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Nunavunmi Parnaiyiit
Nunavut Planning Commission
Commission d'Aménagement du Nunavut

October 11, 2013

Oliver Curran
Baffinland Iron Mines Corporation
2275 Upper Middle Road East, Suite 300
Oakville, ON, Canada L6H 0C3

By email oliver.curran@baffinland.com

Dear Mr. Curran,

Re: <u>Joint Review of Transportation Corridor under North Baffin Regional Land Use Plan</u>

Thank you for your correspondence dated September 27, 2013, confirming that Baffinland has submitted all relevant information required by Appendix J of the North Baffin Regional Land Use Plan (NBRLUP) to the Nunavut Planning Commission (NPC).

The NPC understands that Baffinland relies on the following information as constituting a detailed application to address Appendices J and K of the NBRLUP;

- The Addendum to the Final Environmental Impact Statement (FEIS) addressed to the Nunavut Impact Review Board (NIRB) dated June 20th, 2013 and specifically the information outlined in Appendix 1B-4 of the Addendum to the FEIS; and

- A "guidance document" provided to the NPC on June 25th, 2013 (Addendum to Final Environmental Impact Statement – NPC Concordance Review)

and that Baffinland describes the "transportation corridor" in Vol 3, Sec 2.2, 2.3 and 2.4 of the Addendum to the FEIS, which includes but is not limited to, upgrades to the Tote Road, new developments at Milne Port including ore stockpile facilities, a conveyor belt system of approximately 1 kilometer from the stockpile to a new fixed ore dock, and the

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Shipping Route through Eclipse Sound by Panamax and Post Panamax freighters, for the life of the Mary River Mine Site Project.

Having reviewed the above information, the NPC requests that the following additional information be provided;

- Any additional seasonal considerations that may be appropriate for the transportation corridor as described.

The NPC notes that the section of the Addendum to the FEIS that Baffinland relies on to address the requirement of Appendix J of the NBRLUP addresses only the shipping component through Milne Inlet and Eclipse Sound and not the transportation corridor as described, which includes both the Tote Road and the developments at Milne Port.

- A comparison of the proposed route with alternative routes in terms of environmental and social factors as well as technical and cost considerations.

The NPC notes that the sections referenced in Appendix 1B-4 of the Addendum to the FIES references alternative routes for the preferred railway corridor. NPC request clarity as to if the proponent is suggesting that the rail routes described are feasible alternatives to the transportation corridor described in Vol 3, Sec 2.2, 2.3 and 2.4 of the Addendum to the FEIS. If this is not the case, the NPC requests that a comparison of the proposed route with alternative routes in terms of environmental and social factors as well as technical and cost considerations be provided.

- How the proposed corridor will minimize negative impacts on community lifestyles.

NPC notes in Appendix 1B-4 that Baffinland believes this is not an applicable consideration when assessing the development of a transportation corridor. Please provide either confirmation that this is Baffinland's position, or alternatively information that addresses this requirement of the NBRLUP.

- How the corridor will not negatively impact community business, residential and projected expansion areas.

NPC notes that Baffinland believes this is not an applicable consideration when assessing the development of a transportation corridor. Please provide either confirmation that this is Baffinland position, or alternatively information that addresses this requirement of the NBRLUP.

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The NPC notes that Baffinland relies heavily on the Addendum to the FEIS addressed to the Nunavut Impact Review Board dated June 20th, 2013 to address Appendices J and K of the NBRLUP. While there is obvious overlap between the information contained in the addendum to the FEIS and the requirements of Appendix J and K of the NBRLUP, there is also additional information in the addendum to the FEIS that has little to no relevance to these Appendices. The NPC requests that Baffinland consider providing a more concise submission to the NPC, which may draw heavily on information already provided, that addresses only the specific requirements of the NBRLUP, as this will facilitate the review by the public.

In response to your request for notification by the NPC if the information already submitted does not meet Appendices J and K, the NPC is not able to make such a determination at this time. Note that section 3.5.12 of the NBRLUP reads:

> The NPC, and either NIRB or a panel acting under section 12.4.7 of the NLCA, shall **publicly review the proposed corridor to determine whether the proposal adequately meets the guidelines set out in Appendices J and K**. Once it is determined that a proposal does meet the guidelines, the NPC may request the ministers to amend the plan to include the new transportation corridor. [A][CR]
>
> [emphasis added]

In accordance with this section, the NPC will be publicly reviewing the proposal using the information described in your September 27, 2013 correspondence, or a more concise submission of the information required by Appendices J and K of the NBRLUP should Baffinland elect to prepare one, to determine whether it adequately meets the guidelines. While we are not imposing a firm deadline on the proponent for the production of additional information referred to in this correspondence, we would request that material be provided by November the 8th, or as soon as practicable, so that NPC can make it available to the public well in advance of the public hearings in January 2014. NPC reserves the right to request any additional information that may be required through the processing of this application.

Please don't hesitate to contact us should you have any questions.

Yours truly,

Brian Aglukark
Director Implementation

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cc. Amanda Hansen, Director Technical Services, Nunavut Impact Review Board

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