

## Comment Index

### Sugar Maple Wind Energy Project, Pictou County

Comment Period End Date: May 12, 2026

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**Nova Scotia Mi'kmaq**

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1	Kwilmu'kw Maw-Klusuaqn (KMK)	May 7, 2026

**Public**

<b>Number</b>	<b>Source</b>	<b>Date Received</b>
	5 Anonymous Public Comments	April 2 to May 12, 2026
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Date: April 9, 2026

To: Jeremy Higgins, Environmental Assessment Officer

From: NSECC, Compliance

Subject: **Sugar Maple Wind Energy Project, Pictou County, Nova Scotia**

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**Scope of review:**

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

**List of Documents Reviewed:**

- Sugar Maple Wind Energy Project, Environmental Assessment Registration Document (EARD)

**Details of Technical Review:**

- A Project-specific Environmental Protection Plan (EPP) will be developed before commencement of construction, which shall incorporate the Province's Conditions of Approval.
- Approval(s) will be required if vegetation management requires herbicide use.
- If shallow water tables are encountered during blasting and excavation at foundation locations, a Groundwater Management Plan may be needed if construction of these structures go below the seasonal water table.
- If required, a monitoring plan will be developed prior to the start of construction to meet the conditions of any required regulatory permits for the project, including NSECC Watercourse Alteration Approvals, that will identify locations and methods to assess the effectiveness of mitigation measures to protect the aquatic environment during construction of the Project.
- A Wetland Monitoring Plan will be developed as part of the NSECC Wetland Alteration Approval for the Project wetlands and is intended to monitor the portion of the subject wetlands that will not be altered by the Project (outside the area of direct wetland disturbance) to determine if ecological characteristics change after the completion of the Project.

**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.




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Date: **April 15, 2026**

To: Jeremy Higgins, Environmental Assessment Officer

From: Sophi Newcombe, Linear Development, Regulatory Review Biologist, Fish and Fish Habitat Protection Program

Subject: **Sugar Maple Wind Energy Project, Pictou County, Nova Scotia**

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**Scope of review:**

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

DFO's review focused on the impacts of the works outlined in the Sugar Maple Wind Energy 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:**

- SUGAR MAPLE WIND ENERGY PROJECT EARD.pdf
- SUGAR MAPLE WIND ENERGY PROJECT EARD – Appendix e.pdf
- SUGAR MAPLE WIND ENERGY PROJECT EARD – Appendix h.pdf

**Details of Technical Review:**

<b>Risk Assessment: Wetland Assessment</b>	
<b>Identify Gap/Risk</b>	Direct and indirect impacts to fish and fish habitat from wetland alterations are not clearly described. Section 9.2.1 of the EARD identifies 139 wetlands partially or fully within the Study Area. Appendix E provides summary details for the Wetland Ecosystems Services Protocol – Atlantic Canada (WESP-AC) for each wetland. Table 9.3 in Section 9.3.1 identifies the potential project-wetland interactions. However, there is no detail on the size of each wetland

	to be impacted and the EARD does not provide site-specific details on the proposed works and residual impacts to fish and fish habitat. It remains unclear how the Project may impact fish and direct and indirect fish habitat through impacts to wetlands at each site.
<b>Can it be addressed in another permit/approval or with a T&amp;C?</b>	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.
<b>Define/provide detail</b>	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.
<b>Risk Assessment: Fish Habitat Assessment</b>	
<b>Identify Gap/Risk</b>	Fish habitat assessments reported in the EARD do not provide sufficient detail to determine potential impacts on fish and fish habitat. Section 7.2.2 in the EARD identifies 62 watercourse crossings within the Study Area and summarizes the characteristics of the watercourses. However, site-specific information, such as watercourse slopes, substrate, and fish habitat information are not included for each watercourse crossing. Table 7.5 in Section 7.3.1 identifies general project related fish and fish habitat impacts, however, the impacts are not site-specific. Additional site-specific information is required to assess the impacts to fish and fish habitat.
<b>Can it be addressed in another permit/approval or with a T&amp;C?</b>	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.
<b>Define/provide detail</b>	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.
<b>Risk Assessment: Watercourse Crossing Designs</b>	
<b>Identify Gap/Risk</b>	Section 7.3.1 includes general impacts that may occur as a result of the project, and identifies standard mitigation measures to prevent

	impacts to fish and fish habitat. However, there is no site specific information provided on the proposed watercourse crossing designs and the avoidance and mitigation measures to be implemented at each crossing.
<b>Can it be addressed in another permit/approval or with a T&amp;C?</b>	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.
<b>Define/provide detail</b>	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.

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

- Submit a complete watercourse crossing package in the application with finalized designs for each crossing located in fish habitat. Applications should include detailed information on the proposed watercourse crossing and wetland alteration designs, detailed descriptions of the fish and fish habitat found at the location of the proposed WUAs (including direct and indirect habitat that wetlands within the project area provide for fish), detailed descriptions on the likely effects of the proposed WUAs on fish and fish habitat (including local and cumulative impacts, potential impacts on species at risk, and direct and indirect impacts on fish habitat), and detailed descriptions of the measures and standards that will be implemented to avoid and mitigate potential harmful impacts on fish and fish habitat.
- 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 Sugar Maple Wind Energy Project be submitted as one application and include a summary table describing all works, undertakings or activities in

or near water. DFO will then conduct a regulatory review of the proposed project under the *Fisheries Act*, *Species at Risk Act*, and Aquatic Invasive Species Regulations to determine if an authorization under the *Fisheries Act* and/or a *Species at Risk* permit is required. It is further recommended that the proponent contact DFO at [ReferralsMaritimes@dfo-mpo.gc.ca](mailto:ReferralsMaritimes@dfo-mpo.gc.ca) prior to the submission of applications for preliminary discussions on regulatory information requirements under of the *Fisheries Act* and *Species at Risk Act*.

**DATE:** April 16, 2026  
**TO:** Jeremy Higgins, Environmental Assessment Officer, ECC  
**FROM:** Dawn M. Sutherland, Provincial Director of Planning  
**SUBJECT: SUGAR MAPLE WIND ENERGY PROJECT**

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**Scope of Review:**

This review focuses on the following: Department of Municipal Affairs' mandates: Statements of Provincial Interest and engagement with municipalities.

**Document Reviewed:**

Environmental Assessment Registration Document – Sugar Maple Wind Energy Project

**Details of Technical Review:**

The Proponents engaged with the Municipality of the County of Pictou regularly to advise on the Project and discuss permits.

Statements of Provincial Interest:

- **Drinking Water:** Reasonably consistent. No municipal Water Supply Areas are in the Project area.
- **Agricultural Land:** Reasonably consistent. No agriculture identified in the Project area.
- **Flood Risk:** Reasonably consistent. No flood areas are identified in the Project area. The Project's Study Area is located at an elevation and distance from the coast; therefore, infrastructure is unlikely to be directly impacted by coastal flooding.
- **Infrastructure:** Reasonably consistent. No identified impact on municipal infrastructure as defined by the provisions of the SPI.
- **Housing:** Reasonably consistent. No identified impact on housing as defined by the provisions of the SPI.

**Key Considerations:** The Proponent should continue to engage with the Municipality of the County of Pictou as the Project moves forward.

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**[Draft] Re: [ea] EA Registration - Sugar Maple Wind Energy Project**

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**From** EA@novascotia.ca  
**Draft saved** Mon 2026-04-20 7:21 AM  
**To** IA-ATL / EI-ATL (HC/SC) <ia-atl-ei-atl@hc-sc.gc.ca>

**From:** Maclean, Lachlan (HC/SC) <Lachlan.Maclean@hc-sc.gc.ca> on behalf of IA-ATL / EI-ATL (HC/SC) <ia-atl-ei-atl@hc-sc.gc.ca>  
**Sent:** Friday, April 17, 2026 3:54 PM  
**To:** Environment Assessment Web Account <EA@novascotia.ca>  
**Subject:** RE: [ea] EA Registration - Sugar Maple Wind Energy Project

You don't often get email from ia-atl-ei-atl@hc-sc.gc.ca. [Learn why this is important](#)

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Unclassified / Non classifié

Hi Folks,

As per your email regarding the Sugar Maple Wind Energy Project, please identify any project-related human health impacts to which you require advice and guidance from Health Canada.

HC's role in Impact/Environmental Assessment is founded in statutory obligations under the Canadian Impact Assessment Act, and its knowledge and expertise can be called upon by reviewing bodies (e.g., Impact Assessment Agency of Canada, review panels, Indigenous groups and/or other jurisdictions). In the absence of such a request from one of the above noted groups, HC is unable to carry out a comprehensive review of the project. **However, HC can accommodate specific requests for human health advice and guidance related to provincial environmental assessments within a reasonable timeframe.**

Health Canada currently possesses expertise in the following areas related to human health:

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

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

Thanks,  
Lauchie

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

Environmental Assessment Division  
Healthy Environments and Consumer Safety Branch  
[lachlan.maclea@hc-sc.gc.ca](mailto:lachlan.maclea@hc-sc.gc.ca) / Tel: 782-409-3340

Spécialiste environnementale

Division de l'évaluation environnementale  
Direction générale, santé environnementale et sécurité des consommateurs  
[lachlan.maclea@hc-sc.gc.ca](mailto:lachlan.maclea@hc-sc.gc.ca) / Tel: 782-409-3340

**Human Health Considerations in Impact Assessment**

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

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

Consideration		Reference Document
<p><b>Receptor Location(s)</b></p> <p>Please ensure the registration document clearly identifies the locations of all receptors that may be impacted by the proposed project, including any receptors located along the transportation route, if applicable.</p>	<ul style="list-style-type: none"> <li>It is important to clearly describe the location and distance from the proposed site(s) to all potential human receptors (permanent, seasonal or temporary), taking into consideration the different types of land uses (e.g. residential, recreational, industrial, etc.), and identifying all vulnerable populations (e.g. in schools, hospitals, retirement or assisted living communities). Note that the types of residents and visitors in a particular area will depend on land use, and may include members of the general public and/or members of specific population subgroups (Indigenous peoples, campers, hunters, etc.)</li> <li>If there is the potential that project-related activities could affect human receptors, impacts to human health should be considered.</li> </ul>	<p><i>Health Canada. 2023. Guidance for Evaluating Human Health Effects in Impact Assessment: Human Health Risk Assessment. Healthy Environments and Consumer Safety Branch, Health Canada, Ottawa, Ontario.</i></p> <p><a href="https://publications.gc.ca/collections/collection_2024/sc-hc/HI29-54-6-2023-eng.pdf">https://publications.gc.ca/collections/collection_2024/sc-hc/HI29-54-6-2023-eng.pdf</a></p>

<b>Atmospheric Environment</b>		
<p>Project impacts to the atmospheric environment include changes to air quality and noise, and can occur in both the construction, operation and decommissioning phases of the project. Project impacts to air quality are commonly caused by emissions from equipment or vehicles as well as by dust. Noise impacts are commonly caused by equipment as well as by activities such as blasting.</p>	<ul style="list-style-type: none"> <li>● If there are receptors that could be affected by project-related activities, impacts to the atmospheric environment should be considered. Changes to the atmospheric environment that may impact human health include: <ul style="list-style-type: none"> <li>○ impacts to air quality (dust or fumes including PM<sub>2.5</sub>, NO<sub>x</sub>, SO<sub>x</sub>, PAHs)</li> <li>○ increased noise from construction or operations</li> </ul> </li> <li>● If there are receptors who could be impacted by project-related noise, it may be necessary to inform receptors prior to loud activities, such as blasting.</li> <li>● If there is the potential for impacts to human receptors from noise and/or air quality changes from the project, the proponent should consider establishing mitigation measures. If complaints are received additional mitigation measures may be required.</li> </ul>	<p><i>Health Canada. 2023. Guidance for Evaluating Human Health Impacts in Impact Assessment: Noise. Healthy Environments and Consumer Safety Branch, Health Canada, Ottawa, Ontario</i>  <a href="https://publications.gc.ca/collections/collections/collecction_2024/sc-hc/HI29-54-3-2023-eng.pdf">https://publications.gc.ca/collections/collections/collecction_2024/sc-hc/HI29-54-3-2023-eng.pdf</a></p> <p><i>Health Canada. 2023. Guidance for Evaluating Human Health Effects in Impact Assessment: Air Quality. Healthy Environments and Consumer Safety Branch, Health Canada, Ottawa, Ontario.</i>  <a href="https://publications.gc.ca/collections/collecction_2024/sc-hc/HI29-54-1-2023-eng.pdf">https://publications.gc.ca/collections/collecction_2024/sc-hc/HI29-54-1-2023-eng.pdf</a></p>
<b>Recreational and Drinking Water Quality</b>		
<p>The proponent should consider whether any nearby waterbodies are used for recreational (i.e. swimming, boating, or fishing) or drinking water purposes, as well as whether there are any drinking water wells in the area potentially impacted by the project. Nearby drinking and/or recreational water quality may be impacted by</p>	<ul style="list-style-type: none"> <li>● If there is the potential for impacts to drinking and/or recreational water quality from the project site, the proponent should consider establishing mitigation measures. If complaints are received additional mitigation measures may be required.</li> </ul>	<p><i>Health Canada. 2023. Guidance for Evaluating Human Health Effects in Impact Assessment: Drinking and Recreational Water Quality. Healthy Environments and Consumer Safety Branch, Health Canada, Ottawa, Ontario.</i>  <a href="https://publications.gc.ca/collections/collections/collecction_2024/sc-hc/HI29-54-2-2023-eng.pdf">https://publications.gc.ca/collections/collections/collecction_2024/sc-hc/HI29-54-2-2023-eng.pdf</a></p>

<p>accidents or malfunctions, such as a fuel spill; by dust and increased sediment runoff; and by other chemical discharges to the environment. Additionally, wells in the area potentially impacted by the project may be impacted by activities such as blasting.</p>	<ul style="list-style-type: none"> <li>• The proponent should consider preparing a response plan in the event of an accident or malfunction with the potential to impact drinking and/or recreational water quality. Response plans should include a spill response kit, adequate spill response training, and a communication plan to notify all recreational and drinking water users in the impacted area as well as all relevant authorities.</li> <li>• In some cases, for projects that are likely to have an impact on drinking and/or recreational water quality, the proponent should consider conducting water monitoring prior to the start of the project (to establish a baseline). Monitoring would continue throughout the construction, operation and decommissioning phases of the project (as applicable) to monitor for any changes in water quality or quantity.</li> </ul>	
<p><b>Country Foods</b></p>		
<p>If there are plants or animals present in the area potentially impacted by the project that are consumed by humans, there may be potential for impacts to country foods. The proponent should consider all country foods that are hunted, harvested or fished from the area potentially impacted by the project. Impacts to country foods may occur from the release of contaminants into soil or water (including from an accident or spill) or from deposition of air borne contaminants.</p>	<ul style="list-style-type: none"> <li>• If there is the potential for impacts to country foods from the proposed project, the proponent should consider establishing mitigation measures. If complaints are received additional mitigation measures may be required.</li> <li>• The proponent should consider preparing a response plan in the event of an accident or malfunction with the potential to impact country foods. Response plans should include a spill response kit, adequate spill response training, and a communication plan to notify all potential consumers of country foods in the impacted area as well as all relevant authorities.</li> </ul>	<p><i>Health Canada. 2023. Guidance for Evaluating Human Health Effects in Impact Assessment: Country Foods. Healthy Environments and Consumer Safety Branch, Health Canada, Ottawa, Ontario.</i>  <a href="https://publications.gc.ca/collections/collection.gc.ca/54-5-2023-eng.pdf">https://publications.gc.ca/collections/collection.gc.ca/54-5-2023-eng.pdf</a></p>

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

*Health Canada. 2023. Guidance for Evaluating Human Health Impacts in Impact Assessment: Noise. Healthy Environments and Consumer Safety Branch, Health Canada, Ottawa, Ontario*  
[https://publications.gc.ca/collections/collection\\_2024/sc-hc/HI29-54-3-2023-eng.pdf](https://publications.gc.ca/collections/collection_2024/sc-hc/HI29-54-3-2023-eng.pdf)

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

*Health Canada. 2023. Guidance for Evaluating Human Health Effects in Impact Assessment: Air Quality. Healthy Environments and Consumer Safety Branch, Health Canada, Ottawa, Ontario.*  
[https://publications.gc.ca/collections/collection\\_2024/sc-hc/HI29-54-1-2023-eng.pdf](https://publications.gc.ca/collections/collection_2024/sc-hc/HI29-54-1-2023-eng.pdf)

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

*Health Canada. 2023. Guidance for Evaluating Human Health Effects in Impact Assessment: Drinking and Recreational Water Quality. Healthy Environments and Consumer Safety Branch, Health Canada, Ottawa, Ontario.*  
[https://publications.gc.ca/collections/collection\\_2024/sc-hc/HI29-54-2-2023-eng.pdf](https://publications.gc.ca/collections/collection_2024/sc-hc/HI29-54-2-2023-eng.pdf)

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

*Health Canada. 2023. Guidance for Evaluating Human Health Effects in Impact Assessment: Country Foods. Healthy Environments and Consumer Safety Branch, Health Canada, Ottawa, Ontario.*  
[https://publications.gc.ca/collections/collection\\_2024/sc-hc/HI29-54-5-2023-eng.pdf](https://publications.gc.ca/collections/collection_2024/sc-hc/HI29-54-5-2023-eng.pdf)

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

*Health Canada. 2023. Guidance for Evaluating Human Health Effects in Impact Assessment: Human Health Risk Assessment. Healthy Environments and Consumer Safety Branch, Health Canada, Ottawa, Ontario.*  
[https://publications.gc.ca/collections/collection\\_2024/sc-hc/HI29-54-6-2023-eng.pdf](https://publications.gc.ca/collections/collection_2024/sc-hc/HI29-54-6-2023-eng.pdf)

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



Impact Assessment  
Agency of Canada

Agence d'évaluation  
d'impact du Canada

Suite 200  
1801 Hollis Street  
Halifax NS B3J 3N4

Bureau 200  
1801 rue Hollis  
Halifax, NE B3J 3N4

April 20, 2026

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

**SUBJECT : Sugar Maple Wind Energy Project**

Dear Jeremy Higgins:

Thank you for the opportunity to review the registration document for the Sugar Maple Wind Energy Project (the project), received on March 27, 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 Sugar Maple Wind Energy Project, the Impact Assessment Agency of Canada (IAAC) is of the opinion that, as proposed, the project does not appear to be described in the Regulations. As such, the proponent would not be expected to submit an Initial Project Description of a designated project. If the project changes from what has been described in its provincial registration, the proponent is advised to contact IAAC if, in their view, any proposed project activities may be described in the Regulations.

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

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

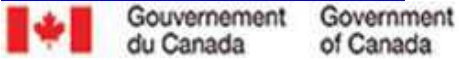
We also note that in proceeding with the project, the proponent may still be required to obtain or seek amendment to other federal regulatory permits, authorizations and/or licences.

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

Kevin Cassell

Policy Analyst, Newfoundland and Labrador Satellite Office  
Impact Assessment Agency of Canada / Government of Canada  
[Kevin.Cassell@iaac-aeic.gc.ca](mailto:Kevin.Cassell@iaac-aeic.gc.ca) / Tel: 709-327-5841

Analyste de Politiques, Bureau satellite de Terre-Neuve-et-Labrador  
Agence d'évaluation d'impact du Canada / Gouvernement du Canada  
[Kevin.Cassell@iaac-aeic.gc.ca](mailto:Kevin.Cassell@iaac-aeic.gc.ca) / Tel: 709-327-5841



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**ECCC Comments: 26-NS-008 Sugar Maple Wind Energy Project, Pictou County, NS**

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**From** Fazeli, Maryam (elle | she, her) (ECCC) <Maryam.Fazeli@ec.gc.ca>

**Date** Tue 2026-04-21 3:50 PM

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

**Cc** Roberts, Sydney (elle | she, her) (ECCC) <sydney.roberts@ec.gc.ca>; Zwicker, Stephen (ECCC) <stephen.zwicker@ec.gc.ca>

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Hello there,

Environment and Climate Change Canada has reviewed the Sugar Maple Wind Project, submitted by WEB Sugar Maple Wind Inc., and we offer the following recommendations.

### **References**

- EC 2007a. *Recommended Protocols for Monitoring Impacts of Wind Turbines on Birds*. [https://publications.gc.ca/collections/collection\\_2013/ec/CW66-364-2007-eng.pdf](https://publications.gc.ca/collections/collection_2013/ec/CW66-364-2007-eng.pdf)
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### **General Comments**

1. Given that the project is registered under Nova Scotia (NS) Environmental Assessment Regulations, it remains the discretion of the province whether sufficient information has been provided to assess the potential effects of the Project under their jurisdiction and responsibility. ECCC does not have any permits (or authorizations) or approvals in relation to the proposed project. Any advice provided by ECCC is intended to support Nova Scotia Environment and Climate Change (NSECC) Environmental Assessment review process. The proponent is responsible for identifying measures which ensure their compliance with the federal *Migratory Birds Convention Act* (MBCA) and *Species at Risk Act* (SARA).
2. ECCC advises that the Province of NS's Department of Natural Resources (NSDNR) holds technical expertise, jurisdiction, and management authority for birds not protected by the MBCA (e.g., raptors) and terrestrial species at risk (SAR) including bats, reptiles, amphibians, land-based mammals, insects, plants, and lichen. ECCC advice on these species is derived from federal recovery strategies produced as per the SARA and are focused on species recovery. SAR are a shared responsibility between the federal government and the provinces and ECCC comments reflect this.
3. ECCC advises that the Environmental Assessment Registration Document (EARD) includes hedging and ambiguous wording, such as "*where possible*" and "*to the extent possible*", when describing mitigation measures.

ECCC recommends removing any ambiguous wording from the EA and associated plans. The EIA should clearly describe commitments to mitigation measures to avoid/minimize potential effects of the Project on migratory birds and SAR, and where effects cannot be avoided/minimized, a proposed plan to mitigate residual impacts should be described (e.g., a monitoring plan, scheduling, buffers, offsetting measures, etc.). Contingency plans identifying mitigation measures should be prepared to address all scenarios that may impact migratory birds and SAR during all times of year and all project phases.

4. The proponent should retain raw survey data (e.g., radar, breeding bird surveys, etc.) until appropriate data standards have been developed. Proponents are to share and store data with:
  - The ECCC's Canadian Wildlife Service (SAR observations; [scf-atl@donneesei-cws-atliadata@ec.gc.ca](mailto:scf-atl@donneesei-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. ECCC notes that if NSECC is considering wildlife protection, mitigation, monitoring and adaptive management plans as part of potential approval conditions related to avifauna and/or migratory bird SAR, ECCC recommends clarifying what elements are expected to be included, and that the consultation process is clear for all parties.

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

6. ECCC advises the Canadian Wildlife Service (CWS) provided information on critical habitat overlap with the Project's Regional Assessment Area (RAA) to CBCL (the consultant for this Project) through a data sharing agreement on March 31, 2026. The scope of this request included the proposed Project footprint with a 5-kilometre buffer search radius to represent the RAA. However, ECCC notes that the area used by CWS for the March 2026 data request and the

“CBCL\_RAA\_RegionalAssessment Areas - Land Use and Value, Visual Landscape, Recreation and Tourism, Birds, Bats and Ambient Light” shapefile provided along with the EARD are different areas.

ECCC advises that it is critical that when a proponent requests data from CWS to inform their EARD that they are providing the same information/shapefiles for consideration. Without consistency, it is possible that important information will be excluded that should be considered as part of the assessment. This should be standard practice for all future submissions.

7. ECCC recommends that to facilitate the review of this Project (and future submissions), the proponent should include the boundaries of the Potential Development Area (PDA), Local Assessment Area (LAA), and Regional Assessment Area (RAA) on maps and figures.

### **Specific Comments**

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

8. Quote (page 13; Table 2.3) *“The Project will consist of up to 16 WTGs. The WTG models under consideration are the Nordex N163, Vestas V162, and Enercon E160...Details on the WTGs under consideration are provided in Table 2.3...Total Height: Nordex N163 – 199.5 m; Vestas V162 – 200 m; Enercon E160 – 194 m”*

ECCC acknowledges that the total height of each turbine will be between 194-200 metres (m), depending on the Wind Turbine Generator (WTG) model chosen. Per ECCC’s guidance *Wind Turbines and Birds: Guidance Document for Environmental Assessment* (ECCC 2007b), onshore wind developments with turbines >150 m height pose higher risk to nocturnally migrating songbirds that typically fly at altitudes of 150-600 m during migration (Horton et al. 2016).

ECCC advises that there are many species of shorebirds (including Lesser Yellowlegs, Semipalmated Sandpiper, Semipalmated Plover, White-rumped Sandpiper, Sanderling, etc.) that stage along the Northumberland shore and are likely to be passing through the Project Area during migration (see [Atlantic Canada Shorebirds - Motus Project Summary](#) and satellite tracking data publicly available on [Movebank](#)). Additionally, based on the radar findings, ECCC advises that shorebirds are likely to be detected (e.g., flying) within the blade height range and are vulnerable to potential collisions with turbines.

ECCC notes that the field surveys that were completed were not adequately designed to detect waterfowl. However, ECCC advises that the project area may provide important breeding habitat for several waterfowl species, and ECCC’s nearby waterfowl breeding survey data suggests that Canada Goose, American Black Duck, Green-winged Teal, Mallard, Ring-necked Duck, Wood Duck, Common Merganser, Hooded Merganser, etc. may be breeding in the area. ECCC advises that waterfowl are known to exhibit avoidance behaviour around wind turbines, resulting in functional habitat loss. Disturbance effects should be considered within a 1 km minimum radius of each proposed turbine. Accordingly, all wetland habitat within 1 km of each turbine should be interpreted as unavailable to waterfowl.

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

9. ECCC advises that avian SAR listed under the *Species at Risk Act* (SARA) or assessed as “at-risk” by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) may occur in the Project area, including but not limited to:

- Bank Swallow (SARA-listed Threatened)
- Barn Swallow (SARA-listed Threatened)
- Bobolink (SARA-listed Threatened)
- Canada Warbler (SARA-listed Threatened)
- Chimney Swift (SARA-listed Threatened)
- Common Nighthawk (SARA-listed Special Concern)
- Eastern Wood-pewee (SARA-listed Special Concern)
- Evening Grosbeak (SARA-listed Special Concern)
- Olive-sided Flycatcher (SARA-listed Special Concern)
- Red-necked Phalarope (SARA-listed Special Concern)
- Rusty Blackbird (SARA-listed Special Concern)
- Short-eared Owl (SARA-listed Special Concern)
- Snowy Owl (non-breeding, COSEWIC-assessed, 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 the best available information including any Recovery Strategy, Action Plan or Management Plan in a final or proposed version; and
- Respect the terms and conditions of the *Species at Risk Act* (SARA) regarding protection of individuals, residences, and critical habitat of Extirpated, Endangered, or Threatened species.

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

10. ECCC notes that the survey methodology targeting SAR migratory birds (specifically the Canada Warbler and the Common Nighthawk, the two species with the largest amount of suitable habitat in the LAA) were insufficient, given that the areas identified as suitable habitat (Figures 12.8 and 12.10, respectively) were not targeted for surveys.

For example, ECCC notes that from the figures of the survey locations provided in Appendix A-3, the breeding bird survey point counts did not adequately target areas that were identified as suitable habitat for Canada Warbler (indicated on Figure 12.8) and the nightjar surveys did not overlap with areas that were identified as suitable habitat for Common Nighthawk. ECCC recommends that the proponent provide additional information on the survey methodologies and how locations were chosen to maximize potential observations to address ECCC's concern.

11. Quote (page 174) "*Pileated Woodpecker roosting, feeding, and possible former nesting cavities were observed and recorded in the Study Area during the execution of field programs. No active Pileated Woodpecker nesting activities was observed during field programs, nor were any nest cavities that appeared to be in recent or current use observed. During breeding bird surveys, 11 individual Pileated Woodpeckers were recorded across all years (2023 to 2025), at eight different point count locations. During migration point counts, 29 Pileated Woodpeckers were recorded at 20 locations during the fall season and 12 were recorded at nine locations in the spring (from 2023 to 2025). During fall and spring passage migration watches, three individuals were recorded in total from 2023 to 2024.*"

ECCC offers the following general recommendations regarding Pileated Woodpecker nesting cavities, which are protected year-round under Schedule 1 of the *Migratory Birds Regulations*:

- Review and understand proponents' responsibilities under the amended *Migratory Bird Regulations* (MBR 2022).

- Conduct a survey to identify suitable nesting habitat within the area planned for vegetation clearing.
- Inspect identified suitable nesting trees for any Pileated Woodpecker cavities and determine occupancy; Note: In the Maritimes, ECCC recommends surveying during the second half of June to confirm nesting. By that time, the nestlings are large and loud and may be heard before the cavity can be seen.
- Notify the ECCC Minister through the Abandoned Nest Registry if any abandoned cavities are found on trees that require removal.
- Monitor occupancy of cavity/cavities over the next 36 months prior to removal and establish a vegetated buffer around the tree. Note: it is important that the nest itself remains intact, and we strongly encourage the Proponent to maintain as much surrounding vegetation as possible to preserve the woodpecker's habitat. If the construction activities are expected to extend during the breeding season, then actions must be taken to ensure that the nesting woodpecker is not disturbed by the construction activities.

For more information on the amended nest protections under the MBR 2022, frequently asked questions on how these protections apply to migratory birds, including Pileated Woodpecker, and your responsibilities for reporting abandoned nests, please visit the following:

- Nest Protection Fact Sheet: <https://www.canada.ca/en/environment-climate-change/services/avoiding-harm-migratory-birds/fact-sheet-nest-protection-under-mbr-2022.html>
- MBR 2022 FAQ: <https://www.canada.ca/en/environment-climate-change/services/migratory-bird-permits/faq-migratory-birds-regulations-2022.html>.

12. Quote (page 155) *“Chimney Swifts primarily nests in artificial structures like chimneys, silos, air shafts, wells, and barns. However, this species will nest in natural habitats, including large hollow trees and tree cavities in mature and old-growth forests (COSEWIC, 2018a; Zanchetta et al. 2014). Because of the limited suitable artificial structures in the PDA, the model focused on natural habitats that may provide suitable breeding habitat. The following parameters were used to model suitable breeding habitat for Chimney Swifts” Old-Growth Potential Index – Values 10 and 11, representing stands with high potential for old-growth characteristics.”*

ECCC advises that the natural structures used by Chimney Swifts for nesting include living or dead trees with hollow trunks, cavities excavated by woodpeckers, and rock crevices (COSEWIC, 2018). Given that Chimney Swift were frequently observed during the various surveys from 2023 to 2025, it is highly likely that Chimney Swift are breeding in the Project Area.

As per section 33 of the SARA *“no person shall damage or destroy the residence of one or more individuals of a wildlife species that is listed as an endangered species or a threatened species, or that is listed as an extirpated species if a recovery strategy has recommended the reintroduction of the species into the wild in Canada”*. Per the [Chimney Swift Residence Description](#), the residence of a Chimney Swift includes 1) the structure housing the nest (including the nest during the nesting period) used by the Chimney Swift to shelter from predators and inclement weather as well as for laying and incubating eggs, and rearing young; and 2) the structure used for roosting (roost site) which provides a place to rest and sleep that is sheltered and protected from predators. The nesting and roosting structures are considered a residence year-round and remain a residence until the species has not used them for three consecutive years, whereas the nest is a residence only during the nesting season until it is abandoned in late summer.

ECCC recommends that the proponent avoid Chimney Swift habitat (e.g., roosting, nesting, or important habitats that support insects, such as wetlands) during design plans and implement appropriate mitigation measures to avoid impacts on these species and their habitat (e.g., buffers, monitoring). For example, ECCC recommends that mitigation measures include measures

that protect trees with large diameter (>50 cm dbh) by maintaining a minimum 100 m buffer surrounding them.

13. ECCC advises that 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](https://species-registry.canada.ca/index-en.html#/species/986-668#recovery_strategies)

14. ECCC acknowledges that a total of 35 Common Loon (*Gavia immer*) observations were made during all survey programs, including during the breeding bird survey (e.g., 6 observations). This species generally builds their nests on the ground, usually on the sheltered side of islands and facing mainland, on the edges of smaller lakes (if no islands are present), or on floating vegetation in bogs.

ECCC recommends a 200-metre buffer from any Common Loon nests during the months of May, June or July, and avoiding high disturbance activities (e.g., blasting) within 1000 metres of active Common Loon nests during the regional nesting season, including before nest initiation.

15. Quote (page 177) “*Vegetation clearing will be completed outside of the general nesting period for migratory birds. If clearing activities occur during the nesting period, procedures outlined in the Wildlife Management Plan, will be implemented. Vegetated buffers around wetlands and watercourses will be maintained to support connectivity for wildlife wherever possible.*”

Nests in complex habitats (e.g., forests, wetlands) are difficult to locate, and adult birds avoid approaching their nests in a manner that would attract predators to their eggs or young. In many circumstances, disturbance and/or harm to migratory birds is still likely to occur even when nest sweeps are conducted prior to vegetation clearing activities.

Therefore, ECCC does not recommend nest sweeps in vegetation prior to clearing or land disturbance activities during the breeding season. Rather, to promote compliance with the *Migratory Birds Convention Act* (MBCA) and its regulations and the *Species at Risk Act* (SARA), ECCC recommends that activities that may result in incidental take of nests or eggs, such as vegetation

clearing and maintenance, occur outside the migratory bird nesting period (mid-April to late-August in this region; nesting zone “C3”, ECCC 2025).

For additional information, see “Vegetation Clearing” standard recommendations below.

16. Quote (page 179) “*Overhead power line installation, operation and maintenance will follow, at minimum, the NSPI nesting birds and vegetation management protocols (NSPI, 2023).*”

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

The proposed placement of above-ground power lines should consider areas used as flight paths by migratory birds during migration, near shorebird staging and foraging involving overland daily movements, or while travelling from nesting to foraging areas, and/or along streams used by waterfowl.

ECCC recommends the following general beneficial management practices to avoid potential harm to migratory birds associated with power lines:

- Avoid building transmission, collection, or distribution lines over, adjacent, or near areas where birds are known to congregate or move, including:
  - 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](http://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).

17. Quote (page 179) “*Potential project effects related to direct mortality and injury can be effectively mitigated through planning and management of construction and operation activities. The following key measures to mitigate the potential risks of bird collisions will be further detailed in a Project-specific EPP and will be implemented prior to and during construction and during operation and maintenance.*”

ECCC advises that the mitigation measures provided do not include any operational mitigations to prevent bird-turbine collisions. ECCC recommends including EA commitments to mitigation measures to avoid/minimize potential impacts to migratory birds and avian SAR during the project’s operational phase *before* impacts occur, such as increasing cut-in speeds or altering the

pitch/feathering the blades during high-risk collision periods (e.g., during migration or in particular weather conditions).

18. Quote (page 182) “...a post-construction mortality monitoring program will be developed in consultation with ECCC-CWS and NSDNR and implemented for two years. Carcass searches will be conducted to target periods of increased activity (e.g., migration and breeding) and periods following unfavourable weather conditions (e.g., rain and head winds)...The results of the post-construction mortality monitoring program will be submitted to the appropriate regulatory agencies as required. Additional surveys or mitigations may be identified in consultation with regulators following review of the results. An Adaptive Management Plan will be prepared in consultation with NSDNR and ECCC-CWS”.

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

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

19. Quote (page 227) “Through implementation of mitigation measures during Project activities, expected effects are expected to be minor to moderate. Cumulative effects on bird populations of the RAA will be detected by monitoring plans to be approved by NSDNR and ECCC-CWS for the Project and other nearby wind projects.”

ECCC disagrees with the proponent’s conclusion that the cumulative effects on migratory birds and SAR would be “minor to moderate”, given the amount of other existing anthropogenic disturbance in the area. ECCC acknowledges that there are a number of developments in proximity to the project area that will contribute to cumulative effects on migratory birds and SAR. It is important to consider that when migratory birds and species at risk are moving through the area, they may be disturbed or displaced along their path, which may bring them into more frequent contact with the project and result in additional interactions.

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

Additionally, ECCC emphasizes that as large-scale projects become more abundant on the Nova Scotia landscape, it is important to assess the cumulative (both additive and interactive) effects of anthropogenic disturbances that are occurring on the landscape on migratory birds and species at risk. Mahon et al. 2019 (*Additive and interactive cumulative effects on boreal landbirds: winners and losers in a multi-stressor landscape*) provides information that proponents should consider when conducting cumulative effects assessments related to migratory birds and species at risk.

### **Terrestrial Species at Risk and Species of Conservation Concern**

\*As noted above, ECCC’s comments on terrestrial SAR are provided from a federal recovery perspective (linked to recovery strategies/management plans), with the understanding that species protected by the *Species at Risk Act* are a shared responsibility between the federal government and the provinces.

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

20. ECCC advises that the following non-avian SAR listed under SARA or assessed as "at-risk" by COSEWIC 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)
- Silver-haired Bat (COSEWIC-assessed Endangered)
- Hoary Bat (COSEWIC-assessed Endangered)
- Eastern Red Bat (COSEWIC-assessed Endangered)
- Wood Turtle (SARA-listed Threatened)
- Eastern Waterfowl (SARA-listed Threatened)
- Black Ash (COSEWIC-assessed Threatened)
- Yellow-banded Bumble Bee (SARA-listed Special Concern)
- Monarch (SARA-listed Endangered)

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

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

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

#### SARA-listed and COSEWIC-assessed Bats

21. Quote (page 139) "*In Nova Scotia, three non-migratory bat species – Little Brown Myotis, Northern Myotis, and Tri-colored Bat – over-winter in caves and abandoned mines (Moseley, 2007). However, the Tri-colored Bat is primarily found in southern Nova Scotia and the Fundy coast of New Brunswick (Broders et al., 2003)...The other four bat species known to occur in Nova Scotia are long-distance migratory species, three of which were assessed by COSEWIC in May 2023 as Endangered: Hoary Bat, Eastern Red Bat, and Silver-haired Bat. The fourth migratory species is Big Brown Bat.*"

ECCC advises that the Tri-coloured Bat has been observed in low numbers outside of southwest Nova Scotia in Antigonish County, with records showing their presence in both summer and winter months and acknowledges that they were detected in small numbers during acoustic recording as part of this Project's survey program. ECCC recommends that the proponent include the Tri-coloured Bat in their assessment and reminds the proponent that although a species may not be confirmed in an area, it does not necessarily mean that they do not occur there, especially if habitat appropriate for the species is available.

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

22. Quote (page 143) *“Bat activity was generally low and spatially heterogeneous across the Study Area, with a few ARU locations accounting for a substantial proportion of total detections.”*

The populations of the three SARA-listed bat species (Little Brown Myotis, Northern Myotis, and Tricolored Bat) are highly depressed in NS, primarily due to the introduction of White-nose Syndrome (WNS), and therefore few acoustic detections are expected. Any additional loss of SAR bat individuals, maternity roosts, and/or hibernacula remaining on the landscape can be biologically significant for these long-lived, k-selected species, and affect their recovery. Additionally, the three “migratory” bat species, which have been assessed by COSEWIC as Endangered, are highly vulnerable to mortality due to wind turbines (see [COSEWIC Assessment and Status Report on the Hoary Bat \(\*Lasiurus cinereus\*\)](#), [Eastern Red Bat \(\*Lasiurus borealis\*\)](#), [Silver-haired Bat \(\*Lasionycteris noctivagans\*\) in Canada](#) for more information).

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

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

ECCC advises that EC 2007a and EC 2007b include guidance for developing post-construction monitoring programs for wind energy development projects in Canada, but the proponent should also consult with the Province of Nova Scotia’s Department of Natural Resources for additional information.

23. Quote (page 143) *“As stated by McCallum Environment Limited (2012), low bat activity levels were recorded at the site of a wind power project to the north of the PDA; the Glen Dhu South Wind Power Project. All the call detected during acoustic monitoring of the site were attributed to Myotis species, no migratory bats were detected (McCallum Environment Ltd., 2012). These results, as well as results from other acoustic monitoring in the region (Broders and Henderson, 2007; Strum 2025; EonWind Electric, 2013) suggest that there is likely no significant movements of migratory bat species through the region.”*

ECCC advises that the incidence of migratory bat species in Nova Scotia (and the Atlantic Region as a whole) appears to have increased over the last two decades according to regional expertise, and ECCC is concerned that the proponent is using old studies (one to two decades old) to support their conclusions, in particular given that migratory bat species were recorded during acoustic surveys. ECCC advises that the per the data on the [NABat partner portal](#), there is evidence to show that the migratory bat species have been detected on the majority (~90%) of acoustic surveys in the Maritime provinces, so it is likely that they will be present in the PDA, LAA, and RAA, and should be included as part of the assessment.

24. Quote (page 148) *“Furthermore, a recent study found that fewer Little Brown Myotis fatalities occurred at taller WTGs than shorter (WTGs ranges from 119 to 189 m (hub height plus blade length)) but fatalities of migratory bats increased with increased WTG heights (Anderson et al., 2022). Since slightly less than half of the bat activity recorded in the Study Area was attributed to Myotis species, especially SM16, which had mostly Myotis passes. This study indicates that the planned WTG height (up to 200 m) could help reduce the risk of collisions for about half of the bats present, particularly those at-risk Myotis species. Considering these factors, the elevated bat activity at ARU SM16 does not correspond to an increased risk in bat-WTG collisions.”*

ECCC does not support the proponent's suggestion that the use of taller turbines is an adequate mitigation measure to reduce potential impacts to at-risk bats. ECCC acknowledges that the proponent has chosen to use taller turbines in an effort to reduce *Myotis* bat mortalities, even though they acknowledge that migratory bat species are more likely to be impacted at these taller structures. However, ECCC advises that per the COSEWIC Assessment and Status Report for the three migratory bat species, currently assessed as "Endangered" by COSEWIC and under consultation for listing on Schedule 1 of the SARA, wind energy development is identified as a "High to Very High Impact" threat for these species. As a result, the proponent will need to implement appropriate monitoring, mitigation measures, and adaptive management measures to avoid and minimize potential impacts on the migratory bat species.

25. Quote (page 143) "*The Study Area does not overlap critical habitat defined by Environment Canada (2015) for SAR bat species, ...the closest recorded bat hibernaculum is the Hirschfeld Galena Prospect (24 km to the south of the Project Area) (Moseley, 2007).*"

ECCC advises that bat hibernacula location information is considered sensitive and could result in further disturbance of species at risk and their critical habitat. As a reminder, it is important for the proponent to ensure that specific location information is omitted from being included in environmental assessment documentation and drawings posted online.

26. Quote (page 144) "*Based on habitat modelling, the LAA provides some habitat (17 ha; 0.6%) that may serve as maternity roost habitat for Little Brown Myotis or Northern Myotis. ...Suitable maternity roosting habitat is limited in the PDA (0.5 ha; 0.2%) ...No suitable bat maternity roost trees were recorded in the Study Area in 2022, 2023, 2024 and 2025.*"

Quote (page 146) "*Only a minor amount of the PDA, 0.5 ha (representing 0.2%) provides suitable maternity roost habitat for Little Brown Myotis and Northern Myotis bats. ...Therefore, it is expected that clearing associated with the project will have minimal impact on maternity roost habitat. ...Adjustments were made to mitigate the loss of areas identified as suitable maternity roost habitat for SAR bats (e.g., old-growth and mature forests)*"

ECCC acknowledges that the proponent states that they have modified the PDA to avoid the loss of suitable maternity roost habitat for SAR bats. Regardless, ECCC recommends that the proponent ensure that mitigation measures (i.e., timing of activities outside of the roosting season) are implemented to minimize potential impacts on bats. The proponent should also ensure that the proponent includes an element of adaptive management to their mitigation plan in case a suitable maternity roost tree is observed during the project activities.

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

Additionally, ECCC acknowledges that the proponent's assessment of important bat habitat (hibernacula and maternity roosts) is focused on Little Brown Myotis and Northern Myotis but does not include much information related to the three COSEWIC-assessed migratory bat species, which were confirmed in the area through acoustic recording. ECCC recommends that the proponent include habitat features that would facilitate the movement/migration of the migratory bat species (i.e., ridges/valleys, coastlines, edges) and consider this information when siting the project.

27. Quote (page 149) “*Guidance specific to minimizing impacts to bats will be provided in a Wildlife Management Plan. The plan will include guidelines to avoid harm to bats, actions/steps to take should a roosting bat be discovered, and appropriate buffers based on disturbance activities.*”

ECCC advises that the mitigation measures provided do not include any operational mitigations to prevent bat-turbine collisions. ECCC recommends including EA commitments to mitigation measures to avoid/minimize potential impacts to SARA and COSEWIC-assessed Endangered bat SAR during the project’s operational phase *before* impacts occur, such as increasing cut-in speeds or altering the pitch/feathering the blades during high-risk collision periods (e.g., during migration or swarming or when wind velocity is low).

ECCC advises that higher cut-in speeds are shown to reduce bat mortalities, given that bat activity is generally higher at lower wind speeds; studies suggest that there is a 33% reduction in mortalities for every 1 m/s increase in cut-in speed (Whitby et al. 2021; Frick et al. 2026). ECCC recommends that the proponent implement an appropriate cut-in speed during the bat migration period in an effort to reduce bat mortality to a level that is sustainable and would not jeopardize recovery of the species. The proponent should consider implementing a standard cut-in speed during the migratory period (and/or during specific conditions) and adjust it appropriately based on the results of post-construction monitoring.

#### Herpetofauna

28. ECCC advises the Canadian Wildlife Service (CWS) provided information on Wood Turtle critical habitat to CBCL (the consultant for this Project) through a data sharing agreement on March 31, 2026. The scope of this request included the proposed Project footprint with a 5-kilometre buffer search radius. As indicated in the data request response, there is a small portion of the Regional Assessment Area (southern portion) that contains habitat that has been designated as critical habitat for Wood Turtle. ECCC notes that this is not included in the EARD as part of the effects assessment, and there is no information provided regarding mitigation measures, etc. that will be implemented to ensure that critical habitat is avoided and any potential residual impacts are minimized. ECCC recommends that this information be included as a consideration in the assessment.

Additionally, ECCC advises that the tributaries that run through the LAA flow into a system with several areas that have been identified as CH for Wood Turtle and/or where there have been historical Wood Turtle observations, so it is important the proponent consider impacts on watercourses connecting to Wood Turtle CH as part of their assessment.

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

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

29. Quote (page 122) “*No turtles were observed during Wood Turtle surveys conducted in 2022; however, suitable habitat was identified (Strum, 2022). This habitat was characterized by sandy and/or gravel banks, clear, flowing water, and adequate sun exposure and occurred outside of the PDA. Incidental observations of turtle habitat and one turtle nest were collected during other biophysical field surveys conducted on site in 2025. Possible suitable Wood Turtle habitat was identified during the aquatic surveys at watercourse assessment point W27...*”

ECCC advises that SAR turtles are elusive (cryptic) species and can be difficult to detect during regular field surveys and reminds the proponent that although these species may not be confirmed in an area, it does not necessarily mean that they do not occur there, especially if habitat appropriate for the species is available.

In particular, ECCC notes that the proponent acknowledges that suitable habitat for Wood Turtle was identified by contractors in 2022, and also incidentally observed during biophysical field surveys in 2025, including two unoccupied nests in the LAA and RAA. Additionally, ECCC advises that there are a number of protected areas near the PDA, including the Eigg Mountain-James River Wilderness Area that likely provide quality habitat (wetlands, watercourses and foraging opportunities) for Wood Turtle. Based on this information, ECCC advises that it is likely that there are Wood Turtle present in the PDA, LAA and/or RAA, and the proponent should conduct the assessment (and implement appropriate mitigation measures) with this in mind.

ECCC recommends that the proponent ensure that appropriate mitigation measures and monitoring efforts are implemented to avoid and minimize any potential impacts on SAR turtles, particularly Wood Turtle, given that it is possible that they could be present in the PDA, LAA or RAA.

30. Quote (page 122) *“Incidental observations of turtle habitat and one turtle nest were collected during other biophysical field surveys conducted on site in 2025. Possible suitable Wood Turtle habitat was identified during the aquatic surveys at watercourse assessment point W27...”*

ECCC advises that the proponent should map out the nesting habitat in the area where they found evidence of the turtle nest in the LAA, and it is important that the proponent ensure that this area is protected from further disturbance to potentially mitigate impacts to SAR turtle species.

31. Quote (page 122) *“Additionally, a predated turtle nest was observed on a gravel roadside near Black Brook; however, there was insufficient evidence to identify the nest to a particular species.”*

ECCC advises that gravelled areas along roads and linear footprints are considered “sink habitat” for nesting turtles, which is low-quality habitat that results in higher mortality rates than births rates. As turtle nests have been observed along roadsides in the LAA and RAA, the effects of increased gravel road density associated with this project should be considered as part of the effects assessment and mitigations for at-risk turtles.

32. ECCC advises that there is no information provided in the mitigations regarding the buffers that will be put in place surrounding SAR turtle habitats to address potential impacts. ECCC recommends that potential turtle nesting and overwintering habitat should be noted and an appropriate buffer should be implemented.

33. Quote (page 128) *“If a SAR or SOCC turtle or nest is encountered during construction activities, work will cease, and the local regional biologist contacted for direction.”*

ECCC advises that if a turtle nest is found along roadsides, the proponent should contact the local provincial biologist for guidance on next steps to prevent females and hatchlings from being run over by vehicles, to prevent the nest from being predated, and for strategies on how to promote females to choose safer, more natural nesting habitats. However, ECCC advises that it remains the Province of Nova Scotia’s discretion whether sufficient information has been provided to inform their environmental assessment decision.

34. ECCC advises that the risk of poaching on SAR turtle species, particularly Wood Turtle, is a concern that has not been included in the EARD (note this has been included for Mainland Moose, but there is no linkage made to turtles). By constructing new road networks, transmission lines, etc., it is

possible that poachers will have increased access to turtles that was not previously possible. ECCC recommends that the proponent ensure that Wood Turtle records remain confidential, and that measures are implemented to address potential poaching risk to SAR turtles.

35. ECCC advises that the proponent has not considered the cumulative effects of the Project on SAR turtles in the Terrestrial Mammals section of Section 15. ECCC recommends that the proponent include SAR turtles in their cumulative effects assessment given that they may be present in the PDA, LAA and RAA based on suitable habitat, incidental observations and evidence of nesting.

### SAR Plants and Lichen

36. Quote (page 92) *“The list of SAR and SOCC vascular plant species from the AC CDC database occurring within 5 km of the PDA, along with other available records, is provided in Table 8.1. Two SAR, Eastern White Cedar (Thuja occidentalis) and Black Ash (Fraxinus nigra), are known to occur within 5 km of the PDA...Black Ash is considered a location-sensitive species in Nova Scotia and is strongly associated with wetland habitats, particularly forested swamps and riparian wetlands.*

ECCC acknowledges that no Black Ash were detected during the field surveys, however ECCC advises that there is Black Ash core habitat located northeast of the Project Area.

ECCC notes that the proponent does not provide any specific mitigation measures to address potential impacts to Black Ash, which is a species that has been assessed as Threatened by the Committee on the Status of Endangered Wildlife in Canada. ECCC acknowledges that per the proponent, there is known Black Ash within 5 km of the PDA (location not specified, given that this species is location-sensitive), but the proponent has not included any measures that will be undertaken if Black Ash is encountered during the project activities.

37. Quote (page 92-93) *“Additionally, an incidental observation of Eastern Waterfan (Peltigera hydrothyria, SARA: Threatened) was recorded during a winter bird survey near the watercourse crossing approximately 60 m from the PDA.”*

Quote (page 95) *“Vegetated buffers around wetlands and watercourses will be maintained to support habitat connectivity where possible.”*

ECCC advises that vegetation clearing can have direct and indirect impacts on Eastern Waterfan (SARA-listed, Threatened) as they are very sensitive to siltation and sedimentation due to erosion and run off (COSEWIC 2013). To reduce potential impacts on Eastern Waterfan, ECCC recommends that the proponent establish appropriate buffers from streams, watercourses and tributaries where an individual is found. ECCC recommends at minimum a 50 m riparian buffer on both sides of the stream, and buffers should be put in place on all watercourses within 1 km of the occurrence.

However, ECCC acknowledges that technical expertise and management jurisdiction of SAR lichen species rests with the Province of Nova Scotia and the decision regarding appropriate buffers remains their discretion.

38. Quote (page 92; Table 8.1) *“Eastern White Cedar – COSEWIC – Vulnerable”*

ECCC notes two points of clarification regarding the proponent’s classification of Eastern White Cedar as assessed as “Vulnerable” by COSEWIC. Eastern White Cedar has not been assessed by COSEWIC, to date, and “Vulnerable” is not one of the terms used during COSEWIC assessment (i.e., Not at Risk, Special Concern, Threatened, Endangered, Extirpated, or Extinct). ECCC recommends that the proponent clarify that the information they have provided in the SAR/SOCC vascular plant table (Table 8.1) remains accurate.

## SAR Insects

39. Quote (page 123) *“The AC CDC (2023a, 2023b) Data Reports contains records of six invertebrate SAR and SoCC within a 100 km radius of the LAA. Only one invertebrate species (Question Mark, *Polygonia interrogationis*, S-rank: S3B) was observed within a 5-km radius of the LAA. No incidental observations of SAR or SoCC terrestrial invertebrates were recorded during the field programs.”*

ECCC advises that most SAR arthropods cannot be reliably detected incidentally. Bumblebees require skilled taxonomic identification, and several SAR species are cryptic and can be easily misidentified. ECCC notes that because no targeted surveys for SAR arthropods were conducted, and several SAR bumblebee species required specialist identification, the absence of incidental observations should not be interpreted as evidence of absence. The project footprint includes early-successional and edge habitats that can support SAR bumblebees such as the Yellow-banded Bumble Bee and their parasite Cuckoo Bumble Bees (e.g., Suckley’s Cuckoo and Gypsy Cuckoo).

ECCC recommends that the proponent implement pollinator-friendly vegetation management practices, including maintaining native flowering plants, avoiding mowing during peak bloom, minimizing soil disturbance, and avoiding pesticide use. These measures will reduce potential impacts to SAR bumblebees and enhance habitat quality within the project area.

## **Wetlands**

40. Quote (page 108) *“The estimated maximum potential loss of wetland area in the PDA is 20.8 ha. This is a conservative estimate calculated to assume the loss of all wetland habitat within the PDA. The Project footprint is expected to be smaller, and wetlands can potentially be avoided. Avoidance of impacts will be implemented in the detailed design and project micro-siting. Compensation will be required for wetland area lost in the PDA.”*

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

ECCC advocates for planning, siting and designing a project in a manner that considers wetland mitigation options in a hierarchical sequence – avoidance, minimization, and as a last resort, compensation. ECCC encourages the proponent to prioritize avoidance and minimization of disturbance to wetlands. Where avoidance is not possible, ECCC encourages a detailed description of potential direct and indirect impacts with a rationale on why avoidance and minimization of impacts were determined to be not possible, and prioritization of rehabilitation and restoration of wetlands impacted by the project.

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

ECCC also recommends the following general measures:

- Developments on wetlands should be avoided;
- Hydrological function of the wetland should be maintained;
- Runoff from development should be directed away from wetlands;

- A 30-metre buffer from the high-water mark of any water body (1:100 Flood Zone) should be maintained in order to retain movement corridors for migratory birds. Please see <https://www.canada.ca/en/environment-climate-change/services/avoiding-harm-migratory-birds/reduce-risk-migratory-birds.html> for further information concerning buffer zones.

41. Quote (page 99) “*The wetland VEC is composed of all provincially regulated wetlands (i.e., greater than 100 m<sup>2</sup> in size) that may interact with the Project.*”

ECCC acknowledges that NSECC regulations limit wetland delineations to those greater than 100 m<sup>2</sup>; however, ECCC encourages the proponent to consider direct and indirect impacts to wetlands of all sizes, as these habitats are important for migratory birds, including shorebirds (e.g., snipe species), and avian species at risk throughout their life cycles.

ECCC recommends that the proponent update the desktop analysis using the most current wetland data available for Nova Scotia, including the Canadian National Wetland Inventory (CNWI) and provincial wetland and wet areas datasets, as the NSDNR (2017) database is outdated. Clarification is also requested on survey effort, as field surveys appear to have focused on the Study Area while the LAA/RAA relied primarily on desktop analysis, which may underestimate wetlands, particularly swamps. Given that 85.7 ha of swamp was delineated but up to 324.5 ha of wetlands may occur within the LAA, further characterization is warranted.

ECCC further recommends that the proponent conduct ground-truthing to the extent possible to confirm wetland types and improve confidence in predictive modelling, and provide clearer descriptions of wetland classes (e.g., shrub vs. forested swamp) and those most likely to be affected by the project.

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

### **Applicable Legislation and Standard Recommendations**

#### **Fisheries Act**

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

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

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

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

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

Section 5.1 of the MBCA describes prohibitions related to depositing substances harmful to migratory birds:

“5.1 (1) No person or vessel shall deposit a substance that is harmful to migratory birds, or permit such a substance to be deposited, in waters or an area frequented by migratory birds or in a place from which the substance may enter such waters or such an area.

(2) No person or vessel shall deposit a substance to be deposited in any place if the substance, in combination with one or more substances, result in a substance – in waters or an area frequented by migratory birds or in a place from which it may enter such waters or such an area – that is harmful to migratory birds.”

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

### Species at Risk Act

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

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

General prohibitions only apply automatically:

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

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

For project assessments, SARA requires:

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

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

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

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

### Vegetation Clearing

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

ECCC provides the following recommendations:

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

### Lighting

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

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

- The fewest number of site-illuminating light possible should be used in the project area. Only strobe lights should be used at night, at the lowest intensity and smallest number of flashes per minute allowable by Transport Canada.
- Lighting for the safety of the employees should be shielded down and only to where it is needed.

- LED lights should be used instead of other types of light where possible. LED light fixtures are less prone to light trespass (i.e., are better at directing light where it needs to be, and do not bleed light into the surrounding area), and this property reduces the incidence of migratory bird attraction.

### Fuel Leaks

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

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

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

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

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

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

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

### Stockpiles

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

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

### Invasive Species

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

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

### Noise Disturbance

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

ECCC recommends the following best management practices:

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

Please let me know if you have any questions regarding the above advice.

Thank you,

**Maryam Fazeli**

Coordinator, Environmental Assessment, Environmental Protection Operations Directorate - Atlantic  
Environment and Climate Change Canada / Government of Canada

[maryam.fazeli@ec.gc.ca](mailto:maryam.fazeli@ec.gc.ca)

Coordinatrice, Évaluation environnementale, Direction des activités de protection de l'environnement  
Environnement et Changement climatique Canada / Gouvernement du Canada

[maryam.fazeli@ec.gc.ca](mailto:maryam.fazeli@ec.gc.ca)

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Date: April 21, 2026  
To: Jeremy Higgins, Environmental Assessment Officer  
From: Department of Health and Wellness – Environmental Health  
Subject: **Sugar Maple Wind Energy Project, Pictou County, Nova Scotia**

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**Scope of review:**

This review focuses on the following mandate: Environmental Health

**List of Documents Reviewed: EARD**

**Details of Technical Review:**

The purpose of the proposed undertaking is to construct and operate an up to 16 turbine, 112 MW wind energy project. The wind turbines will be up to 200 m tall to the tip of the blade and will have a rated capacity of up to 7.0 MW. The Project is situated on the ancestral and unceded territory of the Mi'kmaq people, in Pictou County. It is located approximately 2 km from the rural community of Upper Barney's River, 11 km to the south of the Trans-Canada Highway 104 at Barney's River Station, and 6.5 km northeast of the community of Garden of Eden. The project will also include a short transmission line, electrical collector lines, a substation, switchyard, access roads, and temporary laydown areas. The proponent intends to begin major construction phases of the Project in spring of 2027, and it is expected to reach commercial operation by the end of 2028. This Project is being proposed as part of the Province's Green Choice Program and will operate for 25 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:**

Any changes to the siting of wind turbines made subsequent to the submission of the EARD may make necessary re-modelling for sound and shadow flicker impacts.

Date: April 22 2026

To: Jeremy Higgins, Environmental Assessment Officer

From: Protected Areas Branch Sustainability and Applies Science Janet MacKinnon  
Executive Director

Subject: **Sugar Maple Wind Energy Project, Pictou County, Nova Scotia**

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**Scope of review:**

This review focuses on the following mandate Protected Areas\_

**List of Documents Reviewed:**

[WAPA](#)

[Map](#)

**Details of Technical Review:**

Barneys River NR 3 KM to the east

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

No other comments

**Fisheries and Aquaculture**

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Date: April 23, 2026

To: Jeremy W Higgins, Environmental Assessment Officer, Environment & Climate Change

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

Subject: Sugar Maple Wind Energy Project, Pictou County

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**Scope of review:**

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

**List of Documents Reviewed:**

- Sugar Maple Wind Energy Project – Environmental Assessment Registration Documents (EARD)
- Appendix A-1 - Figures

**Details of Technical Review:**Aquaculture:

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

The project was reviewed in four (4) key areas which could affect the local aquaculture operations adjacent to the project area, such as: sediment creation, power outages, water withdrawal, and water discharge.

There are 12 aquaculture sites within 25km of the proposed project. Of these, nine (9) are marine shellfish sites, and three (3) are land-based aquaculture facilities.

Sediment is likely to be generated during the road construction and site preparation phases, specifically regarding the construction and upgrading of access roads. Sediment can cause turbidity in the water column, which can affect the ability of marine plants to obtain adequate sunlight for growth, reducing oxygen levels for shellfish. Settling sediment can obstruct feeding and destroy habitat by covering benthic substrates, smothering the benthic habitat, and impacting the nutrients available to shellfish bottom cultures. Sediment can also 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 states that a project-specific *Environmental Protection Plan* (EPP) will be developed before commencement of construction, with aims to reduce the impact of sediment creation and erosion through *Erosion and Sediment Control* (ESC) measures. The specific details concerning the ESC are not provided within the EARD.

To reduce the effects of fugitive dust, the EARD indicates that construction-related dust will be controlled through speed limits on access roads, road watering and limiting construction during high wind events. The use of existing road networks will contribute to minimizing the project's

impact to the geologic environment. It is recommended that the applicant be informed of existing aquaculture operations in the area so that the ESC design can appropriately account for aquaculture activities and incorporate mitigation measures to ensure sediment-related risks to those operations remain low.

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

Groundwater impacts are possible if blasting is required. If blasting is necessary, then impacts are projected to only impact wells within an 800m radius of a blast. The three (3) land-based aquaculture operations are outside of the 800m range and therefore, should not be impacted because of blasting.

The impacts of the project on water are more related to removal of plants and watercourse changes (via activities such as culvert installation), rather than water discharge or water withdrawal.

Changes in water quality or quantity may be due to activities during road construction (sedimentation, vegetation removal, and water redirection). It is stated that the applicant aims to develop a project-specific EPP before the commencement of construction. The EPP would include measures to reduce sedimentation and erosion, which would minimize the impacts of the project on water quality and quantity. However, the specific details of the EPP are not provided within the EARD.

Concerning the effects of fugitive dust, mitigation measures are planned to avoid and mitigate any potential effects on watercourses, and the subsequent surface water quantity and quality. These include construction-controlled measures, such as speed limits and road watering. The mitigations provided in the EARD should result in reduced risk to water quality and quantity to aquaculture sites from construction activities if applied appropriately.

#### Marine Fisheries:

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

There are seven (7) licensed Nova Scotian marine commercial fisheries buyers and/or processors located within Pictou County where the project is proposed to be located. Lismore Seafoods Company is located 38km North of the proposed site, Quality Seafoods East Ltd. is located 38km North of the proposed site, Pristine Bay Premium Oysters is located 43km West of the proposed site, Seabright Fisheries Ltd. is located 64km West of the proposed site, North Nova Seafoods Ltd. is located 68km Northwest of the proposed site, Northumberland Fish Co-op Ltd. is located 76km Northwest of the proposed site, and Langille's Fish Ltd. is located 85km West of the proposed site. Since there is limited to no connectivity between the wind farm and the above-noted businesses, the project should have a negligible impact on the operations of these facilities.

Regarding marine commercial fisheries harvesting in the area, lobster is the most lucrative fishery adjacent to the proposed site. The waters adjacent to the proposed site are known as Lobster Fishing Areas (LFAs) 26a1-3. Fishing in these LFAs occurs approximately around April 25th for two (2) months. Since the project is land-based, with no proposed marine activities and with limited to no connectivity to the marine environment, it should have a negligible impact on lobster harvesting and other marine commercial fisheries adjacent to the proposed site.

Regarding impacts to Indigenous communities, there is communal-commercial, and Food, Social, and Ceremonial (FSC) fishing conducted within LFAs 26a1-3 in the waters adjacent to the proposed site. The Indigenous community, Pictou Landing First Nation, is adjacent to the proposed site and

has access to these licenses. Since the project is land-based with no proposed marine activities and with limited to no connectivity to the marine environment, it poses negligible impacts to lobster and other marine commercial fisheries harvested by Pictou Landing First Nation adjacent to the proposed site.

Inland Fisheries:

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

The Project has the potential to affect the aquatic environment associated with the installation of watercourse crossings or sedimentation from runoff, riparian disturbance. Blasting could also impact the health and behaviour of nearby fish populations. Construction activities will follow the NSECC Guide to Altering Watercourses.

The project is not expected to trigger a Harmful fish habitat alteration, disruption, or destruction (HADD), meant to offset habitat loss. Project activities in watercourses will be completed in the dry, in the appropriate timing window, and with a fish salvage and relocation program.

Fish habitat assessments were conducted. The project is based on the headwaters of St. Mary's River and the West River of Antigonish. Both systems are designated as Special Trout Management Areas.

Twenty-five (25) watercourses overlap with the PDA. Watercourses were characterized by size and water quality, based on suitability to support salmonids. Of these, seven (7) streams were classified as permanent (2 large and 5 small). Habitat assessment results indicate that the permanent watercourses within the PDA can support salmonids. Brook trout were observed in watercourses within the PDA, and direct fish assessments were not conducted.

**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 Site Mapping Tool, to locate the aquaculture operations within the area so the proposed *Environmental Protection Plan*, EPP can ensure that mitigations to local aquaculture operations can be applied effectively.

Based on the activities proposed, and with adherence to the environmental policies, guidelines, and regulations, as stated in the EARD, there should be negligible risk to the adjacent marine commercial fisheries activities and NSDFA's marine fishery interests.

NSDFA would like to highlight the importance of brook trout near or in the project area. Potential project impacts to fish and sportfishing are anticipated to be short-term, resulting mainly from road construction and watercourse crossings.

The proponent indicated that the Nova Scotia Watercourse Alteration Standard for Watercourse Alterations under Notification Process will be followed to reduce potential impacts on watercourses. Any project effects that cannot be effectively mitigated may require offsetting through DFO's Fisheries Act authorization process.

Project proponent should also be made aware of:

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

Date: April 22, 2026

To: Jeremy Higgins, Environmental Assessment Officer

From: Climate Change Division – Lori Skaine, Executive Director

Subject: **Sugar Maple Wind Energy Project, Pictou County, Nova Scotia**

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**Scope of review:**

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

**List of Documents Reviewed:**

Environmental Assessment Registration Document

**Details of Technical Review:**

**Adaptation**

- Section 5.2.1 Climate and Weather provides a description of 30-year climate normals recorded at the nearest climate station (Collegetown).
- Section 16 Effects of the Environment on the Project provides a brief overview of current and project climate impacts and adaptation considerations for the project. Based on climate projection data, climate impacts considered include increased wind pressures on infrastructure, increased precipitation that could cause flood damage to access roads and equipment pads, higher extreme temperatures that could create operation and maintenance hazards for personnel and increased energy use to cool buildings, and an increase in conditions favourable for the formation of thunderstorms and wildfires, which could harm public safety and damage infrastructure.
- The proponent also identified climate changes, such as decreasing snow loads and icing, that could result in a decreased risk to project components.
- The proponent considered projected changes in extreme heat and cold thresholds on wind turbine generators but not for personnel working on-site.
- Various design, operation, and maintenance strategies are described to reduce the identified climate risks, such as design and maintenance of the turbines and site to withstand extreme weather, manage surface water, control erosion and sediment, and reduce wildfire risk.

## **Mitigation:**

- The primary sources of greenhouse gas (GHG) emissions for the project, as described in *Section 2.7.3.4* of the EA registration document, occur during the construction phase and total 51,392.6 t CO<sub>2</sub>e. These emissions are largely attributable to site development, concrete foundations, and turbine assembly.
- The operations phase is expected to generate 12 t CO<sub>2</sub>e per year from wind turbine maintenance, reported over approximately 25-year lifespan of the project.
- The project will have a total installed capacity of up to 112 MW, consisting of 16 wind turbine generators.
- Total loss of sequestration potential due to land is presented in *Table 2.4*. is estimated to be 212.6 t CO<sub>2</sub>e per year. These emissions are expected to be temporary and short term for the construction of roads and laydown areas
- Decommissioning of this project is likely not to occur until the 2060s by which time most construction and heavy transport equipment is expected to be zero emitting.
- The proponent expects the project to avoid 234,900 t CO<sub>2</sub>e per year (enough clean energy to power approximately 35,000 homes annually); however, the methodology and figures used to arrive at that calculation were not included in the project.

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

### **Adaptation**

- The proponent may wish to consider using a risk assessment framework to help prioritize climate risks and adaptation measures.
- As the proponent identified potential extreme weather changes, the proponent may wish to consider measures to support worker safety during these events for operational continuity.

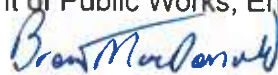
## **Mitigation:**

- The proponent should include GHG mitigation measures, such as the use of locally sourced materials; utilization of the shortest construction and transport routes; reduction of double handling of materials; regular maintenance; and personnel training.
- For added GHG emissions offsetting, the proponent could explore possible technologies that allow CO<sub>2</sub> to be embedded into concrete, including biochar amendments or mineralization.
- The proponent's construction phase emissions are primarily driven by concrete. Where feasible and particularly in cases where procurement choices may reduce embodied emissions, we suggest the proponent complement their quantified life

cycle GHG estimates with procurement information showing (i) whether major suppliers are subject to carbon constraint requirements (e.g., output based pricing systems/emissions trading systems or equivalent), and (ii) any supplier-specific verified embodied carbon documentation (e.g., environmental product declarations) used to inform procurement decisions.

- The proponent should include a brief description of the methodology used to calculate the avoided GHG emissions presented in Section 2.7.3.4, including the expected annual electricity generation (MWh/year) of the facility and a clear description of the baseline scenario against which avoided emissions are calculated.
- In addition to providing the methodology and baseline assumptions, we suggest the proponent present avoided emissions as a range rather than a set figure. A small set of transparent scenarios could be compared (e.g., 2025 intensity held constant, declining intensity aligned with legislated policies, and a faster decarbonization scenario).

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Date: April 20, 2026  
To: Jeremy Higgins, Environmental Assessment Officer  
From: Department of Public Works, Environmental Services – Brent MacDonald, P. Eng.,  
Manager   
Subject: **Sugar Maple Wind Energy Project, Pictou County, Nova Scotia**

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**Scope of review:**

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

**List of Documents Reviewed:**

Sugar Maple Wind Energy Project Environmental Assessment

**Details of Technical Review:**

The Proponent is planning to build up to 16 turbines in Pictou County.

1. The Proponent has referenced a need for a Special Moves Permit (SMP), and a Working Within Highway Right of Way (WWHROW) Permit in Table 1.2 on page 7 and 8 of the EA.
  - a. Regarding the SMP, the Proponent must contact the Nova Scotia Department of Public Works (NSDPW) contacts: Darcey MacBain and Devon Pinks to assess next steps. They can be reached at [Darcey.MacBain@novascotia.ca](mailto:Darcey.MacBain@novascotia.ca) and [Devon.Pinks@novascotia.ca](mailto:Devon.Pinks@novascotia.ca).
  - b. The Proponent references modifying existing access roads and creating new access roads. Any impacts to provincially owned roads will require a WWHROW Permit. To obtain this permit, the Proponent must contact the local NSDPW Area Manager.
2. Any temporary workplaces created because of work within the access road must comply with the appropriate section of the Nova Scotia Temporary Workplace Traffic Control Manual. All Traffic Control Plans must be supplied by the Proponent and be reviewed by the local NSDPW Area Manager.
3. Table 2.1 on page 12 identifies setback distances from Public Highways, using the Wind Energy By-Law from the Municipality of Pictou County. The Proponent must also communicate these setback distances with the Local NSDPW Area Manager to confirm setback distances for provincially owned roads.
4. The report has multiple Transportation sections. Section 2.5.2.1 on page 17 references finalizing the transportation route and traffic management at some

point in the future. Section 13.2.6 on page 191 expands on potential routes for the turbine components and provides Annual Average Daily Traffic (AADT) volumes for these roads. Sections 13.3.1.6 on page 200 and 13.3.2.4 on page 206 references more detail on the route but also references different access points, and a Traffic Management Plan. There is an additional Transportation section (15.2.2.2) that references different highway projects in the area. It would be beneficial to have these different sections consolidated into one section, emphasizing the transportation route and the Traffic Management Plan as these, as well as the SMP, will need to be finalized.

5. There are references to blasting on page 66 and page 128. Any impacts on provincially owned roads must be assessed by the local NSDPW Area Manager for possible mitigation measures.
6. There are some references to collision avoidance with wildlife associated with sign installation (page 128, *Speed Limit and Wildlife Warning Signs*). Any signage installed on provincially owned roads must be approved through the local NSDPW Area Manager.

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

1. The Proponent is responsible for contacting the NSDPW Special Moves Permit contacts.
2. A Working Within Highway Right of Way Permit must be obtained through the local NSDPW Area Manager.
3. Temporary workplaces must comply with the Nova Scotia Temporary Workplace Traffic Control Manual.
4. The Proponent must confirm setback distances for provincially owned roads with the local NSDPW Area Manager.
5. Consider consolidating the many transportation sections into one section for clarity and finalizing the transportation route, the Traffic Management Plan and the Special Moves Permit.
6. The local NSDPW Area Manager must be contacted regarding plans for blasting.
7. The Proponent must have signs approved by the local NSDPW Area Manager before installation on provincially owned roads.

Date: April 23, 2026

To: Jeremy Higgins, Environmental Assessment Officer

From: Water Resource Management Branch

Subject: **Sugar Maple Wind Energy Project, Pictou County, Nova Scotia**

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**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 site spans two secondary watersheds: the majority lies within the St. Mary's River watershed, which drains south to the Atlantic Ocean, and the eastern portion lies within the West River watershed, draining northeast to the Northumberland Strait. Of the 25 watercourses intersecting the site, the EARD classified 60% as intermittent, 24% as small permanent, 5% as large permanent, with the remainder being ephemeral channels.

Where feasible, surface water impacts were minimized using setbacks and existing road infrastructure. Watercourse Alteration Approvals will be required for new culverts and upgrades to existing crossings. The EARD commits to implementing erosion and sediment control (ESC) measures, conducting in-the-dry works and fish salvages where required, and restoring crossing sites to pre-construction conditions, or better, following completion of works.

The nearest protected public drinking water supply, the New Glasgow–Forbes Lake Protected Water Area, is located nearly 30 km west of the Potential Development Area (PDA) and is fully avoided by project infrastructure.

The proponent will prepare an Environmental Protection Plan (EPP) prior to construction, including measures for surface water management. Potential effects on the aquatic environment are primarily associated with construction activities involving direct interaction with watercourses. These effects are expected to be short-term, localized, and largely reversible with the application of planned mitigation. ESC measures including silt fencing, mulching or revegetation of exposed soils, and surface water management procedures are anticipated to be highly effective at reducing erosion and sedimentation risks.

The EARD does not discuss future road maintenance, nor whether the use of salt for de-icing is planned. It does state that concrete for construction will be hauled from an existing plant in Antigonish.

The EARD estimates the maximum potential loss of wetland area of 20.8 ha. The alteration of wetlands may negatively impact water quality in any downstream watercourse as wetlands can act like a filter and help dampen peak flows reducing turbidity/small particles. Stormwater flow from roads or other impervious surfaces may enter wetlands and watercourses in quantities exceeding the natural pre-construction flow. Increased flow velocity may cause increased erosion of wetland soil and watercourse banks and/or beds. This risk could be avoided by avoiding wetland alterations where possible, especially upstream of those watercourses that are providing good fish habitat. The EARD states that mitigation measures will be further developed in the Project-specific EPP prior to construction to minimize adverse effects.

### **Groundwater**

The Project is a proposed wind energy project with a total capacity of up to 112 MW, comprising up to 16 wind turbine generators (WTGs). It is located to the east of the rural community of Upper Barney's River in Pictou County.

Residences surrounding the project site are serviced by private wells. As noted in the EARD, based on NSECC's Well Logs Database, one private well was identified within 1km of the potential development area. According to the EARD, site preparation and/or construction activities could impact groundwater quality and/or quantity, including blasting, temporary excavation dewatering, or accidental fuel spills. The magnitude of impacts is expected to be minor and limited in extent. The EARD suggests several mitigation measures, such as refueling in designated areas and avoiding blasting near residential areas. It is also noted that a Complaint Resolution Plan will be developed and implemented for the project.

### **Wetlands**

A total of 139 wetlands were formally delineated in the Study Area, while 75 wetlands are within or partially within the PDA. WESP-AC scores were calculated for 44 wetlands within the PDA. One WSS, triggered by a Canada warbler, was identified within Wetland 71.

### **Key Considerations:**

#### **Surface Water**

The EARD generally avoided and appropriately mitigated risks to surface water. However, it is noted that baseline water quality monitoring was limited to in-situ quality data for temperature, pH, dissolved oxygen, specific conductivity, and total dissolved solids. Hydrological data was collected for twenty-two (22) watercourses during field assessments. Water quality and hydrological data may need to be confirmed and supplemented with turbidity and/or total suspended solids (TSS) data when developing

plans committed to in the EARD (e.g., ESC, surface water management), especially for those watercourses affected by watercourse and wetland alterations.

Mitigative measures proposed in the EARD including erosion and sediment control and measures to minimize impacts of altered hydrology would reduce risks to surface waters posed by the project. To further minimize risks, these measures, and aspects of the contingency plan, could be integrated into holistic, site-specific, ESC and Surface Water Management plans before construction begins.

The risks to water quality due to wetland alterations was minimally considered. These risks should be further considered and mitigated in the next stages of planning. The EARD committed to following the appropriate regulation, permitting requirements, and protocols in relation to surface water quantity and quality.

### Groundwater

Impacts to groundwater quality and/or quantity may occur as a result of the proposed project, although impacts are expected to be minor and limited in extent. The Proponent suggests implementation of mitigation measures to reduce the likelihood and extent of groundwater impacts, including the development and implementation of a Complaint Resolution Procedure and avoiding blasting near residential areas. If blasting is necessary, a pre-blast survey is required for private wells within 800 m of the blast site. It is noted in the EARD that, based on the Well Logs Database, there is one private well within 1km of the potential development area. The presence and location of private wells within 800 m of each blast site should be verified in the field prior to planning and conducting the pre-blast survey.

The EARD mentions the potential for excavation dewatering should shallow groundwater be encountered during construction. As per the Activities Designation Regulations, a separate water withdrawal approval is required for the withdrawal and/or diversion of water in an amount greater than 23,000 liters per day for a period greater than 2 weeks.

The EARD mentions designating refueling areas to minimize impacts to water resources. A spill response plan should also be implemented to ensure prompt and effective management of any spills that may occur throughout the project.

### Wetlands

The proponent should consider all opportunities to minimize the impacts to wetlands, including changes to the project footprint and mitigations to minimize indirect impacts, especially where WSS alterations are proposed.

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



Date: April 23, 2026  
To: Jeremy Higgins, Environmental Assessment Officer  
From: Air Quality Unit  
Subject: **Sugar Maple Wind Energy Project, Pictou County, Nova Scotia**

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**Scope of review:**

This review focuses on the following mandate: Air Quality

**List of Documents Reviewed:**

- *Sugar Maple Wind Energy project EA Registration Document*
- *Appendix D*

**Details of Technical Review:**

The purpose of the proposed undertaking is to construct and operate an up to 16 turbine, 112 MW wind energy project. The project will also include a short transmission line, electrical collector lines, a substation, switchyard, access roads, and temporary laydown areas. The proponent intends to begin major construction phases of the Project in spring of 2027, and it is expected to reach commercial operation by the end of 2028. This Project is being proposed as part of the Province's Green Choice Program and will operate for 25 years.

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

Project activities will primarily interact with the atmospheric environment through fugitive dust and exhaust emissions during the construction phase. The Project area is vegetated, which may help to reduce the travel distance of fugitive dust emissions from the Project.

There are 22 potential receptors identified within potential development area. The Proponent states they will implement mitigation measures to minimize air quality impacts on nearby receptors. The Proponent 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 considerations:

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



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.
- It is unclear what impact construction noise will have on nearby receptors.

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**[Draft] Re: DNR/DoE EA comments: Sugar Maple Wind Energy Project, Pictou County - comments due by April 23, 2026**

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**From** Jeremy.Higgins@novascotia.ca  
**Draft saved** Thu 2026-04-23 11:11 AM  
**To** Boudreau, Louise M <Louise.Boudreau@novascotia.ca>

**From:** Boudreau, Louise M <Louise.Boudreau@novascotia.ca>  
**Sent:** Thursday, April 23, 2026 10:59 AM  
**To:** Higgins, Jeremy W <Jeremy.Higgins@novascotia.ca>  
**Cc:** Henderson, Rachel A <Rachel.Henderson@novascotia.ca>; Williment, Melissa <Melissa.Williment@novascotia.ca>; Glass, Vimy M <Vimy.Glass@novascotia.ca>  
**Subject:** DNR/DoE EA comments: Sugar Maple Wind Energy Project, Pictou County - comments due by April 23, 2026

Hello Jeremy,

The Department of Natural Resources and the Department of Energy have responded to your request to provide comments on the Sugar Maple Wind Energy Project EA. Please see the attached document.

**FYI: Additional notes from Clean Energy/Electricity, Department of Energy.**

- 
- The proposed project was awarded through the Green Choice Program Request for Proposals.
- 
- Wind energy projects such as the Sugar Maple Wind Energy Project help Nova Scotia transition its electricity system from the use of coal-fired generation that has direct negative environmental impacts, including air pollution and greenhouse gas emissions.
- The transition of our electricity system to renewable energy is part of the province's plans and commitments to climate change mitigation.
- Wind energy is one of the lowest costs of energy world-wide and local deployment of wind energy is anticipated to save rate payers of Nova Scotia millions of dollars over the lifetime of their operation while also reducing the emissions and pollution intensity of the electricity system.
- Wind energy will help the electricity system avoid output-based price compliance for greenhouse gas emissions in Nova Scotia resulting in less upward pressure on rate payers through fuel.
- Transitioning the electricity system to renewable energy is the most cost effective and significant action the province can undertake to reduce its greenhouse gas emissions in the near term.

Please let me know if you have questions.

Warm Regards,

Louise

Louise Boudreau (she/her)  
Senior Corporate Strategist  
Strategic Policy and Planning Division  
Department of Natural Resources  
Department of Energy  
Founders Square | 1701 Hollis Street, 3<sup>rd</sup> Floor | Halifax, NS B3J 2T9 |  
(902) 719-6916

Date: April 23, 2026  
To: Jeremy Higgins, Environmental Assessment Officer  
From: Department of Natural Resources and Department of Energy  
Subject: **Sugar Maple Wind Energy Project, Pictou 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, parks, protected beaches, habitat, Species at Risk, and Old Growth Forest and the Department of Energy (DOE) concerning clean electricity.

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 Land:**

- Environmental Assessment Registration Document, including Project Summary
- Appendices A to L
- Drawings 1.1 to 7.8
- GIS shapefiles

### **Habitat, Flora and Fauna:**

- Environmental assessment registration document
- Drawings: 9.1; 10.1 to 10.3; 11.3; 12.1 to 12.14; 15.2
- GIS shapefiles

### **Clean Electricity:**

Renewable energy projects such as wind projects will assist the Province in achieving its goals in the *Electricity Act* and the *Clean Power Plan*. It will also support *Environment and*

*Climate Change's Environmental Goals and Climate Change Reduction Act (EGCCRA), and the Climate Change Plan for Clean Growth (CCPCG).*

*Electricity Act:*

- 80% Renewable Electricity Standard by 2030;

Department of Natural Resources and Renewables/Energy 2022 Mandate letter:

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

EGCCRA: 80% of electricity in the Province supplied by renewable energy by 2030;

- 53% emissions reduction targets from 2005 levels by 2030;
- Phase out of coal-fired electricity generation by 2030;
- Net-zero emissions by 2050;

CCPCG:

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

Clean Power Plan:

- 1000 MW of new onshore wind energy by 2030.

## **Details of Technical Review:**

### **Crown Land:**

Based on the information provided, the Project is proposed to be located on privately owned land that adjoins Crown lands, with potential to include Crown lands. The Potential Development Area (PDA) overlaps with adjoining Crown lands currently identified as PIDs 01043793 and 01042589. Should the final Project Footprint (which is to be finalized after detailed design is complete and will fall entirely within the PDA) include any adjoining 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 areas, 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 Nova Scotia Power Inc. or Bell owned infrastructure located on Crown lands must be directed to the owner of the utility infrastructure.

## **Habitat, Flora and Fauna:**

Activities associated with the proposed wind development project have the potential to cause direct and indirect impacts on birds and bat species through post-construction collision with turbines and transmission lines as well as loss of habitat and species disturbance during clearing, construction and facility operation.

Critical habitat for brook floater mussels and core habitat for mainland moose are identified within the proposed footprint of the project. Previous wood turtle observations are within the study area for the development. Species at risk birds, bats and mainland moose observations were also noted within the proposed project footprint during species surveys. New roads are proposed to extend from existing roads including a portion that will cross through brook floater critical habitat as well as delineated wetlands and streams.

Avoidance should be the primary form of mitigation implemented to alleviate these effects followed by additional mitigative measures to reduce residual impacts. Consultation with DNR and Environment and Climate Change Canada's Canadian Wildlife Service (ECCC-CWS) on effective forms of mitigation can identify options that work best for the situation. Mitigations include siting turbines away from bat foraging habitat, redirecting new roads to avoid species at risk habitat particularly in streams, and increasing turbine blade visibility and cut-in speeds to minimize impacts association with bird and bat mortalities. Encouraging implementation of emerging innovation and technologies for avian detection and turbine blade feathering can also enable real-time response to reduce avian mortality risks associated with wind developments.

The proponent also acknowledges the potential for cumulative impacts of multiple wind power projects on wildlife for bats, birds and habitat connectivity and proposes monitoring and adaptive mitigation as part of the Wildlife Management Plan.

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

### **Crown Land Legal Requirements**

Obtain all necessary permits and authorizations as required under provincial legislation, regulations and policy related to habitat, wildlife and species risk, including *An Old Growth Policy for Nova Scotia* and the *Nova Scotia Wetland Conservation Policy*.

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

### **Habitat, Flora and Fauna:**

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

## **Additional Surveys and Data**

- No lichens or turtle surveys were completed to date. Carry out lichen surveys by an approved lichenologist as well as turtle surveys to inform siting of project infrastructure including turbines and roads.
- Provide precise locations and data for all flora and fauna observations, particularly species at risk, to DNR.
- Outcomes of survey or additional data or reports should be submitted to DNR, including spatial data.

## **Wildlife Management Planning**

- Develop a Wildlife Management Plan in consultation with DNR and Environment and Climate Change Canada.
- Include monitoring programs and response procedures if species at risk are encountered.
- Maintain buffers around sensitive habitat and species including brook floater critical habitat, potential lichens occurrences from pending surveys, breeding habitat for species at risk birds and foraging habitat for bats.
- Implement measures to reduce impacts to mainland moose, bats, birds, turtles, and other wildlife including construction timing, road management practices and facility operations.
- Consider additional mitigation options such as higher turbine cut-in speeds or blade painting to reduce bat & bird mortality.
- Incorporate adaptive mitigation planning and cumulative effects monitoring at local and regional scales.

## **Clean Electricity:**

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

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

---

Date: April 20, 2026

To: Jeremy Higgins, Environmental Assessment Officer

From: Geoscience and Mines Branch, Department of Natural Resources

Subject: **Sugar Maple Wind Energy Project, WEB Sugar Maple Wind Inc., Pictou County, Nova Scotia**

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**Scope of review:**

This review focuses on the following mandate geoscience health and safety, mineral exploration, mineral development, abandoned mine openings.

**List of Documents Reviewed:**

Environmental Assessment Registration Document – Sugar Maple Wind Energy Project

Nova Scotia’s Registry of Claims (NovaROC)

Mineral Occurrence Database

Abandoned Mine Openings Database

Digital Version of Natural Resources Open File Map ME 2018-001, Bedrock Geology Map of the Antigonish Highlands Area, Antigonish and Pictou Counties, Nova Scotia, scale 1:75 000, by C.E. White, 2018

**Details of Technical Review:**

A preliminary review of the Sugar Maple Wind Energy Project. The review notes the bedrock geological characterization of the proposed site is appropriate. The Proposed Development Area (PDA) is mostly underlain by Neoproterozoic Keppock Formation (Georgeville Group) pink to grey, rhyolitic to dacitic lapilli tuff with abundant crystal and lithic fragments, which make up the core of the southern Antigonish Highlands. There are also Ordovician and Late Neoproterozoic plutons containing granitic, dioritic and gabbroic rocks within the PDA. Proposed mitigation measures should geohazards be encountered for ARD, karst, and erosion and sedimentation are in place. Geological maps included in application display relative location to planned project footprint.

It is recommended that Proponent refer to 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.

Herein, they list the underlying geology and low risk for karst topography, however do not mention acid rock drainage (ARD) potential for the PDA. The Proponent may look to include ARD potential details in the underlying bedrock in future submissions. The PDA consists of mostly calcalkaline-tholeiitic volcanic rocks, so can be considered low for ARD potential. The Proponent does mention they will consult NSECC to determine whether rock samples from the PDA to be excavated require further analysis for sulphide-bearing materials. If any sulphide-bearing materials are discovered, a site-specific mitigation plan needs to be developed in accordance with the Sulphide Bearing Material Disposal Regulations, N.S. Reg 57/95. The Proponent will also

develop and implement an erosion and sediment control plan. No known abandoned mine openings (AMO) are located within the PDA, and the nearby mapped AMO is 2 km to the northeast. Report undocumented abandoned mine openings to the Mineral Management Division.

**Mineral Occurrences**

The proposed project area is ranked medium-low for mineral potential for the most part, with small portions to north of the area falling into high potential areas possibly due to historic staking. The PDA is also not near any protected areas, and no mineral occurrences are contained within the PDA, with a diatomite occurrence outside the area (270m) near Haggard Lake. Northern portion of the PDA (access road) overlaps with an existing exploration license (EL-57894). Due to the mineral rights held close to the proposed area, consideration should be given to concurrent mineral exploration activities. Reach out to mineral rights holder or mineral management division if further information is required.

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

No comment.

## Agriculture

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Date: April 20, 2026

To: Jeremy Higgins, Environmental Assessment Officer

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

Subject: Sugar Maple Wind Energy Project  
Upper Barney's River, Pictou County, Nova Scotia

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

No significant agricultural impacts are anticipated given that:

- The land within the project area is Class 7 (Canadian Land Inventory; CLI) which have no capacity for arable agriculture or permanent pasture.
- The land within a 2km buffer around the project area is predominantly Class 7, with 5% (1,136 acres) Class 4 land defined as having severe limitations that restrict the range of crops or require special conservation practices (CLI).
- There are ten agricultural fields within the buffered area.
  - 125 acres is used for long term crop such as blueberry and forage,
  - 17 acres is inactive agriculture, and
  - Less than 8 acres is for rotational crop.
- The closest registered farms are one beef operation and one Christmas Tree farm, which are both more than 3.5 km from the project area buffer.
- Potential impacts identified during site visits include dust from increased traffic on rural roads. However, farms are likely to also benefit from improved road access and maintenance.

Date: April 23, 2026  
To: Jeremy Higgins, Environmental Assessment Officer  
From: Beth Lewis, Director of Special Places Protection  
Subject: **Sugar Maple Wind Energy Project, Pictou County**

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**Scope of review:**

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

**List of Documents Reviewed:**

EA Document

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

There has been no Archaeology work done to date, therefore there are no archaeology reports to review and comment on. We also noted that A2026NS001 is mentioned, however that is the wrong permit number. The Permit number open for Sugar Maple is A2026NS024.

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

In section *14.3.2 Residual Effects 14.3.2.1*, we did want to note that it is best to wait to comment on of effects on archaeological and heritage resources until there has been an ARIA conducted. At this point, we do not know if there are any areas of moderate to high archaeological potential within the development boundaries.

In section *14.4 Monitoring*, we wanted to advise to hold of on commenting on any recommendations until an ARIA is conducted as well.

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

Review of the mapped bedrock geology of the proposed area shows it listed as Keppock Formation, Neoproterozoic igneous rock units. There are no fossil resources that would be present in this geological unit.

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

No palaeontological concerns.



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Date: April 23, 2026

To: Jeremy Higgins, Environmental Assessment Officer

From: Sylvie Poirier, Regional Environmental Advisor, Transport Canada

Subject: **Sugar Maple Wind Energy Project, Pictou 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:**

[Sugar Maple Wind Energy 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 Canadian Navigable Waters Act 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, 6<sup>th</sup> Floor, 95 Foundry Street,  
Moncton, N.B. E1C 5H7 |

Transports Canada - Région de l'Atlantique / Place Héritage, 6<sup>e</sup> 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](mailto: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**

We acknowledge that the Proponent has been in contact with TC Civil Aviation and that the department has reviewed an Aeronautical Assessment Form for the project. The Proponent is encouraged to reach out directly to the Regional TC Civil Aviation office at [aviation.atl@tc.gc.ca](mailto:aviation.atl@tc.gc.ca) or 1-800-305-2059 for any additional questions or requirements in this regard.

### **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.



May 7, 2026

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

**Re: Consultation with the Mi'kmaq of Nova Scotia on the Sugar Maple Wind Energy Project, Pictou County, NS**

Mr. Higgins,

I write in response to your letter dated April 2, 2026, with respect to the *Terms of Reference for a Mi'kmaq-Nova Scotia-Canada Consultation Process* (ToR) as ratified on August 31, 2010, on the above noted project. We wish to proceed with Consultation.

The Kwilmu'kw Maw-klusuaqn (KMK) would like to acknowledge Glooscap First Nation as an equity partner on this proposed wind farm. It is encouraging to see industry partner with Mi'kmaq First Nations with commitments to include resource revenue sharing among additional Mi'kmaw communities. While these types of partnerships are encouraged, ownership on a project does not indicate support for the entire Mi'kmaw Nation. It also, does not circumvent the Crown's obligation to conduct meaningful Consultation.

There are currently a number of approved wind energy projects in Nova Scotia that are either under construction or moving toward development. While each project has undergone individual environmental assessment, they represent a broader wave of industrial-scale land use change whose cumulative effects on Mi'kmaw rights and territory have not been assessed at a regional level. The Aulds Cove Wind Project, Eigg Mountain Project and the Upper Afton Wind Project have all received provincial Environmental Assessment (EA) approval this year alone. These project have been largely concentrated in Guysborough County, Antigonish County and Mainland Nova Scotia in general. Reviewing these projects in isolation results in habitat fragmentation and could impact the Mi'kmaq's ability to utilize their Section 35 Rights.

Further to habitat fragmentation, Mainland Moose remains endangered in Nova Scotia and the moratorium on Moose hunting in the Cape Breton Highlands remains. Any habitat adjacent to Core Habitat for mainland moose must be considered general moose habitat. Industrial activity within moose habitat must be approached with caution and mitigated responsibly. The cumulative effects from continued development, including other renewable energy developments, forestry, mining, agriculture, and road construction, risk long-term and potentially

irreversible impacts to moose populations. These impacts include water degradation and the immediate and future loss of secure habitat and safe food sources. Sustained efforts are needed to protect the remaining population in Mainland Nova Scotia for the next seven generations of harvesters and beyond.

The KMK Archaeological Research Division (ARD) has reviewed the Environmental Assessment Registration Document (EARD) for the Sugar Maple Wind Energy Project (Section 14, pages 208-214), and MEKS. At this time, only an initial desktop Archaeological Resources Impact Assessment (ARIA), A2026NS001, has been completed and has been summarized in Section 14.1.13. To date, the ARIA is summarized as providing the “environmental, archaeological, and historical context of the region” (EARD 2026: 209). At this time, no subsurface testing or field reconnaissance has been submitted but is documented that it will be completed early in 2026.

Recognizing the proposed project was screened at minimal level and “specific mitigation measures will be developed based on findings of the final ARIA” (EARD 2026: 213), KMK’s ARD cannot provide a response until we receive a copy of the ARIA Final Report (A2026NS001) for review. Mi’kmaw archaeological sites have developed since time immemorial and may not be identified from the surface character of the current landscape; one cannot conclusively eliminate potential for Mi’kmaw archaeological heritage without subsurface testing.

The Maw-lukutijik Saqmaq (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. We wish to clarify that negative tests and negative evidence are considered relevant and important data. The Assembly 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.

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,



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




Marc Theriault, Nova Scotia Environment and Climate Change

Sarah Jadot, Nova Scotia Environment and Climate Change

Matt Schumacher, Nova Scotia Environment and Climate Change

Kim Bard, Nova Scotia Environment and Climate Change

## About the submission

 FORM NAME	 SUBMISSION ID	 SUBMISSION DATE
Environmental Assessment - Project Comments	ed4addf7-d1ab-418d-b0c6-1fb2fc93a4d9	02/04/2026 17:18

### SUBMISSION STATUS

SUBMITTED

## Submission details

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](mailto:ea@novascotia.ca).

**Select a Project:**

Sugar Maple Wind Energy Project ▼

**Comments:**

Eigg Mountain wind Expansion will only benefit a few land owners for a few years until another great green adventure comes along. The Eigg Mountain wilderness area and the little bit of wildlife in that area will be destroyed for ever. Why? So people can drive up there and look at those ugly things spinning around and making weird noises. The people in our surrounding areas will never see their power bills go down. Zero benefit to the people of Nova Scotia. If they want to build this stuff, go as far off shore as they can. Then you will only see those ugly turbines from the window of an airplane. There's way too much of this foolishness happening today. I hope they stay far away from my end of the Keppoch.

**Name:**

**Email:**

**City/Town**

Antigonish NS

**Postal Code**

B2G 2L3

**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)

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## Uploaded document(s)

No documents to display.

## About the submission

 FORM NAME

Environmental  
Assessment - Project  
Comments

 SUBMISSION ID

564e9a7f-a720-44f9-  
a68b-25df0252c081

 SUBMISSION DATE

02/04/2026 19:58

 SUBMISSION STATUS

SUBMITTED

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### Select a Project:

Sugar Maple Wind Energy Project ▼

### Comments:

We used trails years ago on atv. Then they became closed to us to protect the wildlife so we weren't allowed on them trails anymore. Now the whole mountain is near cleaned off to put in a windmill site but the respect for the wildlife somehow disappeared. To me it's a bit confusing. I know we need clean energy. But windmills do not make enough power even to pay for themselves.

**Name:**

**Email:**

**City/Town**

**FORM NAME** Environmental Assessment - Project Comments **SUBMISSION ID** adb18d77-763f-4f5b-b80d-ab9bdf0e8b38

**SUBMISSION DATE** 02/04/2026 20:44 **SUBMISSION STATUS** SUBMITTED

All comments received from the public consultation will be posted on the department's website for public viewing, following the necessary redactions of personal information in accordance with the Freedom of Information and Protection of Privacy Act. **By submitting your comments to the Department, you are consenting to the posting of your comments on the department's website.**

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**Select a Project:**

Sugar Maple Wind Energy Project 

**Comments:**

**Name:**

**Email:**

**City/Town**

Antigonish

**Postal Code**

b2g 2l4

**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.

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**RE: FW: SWEB's Wind Mill Project Sugar Maple Project CRM:0213292...reply**

---

**From** I@EastLink.ca>

**Date** Fri 2026-05-01 9:24 AM

**To** Minister, Env <Minister.Environment@novascotia.ca>; @EastLink.ca>

**Cc** Tutty, Bridget R <Bridget.Tutty@novascotia.ca>; Rahman, Mohammad <Mohammad.Rahman@novascotia.ca>; Alan MacIntosh <alanlizmacintosh@gmail.com>; Premier <PREMIER@novascotia.ca>

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

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

Good morning

Thank you so much for sending these and replying so quick, on a Saturday no less.

If nobody can make the time to visit the Weaver Mountain windmill project, I completely understand. In lieu of visiting the windmill project on Weavers Mountain, I will send you pictures of the massive clear cutting which was done, the windmill sites showing the amount of infrastructure which must be done to install the windmills, and the destruction of wildlife habitat. None of these windmills are close to a dwelling and I believe the wildlife will eventually return to the area making this project viable and not disrupting any business. Windmills are the future for Nova Scotians who have the highest power rates in Canada.

As stated, I 100% agree with finding alternative energy for our province but not at the cost of ruining my deer and bear outfitting business and the tranquility of my remote camp. I am only looking to have 2 of the windmills moved 5 kms from my outfitting camp and my bear sites. I have been in business for 15 years and, being a woodsman, hunter, and fisherman for 50 years, be rest assured, regardless of what SWEB are telling you in their environmental assessment, the wildlife, including bears and deer, are going to move out of the area. This is based on 50 years hands on experience. As stated, wildlife are resilient and I believe they will move back into the area once the project is completed, which I believe is the end of 2028.

I implore you, please consider this when assessing the approval of the Maple Sugar project. It is only 2 windmills I asking to be moved to another area.

Respectively submitted.

Regards

On 05/01/26 08:38 AM, "**Minister, Env**" <Minister.Environment@novascotia.ca> wrote:

Good morning.

Attachments 2 and 3 are emails you had sent dated April 23 and April 28<sup>th</sup>. As requested, they are attached as .pdfs.

Thank you.

---

**From:** @eastlink.ca>  
**Sent:** April 30, 2026 4:43 PM  
**To:** Rahman, Mohammad <Mohammad.Rahman@novascotia.ca>  
**Cc:** Minister, Env <Minister.Environment@novascotia.ca>; Tutty, Bridget R <Bridget.Tutty@novascotia.ca>  
**Subject:** RE: FW: SWEB's Wind Mill Project Sugar Maple Project CRM:0213292

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Good afternoon Mr Rahman,

Thank you for finally replying.

I am unable to open the 2nd or 3rd attachment, would you be able to put them into another form, such as PDF or word files?

Thank you

Best Regards

Sent from my Galaxy

Canadian Black Bear Outfitters

Facebook Page: Canadian Black Bear Outfitters

----- Original message -----

From: "Rahman, Mohammad" <Mohammad.Rahman@novascotia.ca>

Date: 2026-04-30 4:19 p.m. (GMT-04:00)

To: @EastLink.ca>

Cc: "Minister, Env" <Minister.Environment@novascotia.ca>, "Tutty, Bridget R" <Bridget.Tutty@novascotia.ca>

Subject: FW: SWEB's Wind Mill Project Sugar Maple Project CRM:0213292

Good afternoon,

Please find attached a response to your emails below.

Thanks,

Correspondence Assistant

Nova Scotia Environment and Climate Change

Barrington Tower

1894 Barrington Street, Suite 1800

PO Box 442

Halifax NS B3J 2P8

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

**From:** @eastlink.ca>;  
**Received:** Tue Apr 14 2026 21:15:28 GMT-0300 (Atlantic Daylight Time)  
**To:** PNS Environment <minister.environment@novascotia.ca>; PNS Environment & Climate Change <minister.environment@novascotia.ca>; Environment Minister <minister.environment@novascotia.ca>;  
**Subject:** FW: SWEB's Wind Mill Project Sugar Maple Project

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I received an auto reply to send the below mail to this address

Sent from my Galaxy

Canadian Black Bear Outfitters

Facebook Page: Canadian Black Bear Outfitters

----- Original message -----

From: @EastLink.ca>

Date: 2026-04-14 7:49 p.m. (GMT-04:00)

To: timhalmanmla@gmail.com

Cc: premier@novascotia.ca

Subject: SWEB's Wind Mill Project Sugar Maple Project

Gentlemen,

I have been in contact with \_\_\_\_\_ Director of Development for SWEB's wind mill energy projects in reference to the proposed windmill farm in Uppers Barney's River. I have attached a map showing where the wind mills are going, my camp, and my bear bait sites.

The purpose of this correspondence is to ask if one of you would meet with me to visit the Weavers Mountain site and ask if you can help me to get the 2 windmills which are approximately 1 km from my camp moved to a different location.

I am 100% in favor of these projects but I have a major concern with this proposed wind mill farm. I am an outfitter, Canadian Black Bear Outfitters, and for the past 15 years I have had hunters for bear and deer in this area. I operate my business out of my camp in Laggan, Pictou County. Please note 4 of my bait sites are less than 3 kms from a couple of the windmills and my camp is approximately 1 km from 2 of the wind mills. As well, I have been a hunter, fisherman, and woodsman for 50 years and I know the wildlife, including the bears and deer, are going to leave the area once the infrastructure starts. The diesel smell, the machinery, the loss of wildlife habitat, and noise will be substantial. I am told these windmills will be 200 meters high to the top of the blade and the project will be completed by the end of 2028. You should also be advised I have reported to the local DNRR office in MacLellans Brook, Pictou County sightings of a moose family in the area and even had pictures of a few on my game cameras. The moose is an endangered species on mainland Nova Scotia.

I recently visited the Weavers Mountain project site and I could not believe how much wildlife habitat was destroyed to put the roads into the wind mill sites. Hundreds of acres of land were clear cut with 3 lane roads going into each site.

Jason told me he is in the process of finalizing their Environmental Assessment for publication and I believe, if it hasn't already, will be presented to your office.

I have also asked Jason for compensation for the 2 years my outfitting business will be shut down.

My business will be shut down for a minimum of 2 years if the project is completed by the end of 2028. Wildlife are resilient and hopefully they will move back into the area in 2029 depending on how they adjust to the noise created by these wind mills.

Mr. Halman, I understand you do some hiking and like exploring local trails. I would like to take you or Mr. Houston to visit the Weavers Mountain project and you can see 1st hand how these wind mills will effect my business and the wildlife habitat. A representative from SWEB, Sam Chelshire, met with me in 2025 and I asked to have the 2 wind mills which are approximately 1 km from my camp and 1-3 kms away from 4 of my bear baiting sites be moved to another location. He stated they could not move the wind mills. Being 200 meters high and only 1 km from my camp, the noise from these windmills will be heard at my camp, night and day. I am 100% positive neither you, nor Mr. Houston, would allow a 200 meter wind mill to be within 1 km of your residence.

Again, I emphasize, the purpose of this correspondence is to ask if one of you would meet with me to visit the Weavers Mountain site and ask if you can help me to get the 2 windmills which are approximately 1 km from my camp moved to a different location. As stated, I believe the province is on the right track by finding other viable sources of power with Nova Scotians having the highest power rates in Canada.

Please let me know ASAP before the proposed environmental assessment is accepted.

Respectively,

**Canadian Black Bear Outfitters**

<https://www.facebook.com/blackbearoutfitters.ca>



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**Re: SWEB's Wind Mill Project Sugar Maple Project...3rd request**

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**From** @EastLink.ca>  
**Date** Tue 2026-04-28 12:02 PM  
**To** Minister, Env <Minister.Environment@novascotia.ca>  
**Cc** Premier <PREMIER@novascotia.ca>

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Good morning again gentlemen,

\*\*\*See email chain below\*\*\*

I cannot believe I have not received a reply in 9 working days. I am a strong supporter of the Conservative party and your initiative in finding alternative power sources for our province.

Today, I received an email from SWEB stating he will meet with me in May as they are currently having Bunrich complete some road restoration work on site as the winter conditions have left some road sections in rough condition. Does this mean you have approved the environmental assessment and my concerns have been totally ignored?

I thought I would have some support from our elected officials in getting 2 of the windmills moved. As I explained, the 2 windmills are going to have a drastic effect on my outfitting business and the noise is going to be substantial as my outfitting camp is only 1 km away from a 200 meter high tower.

At the very least, please have the courtesy to reply and address my concerns. People are telling me I am totally wasting my time by taking this matter to the province; however, I am a strong believer in democracy and our elected officials. I also believe Mr. Houston, our Premier and Minister of Energy, and Mr. Halman, Minister of Environment, you have the authority to have the 2 windmills moved from the 2 proposed sites which are on the map I provided.

These 2 towers have to be a minimum of 5 kms away from my outfitting camp and bait sites. Once they start the infrastructure the diesel smell, the excavators, trucks, bulldozers, land clearing, gas smells, noises, etc. are going to have a major effect on the deer and bears forcing them to move out of the area essentially killing my business until the project is completed in 2028. The tranquility of having a remote camp will also be gone with the constant winding of the turbines which are only 1 km away.

Respectively, please reply

Thank you

Regards

--

**Canadian Black Bear Outfitters**

<https://www.facebook.com/blackbearoutfitters.ca>

On 04/23/26 10:36 AM,

@EastLink.ca> wrote:

Good morning gentlemen,

It has been 7 days since I sent the request to you in reference to this email chain. To date, I have not received a reply.

I cannot emphasize how important this is to me and my business. I realize how busy both you are but would you kindly take the time to reply.

I have invited one of you to come with me to the Weaver Mountain sites to see the impact these sites have to wildlife habitat. I am only asking if you have the authority to have 2 of the windmills closest to my camp and bait sites moved further away from both. The other windmills should not effect my business and I should be able to continue guiding my clients without any interruptions or noises from the windmills.

Hopefully, you have not approved the environmental assessments yet which were to be presented by SWEB. The windmill project is known as The Sugar Maple Wind Turbines in Upper Barneys Rive, Pictou County.

Again, I know neither of you would want a 200 meter high windmill within a km of your home. The noise alone would be extremely annoying.

Best Regards

**Canadian Black Bear Outfitters**

<https://www.facebook.com/blackbearoutfitters.ca>

On 04/14/26 07:49 PM,

@EastLink.ca> wrote:

Gentlemen,

I have been in contact with \_\_\_\_\_ Director of Development for SWEB's wind mill energy projects in reference to the proposed windmill farm in Uppers Barney's River. I have attached a map showing where the wind mills are going, my camp, and my bear bait sites.

The purpose of this correspondence is to ask if one of you would meet with me to visit the Weavers Mountain site and ask if you can help me to get the 2 windmills which are approximately 1 km from my camp moved to a different location.

I am 100% in favor of these projects but I have a major concern with this proposed wind mill farm. I am an outfitter, Canadian Black Bear Outfitters, and for the past 15 years I have had hunters for bear and deer in this area. I operate my business out of my camp in Laggan, Pictou County. Please note 4 of my bait sites are less than 3 kms from a couple of the windmills and my camp is approximately 1 km from 2 of the wind mills. As well, I have been a hunter, fisherman, and woodsman for 50 years and I know the wildlife, including the bears and deer, are going to leave the area once the infrastructure starts. The diesel smell, the machinery, the loss of wildlife habitat, and noise will be substantial. I am told these windmills will be 200 meters high to the top of the blade and the project will be completed by the end of 2028. You should also be advised I have reported to the local DNRR office in MacLellans Brook, Pictou County sightings of a moose family in the area and even had pictures of a few on my game cameras. The moose is an endangered species on mainland Nova Scotia.

I recently visited the Weavers Mountain project site and I could not believe how much wildlife habitat was destroyed to put the roads into the wind mill sites. Hundreds of acres of land were clear cut with 3 lane roads going into each site.

\_\_\_\_\_ told me he is in the process of finalizing their Environmental Assessment for publication and I believe, if it hasn't already, will be presented to your office.

I have also asked Jason for compensation for the 2 years my outfitting business will be shut down.

My business will be shut down for a minimum of 2 years if the project is completed by the end of 2028. Wildlife are resilient and hopefully they will move back into the area in 2029 depending on how they adjust to the noise created by these wind mills.

Mr. Halman, I understand you do some hiking and like exploring local trails. I would like to take you or Mr. Houston to visit the Weavers Mountain project and you can see 1st hand how these wind mills will effect my business and the wildlife habitat. A representative from SWEB, \_\_\_\_\_ met with me in 2025 and I asked to have the 2 wind mills which are approximately 1 km from my camp and 1-3 kms away from

4 of my bear baiting sites be moved to another location. He stated they could not move the wind mills. Being 200 meters high and only 1 km from my camp, the noise from these windmills will be heard at my camp, night and day. I am 100% positive neither you, nor Mr. Houston, would allow a 200 meter wind mill to be within 1 km of your residence.

Again, I emphasize, the purpose of this correspondence is to ask if one of you would meet with me to visit the Weavers Mountain site and ask if you can help me to get the 2 windmills which are approximately 1 km from my camp moved to a different location. As stated, I believe the province is on the right track by finding other viable sources of power with Nova Scotians having the highest power rates in Canada.

Please let me know ASAP before the proposed environmental assessment is accepted.

Respectively,

**Canadian Black Bear Outfitters**

**<https://www.facebook.com/blackbearoutfitters.ca>**

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**[Draft]** Re: SWEB's Wind Mill Project Sugar Maple Project...2nd request

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**From** Jeremy.Higgins@novascotia.ca  
**Draft saved** Fri 2026-04-24 10:35 AM  
**To** Bedell, Sean <Sean.Bedell@novascotia.ca>

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**From:** [@EastLink.ca](#)>  
**Sent:** April 23, 2026 10:37 AM  
**To:** Minister, Env <[Minister.Environment@novascotia.ca](mailto:Minister.Environment@novascotia.ca)>  
**Cc:** Premier <[PREMIER@novascotia.ca](mailto:PREMIER@novascotia.ca)>  
**Subject:** Re: SWEB's Wind Mill Project Sugar Maple Project...2nd request

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Good morning gentlemen,

It has been 7 days since I sent the request to you in reference to this email chain. To date, I have not received a reply.

I cannot emphasize how important this is to me and my business. I realize how busy both you are but would you kindly take the time to reply.

I have invited one of you to come with me to the Weaver Mountain sites to see the impact these sites have to wildlife habitat. I am only asking if you have the authority to have 2 of the windmills closest to my camp and bait sites moved further away from both. The other windmills should not effect my business and I should be able to continue guiding my clients without any interruptions or noises from the windmills.

Hopefully, you have not approved the environmental assessments yet which were to be presented by SWEB. The windmill project is known as The Sugar Maple Wind Turbines in Upper Barneys Rive, Pictou County.

Again, I know neither of you would want a 200 meter high windmill within a km of your home. The noise alone would be extremely annoying.

Best Regards

**Canadian Black Bear Outfitters**

<https://www.facebook.com/blackbearoutfitters.ca>

On 04/14/26 07:49 PM,

[@EastLink.ca](#)> wrote:

Gentlemen,

I have been in contact with \_\_\_\_\_, Director of Development for SWEB's wind mill energy projects in reference to the proposed windmill farm in Uppers Barney's River. I have attached a map showing where the wind mills are going, my camp, and my bear bait sites.

The purpose of this correspondence is to ask if one of you would meet with me to visit the Weavers Mountain site and ask if you can help me to get the 2 windmills which are approximately 1 km from my camp moved to a different location.

I am 100% in favor of these projects but I have a major concern with this proposed wind mill farm. I am an outfitter, Canadian Black Bear Outfitters, and for the past 15 years I have had hunters for bear and deer in this area. I operate my business out of my camp in Laggan, Pictou County. Please note 4 of my bait sites are less than 3 kms from a couple of the windmills and my camp is approximately 1 km from 2 of the wind mills. As well, I have been a hunter, fisherman, and woodsman for 50 years and I know the wildlife, including the bears and deer, are going to leave the area once the infrastructure starts. The diesel smell, the machinery, the loss of wildlife habitat, and noise will be substantial. I am told these windmills will be 200 meters high to the top of the blade and the project will be completed by the end of 2028. You should also be advised I have reported to the local DNR office in MacLellans Brook, Pictou County sightings of a moose family in the area and even had pictures of a few on my game cameras. The moose is an endangered species on mainland Nova Scotia.

I recently visited the Weavers Mountain project site and I could not believe how much wildlife habitat was destroyed to put the roads into the wind mill sites. Hundreds of acres of land were clear cut with 3 lane roads going into each site.

\_\_\_\_\_ told me he is in the process of finalizing their Environmental Assessment for publication and I believe, if it hasn't already, will be presented to your office.

I have also asked \_\_\_\_\_ for compensation for the 2 years my outfitting business will be shut down.

My business will be shut down for a minimum of 2 years if the project is completed by the end of 2028. Wildlife are resilient and hopefully they will move back into the area in 2029 depending on how they adjust to the noise created by these wind mills.

Mr. Halman, I understand you do some hiking and like exploring local trails. I would like to take you or Mr. Houston to visit the Weavers Mountain project and you can see 1st hand how these wind mills will effect my business and the wildlife habitat. A representative from SWEB, Sam Chelshire, met with me in 2025 and I asked to have the 2 wind mills which are approximately 1 km from my camp and 1-3 kms away from 4 of my bear baiting sites be moved to another location. He stated they could not move the wind mills. Being 200 meters

high and only 1 km from my camp, the noise from these windmills will be heard at my camp, night and day. I am 100% positive neither you, nor Mr. Houston, would allow a 200 meter wind mill to be within 1 km of your residence.

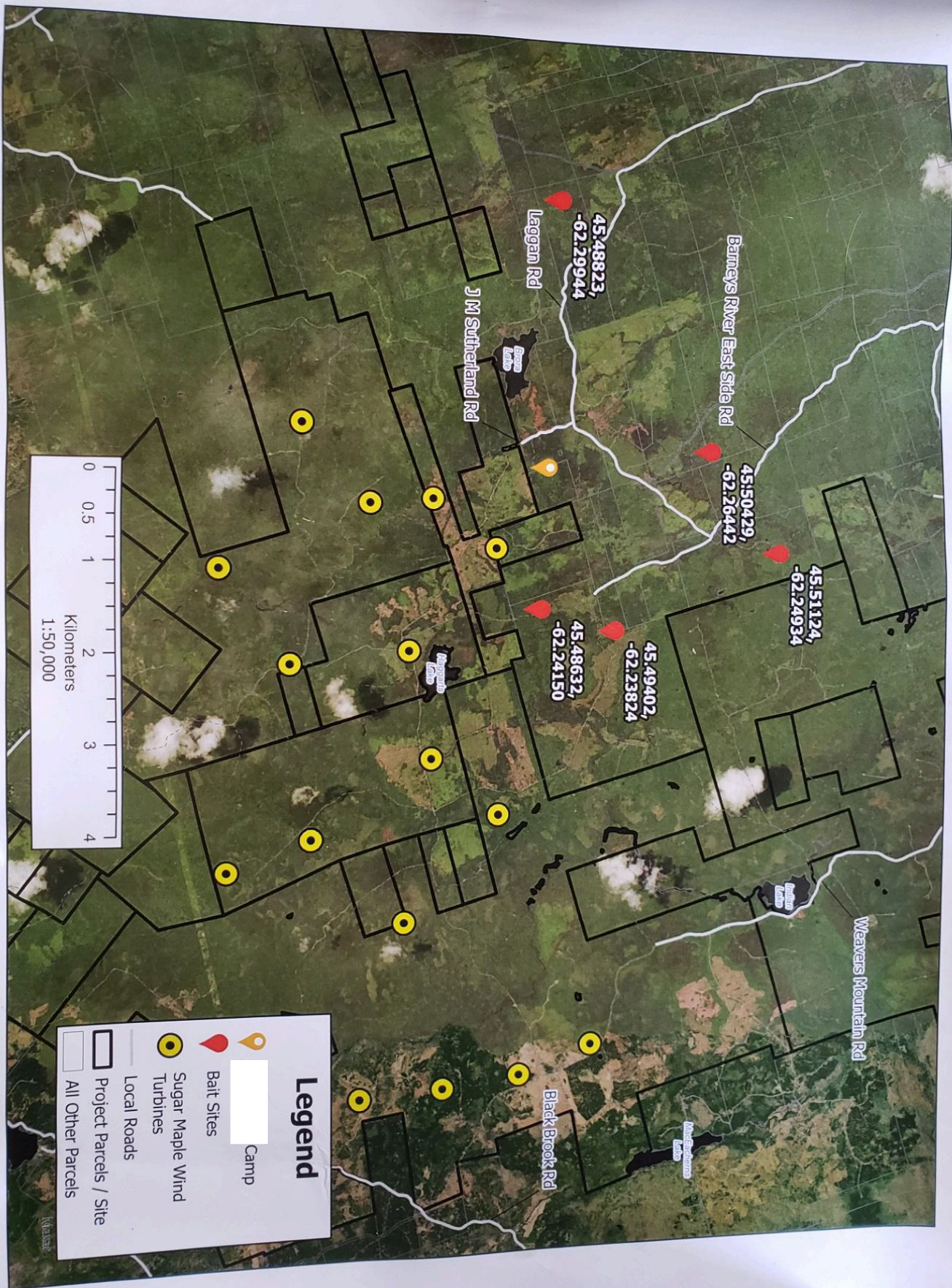
Again, I emphasize, the purpose of this correspondence is to ask if one of you would meet with me to visit the Weavers Mountain site and ask if you can help me to get the 2 windmills which are approximately 1 km from my camp moved to a different location. As stated, I believe the province is on the right track by finding other viable sources of power with Nova Scotians having the highest power rates in Canada.

Please let me know ASAP before the proposed environmental assessment is accepted.

Respectively,

**Canadian Black Bear Outfitters**

<https://www.facebook.com/blackbearoutfitters.ca>



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## Sugar Maple wind energy project public comment

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**From**

**Date** Mon 2026-04-27 5:29 PM

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

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

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Dear Environmental Assessment Branch,

I am writing to express my support for the continued development of wind energy in Nova Scotia, and to highlight a critically important piece of development to strengthen public confidence and experience in this transition toward sustainable energy.

Wind power represents a meaningful effort to reduce emissions and building a cleaner energy future for our province. Many residents recognize this opportunity and want to see it succeed. At the same time, the overall support will be negatively impacted if these projects are not thoughtfully implemented with communities living along side the developments. Inadequate implementation requirements will lead to long-term resentment and push back on future wind development.

One practical and established solution exists, the use of Aircraft Detection Lighting Systems (ADLS). These systems ensure that aviation safety lighting is activated only when aircraft are present, rather than flashing continuously throughout the night. This approach significantly reduces visual impact while maintaining safety standards.

There is already a strong precedent for this technology in the United States, where Federal Aviation Administration (FAA) regulations have enabled adoption within the industry. Halkirk 2 Wind in Alberta has installed ADLS and are operational now. Some developers working in Nova Scotia have begun incorporating ADLS into their projects. However, this is not yet a consistent requirement, and companies such as SWEB are not currently committing to its implementation.

If the province is serious about building lasting public support for wind energy, ADLS should be mandated rather than left to individual company discretion. Allowing developers to self-regulate will result in a patchwork of inconsistent practices, leading to frustration and negative experiences across the province.

Nova Scotia is setting it's course for a night sky marked by continuous flashing red lights—having a broad and undeniable negative impact. It affects not only nearby residents but also the shared experience of Nova Scotia's night skies and quality of life. Without appropriate mitigation, wind turbines risk becoming associated with disruption rather than progress—a red-light radiating scar across otherwise calm and pristine, star-filled landscapes.

This does not need to be the case. The technology exists, the research supports its effectiveness, and its implementation is a matter of common sense. Requiring ADLS presents an opportunity to align

environmental progress with community well-being, ensuring that wind energy projects are experienced as positive additions rather than sources of concern.

Nova Scotia is at a pivotal moment. By adopting clear, consistent standards mandating ADLS, the government can foster trust, encourage public buy-in for the long term, and set a strong example for responsible renewable energy development.

I urge the Province not to squander this opportunity. With thoughtful policy decisions, wind energy can be both environmentally beneficial and broadly supported by communities.

Sincerely,

## Sugar Maple Wind Farm

---

**From** [redacted] <[redacted]@yahoo.com>  
**Date** Thu 2026-05-07 9:02 PM  
**To** Environment Assessment Web Account <EA@novascotia.ca>

You don't often get email from [redacted] <[redacted]@yahoo.com>. [Learn why this is important](#)

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Hello,

I was looking into this project and curious about public engagement sessions. The company's website only lists one event which was back in February. Are there more sessions upcoming? My understanding is that public submissions are only open until May 12th, 2026. If there is only that one session, is it normal to have no public engagement sessions during the 40 day window where public input is sought?

Thanks,