NIRB File No.: 25XN022
NPC File No.: 150591

August 28, 2025

Wesley Sutherland
Kitikmeot Corporation
30B Mitik Street, Box 6
Cambridge Bay, NU
X0B 0C0

Sent via email: wsutherland@kitikmeotcorp.com

Re: Opportunity to address comments received regarding Kitikmeot Corporation's "Cambridge Bay Solar and Storage" project proposal

Dear Wesley Sutherland:

On April 4, 2025, the Nunavut Impact Review Board (NIRB or Board) received a referral to screen Kitikmeot Corporation's (KC) "Cambridge Bay Solar and Storage" project proposal from the Nunavut Planning Commission (NPC or Commission). On July 16, 2025, the NIRB circulated a public notice of the screening for this project, inviting interested parties to provide comments directly to the NIRB by August 6, 2025.

On or before August 6, 2025, the NIRB received comments from the following interested parties:

- *Government of Nunavut (GN)*
- *Crown – Indigenous Relations and Northern Affairs Canada (CIRNAC)*
- *Environment and Climate Change Canada (ECCC)*
- *Transport Canada (TC)*

All comment submissions received by the NIRB relating to this project proposal can be accessed from the NIRB's online public registry at www.nirb.ca/project/126182.

A *summary* of the public concerns reflected in the comment submissions relate to the following:

Crown-Indigenous Relations and Northern Affairs (CIRNAC)

- With respect to spill prevention, CIRNAC recommended the Proponent:
  - Store diesel in secondary containment areas and conduct refueling activities on impermeable surfaces equipped with spill trays and absorbent materials;
  - Maintain spill-response equipment at all refueling sites and conduct regular spill drills; and,

    - Ensure hazardous materials storage and greywater sumps are at least 31 meters from any waterbody's high-water mark.
    - Implement daily inspection routines for all fuel storage and handling areas;
- CIRNAC noted concerns with the safety of Battery Energy Storage System (BESS) and recommended the Proponent:
    - Develop an emergency response plan specific to battery storage system before it is commissioned;
    - Install automated fire suppression systems within battery enclosures;
    - Train local emergency response teams specifically in lithium-ion battery incident management; and,
    - Establish robust emergency response protocols including contaminated water capture and hazardous waste disposal planning.
- With respect to preventing erosion and habitat restoration, CIRNAC recommended the Proponent:
    - Confine all construction activities to defined areas by making work boundaries to prevent any unintentional damage to adjacent tundra;
    - Implementing erosion and sediment controls (e.g., silt fencing, stabilized entrances) pre-disturbance;
    - Diverting clean runoff around disturbed areas; and,
    - Immediately stabilizing and revegetating exposed soils.
- Noted the site is underlain by continuous permafrost and recommended the Proponent to preform regular monitoring to track ground temperatures, active layer thickness, and trigger corrective measures as needed. Further recommended that, where feasible, heavier ground-disturbing work could occur in colder periods, and summer traffic could be minimized off prepared/stabilized surfaces.
- Recommended continued engagement with the Hamlet of Cambridge Bay, the Nattivak Hunters and Trappers Association, Pitquhirnikkut Ilihautiniq/Kitikmeot Heritage Society Board, the Ekaluktutiak Hunters and Trappers Organization, and others. Discussions should include Inuit Qaujimajatuqangit, protection of wildlife and cultural sites, support for traditional land use, and opportunities for Inuit and community member training and employment, local procurement, and regular updates on the status of the project activities.

Environment and Climate Change Canada (ECCC)

- Noted the Proponent does not mention potential impacts to marine water quality. and recommended the Proponent acknowledges the potential for effects to marine water quality and apply all erosion and sediment control measures to prevent impacts.
- Recommended the Proponent extract and analyze fresh quarry rock samples for assessment of Acid Rock Drainage/Metal Leaching (ARD/ML) potential; as it is not sufficient to only sample water that is currently in contact with quarry rock to evaluate ARD/ML.
- Recommended the Proponent implement the suggested mitigation measures as noted in the application and develop the recommended plans for use during the construction phase of the project.
- Recommended the Proponent consider additional mitigation measures during the construction phase of project, including the following:

    - Placement of spill kits anywhere that spills or leaks of fuel or hazardous substances could occur with training provided to all employees and contractors on fueling, equipment operation, and handling of hazardous materials;
    - Procedures and mitigation measures that would be in place for fuel storage and refueling of vehicles or equipment in areas that do not have secondary containment; and,
    - Procedures and mitigation measures that would be in place for stationary (more than two (2) hours) vehicles and equipment, and storage of vehicles and equipment.
- Recommended the Proponent develop a spill contingency/response plan detailing the procedures that will be put in place and resources available, to respond to potential spills.
- Recommended the Proponent develop a waste management plan detailing procedures to safely handle, store, and dispose of wastes, including hazardous wastes.
- Recommended that when the information on specific instructions for the BESS has been developed, it is incorporated into a project emergency response plan. ECCC further recommended that the Proponent incorporate battery fires or explosions into an emergency response plan for the project.
- Requested the Proponent verify whether the pallets mentioned in the application are made of untreated or treated wood and indicate a suitable method of disposal for treated wood.
- Requested the Proponent elaborate on the resiliency of the Project components (e.g., solar array) and what measures have been put in place for periods when temperatures drop to less than -40 degrees Celsius (ºC).
- Recommended that any equipment sourced externally be equipped with engines meeting Tier 4 emission requirements to reduce impacts to air quality.
- Noted that it is important for proponents to ensure they are aware of what species are present in the project area and take appropriate actions to ensure compliance with the *Species at Risk Act*. ECCC recommended that:
    - The Proponent consult the species at risk registry to obtain the most current information for their operations and identify adverse effects of the Project on the species at risk likely to be affected and their critical habitat;
    - Measures be taken to avoid or lessen those adverse effects and monitor them to inform adaptive management;
    - Mitigation and monitoring measures be consistent with applicable species at risk Recovery Strategies and Action Plans or Management Plans;
    - Monitoring should include recording timing and locations of observed species at risk, their behaviour when encountered, and actions taken by the Proponent to avoid disturbance to the species; and,
    - Submit monitoring reports to the appropriate regulators and organizations.
- Recommended that the Proponent consult the Government of Nunavut to identify appropriate mitigation and/or monitoring measures to avoid and lessen project effects to species under their management responsibility.
- Noted concerns with the potential impacts to migratory birds, their nests and eggs and recommended the Proponent implement the following:
    - Carry out all phases of the project in a manner that reduces risk to migratory birds and avoid harming, killing or disturbing migratory birds and their nest;
    - Not conduct potentially destructive or disruptive activities at key locations or during key periods to avoid negative impacts to migratory birds;

    - Avoid vegetation brushing and habitat disturbance during the general nesting period, and consider options such as avoiding, adapting, rescheduling or relocating activities if a nest containing a migratory bird or egg is discovered/disturbed;
- Effects to wildlife from the solar panel fields were not discussed in the project proposal and mitigation were not proposed, beyond the impacts of clearing activities. ECCC recommended mitigations be implemented to reduce migratory bird attraction by:
    - Placing sonar panel arrays in areas with low bird density;
    - Installing markings or scare devices on solar panels to address the risk of attraction due to mistaken impression of water;
    - Altering the angle of solar panels to reduce likeness to water; and
    - Implementing an adaptive monitoring program to determine whether migratory birds are being impacted by the solar panels and ensure the effectiveness of any mitigation measures are employed.

The NIRB would like to provide Kitikmeot Corporation with an opportunity to address the comments noted above prior to the Board rendering its determination for this screening assessment and issuing its subsequent Screening Decision Report to the responsible Minister. The NIRB respectfully requests that a response be provided directly to the NIRB by **September 11, 2025**.

If KC determines that the time required to supply a written response is significantly greater than two (2) weeks, the Board requests written notification and an anticipated date for submission be provided as soon as possible.

Please send any forthcoming submissions directly to the NIRB at info@nirb.ca, or through the online public registry at www.nirb.ca.

If you have any questions or require additional clarification, please contact the undersigned directly at (867) 983-4622 or mbeattie@nirb.ca.

Sincerely,

Mia Beattie
Impact Assessment Officer
Nunavut Impact Review Board

cc: Distribution List
Tannis Bolt, Kitikmeot Inuit Association
Cory Barker, Kitikmeot Inuit Association
Justin Buller, Government of Nunavut, Executive & Intergovernmental Affairs
Dianne Lapierre, Government of Nunavut, Economic Development & Transportation
Sean Joseph, Government of Nunavut, Environment Assessment & Regulations
William Patch, Government of Nunavut, Community Services
Randy Mercer, Government of Nunavut, Community Services
Ken Wasylyshen, Government of Nunavut, Community Services
Olivier Forbes-Bouillon, Government of Nunavut, Community Services

Caroline Whittle, Government of Nunavut, Culture and Heritage
Adam Pollock, Government of Nunavut, Culture and Heritage
Adrian Paradis, Canadian Northern Economic Development Agency
Melissa Alexander, Canadian Northern Economic Development Agency
Transport Canada
Qulliq Energy Corporation
Jim MacEachern, Hamlet of Cambridge Bay