



February 27, 2023

The following submission is in response to Goose Harbour Lake Wind Farm Project Environmental Assessment is on behalf of the Ecology Action Centre (EAC).

The Ecology Action Centre is an environmental charity based in Mi'kma'ki/Nova Scotia. We take leadership on critical environmental issues from biodiversity protection to climate change to environmental justice. Grounded in over five decades of deep environmental change work and fueled by love and grief, EAC takes a 50-year perspective on what is needed to build towards a time of thriving and flourishing. We work to equip human and ecological communities for resilience and build a world where ecosystems and communities are restored not just sustained.

### 30 Day Comment Period

Due to the short time frame provided for the public and civil society groups (including the EAC) to provide comment for Environmental Assessment review (30 days), the EAC staff were only able to review and provide comment on a limited number of aspects of the proposed project. The Ecology Action Centre believes that the 30-day comment period is not enough time to provide a full response. Many of those who are interested in reviewing the documents and submitting comments do so on a volunteer basis and must dedicate a significant amount of time outside of their work and home life to write their comments. Please extend future public comment periods to at least 60 days so that organizations, groups and members of the public have a sufficient opportunity to review the relevant documents and form comments in response. This would also bring the EA public consultation period in line with another Nova Scotia Environment and Climate Changes comment period. NSECC seeks public input on proposed Wilderness Area designation through a public consultation process that is open for 60 days.

### Land footprint

In reviewing the Environmental Assessment, we wanted to raise concern regarding the amount of land the study and project area encompasses in Guysborough County. Seeing the study area, and distribution of turbines within this area raises significant concerns. **The configuration of the wind turbines should be reconsidered to reduce the total study area, and subsequent project footprint.**

This study area encompasses significant portions of the Crown land in the geographic area, and Guysborough County. Considering the additional industrial projects currently under consideration within Guysborough county- two of the largest being the

EverWind Point Tupper Hydrogen/Ammonia project, and the Bear Head Energy Green Hydrogen and Ammonia project, we are concerned that if a wind project for 29 turbines is allocated this much land, with the proposed turbine spacing, wind developments in the region will result in significant strain on the natural environment. This would result in significant adverse effects on wildlife, habitat and ecological connectivity in Guysborough County. With Bear Head and Everwind citing a need for several hundreds of turbines, if a precedent is set that this is appropriate spacing of turbines in a wind farm in Nova Scotia, then these additional project would not only significantly affect Guysborough County, but also other neighbouring counties, resulting in large portion of Nova Scotia's already strained Crown land being slated for industrial development.

**Therefore, the proponent should reconfigure the study area, and reduce turbine spacing through grouping of turbines, or another appropriate means to minimize the project footprint and impacts on this area, and that the project only be accepted after a substantive review has been completed to evaluate whether the project area can be adequately reduced.**

The EAC has repeatedly recommended to government that a holistic approach to Crown land use planning should be undertaken to consider all the competing demands for Crown land. We reiterate this advice/request again here. The potential to overwhelm our limited Crown land base with one-off projects that are considered in isolation from one another and other responsibilities including wildlife habitat protection and connectivity is very real and very concerning.

