

To: Impact Assessment Agency of Canada
Ottawa (by E-Mail)

October 25, 2024

From: W. A. Mac Quarrie

<personal information removed>

Subject: Comment: Build Nova Scotia's Boat Harbour Remediation Project Draft Environmental Assessment Report, (October 15, 2024), outlining the proposed remediation of Boat Harbour and nearby lands.

According to The Impact Assessment Agency of Canada (IAAC), Boat Harbour Remediation Project Draft Environmental Assessment Report (the Report) dated October 15, 2024, as proposed by the Proponent presents the view that the Project is not likely to cause significant adverse effects on fish and fish habitat. It indicates the implementation of the mitigation, follow-up, and monitoring measures subsequent to the cleanup of the lagoon has taken into account all factors.

After a review of the Report I am wondering if proximity of the PLFN sewage plant, the plant efficiency and the makeup and quality of discharge at the outfall have been examined in relationship to the future water quality in a post remediation Boat Harbour – or if such has been ignored or over-looked.

Before construction of the pulp mill treatment facility I had personal knowledge of the water at the entrance to Boat Harbour. Sea water flowed into Boat Harbour during a rising tide in the offshore area. The quantity of inflowing water was considerable and a strong current ran into the harbour.

At that time PLFN did not have a sewage plant, today, about one kilometre west of the entrance to Boat Harbour not far off the beach at the eastern end of Pictou Bar there is a PLFN owned sewage plant and outfall. The Report contains a analysis of an area of the entrance limited to within 500 metres of the harbour entrance; (Figure C-2). It must be considered that at times there have been problems with the quality of the PLFN sewerage treatment plant effluent. No doubt, from time to time there will be again.

During various seasons, water temperatures, tidal states or unusual weather conditions water quality at the entrance is not indicated. At the beginning of a returning (flood) tide, sewage effluent could be drawn back to the west along the shore and the in-draught to the harbour of contaminated water could occur, such eventually could pass undetected.

Subsequent to remediation, Boat Harbour may indeed return to it's former condition and again become a suitable shell-fish habitat. Harvesting, of shell-fish, possibly on a commercial scale, could become possible. Water contamination, either temporarily, or chronically, would make shellfish unsafe to consume and destroy the possibility of a commercial fishery.

There are solutions:

- ▶ The possibility of PLFN sewage ever being drawn into a post remediation Boat Harbour could be revealed or a study completed.

If a potential problem is revealed:

- ▶ Improve the sewage plant to bring discharge to a cleaner condition.
- ▶ Ensure instrumentation to monitor plant operation and failure alarms are installed and maintained.
- ▶ Extend the sewerage discharge line so discharge would not enter the harbour during any environmental or tidal conditions.
- ▶ Restrict discharge of effluent to falling tidal conditions by holding sewage discharge in on site storage tanks during flood tide of other times deemed prudent.

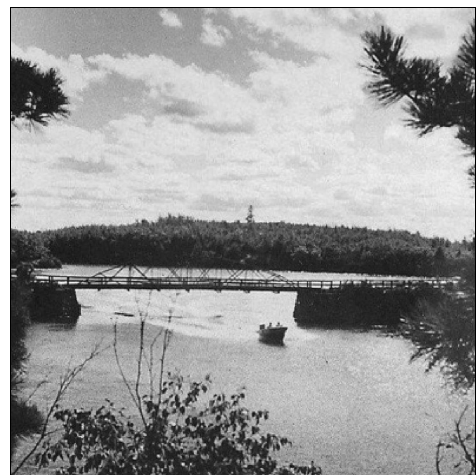
I hope this is helpful.

I was there when Boat Harbour was destroyed. There was no compensation paid to non-aboriginal land owners – including my parents. Eventually First Nations people (PLFN) were. I hope to live long enough to see the day when Boat Harbour is returned to the pristine natural beauty of days past. I am now 78.

<Original signed by>

W. A. Mac Quarrie

Chance Harbour, N.S.



Boat Harbour entrance, looking into the harbour circa 1965.