Appendix B. Consultation

Appendix B.7. Draft ESR Comment and Responses

Caldwell First Nation

14 Orange Street, Leamington, Ontario, N8H 1P5
Phone: **519-322-1766** Fax: **519-322-1533**

Date: 6/27/2025

To: Jennifer Trotman, Environmental Planner, Hydro One Networks Inc.

RE: St. Thomas Line Project Class Environmental Assessment Draft Environmental Study Report

Report Review and Comments

Reference	Text Example	Comments
Hydro One Networks Inc. (2025). *St. Thomas Line Project Class Environmental Assessment Draft Environmental Study Report.* p 3-45	On March 17, 2025, TMHC emailed WIFN for participation for Stage 2 AA field work.	Note the error in referencing WIFN instead of CFN.
ibid. p 4-115	There are no First Nation reserve lands situated within the PSA or LSA.	While there are no reserve lands within the study area, the language does not reflect that this land is part of our Traditional Territory and that of the other First Nations in the area; or mention the land claim that Chippewa of the Thames FN have on part of the land. Territorial acknowledgment is one of the first steps to the Truth portion of Truth & Reconciliation.
ibid. p 5-174	The Socio-Economic environment category comprises nine criteria, as shown in Error! Reference source not found.	Note the error code in the first sentence. One can assume the text is referencing Table 5-2:Socio-Economic Environment Category Criteria but we wanted to bring this to Dillon's attention.

ibid. p 5-181	Table 5-5 through Error! Reference source not found. summarizes the weights applied to each criterion within a factor grouping.	Similar to the above comment, noting the error code in the document.
ibid. p 6-209	Hydro One recognizes a changing climate is likely to result in an increase of unusual weather patterns and severe weather events, which could potentially damage or adversely affect infrastructure and other public facilities.	The Environment and Consultation Department (ECD) is glad to see the potential impacts of the climate crisis considered in the development of this project.
ibid. p 7-218	Where incompatible vegetation must be removed (e.g., hedgerows), these areas will be restored with compatible vegetation (e.g., shrubs, forbs) in discussion with landowners.	The ECD requests that native vegetation is planted during restoration activities, not just compatible vegetation.
ibid. p 7-228	Formal cleanup and site restoration (e.g., restoration planting and seeding) will further minimize this potential effect as construction progresses and is completed.	Similar to the above comment, the ECD recommends any restoration planting or seed mixes be composed of native seeds. This is a consistent standard our Department has for all restoration and planting activities.
ibid. p 7- 245	The effects of any dewatering activities during construction are expected to be temporary, and groundwater levels and flows are expected to return to pre-construction conditions following the construction period.	How is this assessed, i.e. are ground water measurements taken prior and post construction to ensure there is a return to appropriate levels?
ibid. p 7- 249	Wetland areas impacted during construction (directly or indirectly) will be restored to pre-construction drainage patterns.	It is good to see acknowledgement of the cultural significance of wetlands and planning in place for potential impacts to wetlands. Hydro One should strive to counterbalance the residual net effects of a project with environmental benefits that

		surpass industry standards and legislative requirements, considering the cumulative impacts experienced within the treaty territory.

Respectfully,

Zack Hamm
Department Manager, Environmental & Consultation
Caldwell First Nation
226-936-2940
ecd.manager@caldwellfirstnation.ca

No.	Reference	Text Example	CFN Comment	HONI Response
1.	Hydro One Networks Inc. (2025). St. Thomas Line Project Class Environmental Assessment Draft Environmental Study Report. p 3-45	On March 17, 2025, TMHC emailed WIFN for participation for Stage 2 AA field work	Note the error in referencing WIFN instead of CFN.	On behalf of our EA Consultants, we sincerely apologize for the inadvertent error in the recipient's address. This will be corrected in the final report.
2.	ibid. p 4-115	There are no First Nation reserve lands situated within the PSA or LSA.	While there are no reserve lands within the study area, the language does not reflect that this land is part of our Traditional Territory and that of the other First Nations in the area; or mention the land claim that Chippewa of the Thames FN have on part of the land. Territorial acknowledgment is one of the first steps to the Truth portion of Truth & Reconciliation	Although there is no First Nation reserve lands situated within the PSA or LSA, Hydro One acknowledges that this work will be occurring within the traditional territory of the Anishinaabeg and the Attawandaron peoples, including the Council of Three Fires and Caldwell First Nation. Hydro One also acknowledges that these lands are covered by the McKee Treaty signed with the Council of Three Fires. We will include language acknowledging the Traditional Territory of the First Nations in the final report.
3.	ibid. p 5-174	The Socio-Economic environment category comprises nine criteria, as shown in Error!	Note the error code in the first sentence. One can assume the text is referencing Table 5-2: Socio-Economic Environment Category Criteria but we wanted to	Thank you for pointing out this error code for Table 5-2. We will ensure this is updated in the final version of the report.

No.	Reference	Text Example	CFN Comment	HONI Response
		Reference source not found.	bring this to Dillon's attention.	
4.	ibid. p 5-181	Table 5-5 through Error! Reference source not found. summarizes the weights applied to each criterion within a factor grouping	Similar to the above comment, noting the error code in the document.	Thank you for pointing out this error code for Table 5-5. We will ensure this is updated in the final version of the report.
5.	ibid. p 6-209	Hydro One recognizes a changing climate is likely to result in an increase of unusual weather patterns and severe weather events, which could potentially damage or adversely affect infrastructure and other public facilities	The Environment and Consultation Department (ECD) is glad to see the potential impacts of the climate crisis considered in the development of this project.	Thank you for your comment.
6.	ibid. p 7-218	Where incompatible vegetation must be removed (e.g., hedgerows), these areas will be restored with	The ECD requests that native vegetation is planted during restoration activities, not just compatible vegetation	Hydro One will collaborate with CFN and other Nations, if interested, to share traditional ecological insights, focusing on feedback on the selection of native plant species for compatible vegetation restoration. Hydro One shared a list of candidate species suitable for the corridor with CFN for feedback. CFN provided a list of native

No.	Reference	Text Example	CFN Comment	HONI Response
		compatible vegetation (e.g., shrubs, forbs) in discussion with landowners		species for consideration. Hydro One will engage with CFN and the other Nations for community-led biodiversity initiatives related to the project during and post construction.
7.	ibid. p 7-228	Formal cleanup and site restoration (e.g., restoration planting and seeding) will further minimize this potential effect as construction progresses and is completed.	Similar to the above comment, the ECD recommends any restoration planting or seed mixes be composed of native seeds. This is a consistent standard our Department has for all restoration and planting activities.	Please refer to above response.
8.	ibid. p 7- 245	The effects of any dewatering activities during construction are expected to be temporary, and groundwater levels and flows are expected to return to pre-construction conditions following the construction period.	How is this assessed, i.e. are ground water measurements taken prior and post construction to ensure there is a return to appropriate levels?	Should construction dewatering be required, effects on groundwater would be ephemeral with a zone of influence measured in the range of tens of meters. The effect would be limited to the construction phase only, and therefore temporary. During the pending Geotechnical Investigation, inferred groundwater levels will be measured and reported at all assessment locations. Our consultants will make dewatering recommendations based on the inferred water table and depth of our planned excavations and soil works. Dewatering volumes will also be tracked during construction.

No.	Reference	Text Example	CFN Comment	HONI Response
9.	ibid. p 7- 249	Wetland areas impacted during construction (directly or indirectly) will be restored to pre-construction drainage patterns.	It is good to see acknowledgement of the cultural significance of wetlands and planning in place for potential impacts to wetlands. Hydro One should strive to counterbalance the residual net effects of a project with environmental benefits that surpass industry standards and legislative requirements, considering the cumulative impacts experienced within the treaty territory.	Working near or in waterbodies and wetland features, or using/establishing crossings, may be required for access and to facilitate construction works on this project. All work within Conservation Authority Regulated Lands will be executed in compliance with applicable permits and/or approvals, and with standard best practices in mind. Temporary crossings will be decommissioned as soon as possible after use is discontinued. Site restoration to stabilize exposed soils and re-establish vegetation will be completed, along with restoring features to pre-construction drainage patterns. Localized patches of vegetation (<5 m^2) will be allowed to re-establish naturally or seed with native grasses (no fertilizer application). Larger disturbed areas (>5 m^2) will be restored with native seed mix, with meadow marsh seed mix considered near or in wetland areas. Synthetic monofilament mesh/netting will be avoided to prevent harm to wildlife.

Ministry of the Environment, Conservation and Parks

Environmental Assessment Branch

1st Floor
135 St. Clair Avenue W
Toronto ON M4V 1P5
Tel.: 416 314-8001
Fax.: 416 314-8452

Ministère de l'Environnement, de la Protection de la nature et des Parcs

Direction des évaluations environnementales

Rez-de-chaussée
135, avenue St. Clair Ouest
Toronto ON M4V 1P5
Tél. : 416 314-8001
Téléc. : 416 314-8452

Via E-mail Only

July 2, 2025

Jennifer Trotman
Hydro One
Jennifer.Trotman@hydroone.com

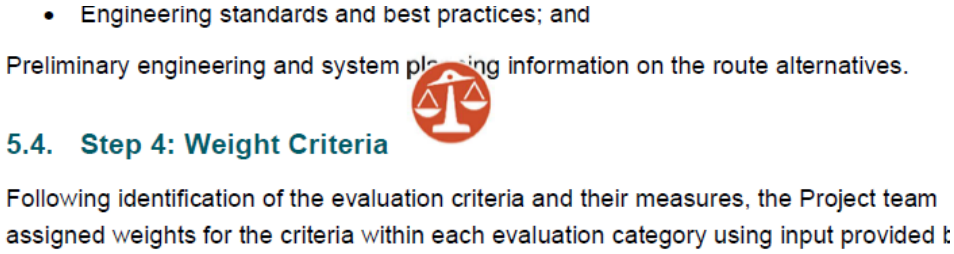
Re: St Thomas Transmission Line Project
Hydro One
Transmission Class Environmental Assessment
Project Review Unit Comments – Draft Environmental Study Report

Dear Jennifer,

Thank you for providing the ministry with an opportunity to comment on the draft Environmental Study Report (Report/ESR) for the above noted Class Environmental Assessment (EA) project. The Ministry of the Environment, Conservation and Parks (ministry) provides the following comments for your consideration.

General

1) Please remove or place the weight logo somewhere that isn't blocking the text on p. 205 of the ESR.


- Engineering standards and best practices; and

Preliminary engineering and system pl ing information on the route alternatives.

5.4. Step 4: Weight Criteria

Following identification of the evaluation criteria and their measures, the Project team assigned weights for the criteria within each evaluation category using input provided b

Indigenous Engagement

2) It is noted that Section B3 of Appendix B contains the Indigenous Communities Communications. It contains communications with Aamjiwnaang and Caldwell First Nations. However, communications with other indigenous communities are missing. Please include all communications with all the indigenous communities that were consulted with.

Noise and Vibration

3) MECP expects that a noise report be prepared to support the ESR for this EA project. Ministry Documents: attached (Guideline and supporting documentation) are two Ministry guidelines for the assessment of high voltage transmission line projects. Please ensure that the noise report is prepared in accordance with these two Ministry documents.

    A) Publication NPC-360, (Protocol for Predicting Audible Noise from HV Transmission Lines), of the document titled "Protocol for the Measurement and Prediction of Audible Noise from HV Transmission Lines (Final Draft)" - Publication NPC-360 dated March 31, 2011 (Ver. 2); and

    B) The example acoustic assessment report for high voltage transmission lines titled "Acoustic Assessment Report, ACME Power Generation, Proposed Green Valley High Voltage Transmission Line, Main Road to Secondary Road Anytown, Ontario" dated April 6, 2011

4) Construction Noise and Vibration: Reference should be made to Ministry Publications NPC-115 "Construction Equipment", NPC-118 "Motorized Conveyances", and NPC-119 "Blasting". Reference should also be made to local municipal noise and vibration by-laws, where applicable.

5) Operational Noise: Publication NPC-360 dated March 31, 2011 is applicable for high voltage (HV) transmission lines similar to the one under consideration. Publication NPC-300 is applicable for stationary sources such as transformer substations. The noise assessment for this HV transmission line should be prepared in accordance with Publication NPC-360, while the assessment of transformer substations should be prepared in accordance with Publication NPC-300. It is recommended that all efforts should be made at this stage of the project to identify the predictable worst-case noise impact of the project and if required, investigate noise mitigation measures due to the potential complexities and costs related to post-design or post-construction of the transmission line and transformer substations.

6) Points of Reception: list all points of reception on both sides of the proposed transmission line. It should be noted that an assessment of predicted audible noise (i.e., operational audible noise) is not required for transmission lines of 600 kV or less where the location of a point of reception exceeds 200 metres from the closest edge of the right-of-way (Part A of Publication NPC-360).

7) Vacant lots: noise sensitive vacant lots and approved (future) developments should be considered in the noise and vibration report.

8) Vibration: identify buildings / receptors that are sensitive to vibration due to construction blasting and piling.

9) Assessment: the noise and vibration impact assessments of all the project components referenced in item 1 above should be included in the noise report. The noise assessment should follow the guidance in item 3A and 3B above. The vibration assessment should follow the guidelines in Publication NPC-119 for Blasting and Publication NPC-207 "Impulse Vibration in Residential Buildings" for piling (impulse vibration).

10) UTM coordinates of the PORs: considering the extensive length of this transmission line (approximately 20 km), the UTM coordinates for all selected points of reception and vacant lots should be listed in the noise report and provided in an Excel file.

11) Air Emission Environmental Activity and Sector Registry (AE EASR): Hydro One should check if the Buchanan Transformer Station (TS) in London and the proposed new Centennial Transformer Station in St. Thomas require AE EASR Approval from MECP

Species at Risk

12) The Protect Ontario by Unleashing our Economy Act, 2025 (Bill 5) received Royal Assent on June 5, 2025, and as a result, the Endangered Species Act, 2007 (ESA) has been immediately amended and will be in effect until such time as the Species Conservation Act (SCA) is proclaimed. The amendments to the ESA are outlined in the Environmental Registry proposal posting. A decision posting reflecting the passing of Bill 5 can be found here.

The amended ESA and proposed SCA legislation can be found below:
Endangered Species Act, 2007, S.O. 2007, c. 6 | ontario.ca
Species Conservation Act, 2025, S.O. 2025, c. 4, Sched. 10 | ontario.ca

Page 188 (4-163) :

- Please note that a new habitat definition has replaced the previous definition in the ESA and "harass" has been removed from the prohibitions regarding harms to species. The habitat regulations outlined in Ontario Regulation 831/21 no longer apply and is only applicable to authorizations previously issued or registered for conditional exemptions already completed prior to Royal Assent, **except** for Black Ash. Regulated habitat for Black Ash remains the same. For questions specific to the amended ESA, please email ESAReg@ontario.ca.
- Please note conditional exemptions under Ontario Regulation 242/08 continue to apply under the emended ESA. For questions specific to the amended ESA, please email ESAReg@ontario.ca.

Page 278 (7-253):

- To mitigate impacts to species at Risk Bats (including the newly listed migratory species), tree removals should take place during the non-active bat period. To accommodate the newly listed species, the active timing periods for bats are as follows:
    - March 15 – November 30: Eastern Small-Footed Myotis
    - April 1 – November 30: Hoary Bat, Silver-haired Bat &Eastern Red Bat
    - April 1 – September 30: Little Brown Myotis, Northern Myotis & Tri-coloured Bat

MECP is aware that Information Gathering Form (IGF) and C-Permit Application Form (CPAF) are being prepared concurrently with the Class EA process. Please note, there are no longer specific permit types under the amended ESA and permits now have simplified requirements. Please see the attached information addressing the changes to the amended ESA and guidance on what should be included in IGF and CPAF forms during the interim period.

At this time, the ESA forms (e.g., Information Gathering Form) can continue to be used and submitted to MECP at SAROntario@ontario.ca.

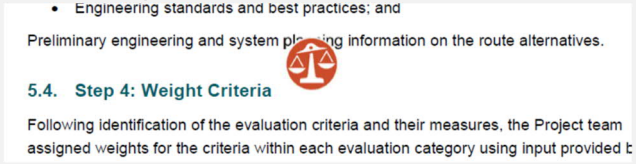
Thank you for circulating this draft Report for the ministry's consideration. Please document the provision of the draft Report to the ministry as well as this Project Review Unit Comments letter in the final report, and please provide an accompanying response letter to support our review of the final report. A copy of the final Notice should be sent to the ministry's Southwest Region EA notification email account (eanotification.swregion@ontario.ca).

Should you or any members of your project team have any questions regarding the material above, please contact me at monika.macki@ontario.ca.

Sincerely,

Monika Macki

Monika Macki
Environmental Resource Planner / EA Coordinator
Environmental Assessment Program Support, Environmental Assessment Branch
Ontario Ministry of the Environment, Conservation and Parks

No.	MECP Comments and Recommendations	Hydro One Response
1.	**General** Please remove or place the weight logo somewhere that isn't blocking the text on p. 205 of the ESR.  	We thank the MECP for this comment and have corrected the formatting on p. 205 in the ESR.
2.	**Indigenous Engagement** It is noted that Section B3 of Appendix B contains the Indigenous Communities Communications. It contains communications with Aamjiwnaang and Caldwell First Nations. However, communications with other indigenous communities are missing. Please include all communications with all the indigenous communities that were consulted with.	We thank the MECP for identifying the missing Indigenous communications in Appendix B. This will be addressed in the final version of the ESR.
3.	**Noise and Vibration** MECP expects that a noise report be prepared to support the ESR for this EA project. Ministry Documents: attached (Guideline and supporting documentation) are two Ministry guidelines for the assessment of high voltage transmission line projects. Please ensure that the noise report is prepared in accordance with these two Ministry documents. A) Publication NPC-360, (Protocol for Predicting Audible Noise from HV Transmission Lines), of the document titled "Protocol for the Measurement and Prediction of Audible Noise from HV Transmission Lines (Final Draft)" - Publication NPC-360 dated March 31, 2011 (Ver. 2); and	In Hydro One's experience on previous transmission line projects, standalone noise and vibration reports have not been requested by the MECP until recently for the St. Clair Transmission Line and Waasigan Transmission Line projects. It has also been noted by Hydro One that there is no clear guidance on this that has been formally published by the MECP. NPC-360 seems to still be marked as "final draft" and does not appear to be published publicly anywhere on the Ministry's website (in contrast to other established guidance such as NPC-300).

No.	MECP Comments and Recommendations	Hydro One Response
	B) The example acoustic assessment report for high voltage transmission lines titled "Acoustic Assessment Report, ACME Power Generation, Proposed Green Valley High Voltage Transmission Line, Main Road to Secondary Road Anytown, Ontario" dated April 6, 2011	The results of the recently completed noise assessment reports for the two above-mentioned transmission line projects show that Hydro One's 230 kV double-circuit transmission lines are well below the specified noise thresholds. As such, Hydro One does not plan to conduct a noise assessment for this provincial priority customer connection project. Hydro One management has enquired about setting up a meeting to engage with the MECP, which will include discussing the application of this policy on Hydro One's transmission lines.
4.	**Construction Noise and Vibration** Reference should be made to Ministry Publications NPC-115 "Construction Equipment", NPC-118 "Motorized Conveyances", and NPC-119 "Blasting". Reference should also be made to local municipal noise and vibration by-laws, where applicable.	We thank the MECP for this comment and will include references to NPC-115 "Construction Equipment", NPC-118 "Motorized Conveyances", and NPC-119 "Blasting" in **Section 7.5.6** of the final ESR. **Section 7.5.6** (Noise and Vibration) does refer to City of London Sound By-law-PW-12, 2021; Municipality of Central Elgin Noise By-Law No.212; and City of St. Thomas By-Law 160-2020) and specifies that Noise By-Law exemptions will be sought if work is required outside of the hours specified in the by-laws.
5.	**Operational Noise** Publication NPC-360 dated March 31, 2011, is applicable for high voltage (HV) transmission lines similar to the one under consideration. Publication NPC-300 is applicable for stationary sources such as transformer substations. The noise assessment for this HV transmission	We thank the MECP for providing these documents and note that NPC-360 seems to still be marked as "final draft" and does not appear to be published publicly anywhere on the Ministry's website (in

No.	MECP Comments and Recommendations	Hydro One Response
	line should be prepared in accordance with Publication NPC-360, while the assessment of transformer substations should be prepared in accordance with Publication NPC-300. It is recommended that all efforts should be made at this stage of the project to identify the predictable worst-case noise impact of the project and if required, investigate noise mitigation measures due to the potential complexities and costs related to post-design or post-construction of the transmission line and transformer substations.	contrast to other established guidance such as NPC-300). As per response #3, Hydro One does not intend to conduct a noise assessment for the proposed 230 kV double-circuit transmission line and is engaging with the MECP about the application of this policy at a broader level.
6.	**Points of Reception** List all points of reception on both sides of the proposed transmission line. It should be noted that an assessment of predicted audible noise (i.e., operational audible noise) is not required for transmission lines of 600 kV or less where the location of a point of reception exceeds 200 metres from the closest edge of the right-of-way (Part A of Publication NPC-360).	Please refer to response #3.
7.	**Vacant Lots** Noise sensitive vacant lots and approved (future) developments should be considered in the noise and vibration report.	Please refer to response #3 regarding the applicability of noise assessments. Vibration is expected to be minimal and temporary during the construction phase of the project. As such, any potential effects of vibration will not affect the future use or development of currently vacant lots.
8.	**Vibration** Identify buildings / receptors that are sensitive to vibration due to construction blasting and piling.	Thank you for your comment. To confirm, sensitive receptors will be identified in the project-specific Environmental Management Plan (EMP), for consideration when planning work such as implosive splicing locations. We will add this commitment to the final ESR in **Section 7.7.3** (Potential Environmental Effects and Mitigation Measures – Noise and Vibration).

No.	MECP Comments and Recommendations	Hydro One Response
		It should be noted that while implosive conductor splicing locations have not yet been determined, that implosive splicing locations will maintain a safe distance from sensitive receptors such as homes. While implosive splicing is the most reliable and commonly used method to splice sections of transmission-voltage conductor, in situations where splicing must occur in close proximity to sensitive receptors (e.g., at heavy angle locations where there may be adjacent houses), non-implosive methods such as compression sleeves will be used. Helical pile foundations are a low-vibration technique and are not anticipated to have any significant risk to structures outside of the ROW. Helical pile foundations were selected for use in part because of the low level of vibration associated with their installation.
9.	**Assessment** The noise and vibration impact assessments of all the project components referenced in item 1 above should be included in the noise report. The noise assessment should follow the guidance in item 3A and 3B above. The vibration assessment should follow the guidelines in Publication NPC-119 for Blasting and Publication NPC-207 “Impulse Vibration in Residential Buildings” for piling (impulse vibration).	As noted above in response #3, Hydro One does not plan to proceed with the preparation of a noise assessment for this project. Regarding sources of vibration, as mentioned in response #8 - the requirement for implosive conductor splicing and the locations has not yet been confirmed. If this activity is deemed to be required for the construction of the proposed transmission line, the implosive splicing locations will maintain safe distance from sensitive receptors such as homes.

No.	MECP Comments and Recommendations	Hydro One Response
		While implosive splicing is the most reliable and commonly used method to splice sections of transmission-voltage conductor, in situations where splicing must occur in close proximity to sensitive receptors (e.g., at heavy angle locations where there may be adjacent houses), non-implosive methods such as compression sleeves will be used. If it becomes apparent that implosive conductor splicing is required in close proximity to sensitive receptors, then we will follow the guidance referenced by the MECP in this comment. If helical pile foundations are used, they are a low-vibration technique and are not anticipated to have any significant risk to structures outside of the ROW.
10.	**UTM coordinates of the PORs** Considering the extensive length of this transmission line (approximately 20 km), the UTM coordinates for all selected points of reception and vacant lots should be listed in the noise report and provided in an Excel file.	Please refer to response #3 regarding the requested noise report.
11.	**Air Emission Environmental Activity and Sector Registry (AE EASR)** Hydro One should check if the Buchanan Transformer Station (TS) in London and the proposed new Centennial Transformer Station in St. Thomas require AE EASR Approval from MECP	The St. Thomas Line project involves constructing a transmission line from the new Centennial TS in St. Thomas to existing transmission lines approximately 5 km east of Buchanan TS. Hydro One submitted an EASR in July 2025 for the new Centennial TS under a separate project. As the

No.	MECP Comments and Recommendations	Hydro One Response
		St. Thomas Line project does not anticipate changes to Buchanan TS, or Centennial TS an EASR for this project is not applicable.
12.	**Species at Risk** The Protect Ontario by Unleashing our Economy Act, 2025 (Bill 5) received Royal Assent on June 5, 2025, and as a result, the Endangered Species Act, 2007 (ESA) has been immediately amended and will be in effect until such time as the Species Conservation Act (SCA) is proclaimed. The amendments to the ESA are outlined in the Environmental Registry proposal posting. A decision posting reflecting the passing of Bill 5 can be found here. The amended ESA and proposed SCA legislation can be found below: Endangered Species Act, 2007, S.O. 2007, c. 6 | ontario.ca Species Conservation Act, 2025, S.O. 2025, c. 4, Sched. 10 | ontario.ca Page 188 (4-163): - Please note that a new habitat definition has replaced the previous definition in the ESA and "harass" has been removed from the prohibitions regarding harms to species. The habitat regulations outlined in Ontario Regulation 831/21 no longer apply and is only applicable to authorizations previously issued or registered for conditional exemptions already completed prior to Royal Assent, **except** for Black Ash. Regulated habitat for Black Ash remains the same. For questions specific to the amended ESA, please email ESAReg@ontario.ca. - Please note conditional exemptions under Ontario Regulation 242/08 continue to apply under the emended ESA. For questions specific to the amended ESA, please email ESAReg@ontario.ca. Page 278 (7-253):	Thank you for providing the link to the amended ESA and Bill 5 information. Hydro One is working with Dillon Consulting to complete the Information Gathering Form (IGF) and C-Permit Application Form (CPAF) as per the amended ESA and will submit this package to MECP once complete.

No.	MECP Comments and Recommendations	Hydro One Response
	- To mitigate impacts to species at Risk Bats (including the newly listed migratory species), tree removals should take place during the non-active bat period. To accommodate the newly listed species, the active timing periods for bats are as follows: - March 15 – November 30: Eastern Small-Footed Myotis - April 1 – November 30: Hoary Bat, Silver-haired Bat &Eastern Red Bat - April 1 – September 30: Little Brown Myotis, Northern Myotis & Tri-coloured Bat MECP is aware that Information Gathering Form (IGF) and C-Permit Application Form (CPAF) are being prepared concurrently with the Class EA process. Please note, there are no longer specific permit types under the amended ESA and permits now have simplified requirements. Please see the attached information addressing the changes to the amended ESA and guidance on what should be included in IGF and CPAF forms during the interim period. At this time, the ESA forms (e.g., Information Gathering Form) can continue to be used and submitted to MECP at SAROntario@ontario.ca.	

From: Jennifer Trotman <Jennifer.Trotman@hydroone.com>
Sent: July 3, 2025 8:38 AM
To: hydroone+pj-00222@mh.boreal-is.com
Subject: Fw: Hydro One - St. Thomas Line Project - Draft Environmental Study Report
Attachments: MNR Southern Region Information Package – For External Proponent Environmental Assessments_Ver2.pdf

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From: Bale, Sarah (MNR) <Sarah.Bale@ontario.ca>
Sent: Monday, June 30, 2025 6:28 PM
To: Jennifer Trotman <Jennifer.Trotman@hydroone.com>
Subject: RE: Hydro One - St. Thomas Line Project - Draft Environmental Study Report

Hi Jennifer,

I have reviewed the draft ESR. I don't really have any comments at this time, it seems really well done, but just wanted to make sure that you are aware of the potential regulatory role of the MNR under the *Public Lands Act* and the *Fish and Wildlife Conservation Act*. I'm sure you understand the potential impacts of these types of projects better than I do and maybe you know permits under these pieces of legislation will not be required, but I just thought it didn't hurt to bring your attention to them since they are not listed in Table 1-1 regarding "Potential Required Permits, Licenses and Approvals". The relevant info about these regulatory roles is in the "MNR Southern Region Information Package" that I sent in response to the Notice of Commencement, and I will attach to this email for your convenience.

In Section 7.7.8.2 of the draft ESR, it states: "*In the event in-water works are required to support the construction of potential watercourse crossings, necessary permits and approvals from MECP, Conservation Authorities, and DFO would be obtained before the commencement of work*".

If I'm not mistaken, MNR should be added to the above list of agencies from whom a permit may be required.

Thanks so much,
Sarah

Project Title: Hydro One Network Inc (HONI)'s Class Environmental Assessment (CEA) for the proposed St. Thomas Line

Proponent: Hydro One Network Inc

RE: Review of the Hydro One Network Inc (HONI)'s Class Environmental Assessment (CEA) for the proposed St. Thomas Line

Through collaboration between the Three Fires Group (TFG) and their technical expert, the Chippewas of Kettle and Stony Point First Nation (CKSPFN) wish to provide the following comments, questions, and concerns to Hydro One Network Inc.

The following comments, concerns, and questions are a result of fulsome review of the Class Environmental Assessment for the proposed St. Thomas Line and internal discussions related to cumulative effects and species at risk.

We are thankful for the opportunity to review and provide comments to Hydro One Network Inc for their consideration on the proposed St. Thomas Line. We look forward to ongoing discussions throughout the next phases of the project related to mitigation planning, compensation and accommodation for lands taken up, procurement and employment, and continued involvement in detailed studies and monitoring.

At a high level, we are seeking additional information or greater clarity on the following:

- **Methodological Uncertainties:**
    - A multi-criteria analysis was conducted to select the preferred route alternative among three main routes. From this analysis, route alternative 3 was selected as the preferred route. However, the ESR does not clearly describe the methods used to conduct this analysis in a reproducible manner, leading to uncertainties about the results and conclusion that route alternative 3 should be the technically preferred alternative. We have included several comments about the technical methods used in this analysis that should be clarified by HONI before the ESR is finalized.
    - In addition to the methods used in the multi-criteria analysis, it is unclear what data was included in the analysis. Specific spatial datasets are not referenced, and ecological field survey methods are not described within the ESR. In some instances where ecological field surveys are mentioned, a report by Dillon (2024) is referenced. We have reviewed this report and comments specific to it are provided in Table 2 below. Even with the inclusion of this document there is still substantial detail missing about the ecological field survey protocols, timing, level of effort, and spatial coverage, making it challenging to assess whether these surveys were sufficient to support the ESR's conclusions.
    - Further, little guidance is provided on the interpretation of the multi-criteria

analysis results. Final weighted scores were produced, but sufficient information on their calculation and interpretation is not provided.

- **Restoration Opportunities:**
    - On-site restoration plans are mentioned in several instances where vegetation removal is proposed. However, given the nature of this project, there will be a need to remove "incompatible" vegetation (e.g., trees) and replace it with "compatible" CK shrubs and herbaceous plants. This does not represent true restoration given that there will be a permanent conversation from treed ecosystem types, and associated edge effects when this occurs in features like woodlands.
    - This conversation is proposed in woodlands, and in a deciduous swamp. Given that very little of the pre-colonization natural ecosystem extend remains in this area, if the proposed removals are deemed unavoidable, these losses should be offset. We have recommended that HONI and CKSPFN consider approaching this through the lens of reciprocal restoration, aiming for offset and restoration efforts to create opportunities for CKSPFN to connect meaningfully with restored lands and waters. Although not specified in the comment table, this could involve the co-development for the given ecosystem (e.g., offsets may need to be higher for a wetland that will take longer to establish), and monitoring and adaptive management plans.
    - It does not appear that HONI is currently considering a biodiversity initiative for this line.
- **Cumulative Effects:**
    - While it is beneficial that HONI has included a cumulative effects assessment, the methods currently used do not result in meaningful insights. The assessment largely concludes that there will be no "sufficient" cumulative effects but does not contextualize the conversion of ecosystems (e.g., the above-mentioned woodlands and wetland) in terms of the additive effect to cumulative ecosystem loss from both the past and the current PowerCo project. This context is crucial given how few natural features remain in this region. We've included a couple of examples of existing cumulative impacts contexts in the comment table, including that woodlands have declined from 80 to 11% in the Carolinian region, where this project is situated.
    - As mentioned in addition to examining cumulative effects in terms of the ecosystem that will be impacted, it would be beneficial for HONI to contextualize the expected cumulative impacts associated with this project. Currently, they include some other notable projects in the area, but without describing the link of these to the proposed project. For example, the PowerCo project that this transmission line will service is impacting a large area of land, and is likely to draw many additional workers to the area, potentially leading to additional urban development. This appears to be a possibility as the current cumulative effects assessment mentions a

servicing study near the line starting location in St. Thomas, but does not explicitly state these potential associated cumulative effects.

- The cumulative effects assessment should be revised before the ESR is considered final.

Detailed comments are provided below:

Table 1. Detailed commentary

Reference		**Comment**	**Recommendation**
Section	***Text***		
Executive Summary	*Comments and concerns received during the draft ESR review period will be recognized, considered, addressed, and documented. Hydro One will make best efforts to respond and resolve issues raised. Following the comment period, the ESR will be finalized in accordance with the Class EA. Upon completion of the Class EA process, the final ESR will be filed with the Ministry of the Environment, Conservation and Parks (MECP), and the Project will be considered acceptable to proceed as outlined in the final ESR. Necessary environmental approvals and permits will be obtained prior to construction.*	As described in the other comments throughout this table, the ESR currently presents large methodological uncertainties that make the results difficult to independently verify. These gaps include a lack of information on the ecological field survey protocols, timing, level of effort, and spatial coverage. They also include a lack of replicable details on how the multi-criteria analysis was completed. Further, the conclusions of the Indigenous Culture, Values, and Land Use multi-criteria analysis should be reviewed with us before they can be considered final.	The methodological gaps throughout the ESR must be addressed before it is finalized. The updated ESR should be provided to us for re-review once these gaps are addressed.

Reference		**Comment**	**Recommendation**
Section	***Text***		
	be imposed (e.g., require further studies). Such requests can only be made on the grounds that the requested order may prevent, mitigate, or remedy adverse impacts on constitutionally protected Aboriginal or treaty rights. The MECP will not consider requests on other grounds. Requests should include contact information, full name, specify the type of order requested, explain how the order may address potential adverse effects on Aboriginal and treaty rights, and provide supporting information. Requests should be sent in writing or email to the Minister of the Environment, Conservation and Parks and the Environmental Assessment Branch of the MECP, and		

[3] Ontario. (2024). Guide to Environmental Assessment Requirements for Electricity Projects. Available from https://prod-environmental-registry.s3.amazonaws.com/2024-04/Guide%20to%20EA%20Requirements%20for%20Electricity%20Projects_Feb%202024_02.pdf

Reference		**Comment**	**Recommendation**
Section	***Text***		
	should also be copied to Hydro One.		
2.0 Study Area	*2.1. Project Study Area* *2.2. Local Study Area* *2.3. Regional Study Area*	It is beneficial that multiple scales of study area are included, and that the Regional Study Area begins to capture landscape-level impacts of the project. However, there remain some impacts that would be better understood at the scale of a watershed or indicator species dispersal distance. This is especially the case for cumulative effects assessment.	Natural environment project effects, and especially cumulative effects, should be considered at scales that are relevant from an ecosystem perspective. Additional requests on spatiotemporal scales are included in later comments regarding the cumulative effects assessment.
Table 3-1: Summary of Interactive Map Comments and Concerns	*Theme: Route direction, location, design (including towers, switching stations, etc.)* *Question/Comment: Is it possible to route the proposed St. Thomas transmission line west of the existing Edgeware transmission lines rather than to the east?* *Response: Is it possible to route the proposed St.*	This route choice means that the line will fragment through a forest in a landscape where remaining forests are already highly fragmented. We understand the forest below the transmission line will be permanently converted to "compatible vegetation" (shrubs/herbaceous species), which will have associated impacts (e.g., edge effects) on the surrounding forest.	Given that this proposed route will fragment forest in a landscape (i.e., the Carolinian region) where forest cover has been reduced from 80% to 11%,[4] further details are needed on the station layout and "coordination" with St. Thomas that makes it impossible for the line to avoid this forest. Justification should be provided in terms of how HONI has considered the mitigation hierarchy (avoid, mitigate, restore, offset). Since the forest will be permanently converted to

[4] Carolinian Canada. (2002). Practical Options for Greening Carolinian Canada. Available from https://caroliniancanada.ca/sites/default/files/File%20Depository/Library/reports/CC-OptionsforGreening.pdf

Reference		**Comment**	**Recommendation**
Section	***Text***		
	Thomas transmission line west of the existing Edgeware transmission lines rather than to the east?		shrub/herbaceous cover if this route choice proceeds, offsetting will be necessary, and offsetting/restoration plans should be formed with meaningful input from us.
3.6.2. Indigenous Community Participation in Field Surveys	*Hydro One offered each Indigenous community the financial resources and the administrative capacity to hire a field monitor to participate in the field surveys conducted on behalf of the Project. All communities identified by the Crown were invited to participate in field programs and the review of the study reports.*	It is unclear if Indigenous communities were invited to help develop the field program, including the survey methods used. Indigenous involvement in the development of field programs can help to ensure more complete results that better reflect the priorities of communities.	If Indigenous communities weren't engaged on the development of the HONI St Thomas field program, it would be beneficial for HONI to consult with Indigenous communities during field program development in future. Participation in these efforts is entirely the choice of invited communities, but the opportunity should be made available.
3.6.6. Chippewas of Kettle and Stony Point First Nation (CKSPFN)	*General Comment*	This section contains HONI's detailed record of consultation with CKSPFN/TFG, the contents of this section aren't included here for brevity.	There is a typo at the bottom of page 3-47 that should be corrected from "Hydro One invited AFN" to "Hydro One invited CKSPFN" There is another typo at the bottom of this subsection that should be corrected from "TMHC

Reference		**Comment**	**Recommendation**
Section	***Text***		
			emailed **WIFN** for participation for Stage 2 AA".
4.0 Environmental Inventory	*Natural and Socio-Economic environment baseline conditions are described in the following sections. Desktop information for the Natural and Socio-Economic Environment was generally collected within the LSA, while Natural Environment field surveys were completed within the PSA (see Section 2). Field surveys were completed between December 2023 and July 2024 to assess baseline environmental conditions and significant natural values to inform the Class EA. Natural heritage field surveys were conducted in accordance with the Natural Environment Field Program Methodology (Dillon, 2024). Where private property access was granted in advance of the field programs, field studies occurred within or directly adjacent to natural heritage*	The field survey window that has occurred to date includes a relatively short timeline that doesn't account for fall ecosystem conditions and wildlife movement. No details are provided on the types of field studies that will occur in 2025, nor are details provided on the actual (versus planned) field survey methods. It is also currently unclear how much of the study areas have not been surveyed. Roadside surveys are not a sufficient replacement for direct survey, especially when it comes to potential SAR habitat, SAR/rare species, and delineation of natural features that may be difficult to detect on imagery (e.g., forested wetlands).	Clear details on the ecological field survey methods, timing, level of effort, and spatial coverage are needed. This includes details on field surveys that have occurred, and those that are planned/underway. Without this information, it is difficult to understand if the relatively short field survey window to date is sufficient. HONI should clarify how much of each route alternative remains unsurveyed given that private property access was not granted for the entirety of the study areas.

Reference		**Comment**	**Recommendation**
Section	***Text***		
	features. Where private property access was not granted and the property was associated with a natural feature(s), field data was collected from the public road allowance, Hydro One's existing transmission ROW and/or from property limits where access was granted. Field data collected from adjacent lands was supplemented with information collected through aerial imagery interpretation and secondary data sources. The results of the natural heritage field surveys are summarized in Section 4.6.7 below. Additional field studies will be completed in 2025.		
4.4.3. First Nations Lands and Interests	*There are no First Nation reserve lands situated within the PSA or LSA.*	This section does not acknowledge that the proposed project and associated study areas fall within the territories of Indigenous communities that include CKSPFN.	This section should be updated to clarify that although there are not reserve lands present, the proposed project falls within the territory of CKSPFN.
4.6.3 Surface Water Resources	*Of the 104 aquatic features, 61 aquatic features within the PSA were assessed*	Information on the protocols used for these aquatic assessments is not included.	While planned aquatic assessment methods are provided within the referenced Dillion

Reference		**Comment**	**Recommendation**
Section	***Text***		
	either at a Route Alternative crossing or the nearest roadside crossing during the 2024 field program, or through aerial imagery due to restrictive property access. Of the 61 aquatic features assessed in the field or through aerial imagery, 45 were assessed to have the potential to support either permanent or intermittent flow.	We appreciate that the watercourse survey locations are listed and mapped in Appendix C-3. However, the methods still have not been specified nor have they been referenced.	(2024) natural environment field program, details of the actual surveys that occurred need to be contained within or appended to the ESR to allow for a fulsome review.
4.6.6 Designated or Special Natural Areas	***Conservation Areas*** *The Dan Patterson Conservation Area, Kirk-Cousins Management Area, Dalewood Conservation Area are located outside of the PSA, and as such, no Conservation Areas are associated with any of the Route Alternatives.*	It is unclear how far these Conservation Areas are from the PSA. There are very few remaining and protected natural areas in the broader RSA and region in general, and these areas may be habitat for SAR. There is the potential that wildlife may need to move across the PSA to access these areas.	HONI should clarify how far these Conservation Areas are from the PSA, and whether wildlife movements across the PSA have been considered as a potential ecosystem process that the project could impact.
4.6.6 Designated or Special Natural Areas	***Locally Significant Areas*** *The Municipality of Central Elgin and City of London OPs show that there are two Environmentally Sensitive Areas located within the PSA (Appendix C-7). The Environmentally Sensitive*	All proposed alternative routes appear to impact the Central Elgin Environmentally Sensitive Area (ESA). However, no clear references are made about what makes this area sensitive.	More details are needed on the impacts that the project is anticipated to have on these areas, including the specific types of vegetation that will be removed. Proposed overlaps with sensitive features (e.g., this ESA) must be

Reference		**Comment**	**Recommendation**
Section	***Text***		
	Areas and the associated Route Alternative include: *• Central Elgin Environmentally Sensitive Area (Route Alternatives 1A, 1B, 2A, 2B, and 3); and* *• Tenants Pond Environmentally Sensitive Area (Route Alternatives 1A and 1B).*	The impacts on this feature appear to be assessed in Section 7.7.7.2, with an anticipated 0.07 ha to be traversed by the transmission right of way. However, this number is not contextualized in terms of the overall size of the ESA, and there is no information on the vegetation that will be removed or other ecosystem-level impacts.	contextualized in terms of the overall size of that feature.
4.6.7 Natural Heritage Features	*General Comment*	Given the lack of clarity around when ecological field work occurred, there is uncertainty about whether the surveys would be sufficient to detect all potential natural heritage features, including seasonal wetlands and watercourses, which fill valuable ecohydrological functions.	HONI should clarify if surveys had the potential to detect seasonal wetlands and watercourses, or if these features are not included in their assessments.
4.6.7 Natural Heritage Features	*Information on natural heritage features and areas, as defined in the PPS were collected from the following sources.*	iNaturalist is not included on this list of sources, however, there are many species records throughout the study areas, and this could include SAR records.	iNaturalist and other community science databases should be reviewed for SAR records within the study areas.
4.6.7.1 Ecological Land Classification & Botanical Assessment	*Botanical assessments were completed concurrently with ELC surveys. If encountered, the location and abundance of botanical Species of Conservation Concern (SCC) (as defined in Section 4.6.7.6) and/or Species at*	The timing of botanical assessments is crucial information, especially for understanding the detection potential of specific SAR or rare species.	Information on the actual timing of ELC and botanical assessments must be provided within the ESR. To ensure a more fulsome baseline assessment, a three-season botanical inventory should be completed before the project proceeds to construction.

Reference		**Comment**	**Recommendation**
Section	***Text***		
	Risk (SAR) (as defined in Section 4.6.7.7) were documented and photographed, and UTM coordinates were recorded.		
	Dillon has taken a conservative approach for properties that could not be surveyed during the 2024 field investigations; through aerial interpretation, where potentially suitable habitat for Butternut was identified on these properties, the presence of Butternut was considered potentially present until surveys to confirm species detection/non-detection are completed. As such, additional field verification surveys are proposed in 2025 for these properties to confirm detection/non-detection of Butternut on the Preferred Route.	All of the Route Alternatives were determined to have the potential to contain Butternut as stated in Table 4-12 Potential SAR habitat. There would be a different number of properties with potential suitable habitat area for Butternut for each of the three Route Alternatives, and a different total area of potential Butternut habitat on each Route Alternative.	HONI could have applied differential weighting to the number of properties with potential Butternut habitat or the total area of potential Butternut habitat for each Route Alternative for the weighted multi-criteria decision-making analysis. By grouping the potential loss of Butternut SAR for each Route Alternative categorically instead of numerically, there is effectively no importance placed on a potential greater loss of Butternut SAR.
	Table 4-5: Vegetation Communities Identified within the PSA *SWD Deciduous Swamp*	This table shows that the preferred route (Route Alternative 3) crosses a deciduous swamp. Given that trees are generally considered "incompatible vegetation", it appears	HONI should clarify why Route Alternative 3 was chosen when it crosses this wetland.

Reference		**Comment**	**Recommendation**
Section	***Text***		
		that this route will result in the permanent conversion of this wetland to another wetland type. Wetland conversion of any type is significant in this area given that the majority of wetlands have been lost since European colonization in this area.[5]	
	A total of 140 plant species were recorded in the PSA during the ELC and botanical surveys, with species diversity differing across the Route Alternatives.	The plant species list should be appended to this report to allow for a thorough review.	
4.6.7.2. Wetlands	*Formal wetland evaluations or assessments as per the Ontario Wetland Evaluation System (OWES) were not conducted within the PSA as part of Dillon's 2024 field surveys.*	It isn't necessary to complete formal wetland evaluations. However, this does result in a data gap that must be addressed through protections and mitigations.	In the absence of evaluations, all wetlands must be protected, buffered, and offset in alignment with how these activities would occur if the wetland were deemed significant through assessments. If wetland evaluations occur, CKSPFN must be invited to attend.
	Table 4-7: Wetland Features Summary	Ephemeral wetlands/vernal pools provide crucial habitat for a large number of species. It is unclear if these features were considered as potential wetlands.	If ephemeral wetlands/vernal pools occur in the study areas, they should be included in the wetland evaluation.

[5] Ducks Unlimited Canada. (2010). Southern Ontario Wetland Conversion Analysis. Available from https://www.a2acollaborative.org/uploads/7/6/8/5/7685208/wetland_conversion_analysis_du_march_2010.pdf

Reference		**Comment**	**Recommendation**
Section	***Text***		
		Additionally, the preferred route (alternative 3) is associated with a pitcher plant fen. Given the previously mentioned immense degree of wetland conversion in this geography since European colonization, this is likely a relatively rare ecosystem.	If impacts are anticipated in the pitcher plant fen, they must be considered in the context of the immense cumulative effects that have occurred on wetland and peatland ecosystems in this region.
4.6.7.3 Aquatic and Fish Habitat	*General Comment*	While impacts on fish are discussed, there are also numerous other potential impacts on species that use these habitats. For example, many species use watercourses for life cycle needs (e.g. as travel corridors to breeding or nesting sites). Additionally, many invertebrate species also rely heavily on specific environmental conditions within waterbodies for reproduction.	HONI should clarify if impacts on species movement along watercourses and potential impacts on invertebrates have been considered.
4.6.7.4. Woodlands	*Under the PPS, significant woodlands are protected in Ecoregions 6E and 7E. The PPS defines significant woodlands as "an area which is ecologically important in terms of features such as species composition, age of trees and stand history; functionally important due to its contribution to the broader landscape because of its location, size or due to*	Please see earlier comment regarding the extensive loss of forest in the Carolinian region. This is part of the cumulative effects context that increases the potential "significance" of any remaining woodlands. Given the noted significance of woodlands for Indigenous communities, permanent conversion of woodlands to "compatible" vegetation types and the associated impacts (e.g., edge effects) likely require offsetting.	Permanent conversion of woodlands to "compatible" vegetation (i.e., shrubs and herbaceous species) should only occur if it can be demonstrated that these impacts cannot be avoided. Given that on-site restoration will not result in a return to the same ecosystem type, an offsetting plan should be developed with our input.

Reference		**Comment**	**Recommendation**
Section	***Text***		
	the amount of forest cover in the planning area; or economically important due to site quality, species composition, or past management history" (MMAH, 2024). *Although the ELC community types are ranked as Common or Secure in Ontario, it is acknowledged that several woodlands in Ontario have been utilized for hunting and trapping, as well as plant and medicinal harvesting by Indigenous communities.*		
4.6.7.6 Wildlife and Wildlife Habitat	*Several woodland and wetland features within the PSA were observed to have*	There are several noted species with candidate SWH, including amphibians, that are susceptible to road mortality.	Potential impacts of access road development must be considered in

Reference		**Comment**	**Recommendation**
Section	***Text***		
Amphibian Breeding Habitat (Woodland and Wetland)	*the potential to provide amphibian breeding habitat during preliminary habitat assessments. During amphibian breeding surveys, anuran species were heard calling at 18 of the 21 established breeding amphibian survey stations. As a third (late-season) survey was not completed, a full assessment of breeding species and population numbers could not be verified.*		terms of mortality potential for wildlife, including amphibians. Additionally, a full (three survey) round of amphibian call surveys should be completed before detailed design to ensure that impacts on these species can be mitigated. This will also help to form a more complete baseline to compare monitoring results after the project commences.
4.6.7.6 Wildlife and Wildlife Habitat *Terrestrial Crayfish*	*Terrestrial crayfish burrows were incidentally observed during the 2024 field program at three survey stations.*	If possible, it would be beneficial to have a map of the locations of these findings available and cross-referenced here. This comment generally applies for any spatially relevant ecological survey results, while recognizing that some SAR and sensitive species results may need to be shared directly with CKSPFN instead of being mapped in the ESR.	
4.6.7.6 Wildlife and Wildlife Habitat *Barn Swallow*	*Although Barn Swallow was documented throughout the PSA, no breeding evidence was observed. As such, Barn Swallow has not been carried forward further, as the species and its habitat (nest adjacent to open areas for foraging) was not identified in the PSA.*	Breeding bird surveys for other species (i.e., wood thrush) are noted within other sections of the ESR itself as not having complete coverage. Without having completed surveys at all potential barn swallow nesting locations, it is not reasonable to not carry this species forward at this stage.	All potential barn swallow nesting habitat should be carried forward in this assessment as candidate SWH or as potential SAR habitat elsewhere in the document, as previously mentioned.

Reference		**Comment**	**Recommendation**
Section	***Text***		
4.6.7.6 Wildlife and Wildlife Habitat	*Table 4-11 Candidate and Confirmed SWH*	There is currently a lack of conclusive information about the following SWH/species: • Turtle wintering areas • Turtle nesting areas • Breeding amphibians • Bald eagle nesting, foraging and perching • Wood thrush • Barn swallow	While we appreciate that many areas will be treated as having candidate SWH within these categories, additional surveys to confirm this SWH should be completed as part of detailed design.
4.6.7.7. Species at Risk	*American Badger American Badger or dens displaying suitable characteristics/evidence of American Badger were not observed during the field program.*	No description is provided on the methods used to detect American badger dens, and this detection has likely been limited given that an uncertain number of surveys occurred from the roadside. Given that this is an elusive species that is generally active from dawn to dusk, it is unclear if sufficient effort has been taken to determine if this Endangered species is present in any of the study areas before it was determined that the species did not need to be carried forward in the ESR.	The ESR must be updated to include field survey methods (i.e., with a referenced or thoroughly described protocol), timing, and level of effort. Without this information clearly outlined, it is very difficult to determine if it is reasonable to exclude American badger at this stage, or if additional surveys are likely to be needed.
4.6.7.7. Species at Risk	*Barn Swallow* *Wood Thrush*	Both the barn swallow and wood thrush were detected through surveys. Although nests were not observed, there is no conclusive evidence that these species are not using habitat throughout all project study areas. Without very extensive field survey	The ESR should be revised to include barn swallow and wood thrush as having potential SAR habitat present. This need is highlighted by the noted (Page 4-156) lack of breeding bird surveys within the deciduous forest near

Reference		**Comment**	**Recommendation**
Section	***Text***		
		effort, it cannot be concluded that these species do not have habitat present along the potential routes. The ESR acknowledges that the nesting activities of barn swallow may change from year to year, and that suitable structures could provide habitat.	the planned Centennial TS, which has potential to provide habitat for wood thrush.

Reference		**Comment**	**Recommendation**
Section	***Text***		
5.0 Identification and Evaluation of Alternative Routes *5.5. Step 5: Evaluate and Select*	*Following identification and weighting of the evaluation criteria, the Project team completed a GIS analysis of the measures identified for each applicable criterion for each Route Alternative based on available data sources.*	Without specific data sources referenced, it is impossible to tell if this analysis is sufficient. Similarly to the comment regarding ecological field survey methods, there is a need to be more specific about the methods used in this analysis. These details need to be included directly within the ESR	The specific datasets used to evaluate each criteria must be referenced.
5.0 Identification and Evaluation of Alternative Routes *5.5. Step 5: Evaluate and Select*	*The information was then fed into a comparative evaluation matrix where numerical weighted scores were provided per criterion and totaled for each evaluation category*	It is unclear how these scores were calculated. Without reproducible methods presented, it is extremely difficult to interpret the results shown in Table 5-9.	Clear (i.e., reproducible) methods need to be included on how the weighted scores were calculated and how they should be interpreted.
5.0 Identification and Evaluation of Alternative Routes *Table 5-9: Natural Environment Category Comparative Evaluation Results*	*Vegetation and Vegetation Communities: 8.4 ha (9.2%) are incompatible with transmission lines (long term effects) while 83.13 ha (90.8%) are compatible (short term effects).*	It is beneficial for different temporal scales to be considered, but to ensure that results can be compared, this method needs to be carried throughout the analysis.	

Reference		**Comment**	**Recommendation**
Section	***Text***		
Table 5-9: Natural Environment Category Comparative Evaluation Results	*Wildlife and Wildlife Habitat*	Given the issues raised above about the lack of methodological context throughout the ESR, including how "weighted scores" were calculated, the results are both difficult to interpret and to compare to one another. For example, under the Wildlife and Wildlife Habitat category, route alternative #3 has a dramatically higher score than other alternatives, which appears to correspond with a lower expected impact on wildlife and wildlife habitat. However, this route is fairly close to route #2, making this a somewhat surprising conclusion. Without understanding the survey methods, level of effort, and timing, it is nearly impossible to independently verify if this is a sound conclusion, or if additional habitat has not been mapped. Additionally, there remain major gaps in wildlife and wildlife habitat knowledge due to a lack of complete land access.	To determine if the results of this assessment are sound, the methods used to survey wildlife and wildlife habitat must be thoroughly described. This must include detailed documentation of the survey methods, timing, and level of effort. The methods used to result in the weighted scores, and guidance on their interpretation must also be provided. The limitations of these surveys must be described in terms of the area and percentage of total alternative routes that could be accessed for surveys. Additionally, these assessments must be updated with any and all Indigenous Knowledge of wildlife and wildlife habitat that CKSPFN wishes to bring forward to HONI.
	Species at Risk (SAR)	Similarly to the above comment, the lack of clarity on how weighted scores were calculated makes it difficult to	Details on the weighted score calculation, including the formulas/analysis procedures

Reference		**Comment**	**Recommendation**
Section	***Text***		
		understand why the scores for each alternative vary so widely. Additionally, as mentioned earlier, the lack of context on ecological field survey methods within the ESR raises uncertainty in the rigor of these results. Barn swallow and wood thrush were both observed in the study areas, while American badger has the potential to occur. All of these species may use habitat in the study area now that was not detected due to incomplete survey coverage or methodological gaps, and all have the potential to use habitat in the study areas before construction occurs.	used, would greatly aid in the interpretation of these results. The previously requested details on ecological field survey methods are also crucial. Given that there are likely methodological and survey coverage gaps, all potential SAR should be carried forward in this assessment. If any additional SAR knowledge is raised by CKSPFN in future, it should be included in this assessment.
	Designated Natural Areas and Identified Habitat Restoration Areas	Here and elsewhere in the ESR, it would be helpful for the area of features (e.g., significant valleylands) to be quantified in terms of percentage of total area of that feature that occurs along each alternative route. This is especially helpful in understanding how notable certain impacts might be in a cumulative effects context.	
	Final Weighted Score	Similarly to previous comments on this table, it is unclear how the final weighted scores were calculated. The final scores do not appear to be a mean, median, or total of the previous categories. Without knowing how this calculation was performed, it is impossible to independently verify that the result is accurate.	Clear, reproducible, methods are required on how these calculations were performed. This includes details on the calculation of final weighted scores.

Reference		**Comment**	**Recommendation**
Section	***Text***		
Table 5-10: Socio-Economic Environment Category Comparative Evaluation Results		Previous comments regarding methodological details on these calculations apply. Indigenous Culture, Values, and Land Use are included as a separate category, there may be additional socio-economic considerations (e.g., economic reconciliation opportunities that may overlap with the proposed route). Evaluating these criteria here will help to ensure that they influence the overall socioeconomic weighted score, versus only being included in the Indigenous Culture, Values, and Land Use category.	Previous requests regarding methodological details on these calculations apply. Any socioeconomic considerations that CKSPFN deems important and appropriate within this category should be added to this table to ensure that they are equally assessed alongside other socioeconomic criteria. For example, employment and economic opportunities, land restoration and stewardship opportunities, as well as education and capacity building opportunities.

Table 5-11: Indigenous Culture, Values and Land Use Category Comparative Evaluation Results	*Assessed Criteria include:* • *Addition to Reserve (ATR) Lands* • *Intersects Areas of Historical Significance* • *Areas that Support Hunting/Trapping and/or Harvesting Grounds* • *Areas that Support Fish Bearing Waters with Identified or Inferred Habitat of Game Fish Species*	It is beneficial that this category is included in equal weight to the other three, but given that this is the primary category where Indigenous Rights and interests are being considered, it may be beneficial for CKSPFN to review and verify the contents of this analysis to ensure that the results are accurate.	Provided that capacity allows, CKSPFN should review the criteria and measures used in this analysis to ensure that all applicable criteria are adequately considered. Several of these Criteria require information from CKSPFN to ensure that the analysis is complete. Comments on these criteria are included in the lines below.

Reference		**Comment**	**Recommendation**
Section	***Text***		
	• *Effects to Rare, Undisturbed Native Habitats/Ecosystems* • *Effects to Rare/Sensitive Species Regeneration Potential* • *Co-Location and Repurpose of Existing Infrastructure*		
	Intersects Areas of Historical Significance: *Mapped areas of historical Indigenous significance within the ROW.*	Adequate analysis of this criteria requires meaningful input from Indigenous Nations on areas of historical significance.	We are currently undertaking multiple traditional knowledge and land use studies and are hopeful that recommendations coming out of this work can support the identification of areas of historical significance throughout the detailed design process. We are also hopeful that any major finds along the selected route can be further discussed with HONI to determine mitigation steps.

	Areas that Support Hunting/Trapping, and/or Harvesting Grounds: *Effects on lands with habitat or vegetation types that support or have potential to support hunting/trapping/harvesting*	Adequate analysis of this criteria requires meaningful input from Indigenous Nations on the habitat tor vegetation types that support these activities.	We are currently undertaking multiple traditional knowledge and land use studies and are hopeful that recommendations coming out of this work can support the identification of areas that support hunting/trapping and/or harvesting throughout the detailed design process. We are also hopeful that any major finds along the selected route can be further discussed with HONI to determine mitigation steps.

Reference		**Comment**	**Recommendation**
Section	***Text***		
	activities and medicinal plants within the ROW.		
	Areas that Support Fish Bearing Waters with Identified or Inferred Habitat of Game Fish Species: *Effects to aquatic habitat including total number and, length of, watercourse crossings within ROW.*	This criteria examines effects on aquatic habitat, including the total number, and length of watercourse crossings in the ROW. This is similar to the "Surface Water Resources and Aquatic Habitat" criteria in Table 5-9 (Natural Environment Category Comparative Evaluation Results). Neither of these criteria capture the potential water quality impacts of construction activities and installation of access roads, which could include increased sedimentation in waterways.	This measure could potentially be assessed by examining the average distance of ground infrastructure (i.e., transmission line poles and access roads) from watercourses along each route alternative, versus only examining the impact of direct crossings. This would give a more accurate picture of the full suite of project impacts on aquatic features.
	Effects to Rare, Undisturbed Native Habitats/Ecosystems: *Effects to rare habitats in southwestern Ontario including tall grass prairies, savannah, native woodlands, natural wetlands, etc., within the ROW, and measured level of disturbance of native habitat and ecosystems bases on calculated average of conservatism associated with the PSA.*	These criteria appear to address a western concept of rare and at-risk species, which may differ from Indigenous Knowledge and perspectives on the risk status of species. There does not appear to be mention of species of cultural significance, which might not be considered rare by western definitions, but may not adequately support sustained harvesting.	Species considered by CKSPFN to be at-risk, rare, or culturally significant should be included within these measures.

Reference		**Comment**	**Recommendation**
Section	***Text***		
	Effects to Rare/Sensitive Species Regeneration Potential: *Long-term effects to species at risk and their regeneration potential within the ROW.*		
	Co-Location and Repurpose of Existing Infrastructure: *Co-Location and Repurpose of Existing Infrastructure*	No comment – included for context	
	Final Weighted Score	Similar to other tables, it's unclear how these weighted scores were calculated. While the numerical metrics here and for each Criteria may provide useful context, they are not a replacement for Nation-provided perspectives on each route unless CKSPFN choses to defer to this analysis.	These results should also be reviewed with CKSPFN to ensure that they align with the Nation's assessment of the potential impacts of each route.
Table 5-12: Technical and Cost Category Comparative Evaluation Results		Previous comments regarding methodological details on these calculations apply.	Previous requests regarding methodological details on these calculations apply.
Table 5-13: Final Overall Weighted Scores		This table ranks the route alternatives as "least", "less", and "most preferred", including for Indigenous Culture, Values, and Land Use. These results currently indicate that Route 3 would be "Most Preferred" in terms of its impacts on Indigenous Culture, Values, and Land Use, but it remains	The results of this analysis, particularly as they pertain to Indigenous Culture, Values, and Land Use, must be reviewed with Indigenous Nations, including CKSPFN, to ensure that they align with Indigenous Knowledge,

Reference		**Comment**	**Recommendation**
Section	***Text***		
		unclear if HONI has enough information available to make this conclusion, and the methods used to calculate these findings remain unclear. Without review and verification of these results by Indigenous Nations, including CKSPFN, these results cannot be considered conclusive. Additionally, the Natural Environment results cannot be considered conclusive until detailed information is provided within the ESR body text or appendices on the ecological field survey methods, timing, level of effort, and spatial coverage.	Values, and perspectives on the alternate routes. Details on the ecological field survey methods, timing, level of effort, and spatial coverage are critical to allow for an adequate review of the Natural Environment results.
6.1 Design Phase	*The final design plans will be based on necessary surveys, including a geotechnical survey, and consultation with stakeholders.* *Hydro One will also finalize restoration plans in consultation with appropriate stakeholders and local communities, as necessary.*	CKSPFN is a rights holding Nation that must be provided with the opportunity to review and contribute to these pieces. This must occur separately from stakeholder consultation. If CKSPFN wishes, there is an opportunity to conduct restoration planning in a manner that aims to restore both the land and waters, and cultural connections to it. This is	CKSPFN must be provided with early opportunities to provide input on the mentioned studies and plans. If CKSPFN wishes, HONI should proceed with restoration planning through the lens of reciprocal restoration, aiming to restore ecosystems in a manner that supports land and water-based rights and practices. This planning should include the previously mentioned provision of offsets for

Reference		**Comment**	**Recommendation**
Section	***Text***		
		known as reciprocal restoration[6], and will require that HONI conducts early consultation on restoration goals with Indigenous Nations.	ecosystems that will be permanently converted due to "incompatible" vegetation (e.g., woodlands, deciduous swamp). This could potentially be achieved through a biodiversity initiative associated with this project, which currently does not appear to be considered.
6.2 Construction Phase	*In addition, a Project-specific Environmental Management Plan will be prepared, outlining specific requirements to be followed for the proposed Project.* *Prior to construction, a detailed construction plan will be developed. Construction activities will be restricted to designated work areas and protective barriers, such as fencing, will be erected to protect features from construction related effects.*	There are many other potential during-construction mitigations that are outside of the scope of the current review, but must be included in the EMP. For example, it is unclear whether the impacts of temporary barriers (e.g., fencing) on wildlife have been considered and addressed. Additionally, construction will result in noise that will have impacts on wildlife given that several species (e.g. bats and many migratory bird species) are extremely sensitive to noise pollution. All potential environmental impacts of construction activities need to be considered and mitigated.	CKSPFN should be provided with the opportunity to review and comment on the Environmental Management Plan (EMP). CKSPFN monitors should be invited to oversee construction activities.

[6] Kimmerer, R.W. (2011). Restoration and Reciprocity: The Contributions of Traditional Ecological Knowledge. In: Egan, D., Hjerpe, E.E., Abrams, J. (eds) Human Dimensions of Ecological Restoration. Society for Ecological Restoration. Island Press, Washington, DC. https://doi.org/10.5822/978-1-61091-039-2_18

Reference		**Comment**	**Recommendation**
Section	***Text***		
	Prior to construction, a detailed construction plan will be developed. Construction activities will be restricted to designated work areas and protective barriers, such as fencing, will be erected to protect features from construction related effects.		
7.7.8.4 Invasive Species	*Additional measures that would be undertaken to reduce the spread of invasive species include:* *Abiding by the Invasive Species Act regulations;*	If there are sections along any of the three Route Alternatives that have invasive species populations that could qualify as an "Invaded Place", by an inspector than there is an obligation under section 19 of the *Invasive Species Act* "to control, remove or eradicate the invasive species found at the place or to prevent its spread to other areas." The current actions under 7.7.8.4 would not be enough to address this obligation under the Invasive Species Act	HONI should identify areas that have the greatest potential to spread invasive species before construction begins to limit the spread of invasive species during the construction phase. HONI has an obligation to take extra precautions when construction equipment moves into a previously less disturbed natural habitat from an area with a known population of invasive species. HONI should have incorporated the risk of spreading invasive species into less disturbed natural habitat into the multi criteria decision making process. There could be different risks of spreading invasive species within the three different route

Reference		**Comment**	**Recommendation**
Section	***Text***		
			alternatives as these three Route Alternatives may not all have invasive species populations that would quality as an "Invaded Place" under the *Invasive Species Act.*
7.8 Indigenous Culture, Values and Land Use	*Hydro One will continue to seek to identify community concerns and build appropriate actions into proposed Project plans to address expressed concerns.*	CKSPFN, in partnership with the Three Fires Group sent comments dated September 27th to HONI about Route Alternatives. This is referenced in section 3.6.6 as being received on September 30th. Section 3.6.6 does state that HONI hopes to *"...discuss opportunities for restoration and community investment development."* but there is no discussion of what this entails, or reference to the importance of this work in section 7.8, or elsewhere in this report. CKSPFN specifically had concerns that are not mentioned in section 7.8 about water quality impacts and concerns that the project would interfere with the ability to practice treaty rights. CKSPFN stated the plant is the main business in the industrial park and that CKSPFN is concerned about the	HONI should specifically address the concerns and comments raised by CKSPFN about current and future development interfering with treaty rights, concerns about cumulative effects, and concerns about changes to water quality. HONI should also specifically address the comments related to land reclamation opportunities within and outside of the project area, community benefits and opportunities for youth, the potential for rebates and the recognition that this project travels through traditional territory. If CKSPFN consents for this information to be shared within the ESR, HONI should include these concerns in section 3.6.6 and section 7.8, accompanied by

Reference		**Comment**	**Recommendation**
Section	***Text***		
		potential for supporting businesses within the supply chain to be located around it. CKSPFN stated they do not know what these are but anticipate they will contribute to the accumulation of impacts in this area. CKSPFN asked about cumulative impacts of development in their traditional territory. CKSPFN asked about the potential for land reclamation opportunities within the project area or other areas. They asked if community benefits and opportunities for the youth were possible through this project and asked if there is the potential for rebates and recognition that this project travels through traditional territory.	a plan to address these comments.
7.13 Cumulative Effects Assessment	*General Comment*	While we appreciate that a cumulative effects assessment is included, the methods used do not render meaningful results. It would be more beneficial to contextualize the proposed impacts in terms of how they will exacerbate cumulative effects, in addition to any associated future impacts.	The cumulative effects assessment should be revised to consider the project impacts in the context of existing cumulative effects on lands, waters, and associated Indigenous rights and practices. The revised assessment should also include greater context on the cumulative impacts that are likely to be facilitated by

Reference		**Comment**	**Recommendation**
Section	***Text***		
		For example, the region where this project has been proposed has had forest cover decrease from 80% to 11%[7], and over 72% of wetlands[8] have been lost in southern Ontario since European colonization, with estimates in the study area likely exceeding 80%. This means that seemingly small losses of forest and wetlands are actually much larger when considered in terms of the cumulative loss of these features, and given the small fraction of natural systems that remain. These ecosystems are crucial for the practice of Indigenous Rights, and impacts on them must not be under emphasized. Further, although it is helpful to understand potential future projects, it would be more meaningful for these to be contextualized in terms of their relation to the current project. For example, the proposed transmission line will facilitate the creation of the PowerCo site, which is likely to come	the project, including connected impacts at the PowerCo site. The determination of "significance" of cumulative effects should be determined based on clearly outlined criteria that are provided to u for review. Without consistent criteria, these results are largely subjective in nature.

[7] [7] Carolinian Canada. (2002). Practical Options for Greening Carolinian Canada. Available from https://caroliniancanada.ca/sites/default/files/File%20Depository/Library/reports/CC-OptionsforGreening.pdf
[8] [8] Ducks Unlimited Canada. (2010). Southern Ontario Wetland Conversion Analysis. Available from https://www.a2acollaborative.org/uploads/7/6/8/5/7685208/wetland_conversion_analysis_du_march_2010.pdf

Reference		**Comment**	**Recommendation**
Section	***Text***		
		with many employment opportunities that could draw new residents to the region. It appears that the area west of the Centennial Transmission Station may be planned for urban development (e.g., due to the servicing studies that are occurring). However, this is not made explicit. As it stands, the cumulative effects assessment does not render meaningful results, the project will have additive effects on the landscape, but these are currently underemphasized by the overall determination that none of these cumulative effects will be "significant".	
7.13 Cumulative Effects Assessment	*Table 7-3 Cumulative Effects Assessment* *Environmental Concerns*	It is unclear if CKSPFN has had an opportunity to provide input to the environmental concerns that are assessed here. Considering that the route choice occurred through an analysis that used different variables ("criteria"), these results are difficult to contrast within the broader context of project impacts.	The environmental concerns used for the cumulative effects assessment should be reviewed with us. It would likely be more meaningful to carry the criteria and measures from the multi-criteria analysis forward to the cumulative effects analysis.
7.13 Cumulative Effects Assessment	*Table 7-3 Cumulative Effects Assessment*	There will be permanent conversion of woodlands under the proposed line, and subsequent edge effects. However, this impact is largely not	Previous comments raised by us regarding permanent impacts on natural features must be considered here. Any permanent

Reference		**Comment**	**Recommendation**
Section	***Text***		
	Special Natural Areas: Significant Woodlands *Natural Environment Resources - Natural Heritage Features: Vegetation*	assessed through the cumulative effects table. Without rigorous offsetting, it is not possible to simply mitigate this impact.	conversions of "incompatible" vegetation must be considered a cumulative effect that requires avoidance, or offsetting if the impact is unavoidable.
8.0 Effects Monitoring	*General Comment*	This section is far too brief, and does not adequately describe species and ecosystem-specific monitoring needs. Additionally, it does not include tangible adaptive management plans if unanticipated adverse impacts occur.	This section should be revised to include a commitment to develop a detailed adaptive management and monitoring plan that has species and ecosystem-specific monitoring plans. Adaptive management actions must be thoroughly described, with associated triggers for action (e.g., the establishment of invasive species will result in X years of management and follow-up monitoring).

Table 2. Commentary on 2024 Natural Environment Field Program Methodology

Reference		**Comment**	**Recommendation**
Section	***Text***		
Overarching Comment		This document generally speaks to planned field methods, but neither here nor in the ESR are the actual methods (e.g., timing, level of effort and spatial coverage) or results of field surveys fully documented. This is critical information to help reviewers understand if the level of effort, timing, and spatial coverage were sufficient.	The actual methods and results of field surveys must be reported on, potential in an appendix to the ESR or in the ESR itself.
4.0 Natural Environment Existing Conditions Table 1,	*Various readily available online resources were used to determine the presence or absence of natural features outlined in Section 4.1. Policies, Wildlife atlases, databases and maps from the following resources were assed in support of the background review (Table 1)*	This background review is missing some key resources that would add value to the route selection process, such as verified community science observation of flora and fauna that exist on online platforms like iNaturalist.	iNaturalist should be included as a background review resource.
4.2 Fish Habitat	*No critical habitat for aquatic SAR was identified within the LSA based on DFO SAR Mapping (2023)*	Only considering critical habitat ignores how upstream conditions may affect downstream habitat through changes to water quality (i.e., increasing turbidity and stream temperature). Dillon (2024) has outlined (in Table B-2) that silver	HONI should acknowledge that critical habitat represents only the habitat that is critical for the survival of SAR and not the entirely of habitat the SAR will use. The ESR should review potential indirect impacts of

Reference		**Comment**	**Recommendation**
Section	***Text***		
		shiner has the potential to occur within the vicinity of the LSA. There is the potential that some of these water crossings could indirectly affect the silver shiner habitat, as the northern portion of the PSA occurs within the Upper Thames Watershed where silver shiner habitat is present, including critical habitat shown on the DFO SAR map.	the project on SAR, including silver shiner habitat.
4.5 Invasive Species	*Based on our knowledge and project experience within southwestern Ontario, the following species were identified as having the potential to occur within the LSA*	Phragmites is an incredibly invasive and destructive species. It displaces native vegetation, degrades wildlife habitat, alters hydrology, and reduces wetland functionality. The consequences of its spread are extreme.	HONI should provide details on how the project will avoid the spread of Phragmites. This should include commitment to develop an invasive species management plan that will be enforced during construction.
5.3.2 Aquatic Assessment	*Fish habitat quality will be assessed by classifying stream geomorphology, in-stream and riparian vegetation, substrate type, bank stability, as well as the presence of groundwater indicators.*	There are other indicators of fish habitat quality that are not included in these methods	In addition to the stated methods HONI could have included: 1. Water Quality Parameters if feasible, Temperature, Dissolved oxygen (DO), pH, Turbidity, Conductivity 2. Hydrological Conditions including seasonal flow variability if repeat visits or historical data exist. Evidence of channel alteration (e.g.,

Reference		**Comment**	**Recommendation**
Section	***Text***		
			straightening, culverts, embankments) 3. Benthic macroinvertebrates kick-net sampling as a proxy for water quality 4. Mapping of connectivity and barriers to fish passage (e.g., perched culverts, dams, weirs)
5.3.4.3 SAR Birds	*SAR bird occurrences will be documented during breeding bird surveys, including incidentally.*	Were there any additional methods for detection of SAR birds beyond the breeding bird surveys?	To address this question, the ESR methods should be updated to: • Note any species-specific protocols used (e.g., for least bittern, eastern whip-poor-will, or bobolink). • Clarify whether point counts, transects, or targeted call playback methods were used. • Note if nocturnal surveys were completed for species such as eastern whip-poor-will or common nighthawk. • Indicate what data were collected for each observation, such as species, behavior (e.g., singing, nesting), location (GPS), habitat type.

Reference		**Comment**	**Recommendation**
Section	***Text***		
5.3.4.4 American Badger	*A habitat assessment will be completed concurrently with the 2024 ELC and wildlife habitat assessment surveys to identify potential habitat features for American Badger*	More details should be provided on how habitat features will be identified.	To improve the methodological clarity of this paragraph, consider adding details on the survey timing (e.g., seasonality and frequency), personnel qualifications (e.g., experienced wildlife biologists or mammalogists and number of surveys), and the spatial coverage or intensity of the habitat assessment (e.g., full coverage vs. targeted habitats). It would also be helpful to outline the protocol for identifying and documenting burrows (e.g., measurement tools, photographic documentation), how potential habitat will be delineated in areas with restricted access (e.g., based on aerial imagery or adjacent habitat conditions), and the criteria for collecting animal hair for genetic testing (e.g., minimum sample quantity or condition). Including these details will enhance reproducibility and support a more robust evaluation of American badger habitat potential within the LSA.

Draft ESR Section	Reference Text	CKSPFN Comment	CKSPFN Recommendation	Hydro One Response
Executive Summary	*Comments and concerns received during the draft ESR review period will be recognized, considered, addressed, and documented. Hydro One will make best efforts to respond and resolve issues raised.* *Following the comment period, the ESR will be finalized in accordance with the Class EA. Upon completion of the Class EA process, the final ESR will be filed with the Ministry of the Environment, Conservation and Parks (MECP), and the Project will be considered acceptable to proceed as outlined in the final ESR. Necessary environmental approvals and permits will be obtained prior to construction be imposed (e.g., require further studies). Such requests can only be made on the grounds that the requested order may prevent, mitigate, or remedy*	As described in the other comments throughout this table, the ESR currently presents large methodological uncertainties that make the results difficult to independently verify. These gaps include a lack of information on the ecological field survey protocols, timing, level of effort, and spatial coverage. They also include a lack of replicable details on how the multicriteria analysis was completed. Further, the conclusions of the Indigenous Culture, Values, and Land Use multi-criteria analysis should be reviewed with us before they can be considered final.	The methodological gaps throughout the ESR must be addressed before it is finalized. The updated ESR should be provided to us for re-review once these gaps are addressed.	Thank you for your comment. The methodology for these surveys is outlined in the Natural Environment Field Program Methodology (Dillon, 2024), which was provided on July 8, 2025, upon request. As documented in Section 5 of the ESR, the comparative evaluation process utilized a multi-criteria decision-making process to evaluate the alternative routes. This is a standard evaluation process and more information is provided in the attached infographic on the comparative evaluation process.

Draft ESR Section	Reference Text	CKSPFN Comment	CKSPFN Recommendation	Hydro One Response
	adverse impacts on constitutionally protected Aboriginal or treaty rights. The MECP will not consider requests on other grounds. Requests should include contact information, full name, specify the type of order requested, explain how the order may address potential adverse effects on Aboriginal and treaty rights, and provide supporting information. Requests should be sent in writing or email to the Minister of the Environment, Conservation and Parks and the Environmental Assessment Branch of the MECP, and should also be copied to Hydro One.			
2.0 Study Area	*2.1. Project Study Area* *2.2. Local Study Area* *2.3. Regional Study Area*	It is beneficial that multiple scales of study area are included, and that the Regional Study Area begins to capture landscape-level impacts of the project. However,	Natural environment project effects, and especially cumulative effects, should be considered at scales that are relevant from an ecosystem perspective. Additional requests	Thank you for your comment regarding the study area needing multiple scales for the cumulative effects assessment (CEA). The CEA was completed in accordance with the Class Environmental Assessment (EA) for Minor Transmission Facilities (2022). This process considers the project's

Draft ESR Section	Reference Text	CKSPFN Comment	CKSPFN Recommendation	Hydro One Response
		there remain some impacts that would be better understood at the scale of a watershed or indicator species dispersal distance. This is especially the case for cumulative effects assessment.	on spatiotemporal scales are included in later comments regarding the cumulative effects assessment.	effects in combination with other proposed projects within the LSA where publicly available documentation was available. The CEA found no areas of environmental concern that would result in a significant cumulative effect. Mitigation measures outlined for the project are considered adequate and effective even when cumulative effects from other projects are taken into account. The ESR also notes that extending the CEA beyond the immediate project area is outside the scope of the Class EA and Hydro One's ability to influence or predict.
Table 3-1: Summary of Interactive Map Comments and Concerns	*Theme: Route direction, location, design (including towers, switching stations, etc.)* *Question/Comment: Is it possible to route the proposed St. Thomas transmission line west of the existing Edgeware transmission lines rather than to the east?*	This route choice means that the line will fragment through a forest in a landscape where remaining forests are already highly fragmented. We understand the forest below the transmission line will be permanently converted to "compatible	Given that this proposed route will fragment forest in a landscape (i.e., the Carolinian region) where forest cover has been reduced from 80% to 11%,[4] further details are needed on the station layout and "coordination" with St. Thomas that makes it impossible for the line	Thank you for your comment. The preferred route alternative (Route 3) was evaluated to impact the least amount of significant woodlands as well as the least amount of incompatible vegetation compared to the other route alternatives To ensure the safe operation of the transmission line, a portion of the significant woodlands within the new transmission line's right-of-

Draft ESR Section	Reference Text	CKSPFN Comment	CKSPFN Recommendation	Hydro One Response
	Response: Is it possible to route the proposed St. Thomas transmission line west of the existing Edgeware transmission lines rather than to the east?	vegetation" (shrubs/herbaceous species), which will have associated impacts (e.g., edge effects) on the surrounding forest.	to avoid this forest. Justification should be provided in terms of how HONI has considered the mitigation hierarchy (avoid, mitigate, restore, offset). Since the forest will be permanently converted to shrub/herbaceous cover if this route choice proceeds, offsetting will be necessary, and offsetting/restoration plans should be formed with meaningful input from us.	way will require vegetation clearing. This removal will be a conversion from incompatible vegetation (e.g., woodland or forest cover) to compatible vegetation (e.g., shorter-growing shrubs or meadow species). This is not considered an overall loss of vegetation on the landscape. To mitigate potential adverse effects on significant woodlands and other natural heritage features, a variety of measures will be implemented. These include minimizing the extent of clearing, retaining compatible vegetation where possible, salvaging or felling incompatible vegetation as appropriate, and using native species for restoration seeding or planting. All work areas will be restricted to designated work zones and protective barriers will be used to protect adjacent features from construction-related effects. The removal of vegetation will be completed outside of the migratory

Draft ESR Section	Reference Text	CKSPFN Comment	CKSPFN Recommendation	Hydro One Response
				bird breeding season and bat active season where practical. Additionally, Hydro One is committed to engaging with Indigenous communities on land use planning, including plant rehabilitation efforts.
3.6.2. Indigenous Community Participation in Field Surveys	*Hydro One offered each Indigenous community the financial resources and the administrative capacity to hire a field monitor to participate in the field surveys conducted on behalf of the Project. All communities identified by the Crown were invited to participate in field programs and the review of the study reports.*	It is unclear if Indigenous communities were invited to help develop the field program, including the survey methods used. Indigenous involvement in the development of field programs can help to ensure more complete results that better reflect the priorities of communities.	If Indigenous communities weren't engaged on the development of the HONI St Thomas field program, it would be beneficial for HONI to consult with Indigenous communities during field program development in future. Participation in these efforts is entirely the choice of invited communities, but the opportunity should be made available.	Thank you for your comment. Indigenous communities were initially consulted during the early stages of the project development and were invited to participate in discussions regarding their preferred methods and community-specific protocols of engagement, including participation in field studies. Hydro One welcomes input on the planning and execution of the field program. However, a detailed, specific, and structured opportunity for communities to influence the development of the field program, including survey methodologies, was not available. As suggested, Hydro One will consider developing a clear and structured engagement for

Draft ESR Section	Reference Text	CKSPFN Comment	CKSPFN Recommendation	Hydro One Response
				Indigenous communities to provide input in the field program to better incorporate community priorities, where feasible within customer-led project timelines and input that is commensurable to the project scope.
3.6.6. Chippewas of Kettle and Stony Point First Nation (CKSPFN)	*General Comment*	This section contains HONI's detailed record of consultation with CKSPFN/TFG, the contents of this section aren't included here for brevity.	There is a typo at the bottom of page 3-47 that should be corrected from "Hydro One invited AFN" to "Hydro One invited CKSPFN" There is another typo at the bottom of this subsection that should be corrected from "TMHC emailed WIFN for participation for Stage 2 AA".	Thank you for your comment. Hydro One will update the ESR to correct these items that you have identified.
4.0 Environmental Inventory	*Natural and Socio-Economic environment baseline conditions are described in the following sections.* *Desktop information for the Natural and Socio-Economic Environment was generally*	The field survey window that has occurred to date includes a relatively short timeline that doesn't account for fall ecosystem conditions and wildlife	Clear details on the ecological field survey methods, timing, level of effort, and spatial coverage are needed. This includes details on field surveys that have occurred, and those	Thank you for your comment on the field survey methods and spatial coverage for the St. Thomas Line Project. Field surveys were conducted between December 2023 and July 2024 to collect environmental data

Draft ESR Section	Reference Text	CKSPFN Comment	CKSPFN Recommendation	Hydro One Response
	collected within the LSA, while Natural Environment field surveys were completed within the PSA (see Section 2). Field surveys were completed between December 2023 and July 2024 to assess baseline environmental conditions and significant natural values to inform the Class EA. Natural heritage field surveys were conducted in accordance with the Natural Environment Field Program Methodology (Dillon, 2024). Where private property access was granted in advance of the field programs, field studies occurred within or directly adjacent to natural heritage features. Where private property access was not granted and the property was associated with a natural feature(s), field data was collected from the public road allowance, Hydro One's existing transmission ROW and/or from property limits where access was granted. Field data collected from	movement. No details are provided on the types of field studies that will occur in 2025, nor are details provided on the actual (versus planned) field survey methods. It is also currently unclear how much of the study areas have not been surveyed. Roadside surveys are not a sufficient replacement for direct survey, especially when it comes to potential SAR habitat, SAR/rare species, and delineation of natural features that may be difficult to detect on imagery (e.g., forested wetlands).	that are planned/underway. Without this information, it is difficult to understand if the relatively short field survey window to date is sufficient. HONI should clarify how much of each route alternative remains unsurveyed given that private property access was not granted for the entirety of the study areas.	for the Class EA. The surveys were carried out within the Project Study Area (PSA), which is a 120-meter buffer on either side of each route alternative. The methodology for these surveys is outlined in the Natural Environment Field Program Methodology (Dillon, 2024), which was provided on July 8, 2025 upon request. As noted in the ESR, access for field studies was granted on a voluntary basis by landowners. For properties where access was not granted, field data was collected from public road allowances, existing Hydro One rights-of-way, and property boundaries. This data was supplemented with aerial imagery and secondary sources to provide a comprehensive view. The ESR acknowledges that additional field studies will be completed in 2025 for the preferred route. These include Stage 2 Archaeological Assessments for areas with archaeological potential that have not been previously assessed. Furthermore, areas

Draft ESR Section	Reference Text	CKSPFN Comment	CKSPFN Recommendation	Hydro One Response
	adjacent lands was supplemented with information collected through aerial imagery interpretation and secondary data sources. The results of the natural heritage field surveys are summarized in Section 4.6.7 below. *Additional field studies will be completed in 2025.*			where access was not granted for the 2024 field investigations along the preferred route will be surveyed in 2025 to confirm the detection or non-detection of species like Butternut, Black Ash, SAR birds, SAR bats, and American Badger. Hydro One is committed to continuing this work and obtaining the necessary permits and approvals before construction begins.
4.4.3 First Nations Lands and Interests	*There are no First Nation reserve lands situated within the PSA or LSA.*	This section does not acknowledge that the proposed project and associated study areas fall within the territories of Indigenous communities that include CKSPFN.	This section should be updated to clarify that although there are not reserve lands present, the proposed project falls within the territory of CKSPFN.	Thank you for your comment. Hydro One will update Section 4.4.3 of the ESR to acknowledge the traditional territories of Indigenous communities and the McKee Treaty, No. 2.
4.6.3 Surface Water Resources	*Of the 104 aquatic features, 61 aquatic features within the PSA were assessed either at a Route Alternative crossing or the nearest roadside crossing during the 2024 field program, or through aerial imagery due to restrictive property access. Of the 61*	Information on the protocols used for these aquatic assessments is not included.	While planned aquatic assessment methods are provided within the referenced Dillion (2024) natural environment field program, details of the actual surveys that occurred need to be	Thank you for your comment regarding the aquatic assessments. The summary of these findings is included under Section 4.6.7.3 of the draft ESR. A more detailed Natural Environment Existing Conditions Report (Dillon, 2024) outlines the aquatic assessment

Draft ESR Section	Reference Text	CKSPFN Comment	CKSPFN Recommendation	Hydro One Response
	aquatic features assessed in the field or through aerial imagery, 45 were assessed to have the potential to support either permanent or intermittent flow.		contained within or appended to the ESR to allow for a fulsome review.	findings and s available upon request. Aquatic assessments included the collection of site-specific information for each watercourse feature specific to physical characteristics, including: feature type (i.e., watercourse, waterbody) flow regime, channel size (bankfull width, bankfull depth, wetted width, wetted depth), adjacent land uses, and potential risks of pollution. Fish habitat quality was assessed by classifying stream geomorphology, in-stream and riparian vegetation, substrate type, bank stability, as well as the presence of groundwater indicators (e.g., iron staining, bank seepage, presence of watercress). Observations of fish were also documented. The draft ESR also specifies that the watercourses supporting fish habitat were observed for each Route Alternative.

Draft ESR Section	Reference Text	CKSPFN Comment	CKSPFN Recommendation	Hydro One Response
				The majority of watercourses in the PSA are a combination of open natural watercourses and agricultural drains with permanent or intermittent flow regimes.
4.6.6 Designated or Special Natural Areas	***Conservation Areas*** *The Dan Patterson Conservation Area, Kirk Cousins Management Area, Dalewood Conservation Area are located outside of the PSA, and as such, no Conservation Areas are associated with any of the Route Alternatives.*	It is unclear how far these Conservation Areas are from the PSA. There are very few remaining and protected natural areas in the broader RSA and region in general, and these areas may be habitat for SAR. There is the potential that wildlife may need to move across the PSA to access these areas.	HONI should clarify how far these Conservation Areas are from the PSA, and whether wildlife movements across the PSA have been considered as a potential ecosystem process that the project could impact.	Thank you for your comment on the proximity of the Conservation Areas to the PSA and the potential for impacts on wildlife movement. The draft ESR confirms that the Dan Patterson Conservation Area, Kirk-Cousins Management Area, and Dalewood Conservation Area are all located outside of the PSA, and therefore, no Conservation Areas are associated with any of the Route Alternatives. Hydro One will update Section 4.6.6 of the ESR to clarify the approximate distances of these Conservation Areas from the PSA. The potential for disturbance to wildlife movement and habitat fragmentation within the Right-of-Way (ROW) and PSA was considered in the ESR. The ESR states that most wildlife species in the project work areas are mobile

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				and are likely to relocate temporarily to nearby habitats, such as existing corridors like fencerows and watercourse riparian areas, to avoid construction disturbances. This displacement is anticipated to be minimal due to the localized and temporary nature of construction.

4.6.6 Designated or Special Natural Areas	*Locally Significant Areas* *The Municipality of Central Elgin and City of London OPs show that there are two Environmentally Sensitive Areas located within the PSA (Appendix C-7). The Environmentally Sensitive Areas* *and the associated Route Alternative include:* *• Central Elgin Environmentally Sensitive Area (Route Alternatives 1A, 1B, 2A, 2B, and 3); and* *• Tenants Pond Environmentally Sensitive Area (Route Alternatives 1A and 1B).*	All proposed alternative routes appear to impact the Central Elgin Environmentally Sensitive Area (ESA). However, no clear references are made about what makes this area sensitive. The impacts on this feature appear to be assessed in Section 7.7.7.2, with an anticipated 0.07 ha to be traversed by the transmission right of way. However, this number is not contextualized in terms of the overall size of the ESA, and there is no information on the vegetation that will be removed or other ecosystem-level impacts.	More details are needed on the impacts that the project is anticipated to have on these areas, including the specific types of vegetation that will be removed. Proposed overlaps with sensitive features (e.g., this ESA) must be contextualized in terms of the overall size of that feature.	Thank you for your comment requesting more details on the impacts to Environmentally Sensitive Areas. The draft ESR notes that the Central Elgin Environmentally Sensitive Area and Tenants Pond Environmentally Sensitive Area are located within the PSA. The proposed transmission line right-of-way (ROW) for the preferred route will traverse 0.07 hectares of the Central Elgin Environmentally Sensitive Area. The Natural Environment Existing Conditions Report (Dillon, 2024) outlines the vegetation communities as well as significant features associated with the area of the ESA crossed by the preferred route as per the findings of the 2024 field program. To minimize adverse effects, the report commits to several mitigation measures, including: • Minimizing the removal of trees and ground vegetation to the extent practical. • Restricting construction activities to designated work areas. While some vegetation removal is necessary to ensure the safe

				operation of the transmission line, this will be limited to the extent practical. The ESR notes that the removal of incompatible vegetation will be a transition to compatible vegetation, such as shrubs and native seed mix, and will not represent a total loss of vegetation cover. Additional mitigation measures specific to the ESA will be included in the ESR.

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4.6.7 Natural Heritage Features	*General Comment*	Given the lack of clarity around when ecological field work occurred, there is uncertainty about whether the surveys would be sufficient to detect all potential natural heritage features, including seasonal wetlands and watercourses, which fill valuable ecohydrological functions.	HONI should clarify if surveys had the potential to detect seasonal wetlands and watercourses, or if these features are not included in their assessments.	The Natural Environment Field Program Methodology (Dillon, 2024) outlines the protocols used for the aquatic surveys and the field surveys that were conducted between December 2023 and July 2024. A total of 104 aquatic survey station locations were proposed, and of these, 61 aquatic features within the PSA were assessed. The assessment included features that have the potential to support either permanent or intermittent flow. Features were identified through desktop review of aerial imagery, and confirmed during surveys the field. Any unmapped watercourses were documented and assessed, and seasonal/intermittent watercourses were assessed throughout the 2024 field program. Where private property access was restricted, data was collected from public road allowances, existing Hydro One rights-of-way, and property limits, supplemented by aerial imagery and secondary data sources.

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				The presence of wetlands was also identified through MNR mapping and Ecological Land Classification (ELC) surveys. Seasonal wetlands were assessed during preliminary site reconnaissance as well as spring amphibian surveys, and were refined during Ecological Land Classification surveys.
4.6.7 Natural Heritage Features	*Information on natural heritage features and areas, as defined in the PPS were collected from the following sources.*	iNaturalist is not included on this list of sources, however, there are many species records throughout the study areas, and this could include SAR records.	iNaturalist and other community science databases should be reviewed for SAR records within the study areas.	Thank you for your comment. Community science databases such as iNaturalist and eBird were used in support of the sources listed in this section of the ESR to assess for the presence of general wildlife and SAR within the study areas, as per the Natural Environment Existing Conditions Report for the project.

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4.6.7.1 Ecological Land Classification & Botanical Assessment	*Botanical assessments were completed concurrently with ELC surveys. If encountered, the location and abundance of botanical Species of Conservation Concern (SCC) (as defined in Section 4.6.7.6) and/or Species at Risk (SAR) (as defined in Section 4.6.7.7) were documented and photographed, and UTM coordinates were recorded.*	The timing of botanical assessments is crucial information, especially for understanding the detection potential of specific SAR or rare species.	Information on the actual timing of ELC and botanical assessments must be provided within the ESR. To ensure a more fulsome baseline assessment, a three season botanical inventory should be completed before the project proceeds to construction.	Thank you for your comment. The draft ESR notes that ELC and botanical assessments were conducted concurrently, with field surveys completed between December 2023 and July 2024. Wording on the timing of these surveys will be added to Section 4.6.7.1. As noted under Section 4.0 of the ESR, additional field studies will be completed in 2025. The timing of these studies will be added to Section 4.0.
4.6.7.1 Ecological Land Classification & Botanical Assessment	*Dillon has taken a conservative approach for properties that could not be surveyed during the 2024 field investigations; through aerial interpretation, where potentially suitable habitat for Butternut was identified on these properties, the presence of Butternut was considered potentially present until surveys to confirm*	All of the Route Alternatives were determined to have the potential to contain Butternut as stated in Table 4- 12 Potential SAR habitat. There would be a different number of properties with potential suitable habitat area for	HONI could have applied differential weighting to the number of properties with potential Butternut habitat or the total area of potential Butternut habitat for each Route Alternative for the weighted multi-criteria decision-making	Thank you for your feedback regarding the weighting of potential Butternut habitat in the project's evaluation process. The project team evaluated the route alternatives using a multi-criteria decision-making approach. This process aimed to balance various environmental, socio-economic, Indigenous land use

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	species detection/non-detection are completed. As such, additional field verification surveys are proposed in 2025 for these properties to confirm detection/non-detection of Butternut on the Preferred Route.	Butternut for each of the three Route Alternatives, and a different total area of potential Butternut habitat on each Route Alternative.	analysis. By grouping the potential loss of Butternut SAR for each Route Alternative categorically instead of numerically, there is effectively no importance placed on a potential greater loss of Butternut SAR.	and perspectives , and technical factors. The evaluation considered SAR as a distinct and important criterion within the Natural Environment category. This criterion was given a weight of 20% of the category's total, which reflected input from Indigenous communities and project stakeholders on the importance of this criterion. The assessment of SAR effects included temporary versus permanent habitat disturbance and/or destruction within the ROW and PSA. As noted under Section 4.6.7.1, initial public comments identified Butternut within the PSA. To address the specific concern about Butternut, the team took a conservative approach for properties that could not be surveyed in 2024 due to not being permitted access. If potentially suitable habitat was identified through aerial interpretation, the presence of Butternut was assumed until surveys could be completed to confirm its presence

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				or absence. Additional field verification surveys were proposed for 2025 to confirm. The timing of the 2025 field studies will be included in Section 4.6.7. The total areas of potential SAR habitat were calculated for each Route Alternative and were used as a quantitative measure in the final comparative evaluation. The preferred route, Alternative 3, was found to have the least effects to SAR and potential SAR habitat, including permanent habitat removal impacts. This indicates that the presence of such habitats, including Butternut, was considered in the selection of the preferred route.

4.6.7.1 Ecological Land Classification & Botanical Assessment	*Table 4-5: Vegetation Communities Identified within the PSA SWD Deciduous Swamp*	This table shows that the preferred route (Route Alternative 3) crosses a deciduous swamp. Given that trees are generally considered "incompatible vegetation", it appears that this route will result in the permanent conversion of this wetland to another wetland type. Wetland conversion of any type is significant in this area given that the majority of wetlands have been lost since European colonization in this area.[5]	HONI should clarify why Route Alternative 3 was chosen when it crosses this wetland.	Thank you for your comment concerning the deciduous swamp crossed by the preferred route (Route Alternative 3). The selection of the preferred route was based on a weighted multi-criteria decision-making analysis (MCDM) that balanced four categories: Natural Environment, Socio-Economic Environment, Indigenous Culture, Values and Land Use, and Technical and Cost. The MCDM concluded that Route Alternative 3 was the most preferred alternative overall because it minimized impacts across multiple factors. Specifically, from a Natural Environment perspective, it had the least effects on incompatible vegetation communities, wildlife and wildlife habitats, SAR, and designated natural areas. It was also preferred in the other three categories. The ESR notes that each route alternative crosses wetlands; however, as per Table 5-9, the preferred route will traverse 0.01 hectares of wetland, which is a

				significantly smaller area than the other route alternatives. While vegetation clearing may be required in this area for the new transmission line, it is important to note that the removal of incompatible vegetation (e.g., taller trees) is not a total loss of vegetation but rather a transition to compatible vegetation. Measures to mitigate impacts on wetlands will be implemented, including restricting construction activities to designated work areas and restoring disturbed areas after construction with compatible native species.

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4.6.7.2. Wetlands	*Formal wetland evaluations or assessments as per the Ontario Wetland Evaluation System (OWES) were not conducted within the PSA as part of Dillon's 2024 field surveys.*	It isn't necessary to complete formal wetland evaluations. However, this does result in a data gap that must be addressed through protections and mitigations.	In the absence of evaluations, all wetlands must be protected, buffered, and offset in alignment with how these activities would occur if the wetland were deemed significant through assessments. If wetland evaluations occur, CKSPFN must be invited to attend.	Thank you for your comment. The ESR outlines mitigation measures to avoid and reduce impacts to wetlands, such as: • Minimizing work activities and access within wetlands to the extent practical. • Restricting maintenance and/or fueling of machinery to beyond 30 m of wetlands. • Implementing Erosion and Sediment Control (ESC) measures. • Restoring disturbed areas with compatible native species. CKSPFN was invited to attend environmental field investigations for this project. The project-specific EMP will be shared with CKSPFN for review before construction.
4.6.7.2. Wetlands	*Table 4-7: Wetland Features Summary*	Ephemeral wetlands/vernal pools provide crucial habitat for a large number of species. It is unclear if these	If ephemeral wetlands/vernal pools occur in the study areas, they should be included in the wetland evaluation.	Thank you for your comment. Community types were assessed during Ecological Land Classification surveys. It is recognized that ephemeral wetlands/vernal pools may occur

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		features were considered as potential wetlands.		within the forests of the study area, and these were assessed during site reconnaissance and amphibian breeding surveys prior to Ecological Land Classification.
4.6.7.3 Aquatic and Fish Habitat	*General Comment*	While impacts on fish are discussed, there are also numerous other potential impacts on species that use these habitats. For example, many species use watercourses for life cycle needs (e.g. as travel corridors to breeding or nesting sites). Additionally, many invertebrate species also rely heavily on specific environmental conditions within waterbodies for reproduction.	HONI should clarify if impacts on species movement along watercourses and potential impacts on invertebrates have been considered.	Thank you for your comment on aquatic and fish habitat. We appreciate your feedback that watercourses are used for more than just fish, including as travel corridors for various wildlife species and habitats for invertebrates. Impacts to aquatic habitat for species movement and aquatic invertebrates will be mitigated by locating transmission towers away from watercourses, limiting the removal of vegetation within riparian habitats, and utilizing erosion and sediment control measures for work near water, including potential temporary water crossings.
	Under the PPS, significant woodlands are protected in Ecoregions 6E and 7E. The PPS	Please see earlier comment regarding the extensive loss of	Permanent conversion of woodlands to "compatible"	Thank you for your comment. To ensure the safe operation of the transmission line, approximately

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4.6.7.4. Woodlands	*defines significant woodlands as "an area which is ecologically important in terms of features such as species composition, age of trees and stand history; functionally important due to its contribution to the broader landscape because of its location, size or due to the amount of forest cover in the planning area; or economically important due to site quality, species composition, or past management history" (MMAH, 2024).* *Although the ELC community types are ranked as Common or Secure in Ontario, it is acknowledged that several woodlands in Ontario have been utilized for hunting and trapping, as well as plant and medicinal harvesting by Indigenous communities.*	forest in the Carolinian region. This is part of the cumulative effects context that increases the potential "significance" of any remaining woodlands. Given the noted significance of woodlands for Indigenous communities, permanent conversion of woodlands to "compatible" vegetation types and the associated impacts (e.g., edge effects) likely require offsetting.	vegetation (i.e., shrubs and herbaceous species) should only occur if it can be demonstrated that these impacts cannot be avoided. Given that on-site restoration will not result in a return to the same ecosystem type, an offsetting plan should be developed with our input.	3.63 ha of significant woodlands within the new transmission line's right-of-way will require vegetation clearing. This removal will be a conversion from incompatible vegetation (e.g., woodland or forest cover) to compatible vegetation (e.g., shorter-growing shrubs or meadow species). Please see comments below regarding the cumulative effects assessment (CEA) and the conversion of incompatible to compatible vegetation types. The CEA was completed accounting for impacts from other projects that were readily publicly available. Hydro One is committed to conducting all project activities in an environmentally responsible and sustainable manner, following the hierarchy of mitigation. Our primary approach is avoidance of environmental impacts. For impacts that cannot be avoided, following the mitigation hierarchy, Hydro One will implement a biodiversity program which includes partnerships with

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				Indigenous communities to lead and support biodiversity initiatives.
4.6.7.6 Wildlife and Wildlife Habitat Amphibian Breeding Habitat (Woodland and Wetland)	*Several woodland and wetland features within the PSA were observed to have the potential to provide amphibian breeding habitat during preliminary habitat assessments. During amphibian breeding surveys, anuran species were heard calling at 18 of the 21 established breeding amphibian survey stations. As a third (late-season) survey was not completed, a full assessment of breeding species and population numbers could not be verified.*	There are several noted species with candidate SWH, including amphibians, that are susceptible to road mortality.	Potential impacts of access road development must be considered in terms of mortality potential for wildlife, including amphibians. Additionally, a full (three survey) round of amphibian call surveys should be completed before detailed design to ensure that impacts on these species can be mitigated. This will also help to form a more complete baseline to compare monitoring results after the project commences.	Thank you for your comment. Based on the 2024 field surveys, several woodland and wetland features within the PSA were observed to have the potential to provide amphibian breeding habitat. As a third (late-season) survey was not completed, all features where amphibians were heard calling during the first two rounds of surveys, as well as features with potential to provide habitat, were conservatively identified as Candidate SWH for Amphibian Breeding Habitat (Woodland and Wetland) and considered in comparative evaluation. Mitigation measures to minimize project impacts will be implemented for all areas identified as candidate amphibian breeding habitat along the corridor. Tower locations and access roads will be located such that they avoid wetlands where possible, limiting the removal of vegetation within amphibian and wetland habitats

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				where possible, and utilizing erosion and sediment control measures for work near aquatic habitats. Wetlands disturbed during construction will be restored following completion of construction. Two areas of Candidate SWH for Amphibian Breeding Habitat (Woodland and Wetland) were identified within the preferred route ROW: associated with Pitcher Plant Fen PSW along Yarmouth Centre Road and a riparian woodland southeast of the intersection of Ferguson Line and Yarmouth Centre Road. Wherever practical, access to construction areas will utilize existing access roads. Boundaries of important wildlife habitats will be identified and the ROW boundaries flagged before clearing. In addition, construction personnel will be educated on the potential for wildlife which may be encountered. Should wildlife, including amphibians, be encountered, they will be allowed to leave on their own accord, and vehicles and equipment left idle

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				overnight at work areas will be inspected for wildlife prior to use.
4.6.7.6 Wildlife and Wildlife Habitat *Terrestrial Crayfish*	*Terrestrial crayfish burrows were incidentally observed during the 2024 field program at three survey stations.*	If possible, it would be beneficial to have a map of the locations of these findings available and cross-referenced here. This comment generally applies for any spatially relevant ecological survey results, while recognizing that some SAR and sensitive species results may need to be shared directly with CKSPFN instead of being mapped in the ESR.		Thank you for your comment. The Natural Environment Existing Conditions Report (Dillon, 2024) outlines the findings of the 2024 field program and has been enclosed in Hydro One's response.
4.6.7.6 Wildlife and Wildlife Habitat *Barn Swallow*	*Although Barn Swallow was documented throughout the PSA, no breeding evidence was observed. As such, Barn Swallow has not been carried forward further, as the species and its habitat (nest adjacent to open*	Breeding bird surveys for other species (i.e., wood thrush) are noted within other sections of the ESR itself as not having complete coverage. Without	All potential barn swallow nesting habitat should be carried forward in this assessment as candidate SWH or as potential SAR habitat elsewhere in the document, as	Thank you for your comment. Barn Swallow flyovers were incidentally observed during the 2024 field program. Whereas Wood Thrush were observed singing within suitable breeding habitat during consecutive breeding bird surveys suggesting possible breeding of the species. No breeding behaviours

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	areas for foraging) was not identified in the PSA.	having completed surveys at all potential barn swallow nesting locations, it is not reasonable to not carry this species forward at this stage.	previously mentioned.	were observed displayed by Barn Swallows within suitable breeding habitat. Barn Swallow generally nest in human-made structures including buildings, bridges, and culverts; and forage in open areas including fields, waterbodies, and open pastures. Barn Swallow nests were not observed along the buildings, bridges, or culverts within the PSA during the 2024 field program. No breeding behaviour or nesting structures were observed during field surveys within the PSA, and therefore nesting habitat for the species was not carried forward. Though no Barn Swallow nesting habitat was identified within the PSA, the ESR identifies mitigation measures should Barn Swallow nests be identified, including nest removals outside of the migratory bird breeding season (April 1 to August 31), assessments of structures such as buildings, bridges, and culverts for Barn Swallow nests should augmentation or removals of the structures be necessary, and

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				installing measures such as netting to avoid Barn Swallow from nesting in structures that may be impacted by the project.
4.6.7.6 Wildlife and Wildlife Habitat	*Table 4-11 Candidate and Confirmed SWH*	There is currently a lack of conclusive information about the following SWH/species: • Turtle wintering areas • Turtle nesting areas • Breeding amphibians • Bald eagle nesting, foraging and perching • Wood thrush • Barn swallow	While we appreciate that many areas will be treated as having candidate SWH within these categories, additional surveys to confirm this SWH should be completed as part of detailed design.	Thank you for your comment. As many of the features have the potential to provide SWH for a number of categories, a conservative approach was taken to classify them as candidate SWH where surveys could not confirm the SWH. As such, these significant wildlife habitats will be identified and the ROW boundaries flagged prior to clearing where required. Therefore, additional surveys for the aforementioned SWH are not proposed.
4.6.7.7. Species at Risk	*American Badger* *American Badger or dens displaying suitable characteristics/evidence of American Badger were not observed during the field program.*	No description is provided on the methods used to detect American badger dens, and this detection has likely been limited given that an uncertain number of surveys occurred	The ESR must be updated to include field survey methods (i.e., with a referenced or thoroughly described protocol), timing, and level of effort. Without this information clearly outlined, it is very	Thank you for your comment. The enclosed Natural Environment Existing Conditions Report (Dillon, 2024) outlines the findings of the 2024 field program and is available upon request. Searches for mammal burrows and evidence of American Badger presence were conducted

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		from the roadside. Given that this is an elusive species that is generally active from dawn to dusk, it is unclear if sufficient effort has been taken to determine if this Endangered species is present in any of the study areas before it was determined that the species did not need to be carried forward in the ESR.	difficult to determine if it is reasonable to exclude American badger at this stage, or if additional surveys are likely to be needed.	concurrently with Ecological Land Classification and botanical surveys, including a desktop review of aerial imagery to determine potential habitat areas, and field surveys. Where mammal burrows and/or dens were observed during the late 2023-2024 field program, a habitat assessment was completed to identify potential habitat features for American Badger. This included recording observations of burrows (including groundhog or woodchuck) that were, at minimum, 6-inches in diameter, with large-sized excavated mounds or sand piles near the entrance, and additional visible characteristics such as claw marks or animal hairs if encountered in the field. If suitable burrow characteristics were identified, and where animal hair was present, this hair may be sent for genetic testing to confirm species presence. Survey protocols have not been developed for American Badger in Ontario at this time. Presence/not detected surveys were conducted

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				using an adapted protocol of the Inventory Methods for Medium-sized Territorial Carnivores: Badger (Resources Information Standards Committee, 2007) from British Columbia. Additional surveys for American Badger were completed throughout the ROW of the preferred route during the 2025 field season. No evidence of American Badger was observed.
4.6.7.7. Species at Risk	*Barn Swallow Wood Thrush*	Both the barn swallow and wood thrush were detected through surveys. Although nests were not observed, there is no conclusive evidence that these species are not using habitat throughout all project study areas. Without very extensive field survey effort, it cannot be concluded that	The ESR should be revised to include barn swallow and wood thrush as having potential SAR habitat present. This need is highlighted by the noted (Page 4-156) lack of breeding bird surveys within the deciduous forest near the planned Centennial TS, which has potential to provide habitat for wood thrush.	Thank you for your comment. As discussed previously, Barn Swallow flyovers were incidentally observed during the 2024 field program, and no breeding behaviors were observed displayed by Barn Swallows within suitable breeding habitat. Barn Swallow generally nest in human-made structures including buildings, bridges, and culverts, and forage in open areas including fields, waterbodies, and open pastures. Barn Swallow nests were not observed along the buildings, bridges, or culverts within the PSA during the 2024 field program. No breeding behaviour or nesting structures were observed

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		these species do not have habitat present along the potential routes. The ESR acknowledges that the nesting activities of barn swallow may change from year to year, and that suitable structures could provide habitat.		during field surveys within the PSA, and therefore nesting habitat for the species was not carried forward. Wood Thrush were observed singing within suitable breeding habitat during consecutive breeding bird surveys suggesting possible breeding of the species, and these areas were mapped as candidate SWH for the species. As Wood Thrush and Barn Swallows are a migratory bird protected under the MBCA, and listed as threatened under Schedule 1 of SARA, individuals and their residences are afforded protection under SARA. Active Wood Thrush and Barn Swallow nest locations were not identified during the field program, and therefore SAR habitat for neither species was identified. Wood Thrush had been previously identified within the deciduous forest near the planned Centennial TS, and therefore the forest was assessed as candidate SWH for the

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				species. The deciduous forest does not provide suitable habitat for Barn Swallow, and therefore it was not assessed as habitat for the species.
5.0 Identification and Evaluation of Alternative Routes *5.5. Step 5: Evaluate and Select*	*Following identification and weighting of the evaluation criteria, the Project team completed a GIS analysis of the measures identified for each applicable criterion for each Route Alternative based on available data sources.*	Without specific data sources referenced, it is impossible to tell if this analysis is sufficient. Similarly to the comment regarding ecological field survey methods, there is a need to be more specific about the methods used in this analysis. These details need to be included directly within the ESR	The specific datasets used to evaluate each criteria must be referenced.	Thank you for your comment. Section 5.3 of the ESR includes a list of field surveys and GIS analysis for each respective category, where applicable. The Natural Environment Existing Conditions Report (Dillon, 2024) outlines the survey methodology and findings of the 2024 field program and has been enclosed in this response.
5.0 Identification and Evaluation of Alternative Routes *5.5. Step 5: Evaluate and Select*	*The information was then fed into a comparative evaluation matrix where numerical weighted scores were provided per criterion and totaled for each evaluation category*	It is unclear how these scores were calculated. Without reproducible methods presented, it is extremely difficult to interpret the results shown in Table 5-9.	Clear (i.e., reproducible) methods need to be included on how the weighted scores were calculated and how they should be interpreted.	An infographic explaining this process has been enclosed with this response. Hydro One would also be happy to meet with Indigenous communities to discuss these details in person.

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5.0 Identification and Evaluation of Alternative Routes *Table 5-9: Natural Environment Category Comparative Evaluation Results*	*Vegetation and Vegetation Communities: 8.4 ha (9.2%) are incompatible with transmission lines (long term effects) while 83.13 ha (90.8%) are compatible (short term effects).*	It is beneficial for different temporal scales to be considered, but to ensure that results can be compared, this method needs to be carried throughout the analysis.		As mentioned above, an infographic explaining this process has been enclosed with this response. Hydro One would also be happy to meet with Indigenous communities to discuss these details in person.
Table 5-9: Natural Environment Category Comparative Evaluation Results	*Wildlife and Wildlife Habitat*	Given the issues raised above about the lack of methodological context throughout the ESR, including how "weighted scores" were calculated, the results are both difficult to interpret and to compare to one another. For example, under the Wildlife and Wildlife Habitat category, route	To determine if the results of this assessment are sound, the methods used to survey wildlife and wildlife habitat must be thoroughly described. This must include detailed documentation of the survey methods, timing, and level of effort. The methods used to result in the weighted scores, and guidance on their interpretation must also be	Thank you for your comment. The Natural Environment Existing Conditions Report (Dillon, 2024) outlines the survey methodology and findings of the 2024 field program (enclosed). In addition, the Natural Environment Field Program Methodology (Dillon, 2024) was provided on July 8, 2025 upon request. Section 5.0 of the ESR provides an overview of the evaluation of Route Alternatives, including the steps of the weighted MCDA. Though route three is geographically close to route alternative 2, the PSAs and ROWs

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		alternative #3 has a dramatically higher score than other alternatives, which appears to correspond with a lower expected impact on wildlife and wildlife habitat. However, this route is fairly close to route #2, making this a somewhat surprising conclusion. Without understanding the survey methods, level of effort, and timing, it is nearly impossible to independently verify if this is a sound conclusion, or if additional habitat has not been mapped. Additionally, there remain major gaps	provided. The limitations of these surveys must be described in terms of the area and percentage of total alternative routes that could be accessed for surveys. Additionally, these assessments must be updated with any and all Indigenous Knowledge of wildlife and wildlife habitat that CKSPFN wishes to bring forward to HONI.	of the routes do not overlap until the southern portion of the routes. As such, the natural features and associated wildlife habitat they support within the areas along and surrounding these routes are different. Therefore, the impacts to the natural features and associated wildlife and their habitats within these areas will differ. Hydro One welcomes Indigenous communities to share Traditional Ecological Knowledge throughout the lifecycle of the project, while respecting OCAP principles and Indigenous Knowledge Sovereignty.

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		in wildlife and wildlife habitat knowledge due to a lack of complete land access.		
Table 5-9: Natural Environment Category Comparative Evaluation Results	*Species at Risk (SAR)*	Similarly to the above comment, the lack of clarity on how weighted scores were calculated makes it difficult to understand why the scores for each alternative vary so widely. Additionally, as mentioned earlier, the lack of context on ecological field survey methods within the ESR raises uncertainty in the rigor of these results. Barn swallow and wood thrush were both observed in the study areas, while American badger has the potential to	Details on the weighted score calculation, including the formulas/analysis procedures used, would greatly aid in the interpretation of these results. The previously requested details on ecological field survey methods are also crucial. Given that there are likely methodological and survey coverage gaps, all potential SAR should be carried forward in this assessment. If any additional SAR knowledge is raised by CKSPFN in future, it should be included in	Thank you for your comment. The Natural Environment Existing Conditions Report (Dillon, 2024) outlines the survey methodology and findings of the 2024 field program (enclosed). Please refer to responses above regarding American Badger survey methodology, and the rationale for not carrying forward Barn Swallow and Wood Thrush for SAR habitat mapping. Section 5.0 of the ESR provides an overview of the evaluation of Route Alternatives, including the steps of the weighted MCDA.

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		occur. All of these species may use habitat in the study area now that was not detected due to incomplete survey coverage or methodological gaps, and all have the potential to use habitat in the study areas before construction occurs.	this assessment.	
Table 5-9: Natural Environment Category Comparative Evaluation Results	*Designated Natural Areas and Identified Habitat Restoration Areas*	Here and elsewhere in the ESR, it would be helpful for the area of features (e.g., significant valleylands) to be quantified in terms of percentage of total area of that feature that occurs along each alternative route. This is especially helpful in understanding how notable certain impacts might be in a cumulative		Thank you for your comment. The approximate area of natural features such as significant valleylands is included in Table 5-9 of the ESR. The results of the weighted MCDA for each category are in Table 5-9 through Table 5-12 and includes the respective measure and percentage where practicable.

Draft ESR Section	Reference Text	CKSPFN Comment	CKSPFN Recommendation	Hydro One Response
		effects context.		
Table 5-9: Natural Environment Category Comparative Evaluation Results	*Final Weighted Score*	Similarly to previous comments on this table, it is unclear how the final weighted scores were calculated. The final scores do not appear to be a mean, median, or total of the previous categories. Without knowing how this calculation was performed, it is impossible to independently verify that the result is accurate.	Clear, reproducible, methods are required on how these calculations were performed. This includes details on the calculation of final weighted scores.	An infographic explaining this process has been provided as part of Hydro One's response. Hydro One would also be happy to meet with Indigenous communities to discuss these details in person.
Table 5-10: Socio-Economic Environment Category Comparative Evaluation Results		Previous comments regarding methodological details on these calculations apply. Indigenous Culture, Values, and Land	Previous requests regarding methodological details on these calculations apply. Any socioeconomic considerations that	Comments from Indigenous communities can extend beyond the Indigenous Culture, Values, and Land Use category and be assessed and weighted equally alongside other factors. The existing category (25% weighting overall) have been developed

Draft ESR Section	Reference Text	CKSPFN Comment	CKSPFN Recommendation	Hydro One Response
		Use are included as a separate category, there may be additional socio-economic considerations (e.g., economic reconciliation opportunities that may overlap with the proposed route). Evaluating these criteria here will help to ensure that they influence the overall socioeconomic weighted score, versus only being included in the Indigenous Culture, Values, and Land Use category.	CKSPFN deems important and appropriate within this category should be added to this table to ensure that they are equally assessed alongside other socioeconomic criteria. For example, employment and economic opportunities, land restoration and stewardship opportunities, as well as education and capacity building opportunities.	based on input from Indigenous communities received during previous projects and is designed to be adaptable to incorporate additional project specific considerations that are raised during route selection stage. Potential socio-economic impacts on Indigenous-owned businesses and partnerships were not identified through project consultation. However, if such considerations are raised by Indigenous communities, they are generally addressed within the Socio-economic and Indigenous Culture, Values and Land Use categories. For instance, this may include considerations related to potential revenue impacts resulting from scheduled outages affecting wind farms owned by Indigenous communities within the project area. Hydro One remains committed to enhancing efforts to account for economic reconciliation considerations during route selection processes.
Table 5-11: Indigenous Culture, Values	*Assessed Criteria include:* • *Addition to Reserve (ATR) Lands*	It is beneficial that this category is included in equal	Provided that capacity allows, CKSPFN should	Indigenous communities were given the opportunity to review and provide feedback on the

Draft ESR Section	Reference Text	CKSPFN Comment	CKSPFN Recommendation	Hydro One Response
and Land Use Category Comparative Evaluation Results	• *Intersects Areas of Historical Significance* • *Areas that Support Hunting/Trapping and/or Harvesting Grounds* • *Areas that Support Fish Bearing Waters with Identified or Inferred Habitat of Game Fish Species* • *Effects to Rare, Undisturbed Native Habitats/Ecosystems* • *Effects to Rare/Sensitive Species Regeneration Potential* • *Co-Location and Repurpose of Existing Infrastructure*	weight to the other three, but given that this is the primary category where Indigenous Rights and interests are being considered, it may be beneficial for CKSPFN to review and verify the contents of this analysis to ensure that the results are accurate.	review the criteria and measures used in this analysis to ensure that all applicable criteria are adequately considered. Several of these Criteria require information from CKSPFN to ensure that the analysis is complete. Comments on these criteria are included in the lines below.	Indigenous Culture, Values and Land Use considerations during the TAC and route selection process. The memorandum provided in September 2024 by CKSPFN helped inform the criteria, emphasizing co-location and repurposing of existing infrastructure as well as minimizing impacts to natural areas and waterways. CKSPFN may review the criteria post route selection process. Hydro One will, where reasonably feasible, consider incorporating any additional feedback provided by CKSPFN.
Table 5-11: Indigenous Culture, Values and Land Use Category Comparative	*Intersects Areas of Historical Significance: Mapped areas of historical Indigenous significance within the ROW.*	Adequate analysis of this criteria requires meaningful input from Indigenous Nations on areas of historical	We are currently undertaking multiple traditional knowledge and land use studies and are hopeful that	Hydro One is supportive of CKSPFN undertaking traditional knowledge and land use studies and looks forward to the recommendations that will arise from these efforts prior to construction scheduledQ2

Draft ESR Section	Reference Text	CKSPFN Comment	CKSPFN Recommendation	Hydro One Response
Evaluation Results		significance.	recommendations coming out of this work can support the identification of areas of historical significance throughout the detailed design process. We are also hopeful that any major finds along the selected route can be further discussed with HONI to determine mitigation steps.	2026. These studies will assist Hydro One in identifying areas of cultural and historical significance. Additionally, Hydro One recognizes its obligation to report any significant archaeological discoveries encountered along the designated route and will ensure that relevant information is shared with Indigenous communities. Mitigation measures will be implemented accordingly.
Table 5-11: Indigenous Culture, Values and Land Use Category Comparative Evaluation Results	*Areas that Support Hunting/Trapping, and/or Harvesting Grounds: Effects on lands with habitat or vegetation types that support or have potential to support hunting/trapping/harvesting activities and medicinal plants within the ROW.*	Adequate analysis of this criteria requires meaningful input from Indigenous Nations on the habitat tor vegetation types that support these activities.	We are currently undertaking multiple traditional knowledge and land use studies and are hopeful that recommendations coming out of this work can support the identification of areas that support hunting/trapping and/or harvesting throughout the detailed design process. We are also hopeful that any major	Hydro One is supportive of CKSPFN to undertake these traditional knowledge and land use studies and looks forward to the recommendations that arise related to the identification of areas that support s.35 rights. Hydro One will share any further significant environmental information throughout the lifecycle of the project.

Draft ESR Section	Reference Text	CKSPFN Comment	CKSPFN Recommendation	Hydro One Response
			finds along the selected route can be further discussed with HONI to determine mitigation steps.	
Table 5-11: Indigenous Culture, Values and Land Use Category Comparative Evaluation Results	*Areas that Support Fish Bearing Waters with Identified or Inferred Habitat of Game Fish Species:* *Effects to aquatic habitat including total number and, length of, watercourse crossings within ROW.*	This criteria examines effects on aquatic habitat, including the total number, and length of watercourse crossings in the ROW. This is similar to the "Surface Water Resources and Aquatic Habitat" criteria in Table 5-9 (Natural Environment Category Comparative Evaluation Results). Neither of these criteria capture the potential water quality impacts of construction activities and installation of access roads, which could include	This measure could potentially be assessed by examining the average distance of ground infrastructure (i.e., transmission line poles and access roads) from watercourses along each route alternative, versus only examining the impact of direct crossings. This would give a more accurate picture of the full suite of project impacts on aquatic features.	Thank you for your comment and suggestion for assessing the criterion. At the time of the comparative evaluation, locations of infrastructure such as transmission line towers and access roads for the Project have not been determined as they are identified following the selection of the preferred route during detailed engineering design. While these locations are unknown, the draft ESR considers the potential Project impacts on surface water resources and aquatic and fish habit under Sections 7.7.4 and 7.7.8.2. This includes mitigation measures associated with construction activities. As noted under Section 7.7.8.2, transmission towers will be located to avoid impacts to fish and aquatic habitat.

Draft ESR Section	Reference Text	CKSPFN Comment	CKSPFN Recommendation	Hydro One Response
		increased sedimentation in waterways.		
Table 5-11: Indigenous Culture, Values and Land Use Category Comparative Evaluation Results	*Effects to Rare, Undisturbed Native Habitats/Ecosystems: Effects to rare habitats in southwestern Ontario including tall grass prairies, savannah, native woodlands, natural wetlands, etc., within the ROW, and measured level of disturbance of native habitat and ecosystems bases on calculated average of conservatism associated with the PSA.* *Effects to Rare/Sensitive Species Regeneration Potential: Long-term effects to species at risk and their regeneration potential within the ROW.*	These criteria appear to address a western concept of rare and at-risk species, which may differ from Indigenous Knowledge and perspectives on the risk status of species. There does not appear to be mention of species of cultural significance, which might not be considered rare by western definitions, but may not adequately support sustained harvesting.	Species considered by CKSPFN to be at-risk, rare, or culturally significant should be included within these measures.	Hydro One welcomes CKSPFN to share information regarding species that are culturally important to CKSPFN.
Table 5-11: Indigenous Culture, Values and Land Use	*Co-Location and Repurpose of Existing Infrastructure: Co-Location*	No comment – included for context		

Draft ESR Section	Reference Text	CKSPFN Comment	CKSPFN Recommendation	Hydro One Response
Category Comparative Evaluation Results	*and Repurpose of Existing Infrastructure*			
Table 5-11: Indigenous Culture, Values and Land Use Category Comparative Evaluation Results	*Final Weighted Score*	Similar to other tables, it's unclear how these weighted scores were calculated. While the numerical metrics here and for each Criteria may provide useful context, they are not a replacement for Nation-provided perspectives on each route unless CKSPFN choses to defer to this analysis.	These results should also be reviewed with CKSPFN to ensure that they align with the Nation's assessment of the potential impacts of each route.	The weighting assigned to each criterion was determined based on feedback received during TAC workshops and a survey, which included participation from Indigenous communities. The weighting for the Indigenous Culture, Values, and Land Use criteria was distributed evenly across all related metrics which is consistent with other projects completed by Hydro One based on feedback received on this project and past projects in Southwestern Ontario. Hydro One welcomes CKSPFN to provide input on the criteria and weighting that can be used for Hydro One projects moving forward.
Table 5-12: Technical and Cost Category Comparative Evaluation Results		Previous comments regarding methodological details on these calculations apply.	Previous requests regarding methodological details on these calculations apply.	Chapter 5 of the ESR documents the standard evaluation method used including the Multi-Criteria Decision Making Analysis process, a standard evaluation process protocol. To assist with this understanding, an infographic summarizing the process has been

Draft ESR Section	Reference Text	CKSPFN Comment	CKSPFN Recommendation	Hydro One Response
				be provided as part of this response.
Table 5-13: Final Overall Weighted Scores		This table ranks the route alternatives as "least", "less", and "most preferred", including for Indigenous Culture, Values, and Land Use. These results currently indicate that Route 3 would be "Most Preferred" in terms of its impacts on Indigenous Culture, Values, and Land Use, but it remains unclear if HONI has enough information available to make this conclusion, and the methods used to calculate these findings remain unclear.	The results of this analysis, particularly as they pertain to Indigenous Culture, Values, and Land Use, must be reviewed with Indigenous Nations, including CKSPFN, to ensure that they align with Indigenous Knowledge, Values, and perspectives on the alternate routes. Details on the ecological field survey methods, timing, level of effort, and spatial coverage are critical to allow for an adequate review of the Natural Environment results.	It is acknowledged that Indigenous community participation in the development of these criteria including data to support their evaluation is a critical aspect of the comparative evaluation process. As noted in Section 5.3.3. of the ESR, several opportunities were provided for Indigenous communities to participate, provide comments and feedback on the evaluation process including development of evaluation criteria and collection of data. During this Class EA process, Hydro One received letters and information from community-led studies to support the evaluation from Indigenous communities which have been incorporated. Hydro One would be pleased to schedule a meeting to discuss Indigenous Culture, Values and Land Use Category and criteria with CKPSFN.

Draft ESR Section	Reference Text	CKSPFN Comment	CKSPFN Recommendation	Hydro One Response
		Without review and verification of these results by Indigenous Nations, including CKSPFN, these results cannot be considered conclusive. Additionally, the Natural Environment results cannot be considered conclusive until detailed information is provided within the ESR body text or appendices on the ecological field survey methods, timing, level of effort, and spatial coverage.		
6.1 Design Phase	*The final design plans will be based on necessary surveys, including a geotechnical survey, and consultation with stakeholders.*	CKSPFN is a rights holding Nation that must be provided with the opportunity to	CKSPFN must be provided with early opportunities to provide input on the mentioned studies	In a response letter dated October 24, 2024, to CKSPFN's memorandum, Hydro One expressed its commitment to exploring biodiversity initiatives

Draft ESR Section	Reference Text	CKSPFN Comment	CKSPFN Recommendation	Hydro One Response
	Hydro One will also finalize restoration plans in consultation with appropriate stakeholders and local communities, as necessary.	review and contribute to these pieces. This must occur separately from stakeholder consultation. If CKSPFN wishes, there is an opportunity to conduct restoration planning in a manner that aims to restore both the land and waters, and cultural connections to it. This is known as reciprocal restoration[6], and will require that HONI conducts early consultation on restoration goals with Indigenous Nations.	and plans. If CKSPFN wishes, HONI should proceed with restoration planning through the lens of reciprocal restoration, aiming to restore ecosystems in a manner that supports land and water-based rights and practices. This planning should include the previously mentioned provision of offsets for ecosystems that will be permanently converted due to "incompatible" vegetation (e.g., woodlands, deciduous swamp). This could potentially be achieved through a biodiversity initiative associated with this project, which currently does not	collaboratively with CKSPFN to create or enhance habitats, as offset measures for impacts related to the project. Hydro One looks forward to partnering with CKSPFN on a community-led initiative, such as reciprocal restoration. Both parties will convene initial discussions to further develop the scope of the biodiversity initiative.

Draft ESR Section	Reference Text	CKSPFN Comment	CKSPFN Recommendation	Hydro One Response
			appear to be considered.	
6.2 Construction Phase	*In addition, a Project-specific Environmental Management Plan will be prepared, outlining specific requirements to be followed for the proposed Project.* *Prior to construction, a detailed construction plan will be developed.* *Construction activities will be restricted to designated work areas and protective barriers, such as fencing, will be erected to protect features from construction related effects.*	There are many other potential during- construction mitigations that are outside of the scope of the current review, but must be included in the EMP. For example, it is unclear whether the impacts of temporary barriers (e.g., fencing) on wildlife have been considered and addressed. Additionally, construction will result in noise that will have impacts on wildlife given that several species (e.g. bats and many migratory bird species) are extremely sensitive	CKSPFN should be provided with the opportunity to review and comment on the Environmental Management Plan (EMP). CKSPFN monitors should be invited to oversee construction activities.	A project-specific EMP will be prepared prior to construction to outline specific mitigation measures for the project, based on the commitments and general mitigation strategies outlined in the ESR. The EMP will be distributed to CKSPFN for review prior to construction. We thank CKSPFN for expressing interest in participating in environmental monitoring during construction of the Project. With regards to environmental monitoring during construction, in the interest of prioritizing the safety of all parties, it has not been Hydro One's historic practice to invite external monitors onto active construction sites. However, in recognition of the interest expressed by CKSPFN in monitoring during construction activities, Hydro One will arrange with CKSPFN non-active site tours to ensure construction mitigations are present.

Draft ESR Section	Reference Text	CKSPFN Comment	CKSPFN Recommendation	Hydro One Response
		to noise pollution. All potential environmental impacts of construction activities need to be considered and mitigated.		
7.7.8.4 Invasive Species	*Additional measures that would be undertaken to reduce the spread of invasive species include:* *Abiding by the Invasive Species Act regulations;*	If there are sections along any of the three Route Alternatives that have invasive species populations that could qualify as an "Invaded Place", by an inspector than there is an obligation under section 19 of the *Invasive Species Act* "to control, remove or eradicate the invasive species found at the place or to prevent its spread to other areas." The current actions under 7.7.8.4 would not	HONI should identify areas that have the greatest potential to spread invasive species before construction begins to limit the spread of invasive species during the construction phase. HONI has an obligation to take extra precautions when construction equipment moves into a previously less disturbed natural habitat from an area with a known population of invasive species. HONI should have	Invasive plant species are a matter of concern on Hydro One corridors. As a standard protocol, Hydro One practices cleaning equipment prior to accessing all corridors if the equipment was in previous contact with restrictive invasive species such as Phragmites, Dog-strangling vine, Japanese knotweed and Tree of heaven. Additionally, Hydro One Forestry maintenance practices aim to control the spread of invasive plant and insect species. This effort is done in cooperation with local conservation authorities, municipalities, Federal Agencies and First Nations. We have a partnership with the Ontario Invasive Plant Council to help prevent and manage invasive species. We are aware of the

Draft ESR Section	Reference Text	CKSPFN Comment	CKSPFN Recommendation	Hydro One Response
		be enough to address this obligation under the Invasive Species Act	incorporated the risk of spreading invasive species into less disturbed natural habitat into the multi criteria decision making process. There could be different risks of spreading invasive species within the three different route alternatives as these three Route Alternatives may not all have invasive species populations that would quality as an "Invaded Place" under the *Invasive Species Act.*	phragmite concerns from the Indigenous communities in the traditional territory.
7.8 Indigenous Culture, Values and Land Use	*Hydro One will continue to seek to identify community concerns and build appropriate actions into proposed Project plans to address expressed concerns.*	CKSPFN, in partnership with the Three Fires Group sent comments dated September 27th to HONI about Route Alternatives. This is referenced in section 3.6.6 as	HONI should specifically address the concerns and comments raised by CKSPFN about current and future development interfering with treaty rights,	Hydro One will initiate discussions regarding biodiversity initiatives and community investments with CKPSFN once the project development details are progressed through detailed engineering, in order to identify and guide appropriate initiatives.

Draft ESR Section	Reference Text	CKSPFN Comment	CKSPFN Recommendation	Hydro One Response
		being received on September 30th. Section 3.6.6 does state that HONI hopes to *"...discuss opportunities for restoration and community investment development."* but there is no discussion of what this entails, or reference to the importance of this work in section 7.8, or elsewhere in this report. CKSPFN specifically had concerns that are not mentioned in section 7.8 about water quality impacts and concerns that the project would interfere with the ability to practice treaty rights.	concerns about cumulative effects, and concerns about changes to water quality. HONI should also specifically address the comments related to land reclamation opportunities within and outside of the project area, community benefits and opportunities for youth, the potential for rebates and the recognition that this project travels through traditional territory. If CKSPFN consents for this information to be shared within the ESR, HONI should include these concerns in section 3.6.6 and section 7.8, accompanied by	As part of the comparative route evaluation, Hydro One has considered potential impacts to waterways in the Natural Environment as well as the Indigenous, Culture, Values and Land Use categories. The concerns regarding the cumulative impacts of development in the industrial park and associated infrastructure projects such as the St. Thomas Line project, enabling future growth, are important but is a broad issue that is outside the control of Hydro One. Hydro One recognizes and appreciates that the legacies of settlement activities – including agricultural use, land conversion, and development – have, and continue, to exert pressures on CKSPFN's current and future use of lands and resources. However, Hydro One's primary role is to deliver the necessary electrical infrastructure connection in accordance with the specifications provided by the Customer, and direction received by the Provincial government. The

Draft ESR Section	Reference Text	CKSPFN Comment	CKSPFN Recommendation	Hydro One Response
		CKSPFN stated the plant is the main business in the industrial park and that CKSPFN is concerned about the potential for supporting businesses within the supply chain to be located around it. CKSPFN stated they do not know what these are but anticipate they will contribute to the accumulation of impacts in this area. CKSPFN asked about cumulative impacts of development in their traditional territory. CKSPFN asked about the potential for land reclamation	a plan to address these comments.	proposed new transmission connection is essential to support the operational requirements of the Customer. Regarding rebates for CKSPFN members due to the project transversing traditional territory and the McKee Treaty, Hydro One provided a response indicating that generation and delivering electricity across the province involves numerous components and coordination among various organizations, with rates regulated by the Ontario Energy Board. For instance, on a typical Hydro One customer bill, only 32.7% of each dollar paid by the customer is retained by Hydro One; the remaining amount covers generation costs (Ontario Power Generation) and regulatory fees. It is noted that delivery charges and taxes are exempted for Indigenous customers. Since hydro rates are regulated, there is no opportunity for rebates related to the transmission lines with the territory and treaty.

Draft ESR Section	Reference Text	CKSPFN Comment	CKSPFN Recommendation	Hydro One Response
		opportunities within the project area or other areas. They asked if community benefits and opportunities for the youth were possible through this project and asked if there is the potential for rebates and recognition that this project travels through traditional territory.		
7.13 Cumulative Effects Assessment	*General Comment*	While we appreciate that a cumulative effects assessment is included, the methods used do not render meaningful results. It would be more beneficial to contextualize the proposed impacts in terms of how they will	The cumulative effects assessment should be revised to consider the project impacts in the context of existing cumulative effects on lands, waters, and associated Indigenous rights and practices. The revised assessment should also include greater context on the	The cumulative effects assessment considered the combined impact of the Project alongside other proposed developments within the immediate Project area; specifically within the 500 meter Local Study Area, based on publicly available documentation. Hydro One acknowledges that PowerCo Canada Inc. electric vehicle battery cell manufacturing facility will be part of a larger industrial park. Future requests for

Draft ESR Section	Reference Text	CKSPFN Comment	CKSPFN Recommendation	Hydro One Response
		exacerbate cumulative effects, in addition to any associated future impacts. For example, the region where this project has been proposed has had forest cover decrease from 80% to 11%[7], and over 72% of wetlands[8] have been lost in southern Ontario since European colonization, with estimates in the study area likely exceeding 80%. This means that seemingly small losses of forest and wetlands are actually much larger when considered in terms of the cumulative loss of these features, and given	cumulative impacts that are likely to be facilitated by the project, including connected impacts at the PowerCo site. The determination of "significance" of cumulative effects should be determined based on clearly outlined criteria that are provided to u for review. Without consistent criteria, these results are largely subjective in nature.	connections to this transmission line may arise. The cumulative effects of these developments are a broader concern that extends beyond Hydro One's jurisdiction and authority. Hydro One also recognizes the importance of these sensitive ecosystems for the exercise of s. 35 rights and has incorporated this crucial consideration into the route selection process within the Indigenous Culture, Values and Land Use category with a dedicated criteria.

Draft ESR Section	Reference Text	CKSPFN Comment	CKSPFN Recommendation	Hydro One Response
		the small fraction of natural systems that remain. These ecosystems are crucial for the practice of Indigenous Rights, and impacts on them must not be under emphasized. Further, although it is helpful to understand potential future projects, it would be more meaningful for these to be contextualized in terms of their relation to the current project. For example, the proposed transmission line will facilitate the creation of the PowerCo site, which is likely to come with many		

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		employment opportunities that could draw new residents to the region. It appears that the area west of the Centennial Transmission Station may be planned for urban development (e.g., due to the servicing studies that are occurring). However, this is not made explicit. As it stands, the cumulative effects assessment does not render meaningful results, the project will have additive effects on the landscape, but these are currently underemphasized by the overall determination that none of these		

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		cumulative effects will be "significant".		
7.13 Cumulative Effects Assessment	*Table 7-3 Cumulative Effects Assessment Environmental Concerns*	It is unclear if CKSPFN has had an opportunity to provide input to the environmental concerns that are assessed here. Considering that the route choice occurred through an analysis that used different variables ("criteria"), these results are difficult to contrast within the broader context of project impacts.	The environmental concerns used for the cumulative effects assessment should be reviewed with us. It would likely be more meaningful to carry the criteria and measures from the multi- criteria analysis forward to the cumulative effects analysis.	Thank you for your comment. The CEA was completed in accordance with the Class Environmental Assessment (EA) for Minor Transmission Facilities (2022). This process considers the project's effects in combination with other proposed projects within the local study area (LSA) where publicly available documentation was available. The "criteria" used are based on the impacts identified as part of the effects assessment, summarized in Table 7-1 of the ESR. Criteria for the CEA was not specifically developed, but rather, a carry through of project impacts. Hydro One would be pleased to meet to discuss the CEA with CKSPFN.
7.13 Cumulative Effects Assessment	*Table 7-3 Cumulative Effects Assessment* *Special Natural Areas: Significant Woodlands* *Natural Environment Resources - Natural Heritage Features: Vegetation*	There will be permanent conversion of woodlands under the proposed line, and subsequent edge effects. However, this	Previous comments raised by us regarding permanent impacts on natural features must be considered here. Any permanent conversions of "incompatible" vegetation must be	The CEA was completed in accordance with the Class Environmental Assessment (EA) for Minor Transmission Facilities (2022). This process considers the project's effects in combination with other proposed projects within the LSA where publicly available documentation was available.

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		impact is largely not assessed through the cumulative effects table. Without rigorous offsetting, it is not possible to simply mitigate this impact.	considered a cumulative effect that requires avoidance, or offsetting if the impact is unavoidable.	In the case of woodland conversion, the other project documents did not specifically identify this as an impact that could be combined with the St. Thomas Line project. The St. Thomas Line impacts associated with vegetation removals have been documented with mitigation measures identified in Table 7-1 of the ESR.
8.0 Effects Monitoring	*General Comment*	This section is far too brief, and does not adequately describe species and ecosystem-specific monitoring needs. Additionally, it does not include tangible adaptive management plans if unanticipated adverse impacts occur.	This section should be revised to include a commitment to develop a detailed adaptive management and monitoring plan that has species and ecosystem-specific monitoring plans. Adaptive management actions must be thoroughly described, with associated triggers for action (e.g., the establishment of	Thank you for your comment. As noted under Section 8.0, a Project-specific EMP will be prepared following the completion of the Class EA process and before construction commences, including a description of the environmental monitoring process and procedures for follow-up actions, as required. This document can be shared with Indigenous communities once available.

Draft ESR Section	Reference Text	CKSPFN Comment	CKSPFN Recommendation	Hydro One Response
			invasive species will result in X years of management and follow-up monitoring).	

[3] Ontario. (2024). Guide to Environmental Assessment Requirements for Electricity Projects. Available from https://prod-environmental- registry.s3.amazonaws.com/2024-04/Guide%20to%20EA%20Requirements%20for%20Electricity%20Projects_Feb%202024_02.pdf

[4] Carolinian Canada. (2002). Practical Options for Greening Carolinian Canada. Available from https://caroliniancanada.ca/sites/default/files/File%20Depository/Library/reports/CC-OptionsforGreening.pdf

[5] Ducks Unlimited Canada. (2010). Southern Ontario Wetland Conversion Analysis. Available from https://www.a2acollaborative.org/uploads/7/6/8/5/7685208/wetland_conversion_analysis_du_march_2010.pdf

[6] Kimmerer, R.W. (2011). Restoration and Reciprocity: The Contributions of Traditional Ecological Knowledge. In: Egan, D., Hjerpe, E.E., Abrams, J. (eds) Human Dimensions of Ecological Restoration. Society for Ecological Restoration. Island Press, Washington, DC. https://doi.org/10.5822/978-1-61091- 039-2_18

[7] Carolinian Canada. (2002). Practical Options for Greening Carolinian Canada. Available from https://caroliniancanada.ca/sites/default/files/File%20Depository/Library/reports/CC-OptionsforGreening.pdf

[8] Ducks Unlimited Canada. (2010). Southern Ontario Wetland Conversion Analysis. Available from https://www.a2acollaborative.org/uploads/7/6/8/5/7685208/wetland_conversion_analysis_du_march_2010.pdf

Deshkan Ziibiing
Chippewas of the Thames
First Nation Treaties, Lands
and Environment

320 Chippewa Road
Muncey, ON, N0L 1Y0
Tel: 519-289-5555
Fax: 519-289-2230
info@cottfn.com

July 29, 2025

VIA EMAIL

Jennifer Trotman, Environmental Planner
Community.Relations@HydroOne.com

Erika Dawson, Senior Advisor, Indigenous Relations
Erika.Dawson@HydroOne.com

To Hydro One Networks Inc.:

Re: St. Thomas Line Project Class EA - Draft Environmental Study Report

The proposed St Thomas Line Project is located within the McKee Treaty, to which Chippewas of the Thames First Nation (COTTFN) is a signatory. It is also located within the Big Bear Creek Additions to Reserve (ATR) land selection area, as well as COTTFN Traditional Territory.

COTTFN staff have reviewed the draft ESR and engaged Neegan Burnside to provide a technical review. Based on those reviews, we offer the following comments and questions:

EA Process:

1. The EA study is required to assess “Alternatives to the Undertaking”. These are alternative ways to supply power to the electric battery facility. This evaluation was completed at a cursory level with a limited number of alternatives. We understand that the purpose of this study was to identify the best way for Hydro One to provide sufficient power to the PowerCo Canada’s electric vehicle battery cell manufacturing facility. We also understand that Hydro One is an electricity transmission and distribution service provider. It seems, however, like a missed opportunity in that the “Alternatives to the Undertaking” could have considered options such as adding solar panels or using geothermal generation to minimize the need for additional transmission. Although these options could not entirely meet the needs of the manufacturing facility, they could have supported a more sustainable power supply overall. We urge Hydro One to work with large electricity consumers to incorporate renewable energy generation, wherever possible.
2. The “Do Nothing” alternative is a required component of the EA process. It should not be dismissed at the start of the study but should be carried through to the route selection process. The Do Nothing alternative provides the baseline against which the impacts of the other alternatives can be measured. It is essential to understand how the impacts of a

320 Chippewa Road
Muncey, ON, N0L 1Y0
Tel: 519-289-5555
Fax: 519-289-2230
info@cottfn.com

project compare to doing nothing to determine if there is sufficient value in carrying out the project.

Consultation:

1. Section 3.6.7 lists the points of contact made with COTTFN; however, there is little detail regarding the actual discussions and comments made and how they were addressed through the EA process. For example, the ESR mentions discussion about the Kettle Creek crossing (page 3-53) but could note that the comment was in relation to cultural and environmental significance. Table 3-4 only includes two (2) questions that were submitted during an open house. The EA could include more detail on the points of discussion and how each comment or question was addressed, while recognizing that some conversations are more confidential.
2. Table 3-4 notes that COTTFN participants requested that the Spirit of the Land be acknowledged in the EA. It does not appear as though this has been included, either in visual impacts or cumulative effects sections.
3. Table 3-4 suggests that Traditional Knowledge Studies were used in the EA process. It is not clear if any TK studies were carried out by other First Nations or if the inclusion is more hypothetical. If the EA process did not include any TK studies, please add qualifying language, such as “if available”.
4. Please include a list of the First Nations, organizations, municipalities, etc. who attended the Technical Advisory Committee (TAC) meetings.
5. Table 3-1 contains a comment suggesting that the project may impact lands purchased by the City of London as a compensation measure for other City projects. Those lands may include a Provincially Significant Wetland. Please provide the location and confirm the accuracy of these comments.

Route Selection:

1. The calculations behind each score are not entirely clear, especially if one criterion involves weighing various measures. We do not want the tables to become more complicated. However, greater detail could be provided in an appendix, particularly for the benefit of those who were not part of the TAC process.
2. Table 5-1 on page 5-196 has a criterion called “Additions to Reserve Lands”. The associated measure is “lands identified by First Nations as interested or potential Addition to Reserve Land Areas within the ROW.” However, the route analysis states that Route 3 will “affect 81.83 ha of Reserve Land Areas within the ROW”. Elsewhere in the ESR, it states that there are no reserve lands along the proposed routes. Is 81.83 referring to potential ATR lands or current reserve lands? How did Hydro One gather that data?

Deshkan Ziibiing
Chippewas of the Thames
First Nation Treaties, Lands
and Environment

320 Chippewa Road
Muncey, ON, N0L 1Y0
Tel: 519-289-5555
Fax: 519-289-2230
info@cottfn.com

Mitigation Measures:

1. Several statements made in the mitigation section of the report are vague and don't provide strong language to ensure that they will be implemented. Examples are as follows:
   a) "Avoidance of sensitive areas, where practical."
   b) "Avoidance of watercourses, where feasible."
   c) "Proactive communication" without providing specific details as to when communication will occur and what is meant by proactive.

   We understand that some flexibility must be left for the contractor and their Environmental Management Plan, and we will review those measures when that document is available. However, please provide clearer commitments without the extensive use of qualifiers or limitations whenever possible.

Accidents and Malfunctions:

1. We have no concerns with respect to planned mitigation for accidents and malfunctions. However, we note that COTTFN should be notified should any spills occur within their traditional territory. Please ensure that any spill response plans include notification procedures for COTTFN.

Socio-economic Effects and Opportunities:

1. COTTFN notes that the purpose of the transmission line is to service the new PowerCo Canada Inc. electric vehicle battery cell manufacturing facility in the City of St. Thomas. The consultation for this project by the Crown has been inadequate and COTTFN has not been accommodated for the impacts of this project on the Nation's inherent and constitutionally protected rights. To date, COTTFN has largely been excluded from any opportunities or benefits related to the gigafactory and related infrastructure.

Water Resources:

1. Groundwater Resources (Section 4.6.4 and Section 7.7.5):
   a) In Section 4.6.4, the following statement should be revised, as groundwater quality information for individual wells is not listed in MECP well records:

   "Well records mapped for the province of Ontario were reviewed to determine groundwater quality (MECP, 2024)."

Terrestrial Ecology:

1. Section 7.7.8.1 discusses mitigation for impacts to wetlands. A high degree of sensitivity and respect must be exercised in planning and undertaking works associated with the

Deshkan Ziibiing
Chippewas of the Thames
First Nation Treaties, Lands
and Environment

320 Chippewa Road
Muncey, ON, N0L 1Y0
Tel: 519-289-5555
Fax: 519-289-2230
info@cottfn.com

hydro corridor that will pass within approximately 100 m of the Pitcher Plant Fen Provincially Significant Wetland (PSW). This fen represents a rare, groundwater-fed, nutrient-poor ecosystem in southern Ontario. It provides critical habitat for plant species that are not only ecologically specialized but also hold significant cultural and medicinal importance to Indigenous communities.

Fen ecosystems such as the Pitcher Plant Fen are sustained by stable groundwater inputs with specific pH and mineral balances. Even minor disturbances can alter their delicate hydrology and chemistry. From an Indigenous perspective, fens are living sources of traditional medicines, teaching sites, and integral parts of the land that support intergenerational knowledge and stewardship.

Section 7.7.4.1 outlines mitigation measures for general surface water quality. Specific concerns and recommendations for the worksite near the Pitcher Plant Fen PSW should include:

a) Protection of hydrology and recharge: Grading plans and construction methodologies must be carefully assessed to avoid altering groundwater recharge or flow paths that sustain the fen. Soil compaction from heavy machinery, installation of access roads, and trenching or grading can change how water moves through the landscape, potentially reducing groundwater inputs to the fen and harming the peatland's ability to function.

b) Runoff and nutrient management:

   i. Disturbance of adjacent farmland and soils increases the risk of nutrient-rich runoff reaching the fen.

   ii. Elevated nutrients can shift the plant community away from specialized fen species to more aggressive generalists, fundamentally altering this unique ecosystem.

   iii. Robust sediment and erosion control measures, including well-maintained silt fencing and setbacks, are essential to protect water quality entering the fen.

   iv. If topsoil needs to be stockpiled, it must be placed on the side of the site farthest from the fen to prevent any runoff or disturbance.

   v. Extra care must be taken to ensure that no stockpiling occurs on the side closest to the fen.

c) Sensitivity to water chemistry:

   i. Fens are highly sensitive to changes in pH and ionic composition.

   ii. Runoff from disturbed soils, introduction of road salts, and any herbicide drift from corridor maintenance can have lasting impacts on fen water chemistry.

   iii. The project should adopt stringent measures to prevent contamination, including appropriate buffers and integrated pest management approaches that minimize or eliminate chemical use near the fen.

320 Chippewa Road
Muncey, ON, N0L 1Y0
Tel: 519-289-5555
Fax: 519-289-2230
info@cottfn.com

d) Increase buffer distance:

i. Where feasible, increase the no-maintenance and no-fueling buffer to 50 m or greater around the fen to further reduce risk.

e) Culturally significant plant species:

i. The Pitcher Plant Fen has the potential to support species that are important traditional Indigenous medicines, which rely on the specific hydrological and chemical conditions found in fens. These include:

- Labrador tea (Rhododendron groenlandicum): a fen and bog obligate species traditionally used for respiratory and general wellness teas.
- Bog cranberry (Vaccinium oxycoccos): another obligate peatland species, valued for its nutrient-rich berries and medicinal uses.
- Sweet flag (Acorus americanus): while more broadly wetland-associated (facultative), it often grows along fen margins and is an important traditional medicine for digestive and spiritual uses.

From an Indigenous perspective, the wellbeing of these plant communities is directly tied to the ability of future generations to maintain cultural practices and land-based knowledge. Any loss or alteration of fen habitat affects not only biodiversity but also cultural continuity and Treaty rights related to harvesting and traditional use.

ii. It is not clear from the ESR which culturally significant plant species are currently found in the Pitcher Plant Fen or how far botanical surveys occurred into the Fen. COTTFN requests that Hydro One helps facilitate a site visit led by Knowledge Keepers to confirm if any additional culturally significant species are found in the Pitcher Plant Fen.

f) COTTFN requests to have Environmental Field Liaisons on site while any work is happening in this area to ensure no impacts to the fen.

2. In Section 7.7.8.6 Wildlife and Significant Habitat, the proposed mitigation measures for Wildlife and Significant Habitat for terrestrial habitats are thorough and suitable. Habitat assessments identified the potential presence of Northern Sunfish, candidate turtle wintering areas, and candidate amphibian breeding habitat within the Project Study Area (PSA). Please ensure that specific impact mitigation measures are included for both the candidate amphibian breeding habitat and the candidate turtle wintering areas to address these sensitive features appropriately.

Cumulative Effects Assessment:

1. Based on the chosen methodology, no significant cumulative effects were identified from the assessment of the project and undertakings that overlap with the project Local Study Area (LSA). COTTFN notes that current methodologies do not sufficiently address the

320 Chippewa Road
Muncey, ON, N0L 1Y0
Tel: 519-289-5555
Fax: 519-289-2230
info@cottfn.com

Indigenous understandings of cumulative impacts and the Spirit of the Land. The report concludes that there are no Provincially Significant Wetlands (PSW) within the Project Specific Area (PSA); however, non-significant wetlands have been identified within the PSA, and mitigation measures have been proposed to address potential impacts.

It is important to recognize that cumulative impacts extend beyond current conditions and include the gradual loss and fragmentation of natural resources over time. The cumulative impacts section should acknowledge that, while the current uses of land may be effectively mitigated, there remains a risk that ongoing incremental losses could affect the future designation of significant wetlands. Areas of vegetation or habitat that are not presently considered significant may become significant in the future, particularly in the context of continued habitat decline within the broader landscape.

2. Southwestern Ontario, including the territories of COTTFN, have been subject to extensive clearing. Although clearing is expected to be relatively minor, this project is set to take place in areas where forests and wetland systems are already highly fragmented and oftentimes degraded. The net effects of clearing multiple small areas can have a substantial impact on biodiversity and ecological functions at a landscape scale. We understand that compensation will be provided through Hydro One's Biodiversity Initiative to offset the loss of significant woodlands and wetlands. Details, such as proposed compensation ratios to offset the loss of natural features, should be provided at this stage. Please ensure that COTTFN is kept informed of participation opportunities in the initiative.

Commitments and Next Steps:

1. The ESR should include a section that summarizes commitments made during the EA process which will be carried out in future stages. A clear list of commitments should include, at a minimum:
   a) A commitment to offer COTTFN participation in future archaeological studies and review of subsequent reports.
   b) A commitment to provide COTTFN the opportunity to review future reports to be prepared as part of this project, including future ecological work, Environmental Management Plans, restoration / ecological compensation plans etc.
   c) A commitment to further discussions with COTTFN regarding employment and procurement opportunities.

Minor edits:

1. Reference to table 5-3 says 5-4 (page 5-177).
2. Label for table 5-5 has an error (p. 5-181).

Deshkan Ziibiing
Chippewas of the Thames
First Nation Treaties, Lands
and Environment

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Muncey, ON, N0L 1Y0
Tel: 519-289-5555
Fax: 519-289-2230
info@cottfn.com

We look forward to your responses to these comments and we will follow up separately about the site visit to the Kettle Creek crossing.

Sincerely,

Jennifer Mills
Energy Sector Consultation Coordinator
Chippewas of the Thames First Nation
consultation@cottfn.com

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EA Process	1.	The EA study is required to assess "Alternatives to the Undertaking". These are alternative ways to supply power to the electric battery facility. This evaluation was completed at a cursory level with a limited number of alternatives. We understand that the purpose of this study was to identify the best way for Hydro One to provide sufficient power to the PowerCo Canada's electric vehicle battery cell manufacturing facility. We also understand that Hydro One is an electricity transmission and distribution service provider. It seems, however, like a missed opportunity in that the "Alternatives to the Undertaking" could have considered options such as adding solar panels or using geothermal generation to minimize the need for additional transmission. Although these options could not entirely meet the needs of the manufacturing facility, they could have supported a more sustainable power supply overall. We urge Hydro One to work with large electricity consumers to incorporate renewable energy generation, wherever possible.	Hydro One serves as an electricity transmitter and distributor utility and does not participate directly in electricity generation. For this project, Hydro One evaluated alternatives to the undertaking related to the required high-voltage electricity connection requested by the Customer. While Hydro One supports the adoption of sustainable energy generation sources, decisions related to renewable energy generation and the engagement with large renewable energy producers are determined by the Customer. Generation activities fall outside of Hydro One's scope of the project and jurisdiction.
	2.	The "Do Nothing" alternative is a required component of the EA process. It should not be dismissed at the start of the study but should be carried through to the route selection process. The Do Nothing alternative provides the baseline against which the impacts of the other alternatives can be measured. It is essential to understand how the impacts of a project compare to doing nothing to determine if there is sufficient value in carrying out the project.	Section 3.2.1 (Do Nothing Alternative) in Hydro One's Class Environmental Assessment for Minor Transmission Facilities (2022) states that: *"Consideration of the "do nothing" alternative will be addressed early in the Class EA Process. The rationale for discarding this alternative will be directly related to the need for the project. Factors involved will typically be limited to technical and economic but will include environmental implications where appropriate. The proponent will be responsible for establishing the need and the rationale for discarding the "do nothing" alternative (as per Section 3.1). The "do nothing" alternative will be included in the Environmental Study Report (ESR), which is prepared for the Class EA project, and will be discussed during consultation activities."* Based on the above, Hydro One's Class EA process first determines the need for the project and then alternatives to the undertaking. The "do nothing" alternative is discarded early in the process with the rationale of not being able to meet the need for the project, which in this case it a large industrial customer connection. The existing conditions described in Section 4.0 of the Environmental Study Report (ESR) then provides the baseline for which the impacts of the alternative methods (in this case transmission line route alternatives) can be measured. The impacts of the route alternatives are then evaluated in Section 5.0 of the ESR and the preferred route alternative from this evaluation would least impact to the environment. The comparative analysis of the route alternatives in Section 5.0 shows the impacts based on the baseline existing conditions of the study area, which would be the "do nothing" alternative. Since Hydro One is directed by the government to connect customers to the provincial electricity grid, Hydro One looks to carry out customer connection projects in a manner that is least impactful to the environment while meeting the needs of the customer.
Consultation	1.	Section 3.6.7 lists the points of contact made with COTTFN; however, there is little detail regarding the actual discussions and comments made and how they were addressed through the EA process. For example, the ESR mentions discussion about the Kettle Creek crossing (page 3-53) but could note that the comment was in relation to cultural and environmental significance. Table 3-4 only includes two (2) questions	Hydro One did not disclose specific details of discussions and feedback from Indigenous communities in order to uphold OCAP principles and Indigenous Knowledge Sovereignty. If requested, we can provide a detailed Record of Consultation to COTTFN that would not be made public in the ESR. Alternatively, with the consent and request of COTTFN, Hydro One could include

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		that were submitted during an open house. The EA could include more detail on the points of discussion and how each comment or question was addressed, while recognizing that some conversations are more confidential.	detailed information regarding the topics of discussions and the manner in which each comment or question was addressed.
	2.	Table 3-4 notes that COTTFN participants requested that the Spirit of the Land be acknowledged in the EA. It does not appear as though this has been included, either in visual impacts or cumulative effects sections.	Hydro One would like to further collaborate with Indigenous communities to integrate Indigenous worldviews into project planning. In the past, assessment criteria have focused on identifying and avoiding areas of spiritual and cultural significance. Our current approach has been co-developed to include a dedicated evaluation category - Indigenous Culture, Values, and Land Use – that is weighted equally alongside natural, socio-economic, technical and cost considerations. This framework has been developed in response to community feedback on Hydro One's projects. By assigning equal weight and importance to Indigenous cultural considerations, our goal is to create a process that respectfully recognizes Indigenous cultural and spiritual perspectives as co-equal knowledge systems alongside Western methodologies. While we have yet to explicitly define specific criteria of Spirit of the Land with First Nations, we recognize work from Indigenous leaders in the field such as Deborah McGregor who proposes that environmental assessments should embody Indigenous ontologies, such as relational connections to the land. We are actively working to develop more collaborative practices with communities and appreciate the significance of community-defined values, including spiritual, ceremonial, and relational responsibilities between land and all beings. To support these efforts, we have allocated resources for ceremony and land-based on-site engagements.
	3.	Table 3-4 suggests that Traditional Knowledge Studies were used in the EA process. It is not clear if any TK studies were carried out by other First Nations or if the inclusion is more hypothetical. If the EA process did not include any TK studies, please add qualifying language, such as "if available".	Thank you for your feedback. An Indigenous community submitted a memo outlining findings from a comprehensive Traditional Knowledge study that encompassed multiple projects, including St. Thomas Line Project. Certain comments and insights from this memo have been incorporated into the route selection process. We will use qualifying language such as "if available" in instances where the Environmental Assessment did not explicitly include Traditional Knowledge studies.
	4.	Please include a list of the First Nations, organizations, municipalities, etc. who attended the Technical Advisory Committee (TAC) meetings.	Thank you for your comment. The list of attendees at TAC meetings will be appended to the final ESR.
	5.	Table 3-1 contains a comment suggesting that the project may impact lands purchased by the City of London as a compensation measure for other City projects. Those lands may include a Provincially Significant Wetland. Please provide the location and confirm the accuracy of these comments.	Comments received throughout the project came from a variety of sources including members of the public, agencies, Indigenous communities, and impacted stakeholders. A comment received does not necessarily confirm third party intentions on how a landowner will use their lands (City of London). Therefore, Hydro One would refer COTTFN to the City of London to confirm their future land intentions or habitat compensation commitments.
Route Selection Route Selection	1.	The calculations behind each score are not entirely clear, especially if one criterion involves weighing various measures. We do not want the tables to become more complicated. However, greater detail could be provided in an appendix, particularly for the benefit of those who were not part of the TAC process.	A figure providing an overview of the multi-criteria decision-making analysis process will be provided.
	2.	Table 5-1 on page 5-196 has a criterion called "Additions to Reserve Lands". The associated measure is "lands identified by First Nations as interested or potential Addition to Reserve Land Areas within the ROW." However, the route analysis states that Route 3 will "affect 81.83 ha of Reserve Land Areas within the ROW". Elsewhere in the ESR, it states that there are no reserve lands along the proposed routes. Is 81.83	The criterion outlined in Table 5-1, "Additions to Reserve Lands (ATR)," pertains to potential ATR lands identified by Indigenous communities. COTTFN provided a map of the Big Bear Creek Additions to Reserve claim to Hydro One for review during the route evaluation process. The map indicated that the entire project study area, covering all three Route Alternatives, lies within the Big Bear Creek and has been identified as potential ATR lands.

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		referring to potential ATR lands or current reserve lands? How did Hydro One gather that data?	
Mitigation Measures	1.	Several statements made in the mitigation section of the report are vague and don't provide strong language to ensure that they will be implemented. Examples are as follows: a) "Avoidance of sensitive areas, where practical." b) "Avoidance of watercourses, where feasible." c) "Proactive communication" without providing specific details as to when communication will occur and what is meant by proactive. We understand that some flexibility must be left for the contractor and their Environmental Management Plan, and we will review those measures when that document is available. However, please provide clearer commitments without the extensive use of qualifiers or limitations whenever possible.	We appreciate COTTFN's understanding that the language regarding mitigation measures in the ESR allows for some flexibility during the early planning phase of the project. The goal is for the initial high-level mitigation statements to develop into detailed, measurable commitments that will be incorporated into contract documents to strengthen accountability. Hydro One will provide a draft copy of the project's Environmental Management Plan for COTTFN's review prior to construction.
Accidents and Malfunctions	1.	We have no concerns with respect to planned mitigation for accidents and malfunctions. However, we note that COTTFN should be notified should any spills occur within their traditional territory. Please ensure that any spill response plans include notification procedures for COTTFN.	Hydro One has an existing notification protocol for minor spills on reserve, such as those resulting from transformers for distribution services. In the event of a significant spill occurring at the project site, we will contact COTTFN. Please note that major spills are uncommon in transmission projects.
Socio-economic Effects and Opportunities	1.	COTTFN notes that the purpose of the transmission line is to service the new PowerCo Canada Inc. electric vehicle battery cell manufacturing facility in the City of St. Thomas. The consultation for this project by the Crown has been inadequate and COTTFN has not been accommodated for the impacts of this project on the Nation's inherent and constitutionally protected rights. To date, COTTFN has largely been excluded from any opportunities or benefits related to the gigafactory and related infrastructure.	Thank you for sharing COTTFN's concerns regarding the level of consultation conducted by the Crown regarding the Customer's facility. Please note that the scope of Hydro One's St. Thomas Line Class Environmental Assessment pertains solely to the high-voltage transmission connection to the provincial electricity grid. As the transmission project proponent, our consultation is focused specifically on the proposed 230 kV double-circuit transmission line. We encourage COTTFN to direct your concerns to the Crown, as they hold the responsibilities related to consultation on the Customer's facility so that they can be addressed. In the meantime, we remain committed to consulting with COTTFN within our scope of the transmission connection.
Water Resources	1.	Groundwater Resources (Section 4.6.4 and Section 7.7.5): a) In Section 4.6.4, the following statement should be revised, as groundwater quality information for individual wells is not listed in MECP well records: *"Well records mapped for the province of Ontario were reviewed to determine groundwater quality (MECP, 2024)."*	Thank you for your comment. We have reviewed the statement in Section 4.6.4 and agree that it requires revision. The MECP well records reviewed for the Project do not contain comprehensive groundwater quality information for individual wells. The ESR will be updated to reflect that the well records were primarily used to identify the location, depth, and overburden material of the wells, as summarized in Table 4-4 and Appendix C-5. We will clarify that while some records described the water as "fresh," detailed quality data was not available. The project's potential effects on groundwater quality are addressed in Section 7.7.5.1. No adverse effects on groundwater quality are anticipated from the Project. Mitigation measures, such as containing and removing contaminated soils if a spill were to occur, would be implemented to ensure groundwater quality returns to baseline conditions.
Terrestrial Ecology	1.	Section 7.7.8.1 discusses mitigation for impacts to wetlands. A high degree of sensitivity and respect must be exercised in planning and undertaking works associated with the hydro corridor that will pass within approximately 100 m of the Pitcher Plant Fen Provincially Significant Wetland (PSW). This fen represents a rare, groundwater-fed, nutrient-poor ecosystem in southern Ontario. It provides critical habitat for plant	Thank you for providing your recommendations regarding the worksite near the Pitcher Plant Fen PSW. Hydro One recognizes the cultural and medicinal importance of the fen ecosystem to Indigenous communities. We will carefully review your suggested protections and mitigation measures and will share them in the draft Environmental Management Plan, when it is developed.

Section	No.	COTTFN Recommendation	Hydro One Response
		species that are not only ecologically specialized but also hold significant cultural and medicinal importance to Indigenous communities. Fen ecosystems such as the Pitcher Plant Fen are sustained by stable groundwater inputs with specific pH and mineral balances. Even minor disturbances can alter their delicate hydrology and chemistry. From an Indigenous perspective, fens are living sources of traditional medicines, teaching sites, and integral parts of the land that support intergenerational knowledge and stewardship. Section 7.7.4.1 outlines mitigation measures for general surface water quality. Specific concerns and recommendations for the worksite near the Pitcher Plant Fen PSW should include: a) Protection of hydrology and recharge: i. Grading plans and construction methodologies must be carefully assessed to avoid altering groundwater recharge or flow paths that sustain the fen. Soil compaction from heavy machinery, installation of access roads, and trenching or grading can change how water moves through the landscape, potentially reducing groundwater inputs to the fen and harming the peatland's ability to function. b) Runoff and nutrient management: i. Disturbance of adjacent farmland and soils increases the risk of nutrient-rich runoff reaching the fen. ii. Elevated nutrients can shift the plant community away from specialized fen species to more aggressive generalists, fundamentally altering this unique ecosystem. iii. Robust sediment and erosion control measures, including well-maintained silt fencing and setbacks, are essential to protect water quality entering the fen. iv. If topsoil needs to be stockpiled, it must be placed on the side of the site farthest from the fen to prevent any runoff or disturbance. v. Extra care must be taken to ensure that no stockpiling occurs on the side closest to the fen. c) Sensitivity to water chemistry: i. Fens are highly sensitive to changes in pH and ionic composition. ii. Runoff from disturbed soils, introduction of road salts, and any herbicide drift from corridor maintenance can have lasting impacts on fen water chemistry. iii. The project should adopt stringent measures to prevent contamination, including appropriate buffers and integrated pest management approaches that minimize or eliminate chemical use near the fen. d) Increase buffer distance:	As part of our approach to ensuring safety and respecting interests for construction monitoring, if work occurs within the fen, we can arrange periodic site visits to monitor environmental conditions at the worksite location. These site tours will help verify that mitigation measures are properly implemented and maintained. However please note that we are not planning work in proximity to the fen as the work site is more than 100 meters away from the fen.

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		i. Where feasible, increase the no-maintenance and no-fueling buffer to 50 m or greater around the fen to further reduce risk. e) Culturally significant plant species: i. The Pitcher Plant Fen has the potential to support species that are important traditional Indigenous medicines, which rely on the specific hydrological and chemical conditions found in fens. These include: - Labrador tea (Rhododendron groenlandicum): a fen and bog obligate species traditionally used for respiratory and general wellness teas. - Bog cranberry (Vaccinium oxycoccos): another obligate peatland species, valued for its nutrient-rich berries and medicinal uses. - Sweet flag (Acorus americanus): while more broadly wetland-associated (facultative), it often grows along fen margins and is an important traditional medicine for digestive and spiritual uses. From an Indigenous perspective, the wellbeing of these plant communities is directly tied to the ability of future generations to maintain cultural practices and land-based knowledge. Any loss or alteration of fen habitat affects not only biodiversity but also cultural continuity and Treaty rights related to harvesting and traditional use. ii.It is not clear from the ESR which culturally significant plant species are currently found in the Pitcher Plant Fen or how far botanical surveys occurred into the Fen. COTTFN requests that Hydro One helps facilitate a site visit led by Knowledge Keepers to confirm if any additional culturally significant species are found in the Pitcher Plant Fen. f)COTTFN requests to have Environmental Field Liaisons on site while any work is happening in this area to ensure no impacts to the fen.	
	2.	In Section 7.7.8.6 Wildlife and Significant Habitat, the proposed mitigation measures for Wildlife and Significant Habitat for terrestrial habitats are thorough and suitable. Habitat assessments identified the potential presence of Northern Sunfish, candidate turtle wintering areas, and candidate amphibian breeding habitat within the Project Study Area (PSA). Please ensure that specific impact mitigation measures are included for both the candidate amphibian breeding habitat and the candidate turtle wintering areas to address these sensitive features appropriately.	Thank you for your comment that the proposed mitigation measures for Wildlife and Significant Habitat being thorough and suitable. We will avoid in-water works within turtle wintering areas during turtle overwintering season. We will update the ESR to specify this. Mitigation measures for Candidate Amphibian Breeding Habitat are captured in Section 7.7.8.6 of the ESR, including: • Boundaries of important wildlife habitats will be identified, and the ROW boundaries flagged before clearing • General avoidance of wildlife habitats, where practical • Promotion of wildlife habitat through vegetation control • Retention of natural vegetation, where possible • Use of native plant species where restoration seeding or planting Is conducted • Construction personnel will be educated on the potential for wildlife which may be encountered within the general work areas.

Section	No.	COTTFN Recommendation	Hydro One Response
Cumulative Effects Assessment	1.	Based on the chosen methodology, no significant cumulative effects were identified from the assessment of the project and undertakings that overlap with the project Local Study Area (LSA). COTTFN notes that current methodologies do not sufficiently address the Indigenous understandings of cumulative impacts and the Spirit of the Land. The report concludes that there are no Provincially Significant Wetlands (PSW) within the Project Specific Area (PSA); however, non-significant wetlands have been identified within the PSA, and mitigation measures have been proposed to address potential impacts. It is important to recognize that cumulative impacts extend beyond current conditions and include the gradual loss and fragmentation of natural resources over time. The cumulative impacts section should acknowledge that, while the current uses of land may be effectively mitigated, there remains a risk that ongoing incremental losses could affect the future designation of significant wetlands. Areas of vegetation or habitat that are not presently considered significant may become significant in the future, particularly in the context of continued habitat decline within the broader landscape.	The concerns regarding the cumulative impacts of development in the industrial park and associated infrastructure projects such as the St. Thomas Line project, enabling future growth, are important but is a broad issue that is outside the control of Hydro One. Hydro One recognizes and appreciates that the legacies of settlement activities – including agricultural use, land conversion, and development – have, and continue, to exert pressures on COTTFN current and future use of lands and resources. However, Hydro One's primary role is to deliver the necessary electrical infrastructure connection in accordance with the specifications provided by the Customer, and direction received by the Province. The proposed new transmission connection is essential to support the operational requirements of the Customer.
	2.	Southwestern Ontario, including the territories of COTTFN, have been subject to extensive clearing. Although clearing is expected to be relatively minor, this project is set to take place in areas where forests and wetland systems are already highly fragmented and oftentimes degraded. The net effects of clearing multiple small areas can have a substantial impact on biodiversity and ecological functions at a landscape scale. We understand that compensation will be provided through Hydro One's Biodiversity Initiative to offset the loss of significant woodlands and wetlands. Details, such as proposed compensation ratios to offset the loss of natural features, should be provided at this stage. Please ensure that COTTFN is kept informed of participation opportunities in the initiative.	Hydro One will initiate discussions regarding biodiversity initiatives with COTTFN once the project development details and potential impacts are clearer, in order to identify and guide appropriate initiatives.
Commitments and Next Steps	1.	The ESR should include a section that summarizes commitments made during the EA process which will be carried out in future stages. A clear list of commitments should include, at a minimum: a) A commitment to offer COTTFN participation in future archaeological studies and review of subsequent reports. b) A commitment to provide COTTFN the opportunity to review future reports to be prepared as part of this project, including future ecological work, Environmental Management Plans, restoration / ecological compensation plans etc. c) A commitment to further discussions with COTTFN regarding employment and procurement opportunities.	Thank you for your comment. We will update the relevant sections in Section 7 to include the list of commitments provided by COTTFN.
Minor Edits	1.	Reference to table 5-3 says 5-4 (page 5-177).	Thank you for your comment. We will make this correction in the finalized ESR.
	2	Label for table 5-5 has an error (p. 5-181).	Thank you for your comment. We will make this correction in the finalized ESR.