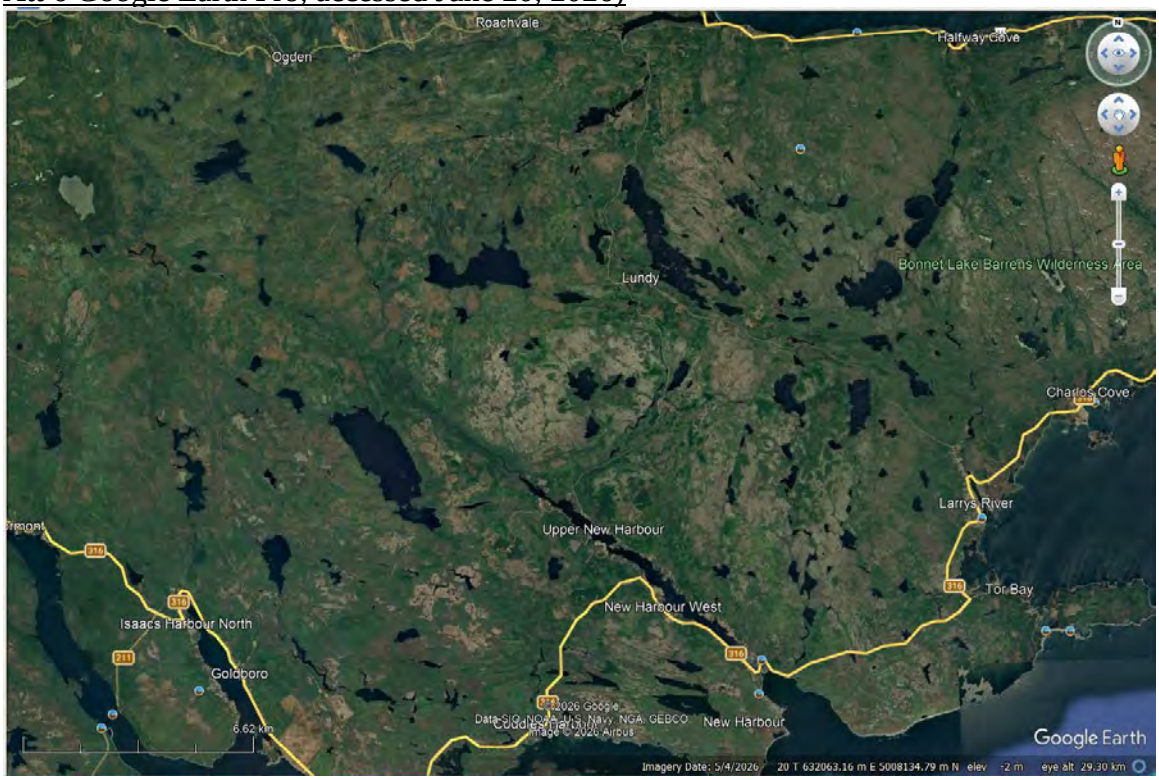
However, many of the existing roads within the study area (other than paved numbered highways) are mainly old logging roads which have grown in to various extents, and will

likely require new road activities. Att 5 shows the NS harvest plan map viewer for the area.
Att 5 (https://nsgi.novascotia.ca/hpmv/ accessed Jun 20, 2026)



Archived harvest plans (go back to early 2016) are shown in brown. There are also many areas of Crown land (green) that have not been harvested in the last 10 years.
Google Earth (Att 6), shows a fairly well vegetated area, with regrowth on many of the archived harvest areas on Att 5. There are some areas where bedrock is at or near surface. Road construction could be more extensive than suggested in the EA.

Att 6 Google Earth Pro, accessed June 20, 2026)



Road construction will provide previously unparalleled access to a large area of the province all at once. Previous harvests and access were in phases rather than a massive area cleared and opened up at once. The impact to wildlife, birds, etc. may be significant from access as well as from the turbines themselves.
Will there be monitoring/policing of activities on all these access roads, and monitoring of dead birds and wildlife near the turbines? A monitoring program should be established, and the results made available to the public.

Another concern with the increased access and usage to a large area is the potential for wildfires. It is well known that many of the recent wildfires in NS were human-related. How will this potential issue be addressed?
Was the following report considered in assessment of old growth forests in the area?:
Old Forest Assessment in the Lawlor Lake Area of Guysborough County, Nova Scotia by Peter Bush. Nova Scotia Department of Natural Resources, Forest Technical Note No. 2018-01, May 9, 2018

8. Water quality/quantity monitoring
During road installation and turbine transport/installation, there are many watercourses (possibly up to 120 interactions) within the study area which may need bridges, culverts, etc., either upgrades to an existing crossing or construction of a new crossing. As noted in the EA, these will require approvals from NSECC. These activities may potentially have water quality impacts on parameters such as (but not limited to): turbidity, suspended solids, pH, nutrients, metals, etc.
The EA outlines some plans to address these issues (Att 7).

Att 7 (EA registration document)

Changes in Surface Water Quantity and Quality

- Develop and implement a Surface Water Management Plan.
    - Integrate water management systems including diversion and collection ditches, roadside drainage channels, vegetated swales, and stormwater retention ponds, as directed by the Surface Water Management Plan.
- Design any necessary alterations in a way that maintains the natural grade of the watercourse, to ensure the hydroperiod remains as it was pre-alteration.
- Fit any watercourse crossings with appropriately sized infrastructure, as prescribed by a certified Watercourse Alteration Installer/Sizer.
- Develop a site-specific Erosion and Sediment Control Plan during the detailed design phase.
    - The plan will target the disturbance to banks (as required) and adjacent land, and will address the type of control structures, proper installation techniques, grading, maintenance and inspection, timing of installation, and vegetation.
- Maintain 30 m vegetated buffers around watercourses, to the extent practicable.
- Integrate outlet protection features to dissipate flow velocities and decrease erosion at the outflow.
- Require that if concrete is to be used, it is pre-cast and cured for at least one week prior to use at a crossing site (NSECC, 2015b).
- Use untreated, rot-resistant timber (e.g., hemlock, tamarack, juniper, or cedar) below the ordinary highwater mark to avoid the leaching of toxic preservatives into waterways (NSECC, 2015b).
- Use rock material that is clean, coarse granular, non-ore-bearing, non-watercourse-derived, and non-toxic to aquatic life (NSECC, 2015b).
- Plan any construction activities that may impact stream banks and substrate to align with low-flow periods.

Monitoring

For crossings subject to provincial notification requirements, visual monitoring will be completed during the installation process to ensure the work is conducted in accordance with the Nova Scotia Watercourse Alteration Activity Standards (NSECC, 2015c). If the crossing requires an approval, monitoring will be determined as part of the permitting process.

A watercourse monitoring plan, if required as part of the permitting phase, may include hydrological, sediment, and stability assessments upstream, downstream, and at the crossing of the watercourse.

CCME and monitoring are not specifically mentioned, with monitoring “if required”. I would recommend that such a program/plan be a mandatory part of the watercourse monitoring plan permitting under site construction and decommissioning activities. Activities before, during and after construction should be monitored as per CCME guidelines, and the data be available to the public?

A monitoring plan is needed - not just for crossings, but for sediment runoff into watercourses, especially during rainfall and/or snowmelt events of high intensity and/or long duration.

From personal experience, many forestry operations and their associated road construction and harvesting, have no CCME or other water-related monitoring requirements, yet have produced silty runoff impacting nearby watercourses. Very few roads are rehabilitated later to reduce erosion.

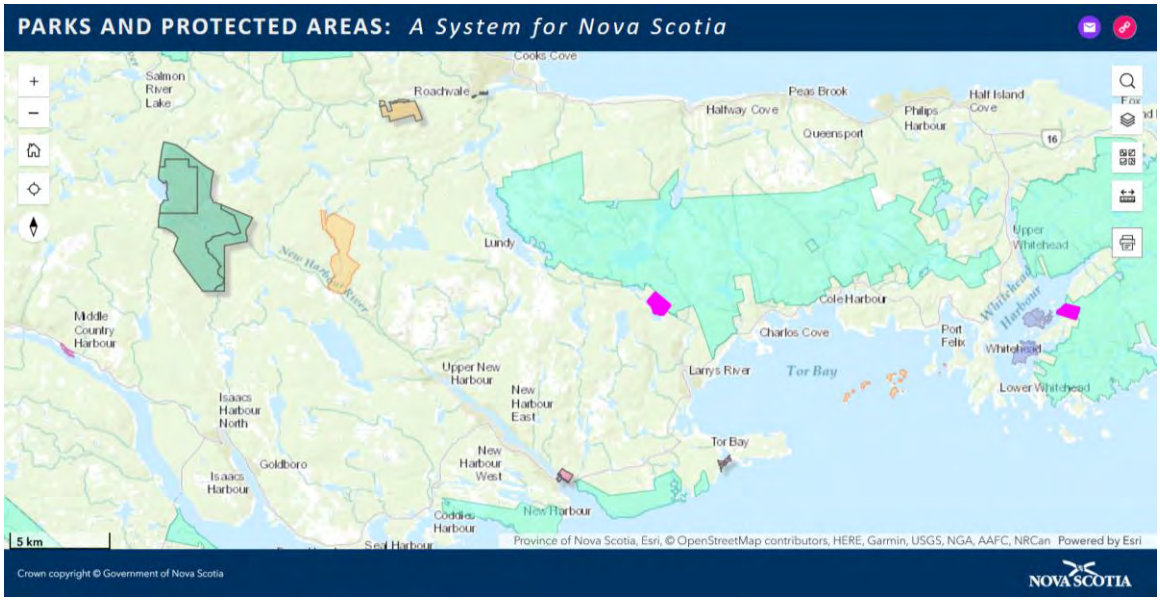
9. Bonnet Lake Barrens

The Bonnet Lake Barrens Wilderness Area to the east of the turbines encompasses Bonnet Lake and surrounding lands that exemplify the granite-dominated landscape typical of this portion of Nova Scotia (Att 8). The protected area preserves an exceptional example of coastal barrens ecosystems, which are increasingly rare and ecologically significant.

This wilderness area includes large, ecologically sensitive raised bogs; rare plants; and an array of lakes and waterways, including ponds, still-waters and streams.

There are several smaller wilderness areas in various stages that should be designated also for their protection.

Att 8 (https://experience.arcgis.com/experience/87a91c432fe7403e8f3ca4bc7631b9b6/)



Att 2 previously shows that the block of MODG from Cooks Cove east to Canso along Chedabucto Bay and south to the Atlantic shore and east along it to Canso, is essentially blocked by the swath of the turbines to any wildlife moving through (such as mainland moose). Birds and bats flying from the west to Bonnet Lake and Canso areas may be negatively affected. There should be fewer turbines and more undisturbed areas let to allow passage into the Bonnet Lake wilderness area.

In the assessment of negative environmental effects that will or are likely to occur and preparation of construction, design and operations and mitigation plans, it is recommended that consideration be given to the distinct natural features of the Bonnet Lake and other wilderness areas in the vicinity. Collecting baseline information and developing mitigation and monitoring measures, and full designation protection, should be given high priority.

10. Sound and vibration

Medium and large turbines generate harmonic vibrations. Depending on interaction, such effect may be magnified or reduced. Has any consideration been given as to the worst case scenario when all turbines are operating at maximum speed, and the possible interactions? The potential for seismic activity should be considered.

"As wind power becomes a widespread and cost-effective renewable energy source at sites throughout the world, researchers are focusing on the propagation of seismic and acoustic waves that wind-harnessing turbines produce.
At the Seismological Society of America (SSA)'s 2024 Annual Meeting, researchers presented simulations of turbine-driven wave propagation across several frequencies and ground conditions. John Fitzgerald of Queen's University and colleagues then compared these simulation results with observations from Wolfe Island, Ontario, the site of one of Canada's first major wind farms.
The seismic signals from wind farms are very small and not likely to be felt by people, but people "can definitely hear and to some extent feel the acoustic signals" from these installations, Fitzgerald said.
"But there isn't a ton of work that has been done to characterize both the ground motion and acoustic noise of these types of installations," he explained. "We're showing that you can do these very large simulations of an entire wind farm, and this could provide important information for planning future wind farm developments."
Vibrations from wind turbines are likely caused by back-and-forth oscillations of the turbine shaking back and forth during operation, while acoustic waves are likely produced directly in front of the turbine blades. Acoustic waves also can couple with the ground and create complex signals."
https://www.seismosoc.org/news/study-takes-the-seismic-and-acoustic-pulse-of-wind-turbines/ Study Takes the Seismic and Acoustic Pulse of Wind Turbines
Published on 2 May 2024

On the north side of the study area, approaching Roachvale, turbines should be limited to south of the Eight Mile Lake Road (western extension Loon Lake Road). There is concern that those on the north towards the Salmon River may create noise due to the configuration of the Salmon River Valley in the Roachvale/North Ogden/Ogden area. This area acts as a huge echo chamber now for noise, e.g. during thunderstorms. In addition, some of these turbines are approaching the M&NE Pipeline. Shadow flicker on the north side of the study area, where the high turbines will be affected by sunlight from the south.

Landowners have the right generally to quiet enjoyment of their land. Sound monitoring should be carried out in the Salmon River Valley, Lundy-Larrys River, Goldboro Road, along the main roads surrounding the study area.

11. Decommissioning after the predicted 35 years of operation. Att 9 shows the EA proposals for decommissioning, though details are limited at present.

Att 9 (EA registration document)

3.6.3 Decommissioning

Prior to decommissioning, Nova Scotia Environment and Climate Change (NSECC) and the Municipality of the District of Guysborough (MODG) will be provided with decommissioning plans for review and compliance with the Project's EA conditions. Opportunities for repowering will be considered prior to entering the decommissioning phase.

Generally, the decommissioning phase will follow the same steps as the construction phase:

- Dismantling and removal of the turbines.
- Decommissioning the turbine foundations as per the conditions of the land lease agreement (to approximately 1 m below surface grade).
- Removal, recycling (where practicable), and disposal of power collection system, conductor, and poles.
- Removal of all other equipment and reinstatement and stabilization of land.
- Access roads will either be removed or remain in place as per lease and easement agreements with the Crown and/or landowners.

According to the Canadian Renewable Energy Association (CanREA, n.d.), up to 90% of wind turbine blades can be recycled. Additional components, such as steel from the towers, copper cables, and electrical equipment, can also be recycled or reused. Materials that cannot be recycled can sometimes be reused in other applications, such as filler in construction materials. Recent innovations in fibreglass recycling have used various chemical and mechanical means to prepare the material for reuse in other applications (Power Technology, 2024). At the time of decommissioning, it is anticipated that newer technologies will allow for a greater amount of recycling or reuse of the end-of-life turbine materials. Any material that cannot be recycled or reused, will be sent for final disposal at an approval disposal facility.

Decommissioning is anticipated to take 18 to 36 months to complete.

Another information source has some additional comments:
windeurope.org norwegianscitechnews.com
Types of Waste from Wind Farm Decommissioning

Decommissioning wind farms generates significant waste, primarily from the following components:
Wind Turbine Blades
- *Wind turbine blades are the most challenging waste to manage.*
- *They are made from durable composite materials that are difficult to recycle.*
- *Many blades currently end up in landfills or are incinerated due to a lack of effective recycling solutions.*

Other Components
- *Turbine Towers: Made of steel, these can often be recycled.*
- *Electrical Components: Includes wiring and transformers, which can also be recycled.*
- *Concrete Foundations: These may be crushed and reused in construction.*

Waste Management Challenges
The decommissioning process faces several challenges:

- *Landfill Ban: The European wind industry has implemented a landfill ban for wind turbine blades, effective from January 2026, which necessitates finding alternative disposal methods.*
- *Recycling Limitations: Currently, about 90% of a wind turbine's mass is recyclable, but the blades remain a significant hurdle.*
- *Increasing Volume: As more turbines reach the end of their operational life, the volume of decommissioned blades is expected to rise, potentially reaching 55,000 tonnes annually by 2030.*

Future Directions
To address these challenges, the wind industry is focusing on:

- *Circular Economy Initiatives: Developing new methods for reusing and recycling turbine blades.*
- *Investment in Facilities: Companies are investing in facilities that can handle the recycling of composite materials.*
- *Regulatory Support: Calls for new waste codes to better manage wind turbine waste and promote sustainable practices.*

These efforts aim to minimize environmental impact and enhance the sustainability of wind energy as a renewable resource.

12. Summary

In summary, a number of concerns/comments have been brought forward for consideration. Mega-projects such as this should be assessed in provincial context for effects on environment, aesthetic, tourism, etc. within the total additive effects of wind turbine development in the province of NS. There are hundreds, possibly into the thousands, of turbines now – existing, in progress, and/or planned. There should be some kind of limit established for the province, and establishment of turbine-free zones to reduce impact on people, wildlife and the environment, and preserve the natural unspoiled beauty of the province and its aesthetic appeal to tourists.

June 22, 2026

Hon. Timothy Halman
Minister of Environment and Climate Change
Department of Environment and Climate Change
1894 Barrington Street, Suite 1800
Halifax, NS B3J 2A8

RE: Public input to the Environmental Assessment Registration Document Ocean Lake Wind Project, May 2026, Appendix E: "WSP Noise Assessment"

Dear Minister Halman,

Summary

Pursuant to Section 12(c) of the Nova Scotia Environmental Assessment Regulations (the Regulations), I ask that you fully consider the concerns expressed by the public in this letter regarding the potential adverse noise effects on the surrounding local community as posed by the Ocean Lake Wind Project (the Project).

After reviewing Appendix E "WSP Noise Assessment" of the environmental assessment registration materials (the EA), my opinion is that the EA is substantially incomplete and lacks sufficient information for the Minister[1] to reasonably decide if the Project's ISO 9613-2 (the Standard) based noise model (the Model) for predicting receptor site noise levels, reliably demonstrates that the Project's operational noise levels at all receptor sites will comply with the Nova Scotia regulatory noise limit (the Limit) of 40 dB(A). To enable an informed decision by the Minister, the proponent should submit an addendum with additional evidence and explanation that addresses:

1) The specific type of acoustical quantity the Limit represents.
2) The relationship between the type of acoustical quantity the Model's predicted noise levels represents and the type of acoustical quantity the Limit represents.
3) How the Project's wind turbines will be managed to ensure their continuous operation in a reduced sound power mode.
4) Quantification of Model conservative assumptions the EA uses to justify excluding the Model's accuracy (the Accuracy) when assessing receptor compliance.
5) An explanation of how the Standard's stated accuracy and additional limitations identified in Section 9 were considered and applied in the compliance assessment.

[1] "Minister" refers to the Nova Scotia Minister of Environment and Climate Change

6) Justification for using the Model to predict noise levels for receptor sites at distances greater than 1 kilometer in a region where the Standard states there is no specified accuracy.

The six sections that follow the next section provide evidence and discussion that supports each of the foregoing EA informational deficiencies and provide additional details for required information.

Approval conditions do not remedy insufficient information

A condition of approval imposed by the Minister after the environmental assessment review process is closed cannot substitute for information that was necessary for the Minister to make an informed decision during the assessment process itself.

The purpose of the environmental assessment process is to provide the Minister with sufficient information to evaluate potential environmental effects and determine whether a project undertaking requires additional information (i.e., proponent addendum, focus report, environmental assessment report), is approved, is approved with conditions, or is rejected. Where information *necessary* to make that determination is absent from the registration documents, a post-decision condition cannot remedy the deficiency because the decision has already been made.

Further, an approval condition cannot provide the public with a meaningful opportunity to review and comment on information that was not available during the assessment process. Public review and participation are core objectives of the process.

Therefore, where the registration information is insufficient for an informed, Minister's decision, additional information must be obtained pursuant to Section 13(1)(a) of the Environmental Assessment Regulations rather than deferred to or replaced by a future condition of approval.

1: Noise limit acoustical quantity undefined

In identifying the noise regulatory framework with which the Project must comply, Section 3 of Appendix E "WSP Noise Assessment" of the EA cites the "Environmental Assessment Supplemental Checklist: Wind Energy Project (Nova Scotia 2024)" (the EA Guide) as the source that establishes the Limit against which the Project's operational noise levels will be assessed. In specifying the Limit, the EA Guide states that the EA must,

> *"Include standard modeling to show that operational noise at permanent and seasonal receptors (within 2 km) will not exceed 40 dBA."*

However, this Limit specification is incomplete. As an acoustical quantity, the Limit must also specify the measurement method. The quote does this in part by specifying that the measurement is A-weighted (dBA), but it does not quantify the measurement duration. For example, a typical Class 1 noise level meter will have "Fast," "Slow," "Impulse," and "time averaging" modes. The latter mode also must include the time interval over which averaging occurs such as ten seconds, one minute, ten minutes, one hour, etc. Neither the EA Guide nor

the EA itself provides this information. Hence the specific type of acoustical quantity against which the Model's predicted noise levels are to be compared has not been adequately specified.

Interestingly, the EA's Appendix E mentions the Nova Scotia Environment and Climate Change document "Guidelines for Environmental Noise Measurement and Assessment" (Guidelines) which does contain a "compliance period" of one-hour as the time averaging mode; this could complete the definition. However, the Guidelines are cited for assessing low frequency noise as opposed to broadband noise for which the Limit applies. If the intent is to also use a one-hour averaging mode when assessing the operational broadband noise levels and the Limit is to be treated as a one-hour average as well, then this needs to be stated.

As it stands, the EA registration information does not provide the Minister with a clearly defined broadband noise limit compliance criterion. The absence of this information does not allow the Minister to determine if the Model's predicted noise levels reliably indicate compliance. Pursuant to Section 13(1)(a) of the Environmental Assessment Regulations, the proponent should submit an addendum with additional evidence that identifies and explains the specific type of acoustical quantity the Limit represents.

2: Model predicted sound level relation to Limit is undefined

Section 5 of the Standard describes the Model's predicted sound level as an A-weighted, sound pressure level averaged over a short time interval for meteorological conditions specified in that section. The standard does not provide a precise value for "short time interval" such as five minutes. However, Section 8 distinguishes between the short-term quantity calculated by the basic model and long-term averages for which a meteorological correction factor may be applied. This distinction suggests that the Model output is not a long-term average which would require a correction factor.

Given that the Limit does not completely identify its type of acoustical quantity (as discussed above), and given that the Standard describes its predictions as a short-term, averaged sound pressure levels without defining the averaging interval, the registration documents do not establish whether the Model's predictive sound levels and the Limit represent the same type of acoustic quantity. Nor do the registration documents provide the mathematical, statistical, empirical, or regulatory relationship by which the Model's predicted levels can be compared to the Limit criterion if it does not represent the same acoustic quantity type.

The EA registration's lack of a definitive relationship between the types of acoustic quantity represented by the Model's predicted sound levels and the Limit does not allow the Minister to determine how the acoustical quantity being predicted by the Model should be compared to the Limit against which compliance at a receptor site is being assessed. Pursuant to Section 13(1)(a) of the Environmental Assessment Regulations, the proponent should submit an addendum containing additional information that:

1) Unambiguously identifies the type of acoustical quantity the Limit represents.
2) Clearly explains and underwrites with credible evidence a method by which the Model's predictive noise levels may be compared to the Limit.
3) Or clearly demonstrates via credible evidence that the Model's predictive noise levels may be directly compared by value to the Limit.

3. Wind turbine reduced sound power mode uncertain

The EA's Appendix E, Section 2 "Project Description," Table 1 "Project Noise Sources and Operating Modes" identifies all the wind turbines as operating in Sound Reduction Mode 4 (SRM4s). Table 4 "Project Noise Emissions" ascribes a total sound power level of 106.5 dB(A) for the Goldwind GWH182 8.0-MW wind turbine operating in this Sound Reduction Mode. Footnote (b) to Table 1 on Appendix E page 8, describes this mode stating,

> *"SRM4s = Sound Reduction Mode 4 with STE [serrated trailing edge] blades"*

For comparison, on page 92 in Section 7.1.3.4 "Assessment Methodology" of the Setapuktuk Wind Project Environmental Assessment Registration Document it states,

> *"The standard power mode for the Goldwind GHW182-8.0 machine produces a maximum noise level of 112.0 dBA"*

Therefore, the same wind turbine model as cited in this EA when operating in "standard" power mode has a total sound power rating 5.5 dB(A) greater than that when operating in the SMR4 mode. The minimum predicted noise level in Table 5. "Predicted Project and Cumulative Noise Levels" is 35.9 dB(A). Applying the difference between the cited standard mode and SRM4 sound power levels to the minimum receptor level reported in Table 5 suggests that receptor locations presently reported as compliant may not remain compliant if the turbines operate in standard mode. This suggests the Project's compliance with the regulatory noise limit is contingent upon continuous operation of all Project wind turbines in the SMR4 mode. This raises several questions:

- Under what wind speeds and directions is the SRM4 active?
- What monitoring and enforcement mechanisms ensure the turbine remains in SRM4 after commissioning?
- Is the enforcement mechanism automated?
- If so, has the enforcement mechanism been demonstrated to reliably maintain the wind turbine in SRM4 mode continuously under all conditions?
- What is the associated reduction in energy production penalty when operating in the SMR4 mode? (If substantial, there may be a significant financial disincentive to maintain the SMR4 mode of operation precisely.)

Other than the Table 1 footnote, the EA registration makes no further comment on the nature of the SMR4 operating mode.

The EA's lack of any information regarding how the SMR4 mode is to be managed, does not allow the Minister to determine that all wind turbines in the Project can be reliably operated in the prescribed SRM4 mode on a continuing basis. Pursuant to Section 13(1)(a) of the Environmental Assessment Regulations, the proponent should submit an addendum containing additional information that answers the questions above and that explains how the SMR4 mode is managed and in so doing demonstrates that the mode can be reliably maintained on a continuing basis.

4: Model Accuracy excluded when assessing compliance

As described in the EA Appendix E Section 4.3 "Noise Prediction Methodology," the Standard's predicted noise level accuracy is +/- 3 dB(A) for distances between source and receptor up to 1 km and for greater distances is not stated[2]. The EA further notes that the accuracy of the total sound power noise emission inputs for the model is often +/- 2 dB(A). Treating these two accuracies as independent phenomena, the EA correctly calculates a combined accuracy[3] of +/- 3.6 dB(A).

Including this Accuracy in assessing receptor site compliance would mean that any receptor, for which the difference between the Model's predicted sound level and the Limit is less than the 3.6 dB(A) Accuracy[4] falls within the Model's range of uncertainty with respect to the Limit. However, the EA's Table 6 "Compliance Assessment" in Section 6.1 "Broadband Noise – Operations" does not include this Accuracy value when determining compliance as revealed by Table 5 "Predicted Project and Cumulative Noise Levels" for which model results greater than 36.4 dB(A) and as high as 40 dB(A) are all reported as "Compliant."

A review of EA Table 5 yields 363 receptors out of 376 (96.5%) having a Model predicted sound level of 36.5 dB(A) or greater thereby rendering their compliance uncertain when the EA's Accuracy is included in the assessment.

In Section 4.3, the EA seeks to justify the Accuracy's omission by having applied the three conservative modeling assumptions that follow:

1) Each receptor was assumed to be downwind from each source 100% of the time which "likely" overestimates noise effects.
2) The wind turbines were modelled with maximum noise emissions 100% of the time. Given turbines often operate less than 100% of the time (e.g., during periods of low wind) this "likely" overestimates noise levels.
3) Acoustical screening from buildings and trees was not considered which will "tend" to overestimate noise effects.

In making this argument, the EA relies upon these three qualitative assertions to more than offset the 3.6 dB(A) uncertainty margin with respect to the Limit by ostensibly overpredicting noise levels. However, the EA appears unsure of this offsetting effect using words such as "likely" and "tend" in describing the influence their conservative assumptions would have on the Model's noise estimates. Further, the EA does not *quantify* the degree of conservatism associated with those assumptions, nor does it demonstrate that the cumulative conservatism is sufficient to

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[2] All the receptor sites itemized in Table 2, "Potential Receptor Locations and Distance to Project Noise Sources," are reported as being more than 1 km from the nearest project wind turbine and therefore lie beyond the distance range for which ISO 9613-2 provides an estimate of predictive accuracy. The discussion in this section and the following section is relevant if the proponent provides evidence supporting the application of the stated accuracy estimate beyond 1 km or otherwise provides a justified basis for assessing prediction uncertainty at those distances. Should a different estimate of prediction uncertainty be demonstrated, the range of model uncertainty discussed herein would be adjusted accordingly.

[3] Henceforth, the term Accuracy shall refer to the Model's combined accuracy.

[4] The predicted sound level is greater than 40 dB(A) minus 3.6 dB(A) or 36.4 dB(A).

completely compensate for the uncertainty margin for receptors having modeled noise levels within the Accuracy range (3.6 dB(A)) of the Limit (i.e., greater than 36.4 dB(A)).

The EA's lack of any information that quantifies the three conservative modeling assumptions does not allow the Minister to determine if the Model's Accuracy can be reasonably omitted from determining a receptor site's compliance with the Limit. Pursuant to Section 13(1)(a) of the Environmental Assessment Regulations, the proponent should submit an addendum containing additional information that:

1) Provides evidence that can reasonably quantify in dB(A) the degree to which each of the three conservative assumptions can offset the Model's Accuracy.
2) Demonstrates that the cumulative offset afforded by the three conservative assumptions is greater than the uncertainty margin (3.6 dB(A)) introduced by the Model's Accuracy into the noise compliance assessment.
3) Or, failing (1) and (2), revises the receptor site compliance Table 6 to accurately reflect the compliance uncertainty for receptor sites where the Model's predicted noise level exceeds 36.4 dB(A).

5: Model's Accuracy definition incomplete

The EA draws the Standard's accuracy information from Table 4 in the Standard's Section 9 "Accuracy and limitations of the method." However, the Table 4 values, by themselves, do not completely characterize the Standard's estimate of predictive accuracy. Section 9 describes the accuracy further stating,

> *"The estimates of accuracy in Table 4 are for downwind conditions averaged over independent situations (as specified in Clause 5). They should not necessarily be expected to agree with the variation in measurements made at a given site on a given day. The latter can be expected to be considerably larger than the values in Table 4."*

The EA neither acknowledges nor quantifies this "considerably larger" variation in measurements which will increase the Model's Accuracy range of 3.6 dB(A) by some unknown amount. This in turn increases the offset for which the EA's three conservative assumptions must compensate.

Absent a complete consideration of all aspects of the Standard's accuracy, the EA's registration information is insufficient for the Minister to determine that the EA's conservative assumptions will also account for the model's accuracy range which extends beyond +/- 3.0 dB(A) by an unprescribed amount. Pursuant to Section 13(1)(a) of the Environmental Assessment Regulations, the proponent should submit an addendum containing additional information that:

1) Based on the available professional and/or academic literature, identifies and justifies a reasonable estimate for the "variation in measurements" described in the Standard's Section 9.
2) Demonstrates that the cumulative conservative assumptions in item (4) above accommodate the increased accuracy range.
3) Or, failing (2), revises the receptor site compliance Table 6 to reflect the increased accuracy range.

6. Model's Accuracy beyond 1 km undefined

As described in item 3 above, the EA Appendix E Section 4.3 "Noise Prediction Methodology," states the Standard's predicted noise level accuracy is +/- 3 dB(A) for distances between source and receptor up to 1 km and for greater distances is not stated. All the receptor sites itemized in the EA's Table 2. "Potential Receptor Locations and Distance to Project Noise Sources," are reported as being greater than 1 km to the nearest wind turbine in the Project and therefore in a region where the model's noise prediction accuracy is undefined. Interestingly, the EA makes no further mention of this limitation.

The absence of any evidence or discussion in the EA regarding the Standard's lack of a stated prediction accuracy for receptor sites greater than 1 km from the noise source, does not allow the Minister to determine whether the EA's conservative noise modeling assumptions will also account for the Model's undefined accuracy beyond 1 km. Pursuant to Section 13(1)(a) of the Environmental Assessment Regulations, the proponent should submit an addendum containing additional information that:

1) Identifies the evidence, validation studies, professional guidance, or academic literature supporting the use of ISO 9613-2 predictions at receptor locations beyond 1 km.
2) Explains the basis upon which confidence in those predictions can be assessed despite the absence of an accuracy estimate in the Standard.
3) Demonstrates that the project's compliance conclusions remain reliable at receptor locations beyond 1 km.

Conclusion

Taken individually, each of the six foregoing issues identifies information that is absent from the EA registration documents and that appears necessary to evaluate the reliability of the Project's predicted receptor-site noise levels. Taken collectively, these issues raise substantial uncertainty regarding the evidence and reasoning upon which the EA concludes that all Project receptor sites will comply with the 40 dB(A) maximum noise limit once the Project is operational.

I therefore respectfully submit that the EA registration information is insufficient to allow the Minister to make a fully informed decision regarding the Project's potential operational noise effects on the surrounding community and that additional information detailed in this letter should be required from the proponent pursuant to Section 13(1)(a) of the Environmental Assessment Regulations.

About the submission

FORM NAME	# SUBMISSION ID	SUBMISSION DATE
Environmental Assessment - Project Comments	99132de9	22/06/2026 15:20

SUBMISSION STATUS

SUBMITTED

Submission details

Panel

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

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

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

Privacy Notice

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

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

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

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

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

Select a Project:

Ocean Lake Wind Project, Guysborough County

Comments:

I am strongly opposed to the Ocean Lake Wind Project and the placement of up to 158 windmill turbines in this area, using all the available Crown land. This area is now the natural habitat for numerous animals, birds, fish and plants. With 158 wind turbines in place, and the access roads needed to place and service these 158 wind turbines their natural habitat will be no more. In addition to this, the power generated by these wind turbines is not for local use. There are no motels, restaurants, large grocery stores, hardware stores, etc... n the area of the Ocean Lake Wind project that would temporarily gain from this project. This area will be sacrificing its natural beauty and have nothing to show for it except 158 wind turbines. We live here because we were born here and we love the look and peacefulnesses of the natural environment which the placement of 158 wind mill turbines will destroy.

Name:

Email:

City/Town

New Harbour

Postal Code

B0H 1T0

Attachment(s):

image.jpg
2.11 MB

3C009E71-C69F-487F-92EE-F1B9B9AB0D13.jpeg
2.41 MB

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2.62 MB

Please note:

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

Yes, I agree (must be selected to proceed)

Uploaded document(s)

Total Documents: 3

image.jpg

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Maritime Aboriginal Peoples Council

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

Forums

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

MAPC Regional
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80 Walker St. Unit 3
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Fax: 902-895-3844
Toll Free: 1-855-858-7240
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Tel: 902-895-1523
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6 F.J. McAuley Court
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New Brunswick Aboriginal
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320 St. Mary's Street
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Tel: 506-458-8422
Fax: 506-451-6130
Email: chiefdiotte@nbapc.org

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

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

Juen 22nd, 2026

EverWind NS Holdings Ltd.

2101 - 1969 Upper Water Street
Halifax, Nova Scotia, B3J 3R7

RE: Ocean Lake Wind Project

To Whom It May Concern,

On behalf of the Native Council of Nova Scotia (NCNS), the Maritime Aboriginal Aquatic Resources Secretariate (MAARS) would like to thank EverWind Holdings Ltd. for taking time to discuss the Ocean Lake Wind Project with us virtually on April 30th, 2026. We would like to provide further comment following our review of the Environmental Assessment Registration Document (EARD) for the Ocean Lake Wind Project being undertaken by EverWind NS Holdings Ltd. and Membertou Development Corporation.

When discussing the potential impacts of this project on Wetlands (Section 9.2), there were a total of 329 potential wetland-project interactions, three of which were noted as potential Wetlands of Species Significance (WSS), and a total of 46 hectares of wetland habitat to be directly impacted by this potential development. Of this impacted area, two of the areas noted to be a potential WSS observed Canada Warbler (*Cardellina canadensis*) and Olive-sided flycatcher, and are expected to be altered for new road construction. Wetland habitats are known to provide important ecosystem functions, as well as habitat for numerous aquatic, terrestrial, and plant species. As such, any impact to the functions of these habitats can have significant effects on the ecosystem. Given the importance of these habitats and direct impacts of 46 hectares of wetland habitat, MAARS requests to review the wetland compensation plans when they are available.

As part of Section 10.1.4.2, the field assessment results for the Terrestrial Environment indicate the presence of two priority species, blue felt lichen and frosted glass-whiskers. The EARD also discusses the potential for construction to impede upon the

100-metre buffer for this at-risk lichen and that steps will be taken to "minimize encroachment within buffers". Nova Scotia's At-Risk Lichens–Special Management Practices states that "there is to be no active clearing, removal or disturbance of trees, soil or wetlands" within the 100-metre buffer for Table 2 species, which is inclusive of blue felt lichen and frosted glass-whiskers. With this, we call upon the Province of Nova Scotia to apply these management practices and ensure that the buffer zones are maintained for both species.

Additionally, both Environment and Climate Change Canada (ECCC)'s Management Plan for the Blue Felt Lichen (*Degelia plumbea*) in Canada (2022) and the Committee on the Status for Endangered Wildlife in Canada (COSEWIC)'s Assessment and Status Report on the Blue Felt Lichen (*Degelia plumbea*) in Canada (2010), blue felt lichen is highly sensitive to changes in habitat, more specifically the reduction in humidity due to deforestation and edge effects. In ECCC's 2022 report, they identified renewable energy, more specifically wind farms, as having the potential to cause extreme effects through the impacts of deforestation and biomass harvesting. ECCC also identified that logging, even within a few hundred metres of this lichen, can significantly enhance drying effects to which this lichen is particularly susceptible. Given the highly sensitive nature of this species, MAARS has concerns over the potential for this development to impede upon the recommended buffer zone which could have the potential to cause significant harm to an at-risk species. MAARS requests that every effort be made to avoid impacts to the 100-metre buffer for blue felt lichen.

Section 10.2 of the EARD describes the potential project interactions with terrestrial wildlife, particularly Mainland Moose. This development encompasses area that is both within the Mainland Moose Concentration Area but also an area of Core Habitat for this species. The clearance footprint of this project anticipates a total clearing area of 1,716 hectares much of which meets one or more habitat requirements as identified in the Mainland Moose Recovery Plan, including the clearing of 621 ha of fair to better habitat. Despite the area being composed of mainly fair to neutral habitat suitability, this development can still further negatively impact the surrounding habitat, especially as it relates to fragmentation and habitat connectivity.

To ensure meaningful protection and long-term stewardship of key habitat for Mainland Moose, we must acknowledge that ongoing development and the safeguarding of essential Core Habitat cannot coexist in the same space. There is a need to approach development activities in core habitat with far greater caution and scrutiny if we hope to see true recovery of Mainland Moose.

With this, we call upon the Province of Nova Scotia to commit seriously to the Recovery Plan for Mainland Moose and focus management to "*maintain existing identified high-quality habitat as well as enhancing habitat suitability in the remainder of the Core Habitat with the goal of improving future HSI rankings*". Developments such as this across Mainland Moose habitat continue to shrink the area acceptable to an already at-risk species that is also culturally significant to the Mi'kmaq people. It is not acceptable to continually decimate or fragment the habitat available to Mainland Moose.

We also request that a Wildlife Management Plan be developed, including provisions for continuous Mainland Moose and White-Tailed Deer monitoring throughout the lifetime of the project. This is especially important given that the Mainland Moose Recovery Plan lists renewable

energy development as a medium impact activity, with moderate severity impacts due to habitat loss, fragmentation, and stress from light disturbance. Additionally, the proximity of this project to numerous deer wintering areas indicates the need to also monitor for White-Tailed Deer.

Section 3.5.9 of the EARD details the potential use of borrow pits during construction to supply materials, with limited details on where these pits would be placed or how they would be operated. While we can appreciate that the proponent has not committed to using borrow pits, this is an important factor in the consideration of this project as whole, given that it will contribute to the clearing footprint and disturbance area. The use of these borrow pits contributes to the cumulative effects assessment of this project and given the already extensive clearing footprint for this project, could contribute more significantly to the overall impacts of the project. Given that the use of borrow pits in the construction of wind energy has not been common practice in Nova Scotia, more information is needed on how this will contribute to the already significant environmental impacts of this project.

As such, MAARS would request that the proponent complete a water balance assessment, given the significant wetland habitat impacts and the potential use of borrow pits. While we understand that this is not a typical requirement for a wind project assessment, we believe that any project which is impacting wetlands and/or watercourses should be required to complete this type of analysis. Without an in-depth analysis of the impacts to the watershed, we find it difficult to accept that the impacts to the wetlands and watercourses are 'not significant', as outlined in Section 13 of the EARD.

Within Section 10.3.5 Effects Assessment for Bats, it is unclear whether the proponent has incorporated mitigation measures during the post-construction/operational phase of this project. These mitigation measures can be critical to ensuring the safety of birds and bats, and particularly those species which are migratory. The three migratory bat species in Nova Scotia (Hoary Bat, Eastern Red Bat, and Silver-haired bat) have recently been assessed by COSEWIC as endangered. One of the key threats identified in COSEWIC's assessment report was wind energy development, classifying wind energy as having a high to very high impact on this species and other migratory bat species, even acknowledging that the current projections of fatality rates by wind farms are likely gross underestimates. COSEWIC identifies turbine curtailment during key periods as an important mitigation measure, with the potential to reduce fatalities by up to 50%.

During the biophysical assessments for bats (Section 10.3), the presence of migratory bat species was noted throughout the project area, particularly along the New Harbour River. While the proponent has adjusted the project layout to provide further setbacks from this area, we have significant concerns over the potential impacts of this project on migratory bats. MAARS recommends that the proponent, in collaboration with ECCC's Canadian Wildlife Service, develop mitigation measures and curtailment protocols for migratory bats to ensure the protection of these at-risk species.

As it relates to Avifauna (Section 10.4), this project is situated within 2.4 km of the County Island Complex, which includes the County Island National Wildlife Area, an area of important habitat for migratory birds, particularly the roseate tern. The project also directly overlaps with the Loon Lake Nature Reserve which serves as a significant habitat for cavity nesting birds. With limited

information on the potential project impacts to these important habitats, we have concerns over the potential effects of this project and the proximity of such a significant development to multiple *protected areas*.

The mitigation measures for birds and bats (Section 10.3 and 10.4) lack consideration for the timing of activities outside of key migration and nesting periods for both birds and bats. Mitigation measures for all avifauna (birds and bats) must also include consideration of the timing of vegetation management and herbicide spraying, which are key factors in protecting migratory bats, and these activities, as well as removals of potential roosting habitat, must be done outside the key season for these species. Additionally, a Post Construction Avian Monitoring Plan should be developed to include post-construction bird and bat mortality monitoring. This type of monitoring is essential to understanding the impacts of construction activities on avifauna and must be completed throughout the lifetime of the project to inform adaptive management decisions and minimize impacts to these species. We also request to review the results of the second year of both the bird and bat surveys when available.

Lastly, archeological resources must be treated with the utmost care. Information within the EARD notes that no field assessments have been completed for archeological resources in the Study Area, including in the areas which have been modelled as elevated archeological potential. Without a thorough understanding of the potential impacts to archeological resources, it is not possible to accurately assess impacts and as such it is not possible to draw any conclusions about the potential effects. Following thorough field assessments, we expect the proponent will undertake all necessary measures to protect and preserve archeological resources in this area, through diligent work practices and consistent involvement of certified archeologists during ground disturbing activities. MAARS requests to review the findings from the archeological assessments once they have been completed.

For contextual purposes

We would like to take this opportunity to reiterate that it is important for all proponents of projects to understand that the Off-Reserve Aboriginal Community represented by the NCNS is included within the definition of the word "Indian" of Section 91(24) of the *Constitution Act*, 1982. The Supreme Court of Canada in a landmark decision in *Daniels v. Canada (Indian Affairs and Northern Development)*, 2016 SCC 12. declared that "the exclusive Legislative Authority of the Parliament of Canada extends to all Indians, and Lands reserved for the Indians" and that the word "Indians" in s.91(24) includes the Métis and non-Status Indians[1]. Since 2004, in multiple decisions passed by the Supreme Court of Canada: *Haida Nation*[2]*, Taku River Tlingit First Nation*[3]*, and Mikisew Cree First Nation*[4], has established that,

[1] Daniels v. Canada (Indian Affairs and Northern Development), No. 35945 (Supreme Court of Canada 2016).
[2] Haida Nation v. British Columbia (Minister of Forests), 3 SCR 511 (Supreme Court of Canada 2004).
[3] Taku River Tlingit First Nation v. British Columbia (Project Assessment Director), 3 SCR 550 (Supreme Court of Canada 2004).
[4] Mikisew Cree First Nation v. Canada (Minister of Canadian Heritage), 3 SCR 388 (Supreme Court of Canada 20051124).

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

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

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

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

Each Native Council in their respective province asserts Treaty Rights, Aboriginal Rights, with Interest in Other Rights confirmed in court decisions, recognized as existing Aboriginal and Treaty Rights of the Aboriginal Peoples of Canada in Part II of the Constitution Act of Canada, 1982. Each Native Council has established and maintains Natural Harvesting Regimes, and each have a co-management arrangement with DFO for Food, Social, and Ceremonial use of aquatic species, through the: Najiwsgetaq Nomehs (NBAPC), the Netukulimkewe'l Commission (NCNS), and the Kelewatl Commission (NCPEI).

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

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

We appreciate the opportunity to engage with EverWind Holdings Ltd. directly to discuss the Ocean Lake Wind Project. We respectfully request that these concerns be addressed in full and that further engagement with the Native Council of Nova Scotia and local communities be prioritized as this project moves forward. We look forward to further dialogue as we continue to advocate for the rights of Off-Reserve Status and Section 91(24) Indians/Mi’kmaq/Aboriginal Peoples of Nova Scotia.

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

Habitat Impact Advisor, MAARS Executive Director, MAARS & MAPC Projects

CC: Chief & President, NCNS
Commissioner, Netukulimkewe’l Commission, NCNS