

Honourable Timothy Halman Minister of Environment and Climate Change
PO Box 441
Halifax, Nova Scotia
B3J 2P8

Re: Windy Ridge Wind Power Project Environmental Assessment

Dear Minister Halman:

This submission of written comments is in response to the Environmental Assessment Registration Document provided for the Windy Ridge Wind Power Project . Protect Project area (PWV), a group of volunteer community members who have significant concerns regarding this project and the proposed location. We desire that the special ecology and biodiversity of the Project area be protected, and where sustainable, support human enjoyment of it now and for generations to come. We believe that the size, location, extent, impacts, risk and cost of any project are critical considerations and that they should proceed only when the benefits of renewable energy are sustainable and developed with consideration to the many factors that contribute to the quality of life of a community and Province. The Minister should reject this Environmental Assessment because of the likelihood that it will cause adverse effects and environmental impacts that cannot be mitigated by the Proponent. The Project Proponent relies on the premise of no evidence that harm is likely but the Environmental Assessment must provide evidence that harm is unlikely.

As follows are our primary concerns:

1. Your department acknowledged that the EA process in Nova Scotia requires improvement and in response launched a project in September 2023 to modernize and update the regulations. Lorie Roberts, an executive in your department reported in a CBC interview that “the world has changed since 2008, the last time the regulations were considered” . She goes on to say that “we have a lot of renewable energy projects coming into the process and also a lot of innovation happening out there in the business world and so it brings some different types of projects that we might have seen in the early 2000s”. Your government’s news release announcing the EA update states” the updated EA process will take into consideration cumulative impacts, diversity, equity and inclusion, independent review, climate change and Netukulimk, the Mi’ kmaq concept of living sustainably in the land through respectful co-habitation. These are all critical consideration to the assessment of the Windy Ridge project and your review of this project should not be completed prior to the conclusion of the EA modernization process”. This Wind project if it proceeds will be the largest on in Nova Scotia. The risk to our environment, quality of life, biodiversity,

wildlife habitat, ecosystems is huge. Therefore the EA review should not be completed until the improvements your government acknowledges are required to the process are implemented. Nova Scotia's deserve protection from your department with a more robust and independent process than the current one .

2. The EA submissions on page 1 states that "The development of this project will provide renewable energy required to produce certified green hydrogen and ammonia in the region, supporting the clean renewable initiative " . However, the proponent does not explain how this support will be provided. It is our belief that this project will put provincial energy targets at risk. This project will compete with renewable projects where the energy is directed at our local grid for valuable resources and land. Page 3 of the document states that" Hydrogen will be blended with atmospheric nitrogen to synthesize ammonia, producing substantially lower greenhouse gas emissions than those of conventional ammonia production methods. Reduction of emissions on a global scale will be supported through international exportation of green ammonia that may be used as a component in fertilizer and fuels". Other reports have indicated that ammonia which is easier to transport than hydrogen will be converted back to hydrogen when it is received in Europe. As you and your department must be aware, scientist and experts have indicated that the process described by the proponent is untested, inefficient and expensive. Julie Levin of the National Climate at Environmental Defence Canada has stated that "Using renewable energy to produce hydrogen, which then get converted in ammonia is a very inefficient use of renewable energy. Each step of that supply chain is complex and expensive". She goes on to say that "in an era in which we are trying to decarbonize in smart ways , this is not a smart way to use renewable power". Michael Liebreich another expert on Hydrogen said, "The idea of using wind energy for hydrogen is absurd from a climate perspective, particularly whilst you have still got coal or fossil fuel used locally in the electricity grid". The EA document goes on to indicate that in addition to the exported ammonia " an agreement is expected to be established with NSPI for the use of green energy from the Project beyond that consumed by the Point Tupper Green Hydrogen/ Ammonia project". However, this agreement has not been completed and there is no indication of when the agreement will be established, how much energy will be contributed to the local grid and at what cost. Everwind representatives have indicated that as much as 20% of the energy produced "might" be directed at the local grid at some point in the future. We submit that you should not be approving a project that will compete for resources of projects which are producing energy which will go directly in our grid. The transportation and storage of both hydrogen and ammonia also risk our environment as a result of

leaks. Our natural resources should not be sacrificed and risked for the **purpose** of this project.

3. The **Cumulative Impact** of this project in the development area has been minimized in the EA document and not appropriately considered. There are 3 approved projects and one proposed near Windy Ridge. The Blueberry Acres proposed project would produce energy for the local grid so should not be negatively impacted by the approval of Windy Ridge, where primary purpose is to export energy. When completed these projects will result in the placement of 108 massive industrial turbines in a relatively small area. Currently the largest wind turbine project in Nova Scotia has approximately 34 wind turbines. Your department has indicated that cumulative impact was an area that needed to be considered in your process of modernizing the EA process. Given that there has never been an area in this province which will be populated with this scale of massive concrete industrial wind turbines it is critical that your regulations take into consideration all risk associated with cumulative impact prior to approval of this project. For example, the EA document indicates there could be 200 trucks needed per day during the peak construction period. Construction period is estimated as 20 months. It is assumed proportionate to their size that the other projects which with the construction periods overlapping will require similar number of large trucks. That would be approximately over 400 trucks per day. These trucks would be largely making use of Highway 4 which since the building of the Cobequid Pass has restricted truck traffic due to safety concerns. Prior to restricting truck traffic this road was referred as "Death Valley". Yet the EA document concludes that risk related to truck transportation is low. The document makes reference to the extensive use of the area for hiking, biking, snowmobiles etc and indicates similar uses of Higgins and Kmtnuk projects. It should be noted that recreational activities is a prime driver of economic activity and investment in the project area. Page 72 of the document indicates that the area can continue to be used for these activities during the lifespan of the project. Another section of the document indicates there will be restrictions to access during the construction phase. Again, the EA document concludes low risk related to recreation and tourism. A conclusion which is not supported by evidence provided in the document.
4. We believe that **public engagement** has been misrepresented in the EA document. Members of our group have attended 7 of the 9 sessions outlined on page 46 in Table 3.3. Public response to the project was overwhelming negative at all of the sessions. The only people we spoke to who were supporting the project were either working for the proponent (RES or Everwind) , related to an employee or expected to be a contractor of the projects. At the November 14

presentation to council community concerns were dismissed by a company representative as NIMBY related that they had been dealing with for years. The disrespect and ignoring of legitimate concerns and comments of community has been exhibited throughout the engagement process. The table on 3.3 indicates only 47 as the public attendance at the November 16 Council presentation. It does not mention that the attendance in the council chambers was limited due to the size of the room and restrictions imposed by the municipality. It also does not mention the many community members who were on the sidewalk in front of the Municipal Chambers during the meeting with their voices raised in protest to the Windy Ridge project. The document suggest that turbines were removed from visual impact on Folly Lake because of community engagement. In reality, the Everwind Brochure which was circulated in mailboxes throughout Colchester County mailboxes made a commitment that there would be no wind turbines seen from Folly Lake. Company representatives in discussion with us at the November public meeting admitted that this was not true, and they would remedy. . This false representation has lead many in the community to question the integrity and intentions of the proponent. not know of the event and that for the remaining 3 office hours, they should consider other ways of informing the public including a newspaper add. Another example of the lack of transparency and true “engagement and respect” of the community was when at the February 12,2024 presentation and Q&A the facilitator indicated that there could be no discussion or questions related to the purpose of the project. Almost all of those who asked questions or made comments at the session again were not supportive of the project. A number did have questions on the purpose of the project and were questioning how we would benefit given the risk to our community of exporting ammonia to Germany in what experts indicated is a very risky and expensive process. But the Everwind paid facilitator was firm that they would not discuss the community concerns related to the purpose of the project using our community resources.

5. Much of the Project area is private land, **essential moose habitat** and a well-known moose concentration area. The Minister of Environment and Climate Change must protect this habitat including Wetlands and adjacent forest habitat consistent with the Province’s commitments per the Nova Scotia Mainland Moose Recovery Plan. The Proponent fails to adequately identify how they will mitigate the risks that this Project places on the endangered Nova Scotia Mainland moose. Dr. Karen Beazley, co-author of the Nova Scotia Mainland Moose Recovery Plan, provided key guidelines/advice that she mentioned in conversations with the Proponent and that were omitted in the Windy Ridge Wind Farm Project’s Environmental Assessment:

- Minimize roads, fences, lighting and other linear infrastructure.
- Orient and clump them together in ways that do not sever or intersect intact forest or other natural habitat linkages through the site.
- Plan in a spatial way that retains wide (300 m minimum; 1000 m ideal) habitat linkages/corridors through the site in multiple directions, especially to connect with intact habitat beyond the site.
- Retain both hardwood and softwood and access to water in order to provide summer and winter security and thermal cover and forage.
- Include mechanisms to deter motorized human access beyond that necessary to service the site.
- Retain and enhance natural cover for moose and other SAR habitat delineated as core habitat in Recovery Plans.
- Retain and enhance natural cover for moose and other SAR habitat modeled as high habitat suitability or high likelihood of presence as delineated in Recovery Plans.
- Avoid new road construction/expansion/enhancement in areas delineated as unroaded/low road density in Recovery Plans.
- Retain as much natural cover as possible to favour moose habitat over deer habitat to minimize incursion of deer and associated P. tenuis (brainworm fatal to moose and carried by deer).

While making reference to a commitment to the NS Moose recovery plan and a proposed moose corridor the EA document does not provide the detail and evidence to conclude that mainland moose habitat will not be negatively impacted as a result of this project . The project will put the survival of NS mainland moose at risk and should be rejected.

6. The Project Area does not have many of the traditional draws that **drive investment and construction in a community. The community surrounding this project** is known and valued for its recreational offerings, ecosystems, tourism opportunities and scenic / serene landscapes. These are the attributes which motivate and drive the purchase of properties, investment and economic development in this area. This makes the location unique and land and property values more at risk from the negative impact on recreation, biodiversity, visuals etc. from massive industrial wind turbines The EA Documents conclusions that land use and values and recreation and tourism will not be negatively impacted is not correct and does not take consider the unique offerings of the project area.

7. The Project area is in the heart of **an essential biodiversity** corridor between the Portapique River Wilderness Area and the Project area Wilderness Area. The Minister should reject the Environmental Assessment because the Proponent has not proven that they can mitigate the harmful impacts of the Project to biodiversity, ecological connectivity, the Nova Scotia Mainland moose and their core habitat and corridor and neighboring parks and private land trust conservation properties
8. It was reported this week that the proponent has identified **grid capacity and transportation infrastructure** not sufficient in this province to accommodate the scale of proposed projects which Windy Ridge will be supplying energy. It appears that the proponent is looking to taxpayers and rate payers to fund the infrastructure upgrades required. I urge the Minister to not approve this project until it is clear what upgrades in NS grid and transportation systems are required and who will be responsible for funding. It is the proponent who will most significantly benefit from the returns of this proposed project and the proponent should be responsible for any risk and cost of investments required. This issue needs to be resolved and all Nova Scotia's need to understand what cost your government is committing our dollars to before any approvals are granted. How can a project that risk of our natural environment ,cost millions(hope not billions) of taxpayer and rate payers dollars and see most of the return directed at foreign investors be a "good deal" for Nova Scotian's.
9. The Windy Ridge project document reports there are **365 wetlands** identified in the project area(354 formally delineated) and of these 11 were determined to be Wetlands of special significance . Windy Ridge expects to lose (infill)72 acres worth of wetlands for the project Some of the wetlands in the assessment area are treed swamps . Treed swamps are important ecosystems for biodiversity and carbon storage. Canada. Treed swamps as carbon sinks in Nova Scotia.. Other main wetlands are bogs and fens . Bogs and fens are peatlands, which store the most carbon of all wetlands. Peatlands are also extremely sensitive to disturbance. Even people walking through them can disrupt the moss – lichen – heath network on the ground. Peatlands also have plants that are naturally nutrient-poor and adapted to acidic conditions. Disturbances that can introduce fertilizer, pesticides, other chemicals (arsenic, silting) can severely impact these plants. Peatlands are resilient and filter water, but too much contamination will disrupt this natural ecosystem service that the peatlands provide. Bogs and fens are a preferred habitat of the mainland moose. Altering wetlands, notably peatlands and forested wetlands which are carbon sinks, defeats the purpose of a wind farm, unless the wetlands are ensured to be protected with this Project. When wetlands are altered, such as drying out or losing vegetation (ponds emit

more methane than a marsh, for example), they emit GHGs of CO₂, CH₄, and N₂O. The EA document concludes that the residual effects of the project on Wetlands are expected to be minor but lacks the evidence and detail to support this conclusion. The document refers to the implementation of proposed mitigation measures, wetland monitoring, and wetland restoration to reduce the negative impact of wetland loss from the project. The detailed description of these measures, monitoring and restoration is not provided and therefore the effectiveness cannot be assessed or considered. Given the extent of wetlands in the project area, the critical contribution that wetlands make to our habitats, wildlife, environment etc and the lack of detail related to how risk to wetlands will be addressed the project should be rejected.

10. Several groups in this Province(including Protect Wentworth Valley) have asked the government to complete a **landscape level planning process** to best determine what locations in the province are best suited for large scale industrial wind development and what province wide restrictions should be implemented. If you and your government are going to be promoting and committed to wind development in this Province then it is your responsibility to ensure that the projects are located in area's where risk to environment and quality of life are minimized and that all community residents are protected by province wide regulations related to set backs, noise, flicker, visual impact, decommissioning etc.. No further approval of large-scale industrialized wind development should be approved until this planning process is completed.

We urge you and your department to take your responsibility to **protect** the environment of this wonderful Province very serious and reject this project.

Respectfully submitted,

Protect Wentworth Valley Committee
c/o
1344 Highway 4,
Folly Mountain, NS
B0M 1G0