

Bear Lake Wind Power Project Environmental Assessment Registration Document (EARD) - Comments from Ecology Action Centre

November 2023

The Ecology Action Centre is an environmental charity based in Mi'kma'ki/Nova Scotia. We have a leadership role in working on critical environmental issues from biodiversity protection to climate change to environmental justice. Grounded in over five decades of deep environmental change work and fuelled 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.

Ecology Action Centre staff have only been able to comment on some aspects of this EARD. This is in part due to the limitations of our expertise – we only hold knowledge in certain subject areas and have commented on those. However, this is also because the 30 day comment period is too short to comment completely on any EARD, including this one. Public comment periods for EARD should be 60 days, minimum. Additional time would have allowed us to hone our comments further and make additional, relevant comments.

Overall comments

Project engagement

Engaging in a negotiation and collaboration process with all stakeholders, including local communities, regulatory authorities, environmental conservation groups, and other interested parties, is crucial to achieving "social license" and a good quality project that incorporates local knowledge and values. Based on what is shared in the EARD, and information we have received about public and government engagement, this project is lacking in several critical steps that can help in this process:

- Identifying Stakeholders: Identify and connect with *all* relevant stakeholders, including local communities, environmental groups, regulatory authorities, and other key actors.

- **Open Dialogue:** Initiate open and transparent dialogue with these stakeholders to understand *and act upon* their concerns, needs, and expectations regarding the project.
- **Clear Communication:** Provide clear and accurate information about the project, including its benefits, potential impacts, and mitigation measures, to all stakeholders. Ensure that communication is two-way and respond to stakeholder concerns through project changes.
- **Mitigation Measures:** Fully commit to implementing the necessary mitigation measures to minimize negative project impacts on the environment and local communities by agreeing to specific mitigation measures in a legally binding way.
- **Regulatory Compliance:** Ensure the project complies with all applicable environmental regulations through the lifetime of the project. Be transparent with community about all environmental compliance work.
- **Ongoing Monitoring and Reporting:** Implement a monitoring and tracking system throughout the project's life to ensure that agreements and mitigation measures are followed. Continually share monitoring and reporting results with community.
- **Conflict Resolution:** Be prepared to address and resolve conflicts or disagreements constructively and fairly, using mediation processes if necessary.

Open collaboration and negotiation are essential for advancing projects like the Bear Lake Wind Farm. The focus on communication, transparency, and consideration of stakeholder concerns is crucial to building solid agreements that benefit all parties involved.

Mitigation measures

The proponent should fully commit to critical mitigation measures outlined in the document addressing environmental and safety concerns and minimize potential harm. These should be stated in the Terms and Conditions of the EA Approval, when the project is Approved with Conditions by the Minister. Their implementation must be monitored regularly by the government/communities.

Here are some of the most critical measures:

Atmospheric Environment:

- Enclose or cover soil storage and stockpile areas to prevent dust.
- Cease dust-generating construction activities during excessive wind.
- Use low-sulphur diesel fuel to reduce sulphur oxide emissions.
- Regularly maintain equipment to ensure proper operations and fuel efficiency.



- Remove malfunctioning equipment and equipment with improperly functioning emissions control systems from service.

Geophysical Environment:

- Safe blasting practices and notification of landowners.
- Protect and restore wetlands whenever possible.
- Erosion and sedimentation control measures.
- Protection of water courses and habitat upgrades.
- Noise and vibration control measures.

Aquatic Environment:

- Protection of aquatic habitats, wetlands, and watercourses.
- Avoidance of impacts to wetlands.
- Water management systems and runoff control.

Terrestrial Environment:

- Minimization of habitat loss and fragmentation, especially for species at risk.
- Restoration and revegetation of cleared areas.
- Avoidance of disturbance during sensitive periods for priority species.
- Measures to prevent injury or mortality of bats and other wildlife.
- Light, noise and vibration control measures.

Socio-Economic Environment:

- Traffic and transportation management to minimize impacts on the community.
- Collaboration with local recreation groups to ensure access to recreational sites.

Specific comments

2.2 Purpose & Need for the Undertaking

Need for Incremental Renewable Energy

This section is somewhat misleading as it indicates that the energy produced by the project will contribute to the province's renewable energy targets. The primary intent, however, for this project is to power a green hydrogen facility at Point Tupper. While a power purchase agreement (PPA) between Nova Scotia Power Inc (NSPI) and the proponent has not yet been announced, it is difficult to gauge how this project will contribute to greening the grid in Nova Scotia. This section should make clear that the primary function of this project is for private use despite being attached to Nova Scotia's



grid and thus its contributions to climate and emissions targets in the region are more limited than it suggests.

As this project will undoubtedly have impacts on the surrounding environment, including crown land, an agreed upon minimum GWh contribution, per annum, to Nova Scotia's grid would better position this project as a participant in provincial GHG reduction efforts. **We additionally encourage the Minister of Natural Resources and Renewables and/or the Nova Scotia Utility and Review Board to require a mandatory clause in the PPA between NSPI and the proponent that ensures at the very least that the needs of the provincial grid during periods of peak demand and emergencies outweigh hydrogen production, prior to official approval.**

Need for the Project

This section attempts to make the case that the Province will benefit by being a “leader” in the “clean renewable energy sector” by developing a green hydrogen industry. The proponent should provide specifics in this section, including how many jobs the project will create. There is also vague reference to economic and social benefits, without any specifics, such as connections to current economic or community development plans.

The project only alludes to potentially contributing to Nova Scotia's renewable energy needs, sometimes. The following statement is made:

“In addition to green hydrogen production, energy produced by the Project will be made available to NS Power at times of peak electricity demand to directly supply customers in the province.”

There would need to be commitments in place to ensure that the project makes any contributions to the energy used by Nova Scotians.

Need for the Green Ammonia

This section of the EARD indicates that the ammonia produced and exported will primarily, at first, be used for ammonia-based fertilizers. This does not contribute to decarbonizing Nova Scotia's energy grid, and in fact could contribute to the over-nitrification of ecosystems through fertilizer runoff, which exacerbates climate change. See <https://www.unep.org/news-and-stories/story/four-reasons-why-world-needs-limit-nitrogen-pollution>

Fertilizers themselves contribute a substantial amount to global CO₂ and N₂O emissions, and run-off from fertilizers contributes to nitrogen pollution, leading to its own impacts (e.g., eutrophication and algal blooms threaten aquatic biodiversity. See <https://www.pnas.org/doi/pdf/10.1073/pnas.2121998119>

Nitrogen pollution as a result of ammonia-based fertilizers also pose a serious threat to local food systems as polluted topsoil cannot be easily, or quickly remedied. These impacts can compromise local/regional efforts towards food security and food sovereignty as they degrade the environment for future generations.

When the Bear Lake wind farm project is used to create hydrogen, which is converted to ammonia, and sold for nitrogen fertilizer, it actually risk exacerbating climate change and biodiversity loss.

3.1 Geographical Location

The Study Area is defined by property boundaries. The Project Area is the direct footprint of some of the project infrastructure. The Assessment Area was created by buffering certain parts of the project infrastructure (e.g., turbines, roads), by a certain amount (e.g., 100m, 25m). The extent of the Assessment Area seems arbitrary. Provide an Assessment Area based on *all* project infrastructure in which buffers are based on likely extent of potential impacts (e.g. 200m from turbine base because this is the area where bird strikes with turbine blades are most likely to occur). Also include temporary project components in the Assessment Area and in assessments.

The project is proposed on provincial Crown land and privately-owned land. The proponent should provide a map showing land ownership type and their project. None of the maps show which parcels are Crown land and which are private.

3.1.1 Siting Considerations

In general, it is good that the project design attempted to maximize the use of existing roads and cleared areas, and reduce the need to create new roads. It is also beneficial that the project has attempted to avoid areas important for conservation, including wetlands and watercourses. However, using, building, and upgrading roads still add to the decline of biodiversity in Nova Scotia. The project still commits to:

- 24km of existing roads to be use/upgraded
- 15km of new roads to be made
- In some cases, the need for 12m wide roads for cranes to move (but the roads could be smaller (6m wide) if "crane is mobilized via a float truck?")
- Roads are actually 17m to 20m wide including ditching and grading

The impact to wildlife mortality, habitat loss, and landscape-level habitat connectivity is downplayed in the EARD, yet these very real impacts will occur. There are opportunities to reduces these impacts even further by committing to fewer roads, narrower roads, and use of smaller trucks and equipment.

Temporary infrastructure, like roads and laydowns areas, can also have short-term and long-term impacts, which are also made to seem quite minimal in the EARD. The project should minimize these impacts wherever possible, such as seems to be considered here:

“Temporary wind turbine laydown areas may be up to 250 m by 100 m, which includes clearing limits and any overburden. There is currently one temporary turbine laydown area under consideration.”

Removal of Temporary Works and Site Restoration

Where temporary work sites and infrastructure, or ultimately the entire operation, are to be decommissioned and remediated, commit to better restoration of the site. Why is a “Hydroseeder” used? Help damaged sites along their restoration trajectory by using native plants, and by actively removing roads.

3.3.2 Operations & Maintenance

“A vegetation management plan will be initiated to ensure that access roads and turbine locations remain clear of vegetation. Timing of vegetation management will depend on site specific conditions and requirements by the Proponent and/or their operations and maintenance contractors.”

The Proponent should commit to not using herbicides or pesticides as part of their vegetation management plan. Additionally, salt should not be used on the roads, as this also damages vegetation and other species (and can have long-term effects on nearby watercourses and wetlands).

3.3.4 Environmental Management & Protection

“An Environmental Protection Plan (EPP) will be developed following EA approval.”

The EPP should be made available publicly once it is created, and should be shared with the CLC.

6.2 Public & Stakeholder Engagement

The EARD cites several groups with which the proponent has “engaged,” however, what has really happened is outreach by the proponent. With regards to the Ecology Action Centre, Healthy Forest Coalition, Living Earth Council, Nova Scotia Nature Trust, and more, the proponent did not connect in any way with a person from these groups. Most outreach did not lead to actually engaging in a conversation. What the EARD frames as “engagement” should be reframed as outreach. Ultimately, the project has engaged with very few of the stakeholders.

6.2.2 Newsletter

A phone number for public contact should additionally be made available on the newsletter to accommodate varying ranges of digital literacy and promote relationship-building between the proponent and neighbouring communities throughout the lifetime of the project.

6.2.3 Public Open House Events

To increase participation and accessibility by all community members, we encourage the proponent to include childcare or child-engagement at public engagement sessions such as open-houses.

To further increase accessibility of these events, we would encourage the proponent to host a virtual attendance session(s) for future open houses, job fairs, and consultations and for continued public engagement on the Bear Lake project moving forward.

6.2.6 Review of Concern

In table 6.2, responses to community benefits are mentioned, including the community subsidy fund, community vibrancy fund, and bursary program. These benefits and information on distribution, eligibility, and timelines should be detailed in this EARD and on the 'Benefits' section of the proponent's website, as opposed to solely in the presentation document. Some detail on estimated contributions to each fund/bursary was included in a follow-up email on November 7th. These figures should also be made available on the website and should have ideally been included in all engagement material and EARD. Commitments to these benefits should additionally be included in the Terms and Conditions of the EA approval.

Table 6.3 in addition to more general comments in this section refer to the formation of a Community Liaison Committee (CLC). Greater detail on when the CLC will be formed, timeline for their involvement, and how representatives will be selected is needed. Similar to the federal Impact Assessment process, a plan for public participation and engagement opportunities for the rest of the project could be formed which may also highlight regular meetings and with the CLC and how information will be disseminated to the greater public.

6.2.7 Ongoing Engagement

We encourage the proponent to compile information from surveys and studies conducted for the EARD into a more accessible and comprehensive format for distribution to the community. The level of technical detail involved in the EARD, and sheer length of the



report make it highly inaccessible to a public audience. Results of valued component assessments should be synthesized and presented in a condensed format that includes plain language summaries and graphics.

Associated data and reports conducted through the EA process and over the course of the project's lifetime should be made available freely and indefinitely to promote data sovereignty, transparency, and understanding within the communities and rightsholders that steward the land and waterways in the study area. This request excludes results from the project's MEKS as sharing this knowledge is to be decided by the Nations and knowledge keepers it was compiled with, as per the principles of OCAP and CARE.

To ensure that this project benefits the surrounding community throughout and beyond its lifetime, we recommend that the requested data and summaries be a condition in the Terms and Conditions of this EA approval.

7.1.1 Climate Change

The calculations of the contributions to climate change from the project are incomplete. The EARD for the Bear Lake Wind Project does not account for the emissions of transporting the ammonia from the Point Tupper green hydrogen plant to Europe (or other locations), *and* the impacts from shipping were also not calculated in the EverWind Point Tupper Green Hydrogen/Ammonia Project Environmental Assessment (see section 13.3.4 from the Point Tupper Green Hydrogen/Ammonia Project EARD). Both EARD do not consider the option of using the green hydrogen and ammonia domestically to reduce negative impacts to climate change by removing the need for shipping.

7.1.1.8 Effects Assessment - Project-GHG Interactions

The conclusion that "Results are characterized as a positive effect within the LAA, medium duration, continuous, irreversible, and significant (positive)" are inaccurate because the negative impacts of shipping on climate change have not been included.

7.4.1.6 Effects Assessment - Project-Terrestrial Habitat Interactions

The conclusion that "Effects to terrestrial habitat associated with the Project have been assessed, including habitat loss and habitat creation. Based on this assessment and through the implementation of proposed mitigation strategies, effects to terrestrial habitat are expected occur within the LAA and be of low magnitude" are inaccurate for at least 2 reasons. Impacts to terrestrial habitat could be further reduced by the recommendations we made in this document, and potentially by further recommendations made by DNRR. Also, studies on terrestrial fauna, namely Wood Turtle and Mainland Moose, have not been completed yet, so the analysis of the impacts on their habitats is incomplete.

7.4.2 Terrestrial Flora

Lichen

There is a Blue Felt Lichen observation in the Assessment Area near Turbine north of Bear Lake (see Figure 4-4 in the CBCL report on vegetation and wetlands). CBCL therefore calls the wetland a WSS, but the rest of the document does not seem to reflect this finding. Have Figures 5-1 to 5-4 been removed? The text refers to these Figures to show the locations of lichen SOCI. The EARD states: "The Project was designed to avoid areas where plant and lichen SOCI were found, and to avoid any buffered area surrounding lichen occurrences." Was the design changed to avoid the Blue Felt Lichen identified in the 2022 field surveys by CBCL which fell inside the Assessment Area (and within 100m of a planned road)? If there is Blue Felt Lichen in a wetland that wetland should be accorded WSS status by NSECC and consequently cannot be altered.

"The ACCDC report includes points within the Study Area and a 5 km buffer around the Study Area. For the purposes of this report, only those points within the Study Area have been included." The proponent should have used the ACCDC records *within 5km of the Study Area (not just within the study area)* to guide surveys within the Study Area (i.e., species within 5km of the Study Area should be searched for within the Study Area).

7.4.3 Terrestrial Fauna

Mainland Moose

Field studies for mammals, including Mainland Moose, are not complete. The EARD notes that:

"The following field assessments will be carried out beginning in winter 2023/2024. Winter tracking and pellet surveys will be conducted to assess the presence and distribution of mammals across the Study Area, and trail cameras will also be placed across the Study Area to capture the presence of wildlife without any interference from human disturbance.

"There is, however, a stretch of Core Habitat adjacent/through the Study Area."

"Although some area considered to be high-quality Mainland moose habitat will require alteration or removal to construct the Project, the design has maximized the use of existing infrastructure and disturbed areas such that the overall area of habitat loss is small and the direct impacts to moose habitat are expected to be low."

These statements that attempt to minimize the project's impact on Mainland Moose because there is enough suitable habitat in the RAA and LAA are unsubstantiated. The proponent does not control lands outside the Study Area and therefore does not control

what happens to Mainland Moose habitat in the vicinity of the project. Habitat in the Study Area may be needed to support the recovery of Mainland Moose.

The proponent should avoid altering or disturbing all Core Habitat and all high-quality Mainland Moose habitat. This species is Endangered in Nova Scotia, and one of the specific threats to its recovery is roads, including roads from wind farm projects. Additionally, the Province has been delinquent in implementing measures to protect and recover the species, likely beleaguering it further. It is incumbent upon the proponent to design, construct, and maintain the project using the information available that indicates areas to avoid (i.e. Core Habitat and high-quality habitat).

The idea that wider road ROWs will create new foraging habitat for Mainland Moose at the side of the road is unsubstantiated and not a net positive. Of note: collisions with vehicles on roads is a threat to Mainland Moose.

The “only approximately 15 km of new roads needing to be constructed” will contribute to habitat fragmentation, a threat to Mainland Moose. The EARD attempts to minimize this by pointing to the approach of making use of existing roads where possible, but this does not mean that 15 km of new roads would not have a substantial negative impact.

New roads also mean an increase in two other threats to Mainland Moose: easier access for White-tailed Deer, and for poachers. Both are documented threats to Mainland Moose, both threats increase in Mainland Moose habitat when new roads are created. The proponent should not minimize these threats, as is done on page 158 of the EARD.

The statement “Based on this assessment and through the implementation of proposed mitigation and monitoring activities, effects to terrestrial fauna are expected to be of low magnitude and within the RAA” is false. There are surveys that must still be completed on terrestrial fauna, including for 2 Species at Risk (Mainland Moose, Wood Turtle). The proponent has not provided evidence that the destruction of Mainland Moose Core Habitat is not of high magnitude with regards to its negative impacts.

Wood Turtle

Watercourse and wetland surveys were paired with surveys for turtles and turtle habitat; these surveys were completed by CBCL. These surveys were completed between August and December in 2022. This not a suitable time of year to search for Wood Turtles, a federally- and provincially-listed Species at Risk (Threatened) that is suspected in the Assessment Area. The report by CBCL recognizes that surveys did not follow “NS DNRR’s 2018 Wood Turtle Survey Protocol)” with regards to the survey timing. **The proponent must survey the Assessment Area, including above and below watercourse crossings, for Wood Turtles, during the time of year most likely to detect the hard-to-find Wood Turtle (i.e. April and June, with water temperatures are above 6°C or air temperatures are above 9°C).** In fact, the CBCL report recognizes this deficiency: “To fully assess the likelihood for turtle presence within watercourses, targeted turtle surveys should be conducted in identified

areas of potentially suitable aquatic turtle habitat during the appropriate season. The preferred timing window for Visual Encounter Survey (VES) for Wood Turtles in Nova Scotia is late April to late May (McLean, 2018) when air temperatures are above 9°C, and the weather is generally sunny. For construction projects, NS DNRR recommends Wood Turtle VES in May, prior to leaf emergence, and another immediately prior to the commencement of site clearing and construction activities (Lavery, Pers comm, 2020)."

The proponent has committed to more surveys: "Because turtle habitat surveys were completed by CBCL outside of the appropriate season to detect Wood turtles, survey methods as recommended by NSNRR will be employed in Spring 2024 to further understand the presence of turtle SOCI within the Study Area. Habitat that will be targeted for surveys will include areas 200 m upstream and downstream within the watercourses determined to be potential Wood turtle habitat by CBCL." **The Minister should not approve this project until these and other pending surveys are completed, and the reports based on these surveys are reviewed and incorporated by NSDNRR staff.**

Bats

The statement "Based on low observed bat activity and existing disturbance (forestry, recreational, etc.) within the Study Area, impacts to bat SOCI populations at a regional scale or population level are not anticipated." Was the observed bat activity low? What is the local population level, and how are populations doing at a regional scale? Multiple species were confirmed in the Study Area during spring, summer, and fall. Wind turbines are known to be direct threats to these species. Are these species also experiencing the same and other threats at a regional scale, and to what degree? The assertion that the project does not create impacts to bats at a regional or population level is has no basis.

Regarding bats, the conclusion that "results are characterized as moderate magnitude, within the LAA, medium duration, continuous, reversible, and not significant" is not accurate.

Avifauna/ Birds

Bird surveys reports are not completed. **The Minister should not approve the project until all survey reports have been submitted, approved, and incorporated by NSDNRR staff.**

Mitigation Measures to reduce potential impacts to birds can be improved:

- Use navigational hazard lights that are on-demand instead of lights that are on all night, every night. Commit to this in the EPP and the Terms and Conditions of any EA Approval.
- Stop the use of the turbines during times of peak migration.

The conclusion that “Based on this assessment and through the implementation of proposed mitigation and monitoring activities, effects to avifauna are expected to be of low magnitude, within the LAA, of medium duration, intermittent, reversible, and not significant” is not substantiated. The bird strikes associated with the 35+ years of wind turbine use likely significant for the bird Species at Risk detected in the study area. Many bird species pass through the Study Area during migration, and several are likely breeding in the Study Area (despite the EARD downplaying this likelihood). The proponent should enact the additional mitigation measures listed above, and likely other measures too.

7.4.3.6 Effects Assessment - Project-Terrestrial Fauna Interactions

The conclusion that “While effects to mammals, herpetofauna, and insects differ, the effects considered to be of greatest concern include habitat loss, habitat fragmentation, and associated disruption of the life history of populations within these groups. Based on this assessment and through the implementation of proposed mitigation and monitoring activities, effects to terrestrial fauna are expected to be of low magnitude and within the RAA” is inaccurate. Again, studies on terrestrial fauna, namely Wood Turtle and Mainland Moose, have not been completed yet, so the analysis of the impacts on their habitats is incomplete. These studies could provide data that should be used to modify the project to reduce impact to these fauna.

Watercourses and wetlands

The proponent reviews two on-the-ground studies that have been done in the project area concerning wetlands. In one study 81 wetlands were identified, in the other 94 were identified. Because of this inconsistency it was difficult to follow all the proposed changes to wetlands areas.

The proponent notes that of the 94 identified wetlands/wetland fragments, there are 77 potential alterations. The majority of these alterations are due to road upgrades. However, the proponent also notes that “A GIS suitability analysis was conducted to design a Project Area that would optimize the placement of Project infrastructure to avoid and minimize loss of wetland area and function, to the greatest extent possible.” It is disappointing that 77 potential alterations are still being proposed. The proponent should do better to avoid such a large number of wetland alterations. For example:

- Why not move the Operations area (big square on Project Area map) to the east to avoid more impacting the wetland it interacts with?
- Why not move Turbine 8 to the east so it is out of a wetland?
- Why not move Turbine 7 to the east so it is out of a wetland?

There are inconsistencies related to watercourse and wetland surveys:

1. The CBCL watercourse + fish + turtle surveys in 2022 doesn't seem to include SOCI. Were CBCL staff not tasked with looking for SOCI while in the field?
2. CBCL determined 4 wetlands to be WSS because of presence of SAR. In 2023, Strum surveyed 34 wetlands and found none to be WSS. Why the discrepancy?
3. Turtle evidence was observed by CBCL in 2022 between WL18A and WL18B (CBCL). This is within the Assessment Area (on a road). What will be done to avoid alteration of WL18A and WL18B, given it is a WSS?
4. The mitigation measure to reduce impacts to life history for several mammal and herpetofauna species should include Wood Turtle (none are listed on page 162-163 of the EARD).

Value Component – Light

“Lighting associated with the Project will be minimal, and the turbines will be un-lit at night (apart from a red navigation hazard light mounted on the turbine’s nacelle). This red navigation hazard light can be light on-demand and thereby reduce light pollution, which affects birds and other species. See new Germany requirement for on-demand navigational lights on turbines.

The mitigation measure “restrict on-site lighting, especially at night, to limit disturbance” can be enhanced beyond what is said in the EARD. The proponent should commit in the EARD and Terms & Conditions (if the project is Approved) to on-demand navigational hazards lights, as opposed to lights that are constantly on a night.

Cumulative effects assessment

With regards to other wind farm projects in the vicinity of the proposed Bear Lake wind farm project:

“The South Canoe Wind Farm in Lunenburg County is located approximately 6 km to the west of the Assessment Area and consists of 34 turbines. The Martock Ridge Community Wind Project located in Hants County is also nearby, situated approximately 8 km north and consists of three turbines.

The Ellershouse Wind Project, located in Hants County, is situated approximately 14 km northeast and consists of 10 Enercon E-92 wind turbines. The Ellershouse 3 Wind Project, an expansion of the existing Ellershouse Wind Project, also received EA approval for installation of an additional 12 turbines on July 5, 2023.



“Another proposed project in the area includes the Benjamins Mill Wind Project being developed by Natural Forces, which received EA approval in January 2023. This project, if undertaken, would be located approximately 8 km northwest from the subject Project.”

The cumulative effects section seems to assess at an arbitrary distance (i.e., 5 km), but there are 5 other relevant undertakings close by (e.g, 6km to 14 km). The cumulative effects assessment should be redone to include these other undertakings that could impacts the same VCs in the same ways, therefore very relevant to assessing cumulative impacts. **The Minister should require that the proponent complete an actual cumulative effect assessment before determining if the project can go ahead.**

The statement that “other industrial activities identified (e.g., forestry) are not anticipated to interact with the Project in a way that results in adverse cumulative impacts on the surrounding biophysical, archeological/ cultural, or socioeconomic environment” is not accurate. Forestry activities threatened some of the same VC, and same species, as were identified as potentially impacted by the Bear Lake wind farm project in the EARD. There would be cumulative impacts as a result of habitat loss and fragmentation due to the proposed project in addition to the habitat loss and fragmentation caused by nearby forestry activities.

The whole cumulative effects assessment in the EARD is pretty baseless and poorly done.

8.1.3 Effects Assessment - Project-Economy Interactions

The proponent states that a job fair will be held prior to the construction of the project to engage local talent, as well as investing in a bursary for renewable energy education. Given the 1-4 years required to attain most training required for employment on a wind turbine project, bursaries and scholarships should be made available as soon as possible and well before construction of the project starts. Information regarding eligibility for these scholarships, how to apply, and how long they will be available should also be made available on the website as well as circulated through neighbouring communities, high schools, and post-secondary campuses. As mentioned above, commitments to these bursaries should be part of the community benefits included in the project's EA approval to ensure that the proponent is meaningfully investing in the just transition of Nova Scotia's labour force.

8.2.3 Effects Assessment - Project-Land Use and Value Interactions

“A recent study mentions that given the traditional energy industry's impacts on conservation in both direct and indirect ways, wind energy can be seen as a complementary land use to conservation and protected areas in a broad way, as wind energy is not a carbon emitter (Wind Europe, 2017). Given the context of Nova Scotia where the traditional energy source has primarily been coal, land use for wind energy can be seen as a positive step.” (pg 206-207)



This is an insufficient assessment of land-use valuation for conservation as it does not take into account the incomplete assessments of two endangered species that are critical for conservation planning in Nova Scotia; the Mainland Moose and Wood Turtle. The site is also close to other protected areas and thus could be considered valuable land for ensuring connectivity between protected areas. The proponent should provide a more holistic and updated assessment of effects to the value of the study area for conservation or protected area land-use once a complete assessment of Mainland Moose and Wood Turtle impacts has been completed.

