SUMMARY OF ISSUES – Aspen Power Station Project

This document provides a high-level summary of issues submitted to the Impact Assessment Agency of Canada (the Agency) about the Aspen Power Station Project (the Project) during the comment period on the Summary of the Initial Project Description, submitted by Saskatchewan Power Corporation (the Proponent). The issues highlight information that support decision making by the Agency on whether an impact assessment is required under section 16 of the *Impact Assessment Act* and — if an assessment is required — inform the tailoring of planning phase documents. Original submissions are online, on the Canadian Impact Assessment Registry Internet site for the Project (Reference Number 84525).

The Proponent must provide the Agency with their response to the Summary of Issues that details how they intend to address the issues, and the Detailed Project Description. The Detailed Project Description must contain the information from the Initial Project Description with new information integrated throughout the main body of the document as appropriate to respond to the issues raised. This will facilitate understanding by assessment participants, including Indigenous groups and public groups, federal authorities, provincial ministries and municipalities.

Issue

Fish and Fish Habitat

Need for information on how the proposed water withdrawal during project operation may affect fish and fish habitat at the water source and related water bodies, and how these effects will be addressed.

Clarify potential effects to fish and fish habitat in relation to the natural gas supply pipeline and how these effects will be addressed.

Migratory Birds, Other Birds and Their Habitats

Potential for effects to migratory birds during all project phases, and corresponding obligations stemming from the *Migratory Birds Convention Act, 1994* and its regulations.

Potential effects to migratory birds from the Project related to road construction, increased traffic, sensory disturbances, linear disturbances, and the need for information on sources of sensory disturbances, migratory paths, monitoring, and how potential effects will be addressed.

Clarify how and when vegetation clearing will be conducted.

Species at Risk, Terrestrial Wildlife and Their Habitats

Need for information related to the potential presence of Western Tiger Salamander and Northern Leopard Frog in the project area, their potential use of the stormwater pond, and identification of mitigation measures to address effects.

Comment regarding potential project effects to species at risk such as sensory disturbances, and how potential effects will be addressed.

Need for information related to the potential presence of Whooping Crane, Baird's sparrow, Sprague's pipit and other grassland nesting birds in the project area, potential effects to these species, and identification of mitigation measures to address effects.

Climate Change and Greenhouse Gas Emissions

Describe the Project's resilience to future climate change, and where relevant, how it is considered in project design.

Clarify the Project's greenhouse gas emissions and contribution to climate change with consideration of the Strategic Assessment of Climate Change and the Government of Canada's long-term goal to achieve net-zero emissions by 2050. Provide a description of the planned mitigation measures,

technologies, and best practices to be applied, including measures being considered to reduce the Project's greenhouse gas emissions on an ongoing basis.

Comment related to broadening the consideration of components in the effects assessment in relation to greenhouse gas emissions.

Concern regarding long-term investments in fossil fuel electricity generation and carbon emissions.

Need for fuel consumption estimates for different capacity scenarios including details on simple cycle generation scenarios and greenhouse gas implications.

Clarify units and scope of the Project's emissions estimates.

Need for additional information on project greenhouse gas emissions estimates, including emissions from land-use change.

Indigenous Peoples' Spiritual, Physical, and Cultural Heritage

Comment on adequacy of archaeological study and potential project effects to archaeological, physical and cultural heritage resources.

Indigenous Peoples' Current Use of Lands and Resources for Traditional Purposes

Clarify potential or perceived project effects to wildlife and vegetation, corresponding potential effects to traditional food sources and food security of Indigenous groups, and how these effects will be addressed.

Clarify land use by Indigenous groups, including locations, and whether and how access to traditional land may be affected by the Project.

Indigenous Engagement and Consultation

Need for meaningful engagement with Indigenous groups, clarity on engagement that has taken place, and any updates to information on engagement and pending engagement. Include health or specific determinants of health-related issues raised by each Indigenous group, and proposed measures to mitigate any issues raised by the community members.

Health Conditions of Indigenous and Non-Indigenous Peoples

Need for the location of sensitive receptors (e.g., hospitals, schools, retirement complexes, assisted care homes) and traditional land use when identifying potential project-related air quality impacts on human health.

Clarify potential surface water and groundwater quality changes from the Project, including consideration on how Indigenous Peoples consume water, and effects on human health.

Use of Health Canada guidance documents when assessing the health effects of projects.

Need for information on country foods used by Indigenous Peoples, including information on existing contamination and any possible increase of contamination and projected effects on human health.

Social and Economic Conditions of Indigenous Peoples

Clarify how the increased demands on local services will impact Indigenous groups and how potential effects will be addressed.

Clarify any Indigenous employment targets that may be identified for the Project.

Social and Economic Conditions of Non-Indigenous Peoples

Clarify hiring strategy, including permanent employment anticipated, source and quantity of labour, how peak construction workforce will be staffed and how labour shortages and/or accessibility to trained labour were considered.

Clarify the economic viability of the Project.

Need for information on economic, social and ecological effects as well as employment opportunity effects on communities.

Clarify whether any federal financial assistance is anticipated to address labour and employment issues that result from the Project.

Need for empirical evidence to support that the Project will be of economic benefit to the province and will improve federal gross domestic product.

Clarify how the Project's decommissioning will impact employment.

Vulnerable Population Groups (Gender-Based Analysis Plus)

Clarify how inclusion will be tracked and how gaps in representation will be addressed with respect to engagement.

Need for more data within the regional and local areas and consider a Gender-Based Analysis Plus approach. Include consideration of gender-based violence and recruitment and hiring practices.

Clarify the mitigation measures that consider the differential impacts on various population groups.

Consider Gender-Based Analysis Plus throughout the project lifecycle, engagement, consultation, mitigation, and to create baseline conditions. Include potential gender-based violence risks.

Need for a detailed description of the Proponent's corporate diversity strategy and how it is relevant to Gender-Based Analysis Plus and employment and labour issues regarding the Project.

Acoustic Environment

Need for information on noise effects considering vulnerable populations and Indigenous groups' uses of the land.

Need information related to ambient noise surveys, timing of construction activities, predicted noise levels during construction and operations and mitigation of noise effects.

Clarify noise complaints and resolution procedures, and noise attenuation plans.

Surface Water and Groundwater

Consideration of potential effects to groundwater including potential contamination from spills.

Identify contingency options to manage potential excess water volumes should the evaporation pond reach capacity.

Need information on the possible project-related changes to water availability, local weather and water bodies in consideration of climate change.

Clarify which water sources are anticipated to be affected by the Project and how potential effects will be addressed.

Potential effects to water quality and corresponding, obligations stemming from the *Fisheries Act* and its regulations.

Navigable Waters

Clarity on whether and how any project component(s), including incidental activities, may affect a navigable waterway, and how these effects will be addressed.

Wetlands

Need for additional information on wetlands to better understand potential effects to migratory birds and wildlife species at risk, including potential for direct and indirect impacts, types of wetlands that may be impacted, the regional importance of potentially impacted wetlands and regional cumulative impacts due to wetland loss.

Cumulative Effects

Need for consideration of cumulative effects.

Need for the Project

The Project would provide a local source of energy, help to reduce wasted energy and help meet carbon emission targets.

The Project will likely create positive social and economic impacts and assist in reducing greenhouse gas emissions.

Alternative Means of Carrying Out the Project

Need for clarification on alternatives or mitigations with respect to greenhouse gas emissions, such as Grid Enhancing technology, Carbon Capture Utilization Storage, battery storage from renewable energies (e.g., solar, wind) and fuel cells, including their feasibility and cost effectiveness, that were considered.

Clarify details of the proposed alternatives for water supply including source waters, related potential effects, and water needs during operations and maintenance.

Clarify which alternative pathways for sharing Planning Reserve Margins with neighbours were considered, if any.

Alternatives to the Project

Need for consideration of and further information on alternative options to the Project to substantiate why the Project is considered the ideal option for enabling renewable generation and achieving emissions reductions.

Accidents and Malfunctions

Need for further information on the potential project effects and how these effects will be mitigated including consideration of spills or releases of hazardous or deleterious substances from unplanned accidents and malfunctions.

Need for further information on potential accident and malfunction scenarios that could lead to the release of contaminants into the surrounding environment for each phase of the Project, and the potential effects on human health.

Follow the *Canadian Environmental Protection Act, 1999* and regulations when developing the emergency preparedness plan.

Development of a Spill Contingency Plan.

Need for further information on the Community Awareness and Emergency Communications plans.

Waste and Emissions

Need to assess the option for the Project to go waste-free.

Clarify the methodology and supporting information for the calculation of fugitive emissions.

Need for air quality information about emissions and dispersion of air contaminants from project activities.

Need for complete inventory of all potential air pollutants (including diesel exhaust emissions), predicted residual effects on air quality from project construction, operations, and maintenance, and an exclusion list of all air pollutants and the justifications for exclusion.

General Project Description

Additional information on incidental activities (including natural gas supply lines) such as routing, portions that are solely for the benefit of the Project, potential effects, and how they will be addressed.

Other – Editorial Comments on the Initial Project Description

Clarify references to decommissioning emissions.

Project lifespan should be included in the introductory section.