Ecology Action Centre
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The Ecology Action Centre is concerned about the development of the proposed Salt Springs Gas Power Generation Facility (Gas Plant).

These gas plants will not support decarbonization and ultimately limit environmental progress. Our comments are based upon the EA Registration Documents for the proposed project at Salt Springs

1) The proponent – IESO – is a non-for profit responsible for the planning and reliable operation of Nova Scotia's bulk electricity system. Whereas the purpose of EA is to promote sustainable development by protecting and conserving the environment, the EAC seeks to identify and assess adverse effects on the environment. The involvement of NGOs and the general public is crucial to achieve this goal, and the EAC appreciates the opportunity to engage with the IESO on the construction of gas plants. The Proponent's Guide to Environmental Assessment notes that "in certain circumstances, special consultations may be held with First Nations." The EAC urges the proponent to engage in the aforementioned special consultations given the relative proximity of both projects to Pictou Landing First Nation, and the history of environmental racism in Nova Scotia. Nova Scotia environment minister Iain Rankin has referred to decades of effluent dumping in Boat Harbor as one of the worst cases of environmental racism in Canada, and it is important that both the proponent and the Department of Environment and Climate Change (NSECC) ensure that the consultation process for the EA is perceived as legitimate by the general public and Mi'kmaq people specifically. Every opportunity should be taken to consult with First Nations, and we strongly believe special consultation is warranted as the part of this EA process.

2) In section 3.3.2.3 Freshwater, pg. 15 it states that "A sustainable groundwater supply will be required for power plant operation. Preliminary desktop investigations estimate a peak raw water consumption of 175 m3/hr and average annual consumption of 23 to 31 m3/hr based on the expected power plant operation." Both the 2022 and 2025 Climate Change Risk Assessments identify increased risk of drought, and less snow and water in the coming decades, which may reduce the availability of fresh water. These risks – along with rising water rates exacerbated by industrial demand on local water supplies – could harm residential access to water. The gas plants require 24/7 operation, and the resulting water usage could further increase the risk of drought, while decreasing local capacity to respond to wildfires.

3) Section 3.5 Project timelines. According to S&P Global, overall demand for gas plants has increased sharply – driven by AI, as well as demand in other sectors. Wait times are as much as seven years in the US, and costs are up 2.5 percent in some US markets[1].

[1] https://www.spglobal.com/energy/en/news-research/latest-news/electric-power/052025-us-gas-fired-turbine-wait-times-as-much-as-seven-years-costs-up-sharply

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4) The EAC questions the feasibility of timeline for construction and operation of both gas plants presented by the proponent, and is concerned about the impact of potential delays and rising costs on consumers. Nova Scotia's clean power plan calls for the development of 300MW of Battery Storage, noting that battery prices haven fallen by 95% in recent decades and that Nova Scotia is also home to world-class expertise in batteries, and rapidly growing new firms specializing in Battery Energy Storage Systems (BESS).The proponent's Request for Expressions of Interest (REOI)for fast-acting power generation imposed unnecessary limitations on the type of generation requested – namely simple cycle, fast acting, combustion turbine package – when other forms of dispatchable generation could provide the same benefits to the grid with a lowest risk of delays and cost overruns , GHG emissions produced as a result of the operation of both gas plants are subject to Nova Scotia's output-based pricing system (OBPS) as each facility exceed 50,000 tCO2e, with associated costs passed on to ratepayers. The projects will be subject to emissions limits under the Clean Electricity Regulations, diminishing associated system benefits and reliability benefits for ratepayers, particularly when compared to other forms of dispatchable generation such as BESS projects

5) Issues with Section 7 under Mitigation pg. 83 The EAC is skeptical about the feasibility of producing renewable natural gas. No fossil fuel can become renewable, nor can it become low carbon. Advertising fossil fuels as such is misleading, coercive and greenwashing. Carbon capture storage (CCS) only buries carbon eliminating it from the atmosphere and is not an effective long term solution as continuing to do so will cause further waste and overcrowding to existing land mass due to domination by CCs facilities.

6) In Section 9.2 – Wetlands - If a wetland meets the criteria for a potential WSS it should not be altered. This includes WL16 at the Salt Spring site (potential WSS with observation of Canada Warbler).

7) In Section 10.3 – Terrestrial Fauna - The proponent should also create a Wildlife Management Plan in cooperation with NSNR which includes plans to respond to moose sightings on site.

8) In Section 10.4 – Avifauna - Mitigation measure should include avoiding the destruction or disturbance of habitat for the SAR bird species observation on site. The known and predicted habitat of these SAR-listed species at the site should be avoided as per SARA (and the Migratory Birds Convention Act).

9) The EAC communicated our preference for a technology neutral REOI at a meeting in December. This sentiment is reflected in our comments as well. We would like to note that was unclear to EAC staff that their request for a meeting with EAC was understood by the proponent as a component for their engagement for the proposed gas plants.

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10) The application for 2 gas plants of 300MW each indicates an overbuild of gas larger than what was defined in the clean power plan (300MW). There is no indication of retrofitting existing assets to meet dispatchable energy needs. The Clean Power plan indicates that only 300 MW of New dispatchable power generators be added to meet the 2030 goal. These plants do not include the pre-existing 450 MW of oil/gas that is said to be included in the plan. This is in addition to 100MW to be received in a new deal for a portion as new gas peaker plant output recently announced with New Brunswick Power. Overbuilding of gas generation would be ineffective, inefficient, and environmentally damaging, and costly, especially when there are lower carbon alternatives. The dash to gas risks negative and unnecessary impacts on the environment and on ratepayers. Similarly, EAC is skeptical of the feasibility of sustainable hydrogen and forestry biomass use as a fuel input for these gas plants. The US Department of Energy[2] estimates that the maximum amount of hydrogen can be blended and carried in natural gas pipelines is theoretically 15%, and the EAC is concerned that plants will lock in emissions with little chance of GHG reduction as a result of hydrogen blending.

11) Section 2 – EAC would like to reiterate that batteries and battery storage have not been adequately evaluated as a viable low carbon alternative to the proposed gas plants. The REOI does not address battery storage as a dispatchable energy resource. Unlike gas, BESS plants would not be subject to OBPS or volatility in the price of fuel inputs and will be integral to deployment and integration of intermittent renewable energy resources in Nova Scotia – including offshore wind. Similarly, there are pre-existing shovel ready projects. In the Pictou County region Mi'kmaq majority-owned, shovel-ready 150 MW/600-1,200 MWh BESS exists in Trenton. The EAC is concerned that the deployment of these gas plants will undermine this business case for the deployment of these BESS plants, and that competitive procurement based on a technology neutral REOI would provide better value to ratepayers while adhering closely to the Nova Scotia Clean Power Plan.

[2] Hydrogen Pipelines | Department of Energy