



CIRNAC COMMENTS TO NIRB

Re: Notice of Screening for Northern Energy
Capital Inc's "Nunavut Clean Energy Project:
Rankin Inlet and Baker Lake" Proposed Project



Nunavut Regional Office
P.O. Box 100
Iqaluit, NU, X0A 0H0

Your file - Votre référence
NIRB file #19XN014
Our file - Notre référence
CIDM #1247155

April 11, 2019

Jaida Ohokannoak
Technical Advisor II
Nunavut Impact Review Board
PO Box 1360
Cambridge Bay, NU, X0B 0C0
Via electronic mail to: info@nirb.ca

Re: Notice of Screening for Northern Energy Capital Inc.'s "Nunavut Clean Energy Project: Rankin Inlet and Baker Lake" Project

Dear Ms. Ohokannoak,

On March 21, 2019, the Nunavut Impact Review Board (NIRB) invited parties to comment on Northern Energy Capital Inc.'s "Nunavut Clean Energy Project: Rankin Inlet and Baker Lake" project proposal. Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) reviewed the project proposal and related documents and appreciates the opportunity to provide comments and offers the responses below as it pertains to the NIRB's request:

Any matter of importance to the Party related to the project proposal:

Construction Activities:

In the project application the Proponent indicates there are "no predicted negative environmental impacts" related to the project activities and does not include information about potential environmental impacts associated with the proposed construction activities which include: access road development, windmill foundation construction, use of heavy equipment, and drilling and blasting. CIRNAC recommends the NIRB request more information relating to the assessment of potential environmental impacts of the proposed construction activities and appropriate mitigation measures.

Project Feasibility:

CIRNAC has noted there remains the question of project feasibility in the absence of baseline data. The project application indicates that the wind turbines mechanical components and software will operate in "temperatures down to -40°C". CIRNAC notes that historical weather records for the Baker Lake and Rankin Inlet areas indicate temperatures of -40°C and below during the winter months.



Environmental Impacts Table:

In the "Identification of Environmental Impacts" table within the project application the Proponent has indicated negative and mitigatable impacts (M) related to noise levels in the operations phase of the project and negative and non-mitigatable impacts (N) related to birds (habitat and migration patterns) during the construction phase. Other than identifying the environmental impacts within the table, there is no further discussion or assessment of mitigation measures.

Fuel Management:

Information presented in *Section 1.2.8 Fuel and waste management* of the *Rankin Inlet and Baker Lake Wind Energy Project Overview*, indicates there will be "daily fuel transportation in approved slip tanks in pickups" but it is unclear how these operations will be managed in order to avoid, or minimize fuel spills. CIRNAC recommends the following terms and conditions apply to fuel transportation and refuelling practices, should the project be approved:

- Drip pans or other equivalent devices should be used when refueling equipment on-site,
- Conduct the re-fueling of equipment at a minimum of thirty-one (31) meters away from the high water mark of any water body,
- Appropriate spill response equipment and clean-up materials must be readily available to respond to leaks and spills,
- All personnel should be properly trained in fuel and hazardous waste handling procedures, as well as spill response procedures, and
- All reportable spills of fuel must be reported immediately to the 24 hour Spill Line at (867) 920-8120.

CIRNAC appreciates the opportunity to provide comments and looks forward to working with the NIRB and the Proponent, as necessary, throughout any further phases of this project. Should you have any questions, please contact Krista Pooley at (867) 975-4587 or by e-mail at krista.pooley@canada.ca.

Sincerely,



Felexce Ngwa
Manager, Impact Assessment

