

Please accept this correspondence as a formal request that the Impact Assessment Agency of Canada deny approval of the proposed natural gas power generation facilities in Marshdale and Salts Springs, Pictou County, Nova Scotia. I submit this request as a former resident of both Concord Road and Lorne Station Road, in the communities of Glengarry Station and Lorne, respectively.

Basis for Request

1. Climate, public health, and policy alignment concerns

Approval of these facilities is incompatible with Nova Scotia's climate commitments and broader public health and sustainability objectives. Nova Scotia has committed to achieving net-zero emissions by 2035, while the proponent has indicated these facilities could operate upwards of 45 years.

The combustion of natural gas and diesel fuel produces nitrogen oxides, particulate matter, and greenhouse gases, all of which are associated with adverse public health outcomes. The Canadian Association of Physicians for the Environment and Lung Health Associations have publicly opposed new fossil fuel infrastructure and have called for moratorium on such developments in the interest of public health.

Similarly, Ontario's Ministry of Energy has requested that the IESO evaluate a moratorium on new natural gas generation procurements, citing emissions and related concerns. At the federal level, the Government of Canada has stated that all departments and agencies are responsible for implementing the UN 2030 Agenda for Sustainable Development, advancing environmental protection and supporting a sustainable, future-proof economy. Approval of these projects runs counter to these stated objectives and international commitments.

2. Impacts to species at risk, wildlife, and ecosystems

The assessment documentation does not adequately address impacts to species protected under the Species at Risk Act (SARA), nor does it meaningfully consider applicable recovery strategies. In particular, potential impacts to Atlantic salmon and mainland moose have not been sufficiently documented.

While impacts to Black Ash—a SARA-listed species—are acknowledged, they are not adequately considered. Black Ash is highly dependent on wetland ecosystems, and wetland degradation or drying is known to result in significant mortality of this species.

The proposed developments would also impact a Wetland of Potential Significance, resulting in the loss of specialized habitat and ecosystem services, including flood

mitigation, wildfire mitigation, carbon sequestration, and wildlife habitat. Wetlands also hold cultural significance for Indigenous communities.

Additional impacts to non-SARA wildlife species—including fisher, black bear, bobcat, marten, snapping turtle, and others—have not been considered.

3. Lack of social license and absence of free, prior, and informed consent

The projects lack secure social license and have not met the standard of free, prior, and informed consent among Mi'kmaq First Nations. Information provided to local and Indigenous communities has been inadequate. At the time of public information meetings—and prior to the submission deadline—key geotechnical and hydrological studies had not been completed or made available for review and discussion. There has also been limited transparency regarding proposed wastewater treatment processes.

With respect to the Marshdale facility specifically, the proposed site is located wholly or partially within the boundaries of the Town of Stellarton's watershed. Assurances regarding water availability are insufficient, as the hydrological study remains incomplete. There is a lack of clarity regarding drought contingencies, long-term water insufficiency risks over the lifespan of the project, and responsibility for associated costs should water shortages occur—whether borne by homeowners, county ratepayers, or the proponent. Additional concerns include potential declines in property values and impacts on nearby livestock operations.

4. Community demographics and barriers to meaningful public participation

Marshdale and surrounding communities—including Lorne, Glengarry, Glengarry Station, Whitehill, and others—are predominantly composed of long-term residents, many of whom are over the age of 55. Cellular service in the area is limited, and many residents do not have access to home internet. As a result, reliance on online platforms and social media for outreach has significantly limited public awareness.

Based on conversations with community members, overall awareness of both projects—and of the associated regulatory processes and opportunities for public input—is exceptionally low. The limited number of submissions received through this process appears to reflect this lack of awareness rather than a lack of concern. Members of Mi'kmaq First Nations have expressed similar concerns in recent days, particularly with respect to water use, wetland loss, and potential impacts to Black Ash, salmon, moose, and bear populations.