NI TI MOUNTAIN WIND PROJECT

Quality-of-Life Memorandum

Energy Resource Activities Act Permit Application

October 2026



List of Acronyms and Abbreviations

Acronym/Abbreviation	Definition
ATV	All-terrain vehicle
BC	British Columbia
BCER	British Columbia Energy Regulator
ERAA	*Energy Resource Activities Act*
FSR	Forest Service Road
MOTT	The Ministry of Transportation and Transit
MW	Megawatt
Ni Ti Mountain Power General Partnership	Developer of the Ni Ti Mountain Wind Project. A partnership between Stellat'en First Nation (Stellat'en) and Innergex Renewable Energy Inc. (Innergex).
QP	Qualified Professional
REPR	Renewable Energy Projects Regulation
The Project	The Ni Ti Mountain Wind Project

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1.0 Introduction

The Ni Ti Mountain Wind Project (the Project) is a 200-megawatt Indigenous-majority-owned wind energy project being developed by Ni Ti Mountain Power General Partnership (Ni Ti Power), which is comprised of Stellat'en First Nation (Stellat'en) and Innergex Renewable Energy Inc. (Innergex). Ni Ti Power is the owner and developer of the Project. Ni Ti Managing Partner Inc. is the managing partner of Ni Ti Power and is the applicant and permit-holding entity for the *Energy Resource Activities Act* (ERAA) application and associated authorizations, acting in its capacity as managing partner of Ni Ti Power.

This Quality-of-Life Memorandum has been prepared to support the renewable energy project permit application to the BC Energy Regulator (BCER) under the ERAA and provides the community around the proposed Project with information on possible interactions with values that participants in engagement activities have indicated are important. This report is provided to the Fraser Lake and Stellat'en community around the Project to support their engagement in the ERAA approval process.

1.1 Project Description

The proposed Project is located in the unceded territories of the Stellat'en and Nadleh Whut'en First Nation (Nadleh Whut'en), and neighbouring Nations: Skin Tyee Nation, Nee Tahi Buhn Indian Band, and Saik'uz First Nation. The Project area is accessed directly off Highway 16 via Holy Cross Forest Service Road (FSR; see Figure 1). The Stellat'en community of Stellaquo and the Village of Fraser Lake are the closest communities to the Project area, approximately 14 km north of the Project. Infrastructure for the Project is sited on provincial Crown land within the Regional District of Bulkley-Nechako.

Stellat'en participates in the Project as both a rights-holder and equity partner, and expects Project planning, assessment, construction, operations, and reclamation activities to align with the principles of free, prior, and informed consent and meaningful Indigenous participation and stewardship governance.

When complete, the Project will consist of up to 30 wind turbines, with associated overhead and buried collector lines, new and upgraded access roads, three meteorological towers, an operations and maintenance facility, a substation, and an approximately 25-km, 230 kV transmission line connecting the facility to BC Hydro's Glenannan Substation. During construction several temporary sites will also be developed, and later decommissioned: temporary laydown areas, a batch plant, and borrow areas. A groundwater well will also service construction needs and the operations and maintenance facility.

The construction phase is anticipated to begin in fall 2027. Construction and commissioning will take place over three years, with most activities occurring spring through late fall. If weather allows, the construction schedule may extend into December. The current schedule anticipates commercial operations starting in November 2029. During 2027 and 2028, construction will occur over a five-day week, with Saturday's being a contingency workday that might be used to maintain schedule. During turbine erection work in 2029, nighttime and seven-day work will occur to take advantage of all available low-wind periods for the necessary high elevation work.

The Project has an Electricity Purchase Agreement with BC Hydro for the 30-year operational life. At the end of this term, the Project may be re-powered under a re-negotiated Electricity Purchase Agreement or decommissioned. Decommissioning would take approximately two years and would include removal of turbines and associated infrastructure, recycling and disposal of materials, and land restoration.

1.2 Quality of Life Assessments

Renewable energy projects can have quality of life impacts that extend beyond the project boundaries. To uphold the quality of life indicators that are identified by the BCER[1,2] and the community, Ni Ti Power is required to identify the potential impacts. Where those impacts are determined to be likely, Ni Ti Power needs to develop mitigation measures.

Quality of life is defined by the International Association of Impact Assessment as "the general wellbeing of an individual, differing from standard of living in that it includes all the subjective, non-economic dimensions of life."[3] This Quality-of-Life Memorandum describes the timing, geographic area, and nature of potential quality of life impacts within 1.5 km of the Project area. The potential for impacts is variable, and to address this the evaluation has considered the Project's life cycle through the construction, operation, and decommissioning phases. The quality-of-life indicators that BCER guidance asks applicants to consider for wind projects are, at a minimum, traffic and access management, noise, light, dust, and shadow flicker. Based on engagement feedback, viewscape is also discussed in this memorandum.

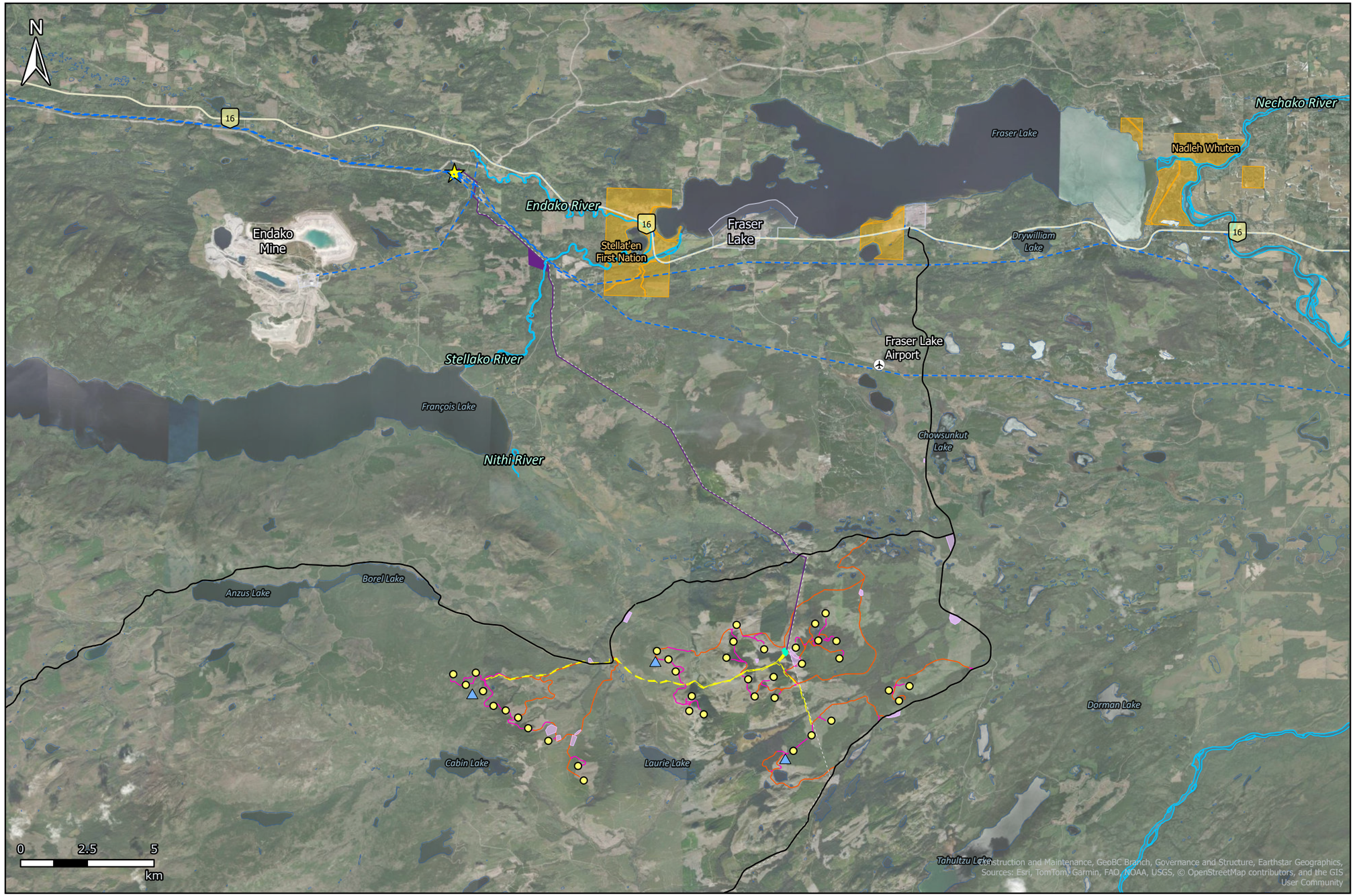
This quality of life assessment draws on professional studies and assessments, the authors' professional experience in renewable energy, and BCER best practice guidelines to characterize potential impacts on quality-of-life. It also incorporates input received through engagement with First Nations, rights holders, landowners, local authorities, federal bodies, and interested parties in the community. Engagement sessions in the communities have provided valuable information to develop these assessments. Given the Project's location is well away from residential habitation, changes to quality of life values are expected to be minor in areas where people are residing or using the land. Where changes were identified, mitigation measures and best practices are proposed to be implemented, as is outlined in this memorandum. Based on the assessment findings, the Project is not expected to substantially affect nearby residents' and community quality-of life.

Ni Ti Power will continue to seek and consider feedback from First Nations, rights holders, landowners, local authority, federal bodies, and interested parties in the community as the Project is developed. Comments can be sent to, quoting Application Determination (AD) number 100122480:

Ni Ti Power
niti_mountain@innergex.com
778-554-1652

British Columbia Energy Regulator (BCER)
#201 - 1110 6th Ave
Prince George, BC, V2L 3M6
https://www.bc-er.ca/contact/

[1] Renewable Energy Project Regulations. Available at: Renewable Energy Projects Regulation.
[2] BC Energy Regulator. 2026. Draft Proposal: Interim Guidance for Renewable Energy Permit Applications. 43 pp. Available at: BCER Guidance.
[3] Vanclay, F. et al. 2015. Social Impact Assessment: Guidance for assessing and managing the social impacts of projects. Prepared for the International Association of Impact Assessment. 107 pp. Available at: Social Impact Assessment Guidance - IAIA.





LEGEND

- Point of Interconnection (Glenannan Substation)
- Wind Turbine
- Met Mast
- Project's Transmission Line Construction Corridor
- Overhead Collector Lines
- Blackwater Transmission Line - Orthophoto Delineated
- Existing BC Transmission Lines
- O&M Building & Substation
- Laydown/Borrow Area
- First Nation Reserve
- Municipal Boundary
- Highway 16
- Forest Service Roads
- New Roads
- Existing Roads

NOTES & SOURCES:

- THIS FIGURE IS FOR ILLUSTRATIVE PURPOSES ONLY AND SHOULD BE INTERPRETED IN THE CONTEXT OF THE ACCOMPANYING REPORT.
- THE PROJECT'S FINAL DESIGN IS UNDER DEVELOPMENT AND SUBJECT TO CHANGE BEFORE APPLICATION SUBMISSION.
- THIS LAYOUT INCLUDES ALTERNATIVE TURBINE LOCATIONS. AT COMPLETION, THE PROJECT WILL HAVE A MAXIMUM OF 30 TURBINES
- PUBLIC DATA: PROVINCE OF BRITISH COLUMBIA

Projection: NAD 1983 UTM Zone 10N	Project: NI TI MOUNTAIN WIND PROJECT	Figure: 1
Scale: 1:150,000	Prepared for: NI TI MANAGING PARTNER INC.	
Dated: 2026-09-23		
LEGACY ENVIRONMENTAL	Title: **PROJECT OVERVIEW**	

2.0 Feedback Heard to Date

Stellat'en initially led engagement with neighbouring First Nations regarding the potential for a wind energy project when the Project's investigative licence was obtained in 2012. Ni Ti Power began formal engagement on the Project with Stellat'en members, Nadleh Whut'en, Skin Tyee Nation, and Nee Tahi Buhn Indian Band in late 2023, and Saik'uz First Nation in 2024. Community engagement on the Project began in 2024.

In early 2026, Ni Ti Power specifically sought feedback on potential Project-related impacts on quality-of-life, including effects on operations and activities, in accordance with Section 6 of the Renewable Energy Projects Regulation (REPR). This engagement included contact with surrounding First Nations, rights holders (as defined under the Requirements for Consultation and Notification Regulation), landowners, local authorities, federal bodies, and interested parties.

Feedback received to date from First Nations, rights holders, the Regional District of Bulkley-Nechako, and interested parties in the community includes concerns about traffic and access management, noise, lighting, shadow flicker, viewscapes, and health. Ni Ti Power has received concerns that noise, shadow flicker, lighting, and changes to the landscape could contribute to stress, anxiety, sleep disruption, and reduced enjoyment of the area by residents and land users. Project interactions with quality-of-life indicators outlined in the BCER guidance are discussed in Section 3.0.

Additional concerns raised during engagement include potential impacts to environmental values, cultural heritage, land use, and impacts to tenured guide outfitter operations, as well as concerns about decommissioning and reclamation. This feedback is addressed in other BCER-required application documents. Potential impacts to environmental values and proposed mitigation measures will be discussed in the Adverse Impacts Report. Potential effects on housing, communities, and local infrastructure and proposed mitigation measures are discussed in the Social and Economic Impacts Report. Mitigation measures for cultural values and traditional land use will be presented in the Project's Cultural Heritage Plan. The Adverse Impacts Report, Social and Economic Impacts Report, and Cultural Heritage Plan are being prepared as part of the ERAA Application. Decommissioning and restoration requirements will be addressed in the Project's Decommissioning and Restoration Plan, which is required by BCER.

Ni Ti Power will continue to engage directly with these parties to discuss concerns and mitigation measures.

3.0 Potential Impacts to Quality-of-Life Indicators

In the sections below we present details on Project interactions with each quality-of-life indicator, how the Project could change these indicators, and the mitigation measures that Ni Ti Power is proposing to address and reduce impacts to quality-of-life.

3.1 Traffic and Access Management

Maintaining access to recreation sites, and forest service and resource roads surrounding the Project is important for supporting other land users' enjoyment and commercial use of the land. Access is also important for the provision of emergency services to and through the Project area. Ni Ti Power will maintain access to and through the Project area during operations; with restrictions only for safety, e.g., at the substation (fenced) and during potential winter ice-throw periods around the turbines. During construction, there will be temporary delays and restrictions to access through the Project area, and access to active work sites will be restricted.

From Highway 16, the Project will be accessed using Holy Cross FSR, which is used as access to local recreation sites, including Laurie Lake, and by other industrial users that are active in the area (see Figure 1). Ni Ti Power considered the anticipated duration and extent of access restrictions during the construction phase and the nature of Project activities to determine potential impacts to access for First Nations, rights holders, landowners, and other land users.

Most of the Project-related traffic activity and changes to access are anticipated to occur during construction and decommissioning. Users of Holy Cross FSR and other resource roads used to access the Project area may experience temporary restrictions or one-way traffic during construction to accommodate oversize load delivery, such as turbine blades, nacelles, tower sections, and the main power transformer. Temporary road closures may also occur where roads require upgrading or widening. Similar closures may occur for roads leading to the proposed turbine sites; however, these roads, some of which will be newly constructed or upgraded to necessary standards, are not known to currently receive a high degree of public use. In addition, temporary closures may be required to support heavy crane lifts of wind turbine equipment. Road closures will be temporary and managed to keep the public safe and informed of the restrictions. Mitigation measures will be developed to limit closure periods, and to coordinate with First Nations, rights holders, landowners, local authorities, and interested parties to maintain a high standard of safety and access across the Project area. Ni Ti Power will account for the timing of MOTT load restrictions on Holy Cross FSR in construction planning.

To minimize impacts to other land users, Ni Ti Power will notify First Nations, rights holders, landowners, local authorities and interested parties ahead of these anticipated restrictions, and any closures. This information will also be posted on the Project's website. Initial notification will allow for further coordination and for local authorities or land user groups to repost or link to these notifications. This is intended to reduce potential conflicts and to allow users to plan when and how to access the area. Emergency service providers will be contacted with information on access changes and restrictions.

Recreational activities, such as snowmobile and ATV, occur in the Project area. Ni Ti Power will share road layout information with recreational users to support use and future planning (i.e., for new trail development to avoid the Project area), and will provide information on roads that will be upgraded or maintained during operations.

Apart from the temporary construction restrictions described above, changes to existing traffic within 1.5 km of the Project area are expected to be low. Project equipment will be delivered via Highway 16. Oversized loads, such as turbine components, require a Controlled Access Permit from the Ministry of Transportation and Transit (MOTT), which Ni Ti Power will obtain prior to delivery. Deliveries will also be coordinated with MOTT to minimize disruptions where oversized loads turn off Highway 16 into the Project area.

Use of the Project area during operations is expected to cause minimal disruptions to land users. An operations team of 5 to 10 people will access the Project area for periodic maintenance. This is not a material increase in vehicle traffic. Traffic during operations will consist primarily of pick-up trucks for routine maintenance, inspections, and vegetation control. Warning signage and temporary access restrictions may be used during periods of elevated winter risk (i.e., potential for ice throw).

Standard safety measures will apply during the construction, operations, and decommissioning phases on roads for which Ni Ti Power is responsible, such as two-way radio for road calling procedures, speed limits, and using flag persons when site-specific road restrictions are in place.

Ni Ti Power will develop an Access Management Plan (focused on road use agreements) and a Traffic Management Plan (focused on safety and traffic management), which will describe how access restrictions will

be managed in regard to public safety, rights and interests of First Nations, and land users, as well as shared road use agreements and road upgrades within the Project area. Access management details will also be included in the Construction Environmental Management Plan, to be developed ahead of construction, which will guide the protocols for communicating access management information.

3.2 Noise

Operational wind projects can generate noise that may affect nearby residents and land users. Wind energy projects in BC must follow the BCER Noise Best Practices Guidelines, which set acceptable sound levels for residential sites within 1.5km of Project infrastructure. Under these guidelines, a noise impact assessment must be completed if there are identified receptors (buildings regularly occupied by persons) within 1.5 km of noise-generating Project components (wind turbines and substations).

Qualified Professionals (QP) retained by Ni Ti Power confirmed that no identified receptors are located within 1.5 km of the proposed turbines or substation and concluded that a noise impact assessment is not required. As documented in Appendix A (Noise Impact Assessment Memo), the nearest identified receptor is located approximately 4 km north of the nearest proposed turbine location. Additionally, there are no identified receptors within 1.5 km of the proposed substation. Given the separation between proposed noise-generating components and identified receptors, operational noise effects on residents are expected to be limited.

Ni Ti Power recognizes the noise-related concerns raised during engagement and has considered research on these effects, including Health Canada's Wind Turbine Noise and Health Study, which focused on people living close to wind turbines. Although no residences are located within 1.5 km of the Project, Ni Ti Power will continue to engage with residents and land users who raise noise concerns.

Elevated noise levels may occur near active work areas during construction and decommissioning. This noise will be temporary and associated with specific activities. During turbine erection in fall to winter 2029, work is anticipated to occur up to 24 hours a day, seven days a week, to take advantage of low-wind periods. The nearest recreation site (Laurie Lake) is approximately 2 km from the nearest proposed turbine location. Potential noise effects on recreation users will depend on the location, timing, and nature of construction and decommissioning activities, but the duration of these activities in both construction and decommissioning periods is short (i.e., one to two years).

3.3 Light

As noted in Section 2.0, concerns were raised that Project lighting could contribute to stress, sleep disruption, and reduced enjoyment of the area by residents and land users.

During construction and decommissioning, temporary lighting may be required on cranes and around work areas for aviation safety, worker safety, and work activities. Night lighting will be needed during 2029 turbine erection, when work is anticipated to take place up to 24 hours a day, seven days a week.

During operations, the Project's main source of light will be aeronautical lighting required by Transport Canada on turbine towers and nacelles (the housing units at the top of turbine towers), along with lighting on meteorological towers. The number and type of navigation safety lighting on turbines needs to be approved by Transport Canada, but it is expected to be red lights, flashing periodically from a subset of the turbines.

The nearest receptor is approximately 4 km from the nearest proposed turbine, and the closest communities are approximately 14 km away. Throughout all phases of the Project lifecycle, light emissions are not expected

to impact quality-of-life, based on the distance between the Project and the nearest receptors. Project lights may also be visible to users of Laurie Lake and Mary Jane (26 Mile) recreation sites and could affect their enjoyment of nighttime views; however, this is expected to be minimal.

While most wind projects in Canada have standard aviation safety lighting, newer technology is being used in the industry to reduce visual impacts, notably at sites where turbine lighting could affect dark sky conditions. Ni Ti Power may consider variable-intensity lighting or similar technology to reduce nighttime light intensity during high-visibility conditions, taking into account the final turbine layout and potential visibility from nearby recreation sites, subject to acceptance by Transport Canada.

3.4 Dust

Dust is generated when construction and decommissioning activities release fine particles into the air. Sources may include construction of new roads and laydown areas, upgrades to existing unpaved roads, and increased vehicle traffic on the site access roads. Dust may spread beyond the Project area during vegetation clearing, road construction and grading, and transportation of heavy materials along access roads, particularly during dry conditions. During operations, dust generation is expected to be minimal because only a small site team (5 to 10 people) will only access the site for periodic maintenance and using mostly light-duty pickup trucks.

Ni Ti Power will manage fugitive dust and particulates during construction and decommissioning. Dust suppression measures may include applying water or another suitable dust suppressant to unpaved roads during dry conditions. Speed limits for Project vehicles will also help reduce dust generation and distribution. If water is needed for dust suppression or other construction uses, it will be sourced from the Project's groundwater well, an existing permitted water source, or a nearby waterbody in accordance with a temporary use approval under section 10 of the *Water Sustainability Act*.

3.5 Shadow Flicker

During operations, shadow flicker can occur at certain times of day when the sun is positioned behind a turbine's rotating blades relative to a nearby building. As the blades rotate, they cast moving shadows that, when passing across a window or other opening facing the turbines, cause alternating periods of light and shadow inside the building. This effect may cause visual disturbance or discomfort for occupants. The BCER requires a Shadow Flicker Assessment for wind energy projects where residence or receptors (buildings regularly occupied by persons) are located within 1.5 km of proposed turbine locations. Potential effects can be reduced through turbine siting that considers the location of receptors and site conditions such as intervening topographic or vegetation screens.

As noted in Section 2.0, concerns were raised that shadow flicker could contribute to stress, sleep disruption, and reduced enjoyment of the area by residents and land users. The receptor screening completed by Ni Ti Power, included as Appendix B, identified no receptors within 1.5 km of the proposed turbines. The nearest identified receptor is approximately 4 km from the nearest proposed turbine. Based on these findings, a shadow flicker assessment is not required, and shadow flicker effects at residence are not expected.

Shadow flicker is associated with rotating turbine blades during operation and is not applicable during construction and decommissioning.

3.6 Viewscapes

Visual changes to the landscape are a potential effect of wind energy projects due to the introduction of turbines and associated infrastructure into existing views. Although a formal visual impact assessment is not required by BCER for the quality-of-life assessment, potential visual effects were identified as a topic of interest during engagement. Concerns included changes to residents' and land users' enjoyment of the surrounding landscape. Stellat'en members specifically expressed concern that visual and sensory changes associated with the transmission line could affect their sense of place and peaceful enjoyment of the land.

Ni Ti Power completed visual assessment work to better understand potential changes to views of the Project area. A theoretical visibility map was prepared to identify areas within surrounding the Project area from which the Project may be visible (Figure 2). Shaded areas represent potential visibility without accounting for screening effects by vegetation, buildings, or other surface features. Actual visibility may therefore be more limited than shown. Two representative visualizations were also prepared from locations on Figure 2 to illustrate how the proposed Project would appear within the existing landscape (See Appendix C).

The assessment found that Project visibility varies depending on location, terrain, distance from the Project, and existing vegetation screening. At many viewpoints, topography and forest cover are expected to partially or fully screen the Project. Where visible, turbines are generally expected to appear along ridgelines or against the mountain backdrop, within a landscape that includes existing industrial and resource development activities. Visual changes are expected to be most noticeable from locations with relatively open views toward the Project area.

Project layout and turbine siting have considered opportunities to reduce visibility from surrounding viewpoints where feasible. As recommended by Stellat'en, the transmission line will follow the route of the existing Blackwater Gold Mine transmission line corridor to limit additional landscape disturbance and associated visual effects.

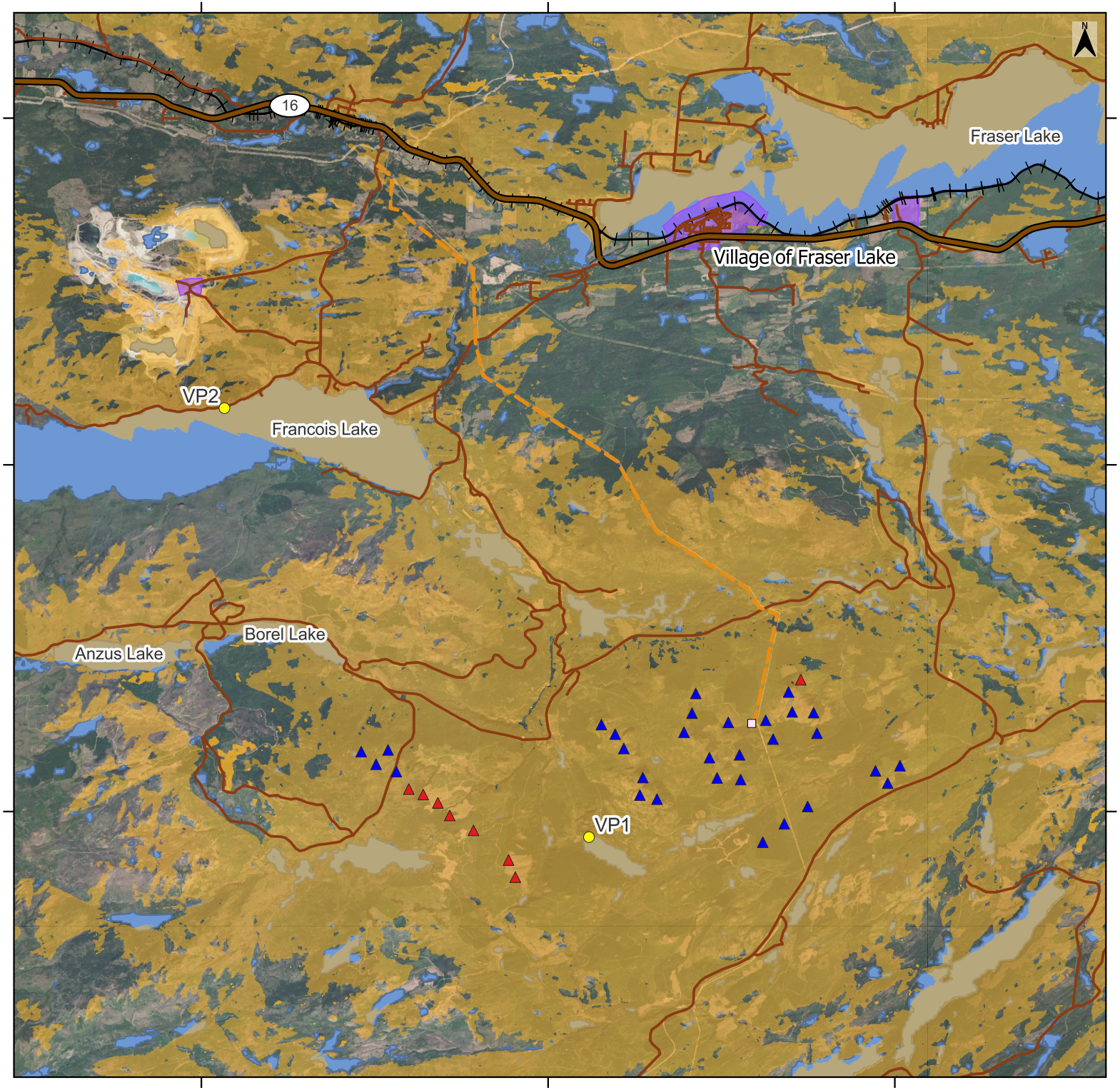


Figure 2: Ni Ti Mountain Wind Project ZTV and Viewpoint Map

Legend

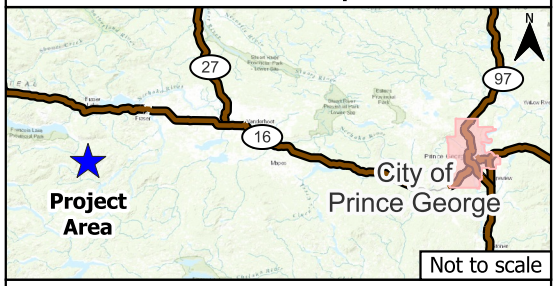
- Project Primary Turbine
- Project Alternate Turbine
- Project Substation
- Project Transmission Line
- Viewpoint

Zone of Theoretical Visibility (ZTV)

- Project Visible
- Road
- Highway
- Railway
- Waterbody
- Village of Fraser Lake

Notes: This map shows the theoretical zones where the Project may be observed within the study area. Features such as foliage and buildings are not considered.

Overview Map



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Coordinate System: EPSG:26910 - NAD83 / UTM zone 10N
Data Credits: Innergex, Green Cat Renewables Canada Corp., NRN, GoogleMaps, ESRI

Client: Ni Ti Mountain Power General Partnership

Drawing By:	Green Cat Renewables Canada Corp.
Version:	1.0
Author:	NA
Checked by:	JG
Approved by:	JG
Date:	2026-10-20

greencat Renewables

4.0 Closure

This memorandum describes the impacts of the Project on quality of life indicators raised by the community and as required by the BCER. The potential quality-of-life topics assessed in this memorandum found that the impacts from the Project from traffic, noise, light, dust, and shadow flicker are anticipated to be low to no impact either due to the proximity of the Project relative to residences or due to Project mitigation. The Project is in a rural location with no nearby residential properties, and there are not expected to be significant interactions with the public and community use of the Project area during the construction or operation phases. The primary interactions are expected on existing access roads during construction for the delivery of Project equipment, which will be conducted in coordination with MOTT and other users of the land. An expanded discussion of impacts and mitigation measures will be included in the following documents submitted under the ERAA permit application: Social and Economic Impacts Report, Adverse Impacts Report, Noise Impact Assessment Memorandum, and Shadow Flicker Assessment Memorandum, and the First Nations' Cultural Heritage Plan.

The Project's location and design sought to avoid or minimize impacts to quality-of-life by locating it away form residences. Ni Ti Power expects that, with the proposed mitigation measures, any remaining impacts on quality of life will be minimal throughout the construction, operations, and decommissioning phases. Ni Ti Power welcomes continued feedback on quality of life issues. If further concerns are raised through engagement, the application of additional mitigation measures will be explored.

Appendix A: Noise Impact Assessment Memorandum

Jacqueline Gallagher
Project Manager
Green Cat Renewables Canada Corporation

Laura O'Neill
Environmental Manager
Innergex Renewable Energy Inc.

June 30, 2026

Ni Ti Mountain Wind Project – Noise Impact Assessment Memo

The Ni Ti Mountain Wind Project (the Project) is a 200-MW Indigenous-majority-owned wind energy project owned and being developed by Ni Ti Mountain Power General Partnership (Ni Ti Power), which currently includes Stellat'en First Nation (Stellat'en) and Innergex Renewable Energy Inc. (Innergex). Nadleh Whut'en First Nation (Nadleh Whut'en) is also expected to join the Partnership by acquiring an equity interest in the Project. In 2024, the Project was selected as one of nine successful wind projects to receive an Electricity Purchase Agreement (EPA) through BC Hydro's 2024 Call for Power competitive Request for Proposal procurement process. The Project is located in the Bulkley-Nechako region of British Columbia (BC), immediately south of Fraser Lake and will include the installation of up to 35 utility scale wind turbine generators, collector lines, transmission lines, a substation, Operations and Maintenance (O&M) facility, site access roads, and temporary construction and laydown areas. The Proponent has retained Green Cat Renewables Canada Corp. (GCR) to prepare a noise impact assessment (NIA) for the Project.

Version 1.2 of the British Columbia Energy Regulator's (BCER) *Draft Proposal: Interim Guidance for Renewable Energy Permit Applications* (the Interim Guidance), released in January 2026, includes circumstances under which an NIA may be required in support of an Energy Resource Activities Act Permit application to construct and operate a renewable energy project. Specifically, the Interim Guidance states that an NIA is "required to be submitted if there is a receptor (building regularly occupied by persons) within 1.5km of potential noise sources".[1] The definition of a noise receptor is from version 2.4 of the *BC Noise Control Best Practices Guideline*, which specifies that regularly occupied buildings include "any permanently or seasonally occupied structure used for habitation for the purpose of human rest; […] with the exception of an employee or worker residence, dormitory, or construction camp located within an energy-related industrial plant boundary."[2]

Potential noise sources associated with the Project include wind turbine generators and interconnection infrastructure including an electrical substation. Receptors were identified using satellite imagery. The nearest receptor, as defined by the Interim Guidance, is located approximately 4km north of the nearest proposed turbine location, with all other turbines sited between 4km-11.5km, and approximately 5.8km north of the proposed substation. As there are no receptors within 1.5km of any Project noise source, an NIA is not required under the Interim Guidance. The Project area in relation to nearby receptors is shown below in Figure 1.

Given the substantial distance between the Project's potential noise sources and the nearest receptor, it is not expected that the Project will produce excessive noise at any receptor. It is in GCR's professional opinion that the potential for Project-related noise to result in an exceedance of applicable noise limits is very low. Accordingly, in alignment with the Interim Guidance, it has been determined that an NIA is not required for the Project.

[1] British Columbia Energy Regulator, *Draft Proposal: Interim Guidance for Renewable Energy Permit Applications* (Jan. 2026), Version 1.2, Chapter 2
[2] British Columbia Energy Regulator, *British Columbia Noise Control Best Practices Guideline* (Jun. 2024), Version 2.4, Appendix A

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If concerns are raised regarding the Project's noise level at the nearby receptors, the Proponent will engage with the impacted parties to investigate the concern and, where appropriate, identify and implement suitable mitigation measures.

Kind regards,



Jacqueline Gallagher

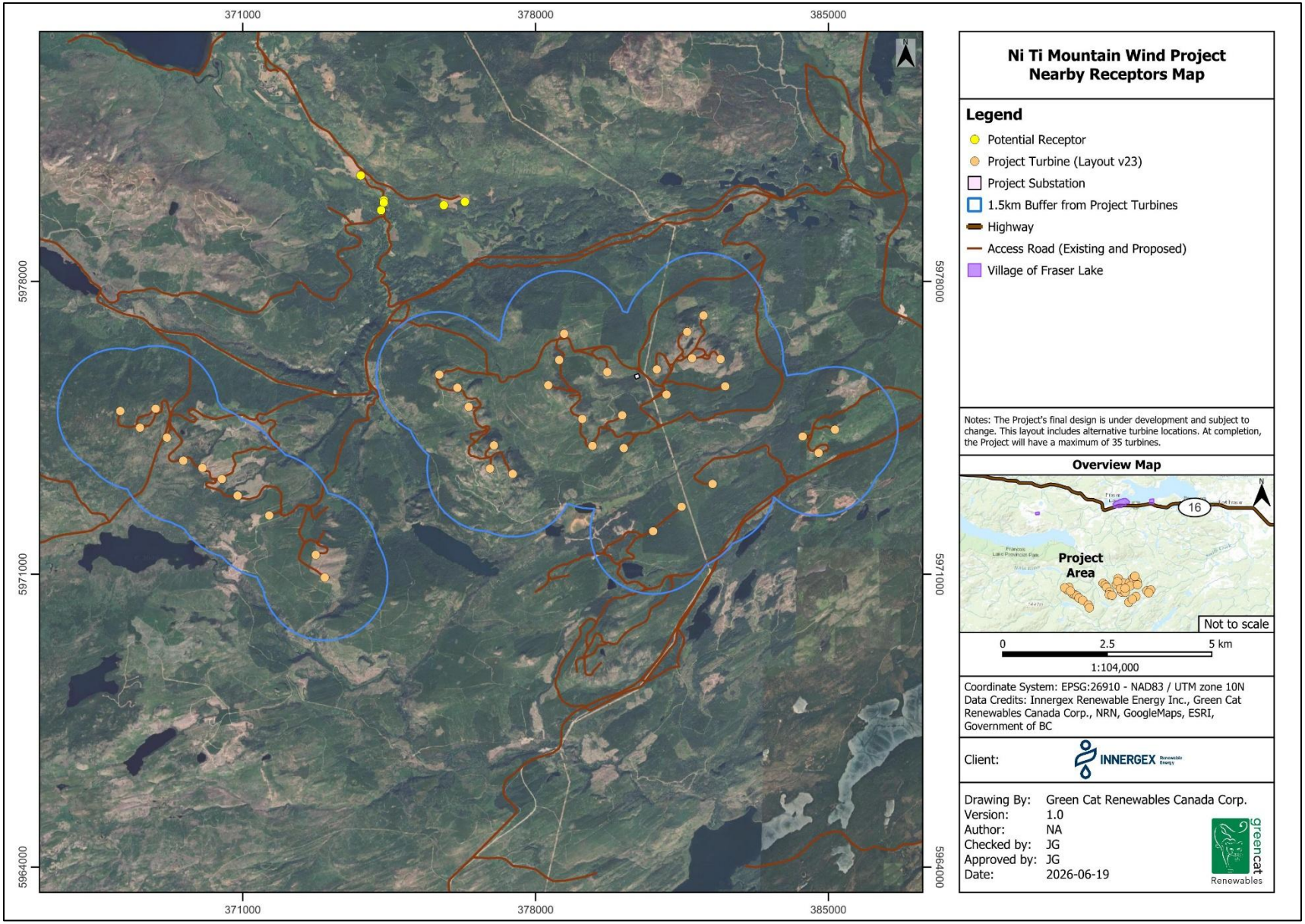

Figure 1: Project overview and relative location of nearby receptors

Appendix B: Shadow Flicker Assessment Memorandum

Jacqueline Gallagher
Project Manager
Green Cat Renewables Canada Corporation

Laura O'Neill
Environmental Manager
Innergex Renewable Energy Inc.

June 30, 2026

Ni Ti Mountain Wind Project – Shadow Flicker Assessment Memo

The Ni Ti Mountain Wind Project (the Project) is a 200-MW Indigenous-majority-owned wind energy project owned and being developed by Ni Ti Mountain Power General Partnership (Ni Ti Power), which currently includes Stellat'en First Nation (Stellat'en) and Innergex Renewable Energy Inc. (Innergex). Nadleh Whut'en First Nation (Nadleh Whut'en) is also expected to join the Partnership by acquiring an equity interest in the Project. In 2024, the Project was selected as one of nine successful wind projects to receive an Electricity Purchase Agreement (EPA) through BC Hydro's 2024 Call for Power competitive Request for Proposal procurement process. The Project is located in the Bulkley-Nechako region of British Columbia (BC), immediately south of Fraser Lake and will include the installation of up to 35 utility scale wind turbine generators, collector lines, transmission lines, a substation, Operations and Maintenance (O&M) facility, site access roads, and temporary construction and laydown areas. The Proponent has retained Green Cat Renewables Canada Corp. (GCR) to prepare a shadow flicker assessment (SFA) for the Project.

Version 1.2 of the British Columbia Energy Regulator's (BCER) *Draft Proposal: Interim Guidance for Renewable Energy Permit Applications* (the Interim Guidance), released in January 2026, includes circumstances under which an SFA may be required in support of an Energy Resource Activities Act Permit application to construct and operate a renewable energy project. Specifically, the Interim Guidance specifies that an SFA is "required to be submitted if there is a receptor (building regularly occupied by persons) within 1.5km of proposed operating area".[1] The definition of a shadow flicker receptor follows the same definition used for noise receptors. The definition is from version 2.4 of the *BC Noise Control Best Practices Guideline*, which specifies that regularly occupied buildings include "any permanently or seasonally occupied structure used for habitation for the purpose of human rest; […] with the exception of an employee or worker residence, dormitory, or construction camp located within an energy-related industrial plant boundary."[2]

Shadow flicker can only be observed under certain combinations of geographical position and time of day, when the sun may pass behind the rotor of a wind turbine and cast a moving shadow over a neighbouring residence. The shadow flicker effect is only experienced from within a building where the shadow passes over a window, or other opening, facing the project turbines.[3] Receptors were identified using satellite imagery. The nearest receptor, as defined by the Interim Guidance, is located approximately 4km north of the nearest proposed turbine location, with all other turbines sited between 4km-11.5km. As there are no receptors within 1.5km of Project turbines, an SFA is not required under the Interim Guidance. The Project area in relation to nearby receptors is shown below in Figure 1.

Given the substantial distance between the Project turbines and nearest receptor, the Project is not anticipated to cause shadow flicker impacts on nearby receptors. Any potential shadow flicker predicted for receptors farther than 1.5km from a turbine is expected to be far less impactful than for receptors closer to a turbine due to the decreased

[1] British Columbia Energy Regulator, *Draft Proposal: Interim Guidance for Renewable Energy Permit Applications* (Jan. 2026), Version 1.2, Chapter 2
[2] British Columbia Energy Regulator, *British Columbia Noise Control Best Practices Guideline* (Jun. 2024), Version 2.4, Appendix A
[3] P. Brinckerhoff, *Update of UK Shadow Flicker Evidence Base: Final Report* (London: UK Department of Energy and Climate Change, Mar. 2011) pg. 51-52.

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shadow definition at longer distances. Given the direction of the Interim Guidance, and the significant distance between the turbines and the receptors, it is GCR's professional opinion that a shadow flicker assessment is not required for this Project.

If concerns are raised regarding shadow flicker from the Project at the nearby receptors, the Proponent will engage with the impacted parties to investigate the concern and, where appropriate, identify and implement suitable mitigation measures.

Kind regards,



Jacqueline Gallagher

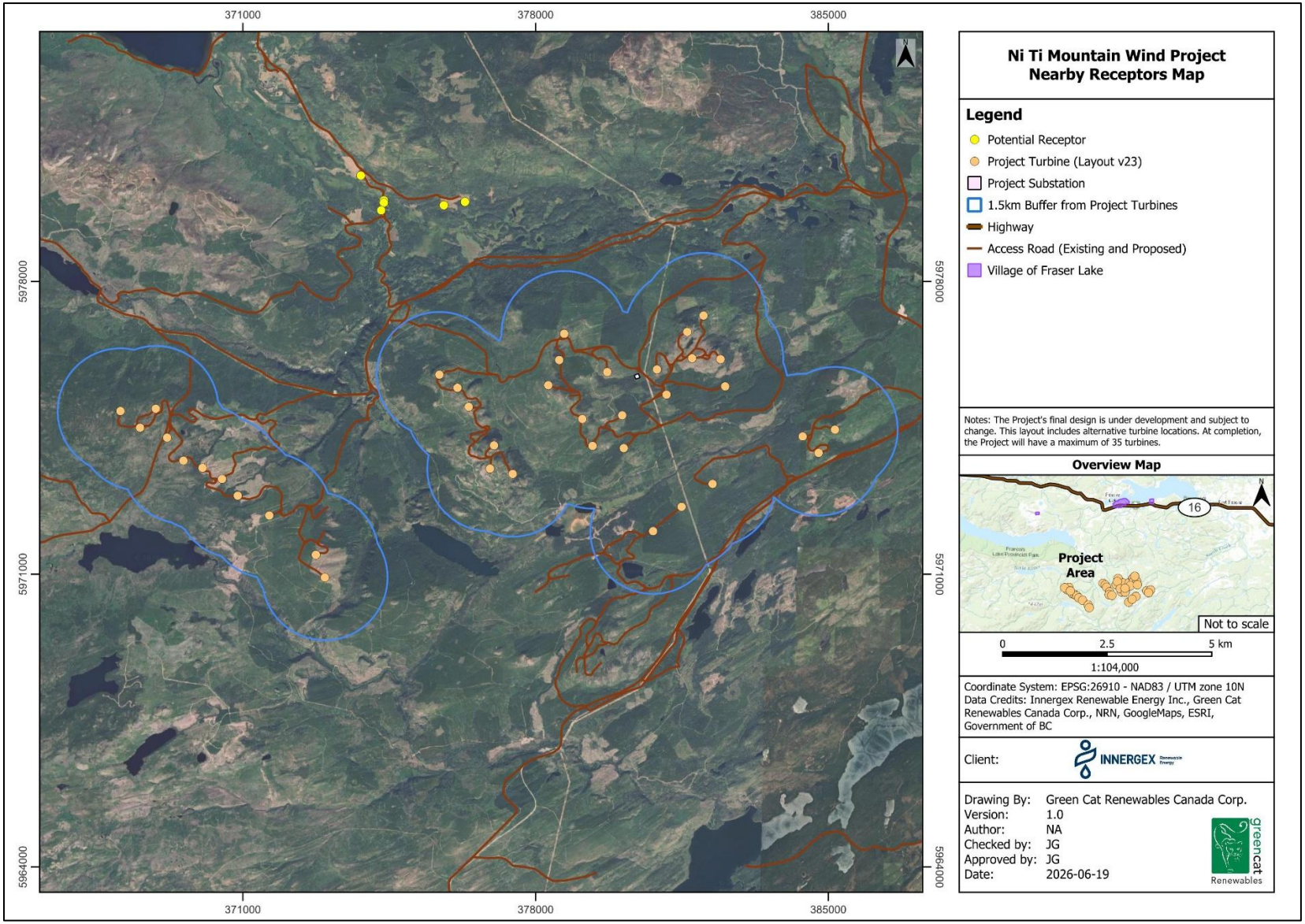
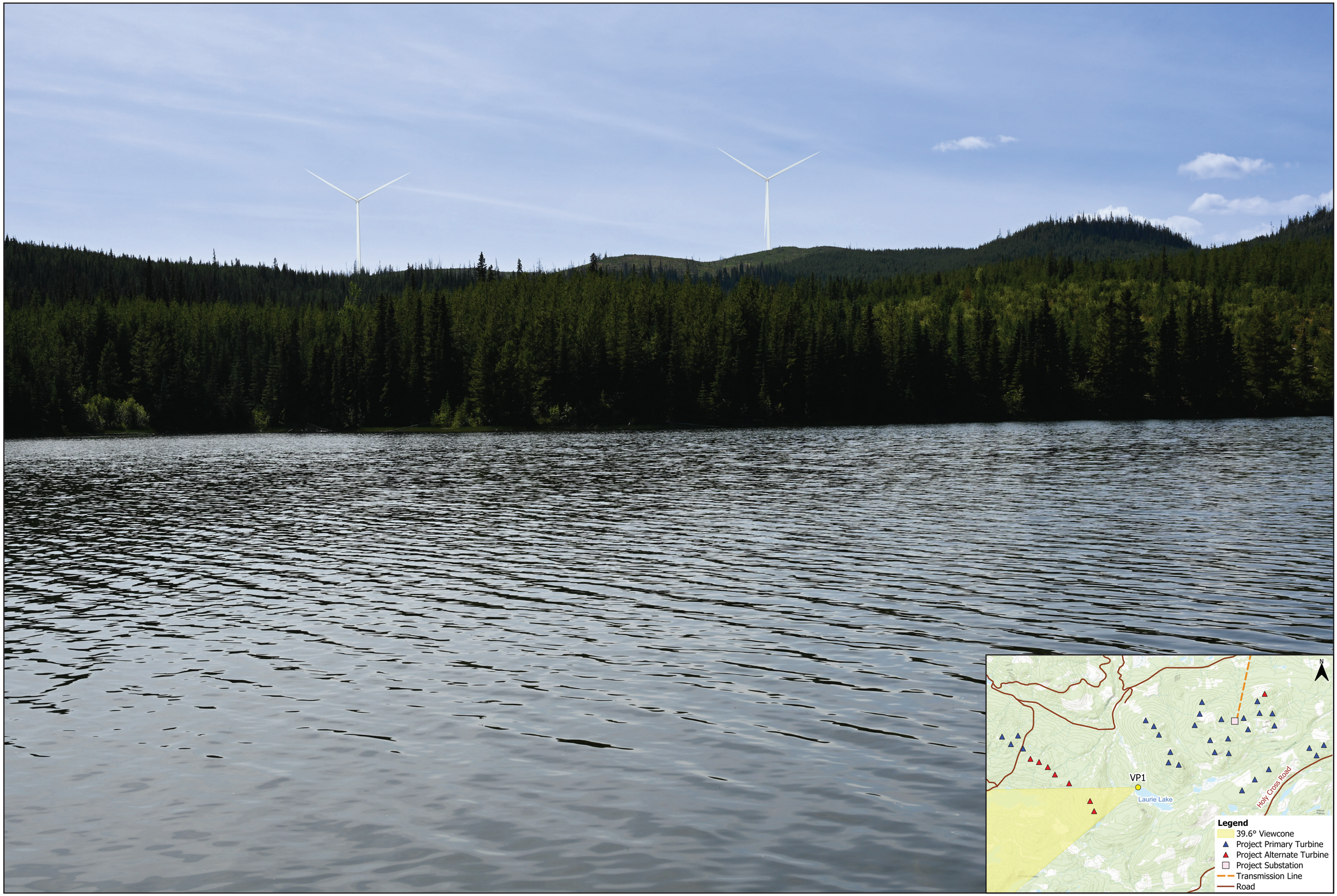


Figure 1: Project overview and relative location of nearby receptors

Appendix C: Viewpoint Visual Simulation

When viewed at a comfortable arm's length (approx. 500mm), this image is representative of our detailed central vision, but is not representative of scale and distance.



Viewpoint Location:	E375296 N5972193	**Field of View:**	39.6° (planar)	**Camera:**	Nikon Z5	**Author:**	SF
Viewpoint Elevation:	1038m ASL	**Paper Size:**	420 x 297mm	**Lens:**	50mm	**Checked by:**	JG
View Direction:	249°	**Printed Image Size:**	390 x 261 mm	**Camera Height:**	1.5 AGL	**Approved by:**	JG
Nearest Turbine:	2.7km			**Date and Time:**	2025-08-21 15:12	**Issued Date:**	2026-07-03

Viewpoint 1: Laurie Lake Recreation Site

Nordex N175 Turbine, 120m Hub Height

When viewed at a comfortable arm's length (approx. 500mm), this image is representative of our detailed central vision, but is not representative of scale and distance.



Viewpoint Location:	E363731 N5985801	**Field of View:**	39.6° (planar)	**Camera:**	Nikon Z5	**Author:**	SF
Viewpoint Elevation:	722m ASL	**Paper Size:**	420 x 297mm	**Lens:**	50mm	**Checked by:**	JG
View Direction:	118°	**Printed Image Size:**	390 x 261 mm	**Camera Height:**	1.5 AGL	**Approved by:**	JG
Nearest Turbine:	17.5km (in view) 11.7km (out of view)			**Date and Time:**	2025-08-21 17:15	**Issued Date:**	2026-07-03

Viewpoint 2: Francois Lake along Francois Lake Road

Nordex N175 Turbine, 120m Hub Height