



**NIRB File No.: 19XN014**  
NPC File No.: 149048

April 17, 2019

Kailey Wright  
Northern Energy Capital Inc.  
72097 7th Ave  
Whitehorse, Yukon Y1A 1R5

*Sent via email: [kwright@northernenergycapital.com](mailto:kwright@northernenergycapital.com)*

**Re: Opportunity to address comments received regarding Northern Energy Capital Inc.'s "Nunavut Clean Energy Project: Rankin Inlet and Baker Lake" Project Proposal**

Dear Kailey Wright:

On February 14, 2019 the Nunavut Impact Review Board (NIRB or Board) received a referral to screen Northern Energy Capital Inc.'s "Nunavut Clean Energy Project" project proposal from the Nunavut Planning Commission (NPC or Commission). On March 21, 2019 the NIRB circulated a public notice of the screening for this project, inviting interested parties to provide comments directly to the NIRB by April 11, 2019.

On or before April 11, 2019 the NIRB received comments from the following interested parties:

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

All documents received and pertaining to this project proposal can be accessed from the NIRB's online public registry at [www.nirb.ca/project/125450](http://www.nirb.ca/project/125450).

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

- Concerns with respect to potential impacts to wildlife and their habitat, birds and their habitat, traditional uses of land, Inuit harvesting activities and community involvement and consultation;
- Lack of baseline information and discussion (including assessment) on the potential environmental impacts and the assessment of mitigation measures for the activities of the project;

- Lack of information on the potential adverse effects related to the use of known technology;
- Lack of information on the feasibility of the project in the absence of baseline data;
- Lack of baseline information and information on the possible effects to migratory birds and wildlife including wildlife movement;
- Further information required on the Proposed mitigation and monitoring plans for potential effects to migratory birds and wildlife;
- Lack of information on the potential impacts on soils and vegetation;
- Incorporation of Inuit Qaujimajatuqangit from knowledgeable community members and local Hunters and Trappers Organizations to assist in site location to minimize impacts to wildlife, to identify potential impacts to wildlife, traditional harvesting locations, sensitive areas and identify mitigation;
- Engage with ECCC to discuss the project and determine the level of risk, baseline requirements and monitoring for the potential impacts of wind turbines on migratory birds;
- Need for a Wildlife Mitigation and Monitoring Plan and a Spill Contingency Plan;
- Further information required on the methodology used to collect information on community consultations with documentation on traditional knowledge provided for review;
- Aeronautical assessment will be required prior to construction as the proposed wind turbines may exceed the maximum elevation permitted in the Rankin Inlet Zoning Regulations on land inside a 4,000-metre radius from the centre of the airport and also on land located under the approach surfaces extending about 15 kilometres from each threshold along the extended runway centre line;
- Clarification required on data collected and used when calculating potential power outputs and in the design;
- Lack of sufficient climate change assessment to account for changes in ground permafrost conditions, specifically in regard to underground high voltage cables connecting wind turbines;
- Additional details required on the project:
  - Key information regarding project description with associated facilities including design specifics,
  - Site selection alternatives,
  - Fuel storage,
  - Fuel management,
  - Waste disposal,
  - Water usage,
  - Source of emergency services, and
- Lack of information regarding any archeological survey.

The NIRB would like to provide Northern Energy Capital Inc. 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(s). The NIRB respectfully requests that a response be provided directly to the NIRB by **May 1, 2019**.

If Northern Energy Capital Inc. 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](mailto:info@nirb.ca), or through the online public registry at [www.nirb.ca](http://www.nirb.ca).

If you have any questions or require clarification, please contact the undersigned directly at (867) 983-4609 or [johokannoak@nirb.ca](mailto:johokannoak@nirb.ca).

Sincerely,



Jaida Ohokannoak  
Technical Advisor II  
Nunavut Impact Review Board

cc:                    Distribution Li  
                        Luis Manzo, Kivalliq Inuit Association  
                        Maria Serra, Kivalliq Inuit Association  
                        Brenda Osmond, Kivalliq Inuit Association  
                        Ashley Burton, Kivalliq Inuit Association  
                        Chris Spencer, Government of Nunavut  
                        Randy Mercer, Government of Nunavut, Community and Government Services  
                        Robert Chapple, Government of Nunavut, Community and Government Services  
                        Mosha Cote, Nunavut Research Institute  
                        Tineka Simmons, Canadian Northern Economic Development Agency  
                        Agnes Simonfalvy, Canadian Northern Economic Development Agency  
                        Peter Unger, Natural Resources Canada  
                        Rob Johnstone, Natural Resources Canada  
                        Prairies and Territories Office, Transport Canada