APPENDIX G

Comments and Responses to the 2022 Draft Aquatic and Terrestrial Field Work Plans for the Waasigan Transmission Line Environmental Assessment

1A. Agency Comments: Waasigan Transmission Line Project – NDMNRF Review of Draft Field Work Plans. April 14, 2022.

**Ministry of Northern Development,
Mines, Natural Resources and Forestry**

**Ministère du Développement du Nord,
des Mines, des Richesses Naturelles et des Forêts**

Northwest Region

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Hydro One Networks Inc.
Sarah Cohanim
Via email April 14, 2022

RE: Waasigan transmission line project – NDMNRF review of draft Field Work Plans

Dear Sarah Cohanim,

Thank you for providing the Ministry of Northern Development, Mines, Natural Resources and Forestry (NDMNRF) the opportunity to review the March 21st draft Aquatic and Terrestrial Field Work Plans for the Waasigan Transmission Line project, and for the presentations and discussion about it last month. NDMNRF understands that the draft Field Work Plans will support the alternate route evaluation and effects assessment of the preferred route in the environmental assessment process.

The NDMNRF has completed its review of the document and is providing this letter and accompanying attached table as the ministry's comments on it. The table contains reviewers' detailed comments and, where possible, recommendations for each.

We trust that our comments will be of assistance to Hydro One when planning for field work. We thank you again for the opportunity to provide this input and are available to discuss these comments should you have any questions. Please direct any inquiries to Kirstin Hicks (Kirstin.Hicks@ontario.ca).

Regards,

M. Mauro

Melissa Mauro
Land Use Planning Supervisor, Northwest Region
Ministry of Northern Development, Mines, Natural Resources and Forestry

Comment #	Reference to Field Plan	Comment	Recommendation
1	Section 1.2 Page 8	*RSA- small to moderate breeding home ranges* What RSA value is moose given?	Recommend including a size description of small and moderate home range as well as including large home range details. Please include RSA value for Moose
2	Section 2.0 Page 12	*Desktop analysis to support the alternative route evaluation started in fall 2020 and focused on the 150m alternative route corridors.* ROW was listed as 40-45m wide (Page 6). Is the corridor wider to allow for greater flexibility in final route selection?	Please provide rationale for the wider corridor.
3	Section 5.1 Page 15 Section 6.2 Page 49	Species of Conservation Concern is also recommended to include any species with a subnational rank of SH, as designated by the NHIC While unlikely to encounter these species, there is still a possibility.	NRF recommends including species with a subnational rank of SH within the Species of Conservation Concern
4	Section 5.2 Page 17	*Existing literature and digital data provided by Hydro One, available in-house at Golder, and obtained through publicly available databases, published reports and grey literature, as well*	Add NHIC data to the list of resources in the section.

		as IK/TLRU studies received from Indigenous communities, are being reviewed and compiled to determine which data are available to support the requirements for the wildlife baseline. Natural Heritage Information Centre (NHIC) data should be considered as well. This resource is not currently listed in your summary at the start of the section. Note that a Data Use License is required to access some NHIC data.	
5	Section 5.4 Page 20	Currently the text only indicates two endangered bat SAR. The *draft* Significant Wildlife Habitat Criteria Schedule for Ecoregion 3W identifies Hibernaculum used by Big Brown Bats are of SWH interest.	Please name all three bat species known to hibernate in northwestern Ontario.
6	Section 5.4.2 Page 25	[…] *AMIS mine features that had been previously confirmed as bat hibernacula and that are within 10 km of the preliminary Project footprint for each alternative route will be inspected. A visual*	Please describe whether/how locations identified as no longer intact be considered as hibernacula status.

		assessment of these features will be conducted to determine if there have been physical changes to the features that may preclude bats from hibernating in them (e.g., opening has collapse). If these features are intact, it will be assumed that they are still being used as hibernacula.	
7	Section 5.13.1 Page 36	*Other SWH cannot be screened for at the desktop level (e.g., mineral licks, and seeps/springs) and others were already mapped (e.g., moose aquatic feeding areas); however, these features will be searched for and documented during all field surveys.* Please note that an absence of mapped moose aquatic feeding areas does not mean an absence of these aquatic features. The available mapped data includes only records known to the Ministry and are not a substitute for field investigations. There is also information available for mineral licks known	We recommend adjusting the wording to the following: Other SWH may be challenging to screen at the desktop level (e.g., mineral licks and seeps/springs) and others have a number of features mapped but survey coverage of the LSA is incomplete (e.g., moose aquatic feeding areas); therefore, these features will be searched for and documented during all field surveys.

		to the Ministry that can be provided.	
8	Section 5.13.1 Page 36	*At the request of the MNRF, a field program has been planned to determine if the candidate SWH screened at a desktop level can be confirmed as candidate SWH. Ultimately, the objective of the field survey is to field truth the desktop screening of the FRI base mapping (LIO 2020) and ecosite types in the SWH criteria report (MNRF 2017a).* Please note the FRI base mapping (LIO 2020) and ecosite types in the SWH criteria report (MNRF 2017a) identify potential habitats where SWH features may be located. The objective should not be to field truth the mapping or ecosite types, but rather narrow down the candidate pool.	The Ministry recommends the text be updated to better reflect this differentiation. Some suggested wording is included below: At the request of NRF, a field program has been planned to field truth a portion of the candidate SWH identified during the pre-field mapping exercise. This will confirm the desktop screening results, given the FRI base mapping (LIO 2020) and ecosite types in the SWH criteria report (MNRF 2017a) only identify potential habitats where SWH features may be located.
9	Table 5-3 Page 38	Amphibian Breeding *Note: Anuran call count data has the potential to verify amphibian breeding SWH.* Please note the Ministry recommends identifying at least 20 breeding individuals in addition to	The Ministry recommends updating the wording to include the additional requirement when confirming SWH.

		documenting presence when confirmation SWH.	
10	Table 5-3 Page 39	Diverse and Sensitive Orchid Communities Timing of these opportunistic searches will be important in order to identify these communities. The differences in the ecology of each of these species should be kept in mind.	The Ministry recommends wording be included that reflects this consideration.
11	Section 5.13.2 Page 44	*If there is a significant amount of discrepancy detected during the field program between the subset of sites that are ground-truthed from the desktop analysis, additional desktop work may be necessary to determine if that type of SWH can be included further in the assessment (i.e., used in the alternative route evaluation).* SWH are expected to be evaluated as part of the assessment. As currently written, the wording causes some confusion as to whether SWH will be considered or not going forward.	The Ministry recommends altering the last sentence to provide greater clarity. The following change is suggested: […] additional desktop work may be necessary to refine the SWH analysis to be included further in the assessment.
12	Section 5.13.2 Page 44	*Additionally, the FRI base mapping will be verified in the field and areas of recent logging*	The following change is suggested: Additionally, habitat characterization of the survey

		or other disturbance noted. FRI base mapping is designed for forest-harvesting purposes and ecosite classification is based largely on vegetative cover at an 8ha scale. Therefore, the FRI may not wholly align with habitat characterization necessary for this Project and it should only be used as a tool for informing Project habitat classification within the LSA. The Ministry recommends updating the sentence to better reflect that limitation.	sites will be verified in the field using the FRI base mapping as a starting point, along with noting areas of recent logging or other disturbance. Please also include clarification in Section 6.6 Ecological Land Classification for the following text: *Plots to confirm the accuracy of the FRI ecosite classification data in the Project study area.*
13	Section 5.13.2 Page 44	*During the visual assessment and characterization surveys noted above, field crews will also document any other potential SWH features (e.g., stick nests, seeps/springs, mineral licks) within habitats being investigated and verify SWH already mapped in provincial databases (e.g., moose aquatic feeding areas).* Verification of SWH requires certain survey methodology be followed. If the visual assessment and characterization	It is unclear if the visual assessment and characterization surveys will satisfy SWH confirmation requirements. If not, then it is recommended to not remove mapped SWH from your assessment without providing detailed rationale.

		surveys will not be carrying out survey efforts to “verify mapped” features, then it is recommended to update the wording to clarify. For example, if verification of Aquatic Feeding Habitat for moose will not be following the method outlined in NDMNRF’s Selected Wildlife and Habitat Features: Inventory Manual, then it is recommended to remove the reference to verifying SWH already mapped in provincial databases. Mapped SWH features within our database are considered verified. If there is an interest in verifying the data, methodologies will be required to confirm or deny the presence of that feature.	
14	Section 5.16 Page 47 and Section 6.5 Page 52	*Sensitive information such as SAR or Indigenous Knowledge data will be protected where that information cannot be shared publicly (e.g., generalizing locations or data types).* The Ministry requests Species of Conservation Concern	Please update text to reflect that Species of Conservation Concern data will be treated as sensitive.

		such as Special Concern SAR and subnational-ranked species (S1-S3, SH) have their information generalized as well, given their sensitivity and rarity as outlined in the Data Sharing Agreement.	
15	Section 6.2 Page 49	*Existing literature and digital data provided by Hydro One, available in-house at Golder, and obtained through published reports and grey literature, as well as IK/TLRU studies received from Indigenous communities, will be reviewed and compiled to determine which data are available to support the requirements for the vegetation and wetlands baseline.*	If not already included, the Ministry recommends using data available from both Natural Heritage Information Centre (https://www.ontario.ca/page/get-natural-heritage-information) and Land Information Ontario through their Ontario GeoHub website (https://geohub.lio.gov.on.ca/). Please note, over the duration of this Project thus far, provincial data layers may have changed names, been reorganized or combined from previous iterations.
16	Section 6.4 Page 52	*Submit species inventory data to the NHIC, if required.*	Please clarify what is meant by “if required”? The Ministry recommends this clause be removed to align with the Data Sharing Agreement.

1B. Hydro One Responses: NDMNRF Review Draft Field Work Plans. May 26. 2022.

Comments Table

Proposal: Waasigan Transmission Line Project – NDMNRF review of draft Field Work Plans
Proponent: Hydro One

Agency: Ministry of Northern Development, Mines, Natural Resources and Forestry (NDMNRF) – Northwest Region
Commenter Name and Job Title: Melissa Mauro, Land Use Planning Supervisor, Northwest Region

Comment #	Reference to Field Plan	Comments (NRF – April 14, 2022)	Recommendation	Response (Hydro One – May 26, 2022)
1.	Section 1.2 Page 8	*RSA- small to moderate breeding home ranges* What RSA value is moose given?	Recommend including a size description of small and moderate home range as well as including large home range details. Please include RSA value for Moose	As moose are managed in the province according to the Wildlife Management Units (WMUs), the RSA for moose will be associated with the WMUs that overlap the terrestrial Local Study Area (LSA). Further detail will be provided in the updated Terrestrial Field Work Plan (FWP).
2.	Section 2.0 Page 12	*Desktop analysis to support the alternative route evaluation started in fall 2020 and focused on the 150 m alternative route corridors.* ROW was listed as 40- 45 m wide (Page 6). Is the corridor wider to allow for greater flexibility in final route selection?	Please provide rationale for the wider corridor.	Yes, the consideration of a wider corridor allows for more flexibility with the final location of the 40-45 m wide transmission line right-of-way (ROW).
3.	Section 5.1 Page 15 Section 6.2 Page 49	Species of Conservation Concern is also recommended to include any species with a subnational rank of SH, as designated by the NHIC While unlikely to encounter these species, there is still a possibility.	NRF recommends including species with a subnational rank of SH within the Species of Conservation Concern	Comment acknowledged and updated Terrestrial FWP will include consideration of SH species.
4.	Section 5.2 Page 17	*Existing literature and digital data provided by Hydro One, available in-house at Golder, and obtained through publicly available databases, published reports and grey literature, as well as IK/TLRU studies received from Indigenous communities, are being reviewed and compiled to determine which data are available to support*	Add NHIC data to the list of resources in the section.	NHIC data will be added to the list of data sources reviewed in the updated Terrestrial FWP.

Comment #	Reference to Field Plan	Comments (NRF – April 14, 2022)	Recommendation	Response (Hydro One – May 26, 2022)
		the requirements for the wildlife baseline. Natural Heritage Information Centre (NHIC) data should be considered as well. This resource is not currently listed in your summary at the start of the section. Note that a Data Use License is required to access some NHIC data.		
5.	Section 5.4 Page 20	Currently the text only indicates two endangered bat SAR. The *draft* Significant Wildlife Habitat Criteria Schedule for Ecoregion 3W identifies Hibernaculum used by Big Brown Bats are of SWH interest.	Please name all three bat species known to hibernate in northwestern Ontario.	Focus of the Terrestrial FWP is on SAR bats as criteria and indicators for the EA. It is acknowledged that big brown bats are considered in the criteria schedules to determine SWH for bats; however, they are not SAR, which is why they were not specifically mentioned in the FWP. We will update the FWP to mention big brown bat in the context of SWH.
6.	Section 5.4.2 Page 25	[…] *AMIS mine features that had been previously confirmed as bat hibernacula and that are within 10 km of the preliminary Project footprint for each alternative route will be inspected. A visual assessment of these features will be conducted to determine if there have been physical changes to the features that may preclude bats from hibernating in them (e.g., opening has collapse). If these features are intact, it will be assumed that they are still being used as hibernacula.*	Please describe whether/how locations identified as no longer intact be considered as hibernacula status.	A visual inspection will be conducted from the exterior of the potential hibernaculum feature using the methods outlined in the Protocol for Assessing Bat Use of Potential Hibernacula (PGC and USFWS 2012). If a mine feature meets any of the following criteria, the habitat will be re-classified as **low or nil potential to support hibernating bats** using the guidance mentioned above as follows: ■ There is one horizontal opening, less than 15 cm in diameter, and no or very little airflow is detected; ■ The opening is a vertical shaft less than 30 cm in diameter;

Comment #	Reference to Field Plan	Comments (NRF – April 14, 2022)	Recommendation	Response (Hydro One – May 26, 2022)
				■ The passage terminates at a distance for which the observer can clearly ascertain by visual inspection from the opening that there are no fissures that bats can access; ■ The opening/feature is prone to flooding, collapsed shut and completely sealed, or otherwise inaccessible to bats; or ■ It is a "new" opening, which has formed recently (less than 1 year old) due to subsidence.
7.	Section 5.13.1 Page 36	*Other SWH cannot be screened for at the desktop level (e.g., mineral licks, and seeps/springs) and others were already mapped (e.g., moose aquatic feeding areas); however, these features will be searched for and documented during all field surveys.* Please note that an absence of mapped moose aquatic feeding areas does not mean an absence of these aquatic features. The available mapped data includes only records known to the Ministry and are not a substitute for field investigations. There is also information available for mineral licks known to the Ministry that can be provided.	We recommend adjusting the wording to the following: Other SWH may be challenging to screen at the desktop level (e.g., mineral licks and seeps/springs) and others have a number of features mapped but survey coverage of the LSA is incomplete (e.g., moose aquatic feeding areas); therefore, these features will be searched for and documented during all field surveys.	Wording will be updated in the Terrestrial FWP

Comment #	Reference to Field Plan	Comments (NRF – April 14, 2022)	Recommendation	Response (Hydro One – May 26, 2022)
8.	Section 5.13.1 Page 36	*At the request of the MNRF, a field program has been planned to determine if the candidate SWH screened at a desktop level can be confirmed as candidate SWH. Ultimately, the objective of the field survey is to field truth the desktop screening of the FRI base mapping (LIO 2020) and ecosite types in the SWH criteria report (MNRF 2017a).* Please note the FRI base mapping (LIO 2020) and ecosite types in the SWH criteria report (MNRF 2017a) identify potential habitats where SWH features may be located. The objective should not be to field truth the mapping or ecosite types, but rather narrow down the candidate pool.	The Ministry recommends the text be updated to better reflect this differentiation. Some suggested wording is included below: At the request of NRF, a field program has been planned to field truth a portion of the candidate SWH identified during the pre-field mapping exercise. This will confirm the desktop screening results, given the FRI base mapping (LIO 2020) and ecosite types in the SWH criteria report (MNRF 2017a) only identify potential habitats where SWH features may be located.	Comment noted. Suggested wording: At the request of NRF, a field program has been planned to field truth a portion of the candidate SWH identified during the pre-field mapping exercise. This will confirm the presence of candidate SWH identified in the desktop screening results, given the FRI base mapping (LIO 2020) and ecosite types in the SWH criteria report (MNRF 2017a) only identify potential habitats where SWH features may be located.
9.	Table 5-3 Page 38	Amphibian Breeding *Note: Anuran call count data has the potential to verify amphibian breeding SWH.* Please note the Ministry recommends identifying at least 20 breeding individuals in addition to documenting presence when confirmation SWH.	The Ministry recommends updating the wording to include the additional requirement when confirming SWH.	Comment noted. The Terrestrial FWP wording will be updated to note that we will follow Ministry guidance for the "confirmation" of SWH.
10.	Table 5-3 Page 39	Diverse and Sensitive Orchid Communities Timing of these opportunistic searches will be important in order to identify these communities. The differences in the ecology of each of these species should be kept in mind.	The Ministry recommends wording be included that reflects this consideration.	As sensitive orchid communities may be found in a wide range of ecosites, it is not possible to target areas where they may be found, or to target specific time periods for each species. For this reason, observation of orchids will be made opportunistically during all survey events. This approach will confirm presence but will not confirm absence.
11.	Section 5.13.2 Page 44	*If there is a significant amount of discrepancy detected during the field program between the subset of sites that are ground-truthed from the desktop analysis, additional desktop work may be necessary to determine if that type of SWH can be included further in the assessment (i.e., used in the alternative route evaluation).* SWH are expected to be evaluated as part of the	The Ministry recommends altering the last sentence to provide greater clarity. The following change is suggested: […] additional desktop work may be necessary to refine the SWH analysis to be included further in the	Comment noted. The Terrestrial FWP will be updated with the following wording: […] additional desktop work may be necessary to determine if the specific type of SWH for which significant discrepancies are observed should be included further in the assessment

Comment #	Reference to Field Plan	Comments (NRF – April 14, 2022)	Recommendation	Response (Hydro One – May 26, 2022)
		assessment. As currently written, the wording causes some confusion as to whether SWH will be considered or not going forward.	assessment.	
12.	Section 5.13.2 Page 44	*Additionally, the FRI base mapping will be verified in the field and areas of recent logging or other disturbance noted.* FRI base mapping is designed for forest-harvesting purposes and ecosite classification is based largely on vegetative cover at an 8ha scale. Therefore, the FRI may not wholly align with habitat characterization necessary for this Project and it should only be used as a tool for informing Project habitat classification within the LSA. The Ministry recommends updating the sentence to better reflect that limitation.	The following change is suggested: Additionally, habitat characterization of the survey sites will be verified in the field using the FRI base mapping as a starting point, along with noting areas of recent logging or other disturbance. Please also include clarification in Section 6.6 Ecological Land Classification for the following text: *Plots to confirm the accuracy of the FRI ecosite classification data in the Project study area.*	Comment noted. The Terrestrial FWP will be updated to reflect the limitation of the FRI data. The ELC program has been designed to *confirm the accuracy of the FRI ecosite classification data in the Project study area.*
13.	Section 5.13.2 Page 44	*During the visual assessment and characterization surveys noted above, field crews will also document any other potential SWH features (e.g., stick nests, seeps/springs, mineral licks) within habitats being investigated and verify SWH already mapped in provincial databases (e.g., moose aquatic feeding areas).* Verification of SWH requires certain survey methodology be followed. If the visual assessment and characterization surveys will not be carrying out survey efforts to "verify mapped" features, then it is recommended to update the wording to clarify. For example, if verification of Aquatic Feeding Habitat for moose will not be following the method outlined in NDMNRF's Selected Wildlife and Habitat Features: Inventory Manual, then it is recommended to remove the reference to verifying SWH already mapped in provincial	It is unclear if the visual assessment and characterization surveys will satisfy SWH confirmation requirements. If not, then it is recommended to not remove mapped SWH from your assessment without providing detailed rationale.	Comment noted. As it pertains to moose habitat and other features of cultural importance to Indigenous peoples, we will be verifying the continued existence of some SWH features in the study area rather than confirming their SWH value as we anticipate that the provincial data has already been confirmed as SWH. The Terrestrial FWP will be updated with the following wording: During the visual assessment and characterization surveys noted above, field crews will also document any other potential SWH features (e.g., stick nests, seeps/springs, mineral licks) within habitats being investigated.

Comment #	Reference to Field Plan	Comments (NRF – April 14, 2022)	Recommendation	Response (Hydro One – May 26, 2022)
		databases. Mapped SWH features within our database are considered verified. If there is an interest in verifying the data, methodologies will be required to confirm or deny the presence of that feature.		Additional SWH features that are of cultural importance (e.g., moose habitats, great blue heron rookeries) already confirmed by the province and available in provincial datasets will be verified in the field where possible, but not re-evaluated under provincial SWH guidelines and protocols.
14.	Section 5.16 Page 47 and Section 6.5 Page 52	*Sensitive information such as SAR or Indigenous Knowledge data will be protected where that information cannot be shared publicly (e.g., generalizing locations or data types).* The Ministry requests Species of Conservation Concern such as Special Concern SAR and subnational-ranked species (S1-S3, SH) have their information generalized as well, given their sensitivity and rarity as outlined in the Data Sharing Agreement.	Please update text to reflect that Species of Conservation Concern data will be treated as sensitive.	Comment noted. Terrestrial FWP will be updated accordingly.
15.	Section 6.2 Page 49	*Existing literature and digital data provided by Hydro One, available in-house at Golder, and obtained through published reports and grey literature, as well as IK/TLRU studies received from Indigenous communities, will be reviewed and compiled to determine which data are available to support the requirements for the vegetation and wetlands baseline.*	If not already included, the Ministry recommends using data available from both Natural Heritage Information Centre (https://www.ontario.ca/page/get-natural-heritage-information) and Land Information Ontario through their Ontario GeoHub website (https://geohub.lio.gov.on.ca/). Please note, over the duration of this Project thus far, provincial data layers may have changed names, been reorganized or combined from previous iterations.	Comment noted. Terrestrial FWP will be updated accordingly.
16.	Section 6.4 Page 52	*Submit species inventory data to the NHIC, if required.*	Please clarify what is meant by "if required"? The Ministry recommends this clause be removed to align with the Data Sharing Agreement.	Comment noted. Terrestrial FWP will be updated accordingly.

2A. Agency Comments: Comments Table – MECP Review of Draft Field Work Plans. April 15, 2022.

April 15, 2022

Comments Table

Proposal: Waasigan Transmission Line
Proponent: Hydro One

Work Plan Title: Waasigan Transmission Line Field Work Plan – Terrestrial (March 2022)
Commenter Name, Job Title and Ministry: Kevin Green, Northern Species at Risk Specialist; Mike Allan, Management Biologist.

Comment #	Page/Section # in Work Plan	Comments & Rationale	Proposed Action/Solution
1.	Pg. 7 / Section 1.2 Study Area	MECP's SARB continues to have concerns regarding the proposed Project Footprint (i.e., defined as 40-45 m in ROW width and associated infrastructure such as access roads, laydown yards, aggregate pits, etc.) and Local Study Area (LSA) (i.e., defined as a 1 km buffer of Project Footprint). As per previous comments provided to the proponent on March 21, 2021, should the ROW be moved through the Project Design Phase to avoid sensitive environmental or cultural features, the potential direct and immediate indirect effects of the Project on species at risk may be realized beyond the proposed LSA. Furthermore, the proponent's response provided on March 18, 2022 indicates that the 150 m-wide corridors will be captured within the LSA. MECP's SARB continues to be concerned that potential changes to the ROW location may result in unknown impacts to species at risk because areas outside of the proposed LSA are not adequately captured in the proposed field work intended to characterize baseline conditions. As such, MECP's SARB continues to recommend that the Project	Update the draft Terrestrial Field Work Plan to appropriately define the Study Areas such that they adequately consider potential future changes to the location of the ROW following the design phase.

Comment #	Page/Section # in Work Plan	Comments & Rationale	Proposed Action/Solution
		Footprint include a 150 m-wide corridor to account for potential future changes to the location of the ROW; and to ensure the EA will appropriately assess potential impacts to species at risk and/or their habitat within 1 km of the final location of the ROW following the design phase (e.g., Limits of Work). Again, this recommendation is consistent with previous recommendation on this Project and other large transmission line and infrastructure projects in northern Ontario which defined the LSA for the wildlife and wildlife habitat, specifically species at risk, as a 1 km buffer of the Project Footprint and/or associated Limits of Work.	
2.	Figures 1-2-1, 1-2-2 and 1-3	Additional information is required on the Project Footprint, LSA and RSA illustrated in Figures 1-2-1, 1-2-2 and 1-3. Specifically, it appears as though the LSA is a 1 km buffer of the proposed alternative routes (i.e., ROW) and associated infrastructure such as access roads, laydown yards, aggregate pits, work camps, etc. In some cases, it is clear that it includes existing roads (e.g., area south of the Township of Ignace), but in many instances it is unclear if new infrastructure is necessary and/or has already been identified. Where it has been identified, it would be helpful to identify those features in the draft Terrestrial Field Work Plan and associated figures.	Update the draft Terrestrial Field Work Plan to include additional information on the specific features used to identify the Project Footprint (i.e., include all existing and planned infrastructure that will constitute the Project Footprint).
3.	Pg. 16 / Section 5.1 / Table 5-1 And Pg. 25 /	The draft Terrestrial Field Work Plan indicates that "*additional habitat characterization will be completed at the time of initial detector deployment to document the quality of the adjacent habitat particularly to serve as roosting habitat. For instance, data will be collected based on diameter at breast height of trees, approximate tree heights, and counts of standing dead trees (snags) (MNR 2011a)*".	Update the draft Terrestrial Field Work Plan to reference the draft *Survey Protocol for Species at Risk Bats within Treed Habitats* (MNRF 2017) and appropriate considerations for suitable roosting habitat characteristics

Comment #	Page/Section # in Work Plan	Comments & Rationale	Proposed Action/Solution
	Section 5.4.2	MECP's SARB recommends the proponent refer to, and incorporate, direction provided in the draft *Survey Protocol for Species at Risk Bats within Treed Habitats* (MNRF 2017) which provides additional guidance on consideration for potential roosting habitat (e.g., snag trees and diameter at breast height [dbh]). Specifically, a "snag" should include any standing live or dead tree ≥10 cm dbh with cracks, crevices, hollows, cavities, and/or loose or naturally exfoliating bark.	consistent with the protocol.
4.	Pg. 17 / Section 5.3.2 Field Surveys	The draft Terrestrial Field Work Plan indicates that "*Twenty-five acoustic monitoring stations will be set up to record at select suitable field survey locations/candidate bat maternity roost habitat along all alternative routes*". MECP's SARB understands this to mean the proponent is planning to establish a total of 25 acoustic monitoring stations, which will be distributed across all alternative routes. Recognizing the proposed approach will assess a very small subsample of candidate bat maternity habitat, as identified through the pre-field mapping and shown in Appendix B, additional detail is required on the rationale for the proposed number of acoustic monitoring stations, the total area/percentage of candidate maternity roosting habitat that will be sub-sampled, and a clear description of how information collected from the monitoring stations will be analyzed/used to characterize baseline conditions across the LSA for all alternative routes. As per previous comment provided by MECP's SARB on March 21, 2021 on the 2021-22 Field Work Plan, MECP's SARB recognizes that assigning a value of habitat quality may be a	Update the draft Terrestrial Field Work Plan to describe the rationale for the sufficiency of 25 acoustic monitoring stations and to justify the proposed sampling approach; and how the information collected at these 25 stations will be used to characterize baseline conditions for species at risk bat roosting habitat across the LSA for all alternative routes. Additionally, MECP's SARB cautions against assigning a value of quality to bat maternity and day roost habitat, particularly looking forward to the potential ESA permitting process as all potential maternity roost habitat would be considered habitat,

Comment #	Page/Section # in Work Plan	Comments & Rationale	Proposed Action/Solution
		consideration in the route selection process for the EA. However, it is not recommended looking forward to potential ESA permitting where bat maternity and day roost habitat is not viewed through the lens of assigned quality but rather whether is it or is not habitat. Furthermore, for areas identified as potential habitat, based on the desktop analysis (i.e., habitat query), which are not surveyed to confirm presence/absence MECP's SARB is likely to consider all these areas as species at risk bat roosting habitat. Should the proponent be unable to avoid vegetation clearing within this habitat during that bat roosting period (i.e., May 1 to August 31), an authorization under the ESA will likely be required.	regardless of an assigned value of quality.
5.	Pg. 17 / Section 5.3.2 Field Surveys	The draft Terrestrial Field Work Plan indicates that additional habitat characterization will be completed during 2022 spring and summer surveys to document the quality of the candidate bat maternity roost treed habitat within 200m of the acoustic stations; and that a rapid snag density survey will be conducted at all 25 acoustic survey stations. MECP's SARB recognizes that the proposed snag density surveys will be completed based on provincial guidelines outlined in *Survey Protocol for Species at Risk Bats within Treed Habitats* (MNRF 2017) and *Bat and Bat Habitat: Guidelines for Wind Power Projects* (MNR 2011). A component of the direction in these protocols is to complete snag density surveys during the leaf-off period so that the view of tree cavities, cracks and loose bark, etc. is not obscured by foliage. However, based on the information provided in the draft Terrestrial Field Work Plan, and identified above, the proponent is planning to undertake these surveys	Update the draft Terrestrial Field Work Plan to identify an appropriate time period in which snag tree density surveys will be conducted. Alternatively, update the draft Terrestrial Field Work Plan to describe rationale for the proposed approach.

Comment #	Page/Section # in Work Plan	Comments & Rationale	Proposed Action/Solution
		during the spring and summer; which recognizing this is likely occurring during the leaf-on period is likely to limit the ability of these surveys to achieve the intended purpose of the snag density surveys (i.e., identify suitable snag trees). As such, MECP's SARB recommends conducting the snag density surveys during the leaf-off period.	
6.	Pg. 17 / Section 5.3.2 Field Surveys	Photos should be taken of each candidate hibernaculum and included in the EA to support the ranking (i.e., nil, low, moderate, high).	Incorporate into survey methods.
7.	Pgs. 20 – 24 / Section 5.4.1	The draft Terrestrial Field Work Plan identifies that acoustic monitoring will be undertaken at the following locations and for the following purposes: 1. At candidate hibernacula to confirm use by bats, including species at risk bats; 2. At activity control stations within 500 m of potential hibernacula to be used to differentiate peaks in activity recorded at candidate hibernaculum from activity unrelated to swarming that would reflect high activity due to the presence of a travel corridor or foraging feature on the landscape; and 3. At known hibernaculum within 10km of preliminary Project Footprint "*to confirm if the monitoring of candidate hibernacula did capture the appropriate timing window for swarming activity within the region, during the year of 2022. Information on the activity levels and timing for peak swarming activity at known hibernacula will be used as guidance for cross-referencing to acoustic activity levels recorded at the candidate hibernacula and allow for*	Update draft Terrestrial Field Work Plan as appropriate.

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		QA/QC. For instance, activity patterns at the candidate hibernacula can be compared to the pattern of activity at known hibernacula to decipher if the pattern is associated with swarming behaviour or consistent with initial evening burst of foraging activity." MECP's SARB is supportive of the proposed approach to monitoring known hibernacula within 10km of the candidate hibernacula to confirm if the monitoring of candidate hibernacula did capture the appropriate timing window for swarming activity within the region, during the year of 2022. However, the intended purposes of acoustic monitoring at (1) activity control stations to differentiate peaks in activity recorded at candidate hibernaculum from activity unrelated to swarming that would reflect high activity due to the presence of a travel corridor or foraging feature on the landscape, and (2) at known hibernacula to use as guidance for cross-referencing to acoustic activity levels recorded at the candidate hibernacula and allow for QA/QC, is unlikely to conclusively determine that documented activity at the entrance of the candidate hibernacula. Rather, documented activity (i.e., bat passes) near the entrance of the candidate hibernacula of species at risk bats should be considered as confirmation that the hibernacula is being used; and should the Project activities be unable to avoid impacts to a hibernacula an authorization under the ESA is likely to be required.	
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10.	Pg. 30 /	The field surveys proposed in the draft Terrestrial Field Work Plan	Update the draft Terrestrial Field

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	Section 5.8.2 and Pg. 48 / Section 5.17	for marsh birds, including Least Bittern, follow the protocols provided in the *Marsh Monitoring Program* (Bird Studies Canada 2009). In some regards, these are not considered sufficient to confidently confirm the presence/absence of Least Bittern. MECP's SARB recommends using the methods outlined in the *National Least Bittern Survey Protocol* (Canadian Wildlife Service, Environment Canada, 2011). We note that Section 5.17 – Schedule indicates that the proponent only plans to conduct one round of Marsh Bird Surveys. Due to their secretive nature, Least Bitterns may remain undetected even after one or two surveys I the same wetland (Bogner and Baldassarre 2002; Meyer et al. 2006; Jobin et al. 2007; Latendresse and Jobin 2007) so repeat visits should be made to enhance the species detection. In order to establish abundance and breeding density of male Least Bitterns in a wetland, three visits should be made to each station (Canadian Wildlife Service, Environment Canada, 2011). Further, as per the *National Least Bittern Survey Protocol* (Canadian Wildlife Service, Environment Canada, 2011) it is recommended that the call response broadcast be 13 minutes point count and should be focussed on Least Bittern to increase the likelihood that Least Bittern will be detected and further support the survey results and subsequent conclusions in the EA.	Study Plan to reflect appropriate survey methods for Least Bittern consistent with the *National Least Bittern Survey Protocol* (Canadian Wildlife Service, Environment Canada, 2011).
11.	Pg. 33 / Section 5.10.2	MECP's SARB understands the proponent plans to undertake Eastern Whip-poor-will surveys between May 18 to 22 and Jun 7 to 21, consistent with the draft Survey Protocol for Eastern Whip-poor-will (*Caprimulgus vociferus*) in Ontario (MNRF 2014).	Consider conducting two (2) surveys for Eastern Whip-poor-will between June 7 to 21 and one (1) survey between July 6 to July 13.

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		However, spring weather conditions in 2022 (e.g., unusually deep snow conditions) may affect the return of Eastern Whip-poor-will and constrain access. As such, extra consideration should be given to the proposed sampling period of May 18 to 22 and the recommended weather conditions provided in the protocol (e.g., ≥10 °C, no snow, etc.). While the draft Survey Protocol recommends conducting these surveys between May 18 – June 30, it is likely reasonable to avoid the May time period and extend the survey window this year into early July around the week prior to the full moon (i.e., July 13) period (July 6 - July 13).	
12.	Pg. 33 / Section 5.10.2 and 5.10.3	The draft Terrestrial Field Work Plan indicates that "*Eighty (80) survey stations will be selected throughout the LSA within candidate [Eastern Whip-poor-will] nesting habitats*." MECP's SARB understands that the results of the surveys will be used to approximate centre of territory which will then be used to apply habitat mapping criteria (as per Eastern Whip-poor-will General Habitat Description [GHD]). While this approach is appropriate to confirming presence/absence of Eastern Whip-poor-will and identify associated habitat, the proposed approach only assesses a small subsample of candidate Eastern Whip-poor-will nesting habitat, as identified through the pre-field mapping and shown in Appendix E. As such, it is unclear how the proponent plans to use the results from the proposed subsampling approach to further describe Eastern Whip-poor-will habitat across the alternative routes; and the potential adverse affects of the Project on Eastern Whip-poor-will and their habitat. MECP's SARB recommends the proponent describe the rationale for the proposed number of survey stations, the total area of	Update the draft Terrestrial Field Work Plan to provide rationale to justify the proposed sampling approach; and how this information will be used to characterize baseline conditions for Eastern Whip-poor-will.

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		candidate nesting habitat that will be sub-sampled, and provide a clear description of how information collected from the survey stations will be analyzed/used to characterize baseline conditions across the alternative routes for Eastern Whip-poor-will. Furthermore, for areas identified as potential Eastern Whip-poor-will habitat, based on the desktop analysis, which are not surveyed to confirm presence/absence MECP's SARB is likely to consider all these areas as Eastern Whip-poor-will habitat. Should the proponent be unable to avoid vegetation clearing within this habitat during that nesting period (i.e., May 1 to August 31), an authorization under the ESA will likely be required.	
13.	Pg. 34 / Section 5.11	MECP's SARB recognizes that potential denning features for Gray Foxes (e.g., dug or modified burrows of other species, wood piles, brush piles, rock cervices, hollow logs and trees, hollows under shrubs, and/or space beneath anthropogenic structures) may not be limiting within the Project Footprint and broader Local Study Area. However, dens are one of the most important habitat features for Gray Fox as they are critical for parturition and pup rearing, and to avoid predators. As such, the area within 100 meters of a Gray Fox den are likely to be particularly sensitive to anthropogenic disturbances, including sensory disturbances; and should be avoided during the denning period (estimated to be approximately between February 15 to July 15) to maintain the physical and biological composition, structure and function of the surrounding habitat, and to protect the area in the vicinity of the den (Recovery Strategy for the Gray Fox in Ontario, MECP 2019). Recognizing the potential for denning structures to be present across the Local Study Area (LSA) and practicality of targeted den	Update the draft Terrestrial Field Work Plan as appropriate.

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		site investigations, MECP's SARB supports the proponents proposed approach to (opportunistically) identifying potential den sites and, where a potential den is found, monitoring with a (no-glow infrared) trail camera to determine the occupant. Where Gray Fox dens are confirmed, MECP's SARB recommends avoiding vegetation clearing and construction activities within a minimum of 100 metres of the den during the denning period, estimated to be approximately between February 15 to July 15, to avoid adverse impacts to denning Gray Fox. **Presence Surveys** However, MECP's SARB also recognizes that little is known about the distribution of Gray Fox between the area surrounding the City of Thunder Bay and Atikokan; and there has been little to no survey effort across this area for Gray Fox. As such, MECP's SARB recommends conducting presence surveys between approximately May 1 to October 31 within the LSA associated with Alternative Routes 1, 1A, 1B-1, 1B-2, 1C, 2A, 2B, and 2C using a combination of trail cameras and scent stations to further inform distribution of Gray Fox and appropriately characterize baseline conditions for Gray Fox in the EA. Camera and scent stations can potentially be set up at or near other monitoring stations (e.g., acoustic monitoring stations, etc.) should the habitat be suitable for Gray Fox. A similar study was conducted by the Ministry of Natural Resources ('MNR') on Pelee Island between 2012-2013 using a modified approach to that described in the National Lynx Detection Protocol (pers. comm. J. Bowman 2022) (*note that the*	

Comment #	Page/Section # in Work Plan	Comments & Rationale	Proposed Action/Solution
		hair snag/DNA analysis component described in this protocol was not used in the MNR study and is <u>not</u> recommended as part of these surveys). Additional information related to the efficacy of this recommended survey approach for Gray Fox can be found in Downey et al. 2007. It is further recommended that the survey be developed such that it provides a reasonable sub-sampling design (e.g., survey stations spaced every 5 or 10 km) to further inform the distribution of Gray Foxes across Alternative Routes 1, 1A, 1B-1, 1B-2, 1C, 2A, 2B, and 2C and appropriately characterize baseline conditions for Gray Fox in the EA. Additionally, the recommended timeframe for presence surveys (i.e., approximately May 1 to October 31) is intended to cover a portion of the denning period and dispersal period following independence of the pups, as well as provide the greatest amount of time to collection baseline information within the proponents proposed schedule to support characterization of baseline conditions. **<u>Identifying Home Ranges</u>** Further, MECP's SARB recommends that existing records of Gray Fox (e.g., NHIC, iNaturalist, Thunder Bay Field Naturalists, etc.) and any new observations of Gray Fox identified through the recommended presence survey or other efforts undertaken by the proponent, be used to identify home ranges based on the best available information regarding home range sizes for Gray Fox (e.g., buffer observations by a distance equivalent to the radius of maximum home range sizes). Note that published estimates of home range size for Gray Fox vary widely between <30 ha to over 1000 ha based on habitat quality, sex and season; and Bachmann	

Comment #	Page/Section # in Work Plan	Comments & Rationale	Proposed Action/Solution
		and Lintack (1982) radio-tracked an unmated male Gray Fox in Ontario and found the home range varied from 210 ha in March-November to 1570 ha January-February (Recovery Strategy for the Gray Fox in Ontario, MECP 2019). **Mapping Habitat** Furthermore, recognizing all areas of continuous potential habitat will not be surveyed through the above approach, MECP's SARB recommends that the proponent: 1. Characterize potential suitable habitat using the best available information and informed further by habitat characteristics within identified home ranges (as per above); and 2. Map potential suitable habitat across the broader distribution of Gray Fox, as determined by existing and new records of Gray Fox, within the LSA associated with Alternative Routes 1, 1A, 1B-1, 1B-2, 1C, 2A, 2B, and 2C. **Mitigation/Avoidance Actions** Furthermore, MECP's SARB recommends avoiding vegetation clearing within identified home ranges and potential habitat during the denning period, estimated to be approximately between February 15 to July 15, to avoid adverse impacts to denning Gray Fox. Should the proponent be unable to avoid vegetation clearing within known home ranges of Gray Fox, or in areas of suitable habitat likely to be used by Gray Fox, an authorization under the ESA is likely to be required.	

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14.	Pg. 47 / Section 5.16 Reporting	MECP's SARB strongly encourages the proponent to report all species at risk observations to the Natural Heritage Information Centre (NHIC) (NHICrequests@ontario.ca) by completing the "observation reporting spreadsheet" or the "observation reporting geodatabase" found at Report rare species (animals and plants) | ontario.ca.	No immediate action required.
15.	General – Access to Private Land	The draft Terrestrial Field Work Plan includes several references to access to private land for targeted species at risk surveys (e.g., bobolink, gray fox, etc.). It is understood that land access will need to be granted to enable such surveys. However, where land access is not granted, the EA should include a map of these candidate habitats for species at risk and describe the habitat conditions based on existing information (e.g., desktop analysis); and the potential for these candidate habitats to be adversely affected by the Project.	Update the draft Terrestrial Field Work Plan to describe how candidate habitat for species at risk will be considered in the EA where land access is not granted to conduct surveys.
16.	General – Survey timing	While MECP's SARB recognizes the proposed survey timing windows as being appropriate for the species at risk addressed in the Terrestrial Field Work Plan (e.g., Bobolink, Barn Swallow, Bank Swallow, Eastern Whip-poor-will, etc.), spring weather conditions in 2022 (e.g., unusually deep snow conditions) may affect species at risk occupancy and habitat use; and when surveys should be undertaken. As such, the proponent should consider if/how this year's weather conditions may affect planned surveys and adjust accordingly. Additionally, the above makes it especially important to document weather conditions during all surveys to further support the survey results and subsequent conclusions in the EA.	With the exception noted above (comment #11) regarding Eastern Whip-poor-will survey timing, no additional changes required to the draft Terrestrial Field Work Plan at this time; however, consideration should be given to suitable survey conditions when undertaking proposed field work.
17.	General – Newly Listed	**Red-headed Woodpecker** was re-assessed by COSSARO in August 2020, and subsequently listed as Endangered in January	Update the draft Terrestrial Field Work Plan to include Red-

Comment #	Page/Section # in Work Plan	Comments & Rationale	Proposed Action/Solution
	Species at Risk	2022. Red-headed Woodpeckers are cavity-nesters. As such, they rely on an abundance of dead older wood to excavate nests. MECP's SARB recommends breeding bird surveys include consideration of Red-headed Woodpecker and their habitat. Where potential nesting habitat may be adversely impacted by the Project, vegetation clearing should not occur during the nesting period (i.e., May 1 to August 31) to avoid impacts to Red-headed Woodpecker. Additionally, **Black Ash** was assessed by COSSARO in October 2020, and subsequently listed as Endangered in January 2022. However, ESA protection measures for Black Ash were paused for 2 years and will therefore become effective January 2024. As such, should any Project activities (i.e., vegetation clearing) occur after protection measures become effective which may contravene sections 9 and/or 10 for Black Ash, it is advisable that the proponent consider Black Ash in the EA.	Headed Woodpecker and Black Ash, as appropriate.

2B. Hydro One Responses: MECP Review of Draft Field Work Plans. May 26. 2022.

Comments Table

Proposal: Waasigan Transmission Line Project – MECP review of draft Field Work Plans
Proponent: Hydro One

Agency: Ministry of the Environment, Conservation and Parks (MECP) – Species at Risk Branch
Commenter Name and Job Title: Kevin Green, Northern Species at Risk Specialist; Mike Allan, Management, Biologist

Comment #	Reference to Field Plan	Comments (MECP-SARB – April 15, 2022)	Recommendation	Response (Hydro One – May 26, 2022)
1.	Pg. 7 / Section 1.2 Study Area	MECP's SARB continues to have concerns regarding the proposed Project Footprint (i.e., defined as 40-45 m in ROW width and associated infrastructure such as access roads, laydown yards, aggregate pits, etc.) and Local Study Area (LSA) (i.e., defined as a 1 km buffer of Project Footprint). As per previous comments provided to the proponent on March 21, 2021, should the ROW be moved through the Project Design Phase to avoid sensitive environmental or cultural features, the potential direct and immediate indirect effects of the Project on species at risk may be realized beyond the proposed LSA. Furthermore, the proponent's response provided on March 18, 2022 indicates that the 150 m-wide corridors will be captured within the LSA. MECP's SARB continues to be concerned that potential changes to the ROW location may result in unknown impacts to species at risk because areas outside of the proposed LSA are not adequately captured in the proposed field work intended to characterize baseline conditions. As such, MECP's SARB continues to recommend that the Project Footprint	Update the draft Terrestrial Field Work Plan to appropriately define the Study Areas such that they adequately consider potential future changes to the location of the ROW following the design phase.	As discussed with the MECP in a meeting on April 12, 2022, the study area has already been expanded to consider a 1 km buffer on a 150 m corridor. Although it is not anticipated that there will be further change to the footprint, it is possible that modifications are needed based on the results of field studies and the provision of Indigenous Knowledge. It is understood that site-specific refinements to the study area may be required based on new Indigenous and stakeholder consultation feedback (e.g., culturally significant sites) and environmental mitigation requirements (e.g., results of field studies). Based on that meeting, MECP advised that as long as the proponent recognizes that any shifts to the Project outside of the study area could result in the requirement to undertake additional field data collection, then MECP is comfortable with the approach, so long as the risk is understood.

Comment #	Reference to Field Plan	Comments (MECP-SARB – April 15, 2022)	Recommendation	Response (Hydro One – May 26, 2022)
		include a 150 m-wide corridor to account for potential future changes to the location of the ROW; and to ensure the EA will appropriately assess potential impacts to species at risk and/or their habitat within 1 km of the final location of the ROW following the design phase (e.g., Limits of Work). Again, this recommendation is consistent with previous recommendation on this Project and other large transmission line and infrastructure projects in northern Ontario which defined the LSA for the wildlife and wildlife habitat, specifically species at risk, as a 1 km buffer of the Project Footprint and/or associated Limits of Work.		
2.	Figures 1-2-1, 1-2-2 and 1-3	Additional information is required on the Project Footprint, LSA and RSA illustrated in Figures 1-2-1, 1-2-2 and 1-3. Specifically, it appears as though the LSA is a 1 km buffer of the proposed alternative routes (i.e., ROW) and associated infrastructure such as access roads, laydown yards, aggregate pits, work camps, etc. In some cases, it is clear that it includes existing roads (e.g., area south of the Township of Ignace), but in many instances it is unclear if new infrastructure is necessary and/or has already been identified. Where it has been identified, it would be helpful to identify those features in the draft Terrestrial Field Work Plan and associated figures.	Update the draft Terrestrial Field Work Plan to include additional information on the specific features used to identify the Project Footprint (i.e., include all existing and planned infrastructure that will constitute the Project Footprint).	At this time in the design process, additional information about site-specific infrastructure cannot yet be identified; however, it is understood that site-specific refinements to the study area may be required if new infrastructure is required and is not within the study area. Such changes could result in the requirement to undertake additional field data collection.
3.	Pg. 16 / Section 5.1 / Table 5-1 And Pg. 25 / Section 5.4.2	The draft Terrestrial Field Work Plan indicates that "*additional habitat characterization will be completed at the time of initial detector deployment to document the quality of the adjacent habitat*	Update the draft Terrestrial Field Work Plan to reference the draft *Survey Protocol for Species at Risk Bats within Treed Habitats* (MNRF 2017) and appropriate	The Terrestrial Field Work Plan (FWP) will be updated with reference to this survey protocol and field data collected will include any standing live or dead tree ≥10 cm diameter at breast height (dbh)

Comment #	Reference to Field Plan	Comments (MECP-SARB – April 15, 2022)	Recommendation	Response (Hydro One – May 26, 2022)
		particularly to serve as roosting habitat. For instance, data will be collected based on diameter at breast height of trees, approximate tree heights, and counts of standing dead trees (snags) (MNR 2011a)". MECP's SARB recommends the proponent refer to, and incorporate, direction provided in the draft *Survey Protocol for Species at Risk Bats within Treed Habitats* (MNRF 2017) which provides additional guidance on consideration for potential roosting habitat (e.g., snag trees and diameter at breast height [dbh]). Specifically, a "snag" should include any standing live or dead tree ≥10 cm dbh with cracks, crevices, hollows, cavities, and/or loose or naturally exfoliating bark.	considerations for suitable roosting habitat characteristics consistent with the protocol.	with cracks, crevices, hollows, cavities, and/or loose or naturally exfoliating bark.
4.	Pg. 17 / Section 5.3.2 Field Surveys	The draft Terrestrial Field Work Plan indicates that "*Twenty-five acoustic monitoring stations will be set up to record at select suitable field survey locations/candidate bat maternity roost habitat along all alternative routes*". MECP's SARB understands this to mean the proponent is planning to establish a total of 25 acoustic monitoring stations, which will be distributed across all alternative routes. Recognizing the proposed approach will assess a very small subsample of candidate bat maternity habitat, as identified through the pre-field mapping and shown in Appendix B, additional detail is required on the rationale for the proposed number of acoustic monitoring stations, the total area/percentage of candidate maternity roosting habitat that will be sub-sampled, and a clear description of how	Update the draft Terrestrial Field Work Plan to describe the rationale for the sufficiency of 25 acoustic monitoring stations and to justify the proposed sampling approach; and how the information collected at these 25 stations will be used to characterize baseline conditions for species at risk bat roosting habitat across the LSA for all alternative routes. Additionally, MECP's SARB cautions against assigning a value of quality to bat maternity and day roost habitat, particularly looking forward to the potential ESA permitting process as all potential maternity roost habitat would be considered habitat,	The Terrestrial FWP will be updated to describe the rationale for the sufficiency of 25 acoustic monitoring stations and to justify the proposed sampling approach; and how the information collected at these 25 stations will be used to characterize baseline conditions for species at risk bat roosting habitat across the LSA for all alternative routes. Twenty-five (25) bat acoustic monitoring stations were selected in order to achieve adequate coverage within candidate bat habitat throughout the LSA. Candidate bat habitat was previously provided by MECP SARB in the form of Ecosites that have potential to occur within the LSA. The sub-sample of 25 bat stations has been evenly distributed throughout the LSA at the predetermined Ecosites that represent candidate bat habitat identified

Comment #	Reference to Field Plan	Comments (MECP-SARB – April 15, 2022)	Recommendation	Response (Hydro One – May 26, 2022)
		information collected from the monitoring stations will be analyzed/used to characterize baseline conditions across the LSA for all alternative routes. As per previous comment provided by MECP's SARB on March 21, 2021 on the 2021-22 Field Work Plan, MECP's SARB recognizes that assigning a value of habitat quality may be a consideration in the route selection process for the EA. However, it is not recommended looking forward to potential ESA permitting where bat maternity and day roost habitat is not viewed through the lens of assigned quality but rather whether is it or is not habitat. Furthermore, for areas identified as potential habitat, based on the desktop analysis (i.e., habitat query), which are not surveyed to confirm presence/absence MECP's SARB is likely to consider all these areas as species at risk bat roosting habitat. Should the proponent be unable to avoid vegetation clearing within this habitat during that bat roosting period (i.e., May 1 to August 31), an authorization under the ESA will likely be required.	regardless of an assigned value of quality.	by MECP SARB. Also, it is Golder's opinion that the selection of candidate bat habitat is a conservative approach as it includes forested ecosites containing young trees (≥ 10 cm DBH). Therefore, this represents a greater density of ecosites to identify bat habitat. The baseline data collected from the 25 stations will be used to assess bat species distribution and composition throughout the LSA and the intent of the baseline data collection is not to determine roost occupancy. The information collected at each of the 25 stations will be analyzed by SonoBat and then manually vetted by a trained bat acoustic expert. Analysis will include species identification, composition, and relative bat activity per night at each of the stations. Through this analysis, adequate baseline data for bats shall be achieved. To reduce any potential impacts to bats within the LSA, seasonal timing mitigation measures will be implemented such as, avoiding tree removals during the bat active season from May 1 – August 31. In previous communications, the MECP SARB have disclosed that bat roosting/maternity habitat in northern Ontario is not limiting. Therefore, if the standard seasonal timing mitigation is followed, the above survey approach for a sub-sample of 25 stations is sufficient to document the presence/absence of species at risk bats within the LSA.

Comment #	Reference to Field Plan	Comments (MECP-SARB – April 15, 2022)	Recommendation	Response (Hydro One – May 26, 2022)
5.	Pg. 17 / Section 5.3.2 Field Surveys	The draft Terrestrial Field Work Plan indicates that additional habitat characterization will be completed during 2022 spring and summer surveys to document the quality of the candidate bat maternity roost treed habitat within 200m of the acoustic stations; and that a rapid snag density survey will be conducted at all 25 acoustic survey stations. MECP's SARB recognizes that the proposed snag density surveys will be completed based on provincial guidelines outlined in *Survey Protocol for Species at Risk Bats within Treed Habitats* (MNRF 2017) and *Bat and Bat Habitat: Guidelines for Wind Power Projects* (MNR 2011). A component of the direction in these protocols is to complete snag density surveys during the leaf-off period so that the view of tree cavities, cracks and loose bark, etc. is not obscured by foliage. However, based on the information provided in the draft Terrestrial Field Work Plan, and identified above, the proponent is planning to undertake these surveys during the spring and summer; which recognizing this is likely occurring during the leaf-on period is likely to limit the ability of these surveys to achieve the intended purpose of the snag density surveys (i.e., identify suitable snag trees). As such, MECP's SARB recommends conducting the snag density surveys during the leaf-off period.	Update the draft Terrestrial Field Work Plan to identify an appropriate time period in which snag tree density surveys will be conducted. Alternatively, update the draft Terrestrial Field Work Plan to describe rationale for the proposed approach.	The rationale for the timing of the snag density surveys will be added to the update Terrestrial FWP. Due to EA timeline commitments, it is not possible to search for cavity trees during the leaf-off period. Therefore, survey efforts have been modified to effectively search for cavity trees throughout the LSA. This survey will also be supported by the bat acoustic monitoring program to determine presence/absence, species composition and distribution within the LSA. To minimize/avoid potential impacts to bats, the EA will identify appropriate mitigation measures to be implemented during construction, such as tree removal timing windows.
6.	Pg. 17 / Section 5.3.2 Field Surveys	Photos should be taken of each candidate hibernaculum and included in the EA to support the ranking (i.e., nil, low, moderate, high).	Incorporate into survey methods.	Comment noted and will be added to the methods in Section 5.3.2.

Comment #	Reference to Field Plan	Comments (MECP-SARB – April 15, 2022)	Recommendation	Response (Hydro One – May 26, 2022)
7.	Pgs. 20 – 24 / Section 5.4.1	The draft Terrestrial Field Work Plan identifies that acoustic monitoring will be undertaken at the following locations and for the following purposes: 1. At candidate hibernacula to confirm use by bats, including species at risk bats; 2. At activity control stations within 500 m of potential hibernacula to be used to differentiate peaks in activity recorded at candidate hibernaculum from activity unrelated to swarming that would reflect high activity due to the presence of a travel corridor or foraging feature on the landscape; and 3. At known hibernaculum within 10 km of preliminary Project Footprint "*to confirm if the monitoring of candidate hibernacula did capture the appropriate timing window for swarming activity within the region, during the year of 2022. Information on the activity levels and timing for peak swarming activity at known hibernacula will be used as guidance for cross-referencing to acoustic activity levels recorded at the candidate hibernacula and allow for QA/QC. For instance, activity patterns at the candidate hibernacula can be compared to the pattern of activity at known hibernacula to decipher if the pattern is associated with swarming*	Update draft Terrestrial Field Work Plan as appropriate.	At a meeting with the MECP on April 12, 2022, Golder provided a detailed overview of the proposed approach from desktop assessment to acoustic monitoring and the rationale why monitoring should be undertaken at candidate sites. Golder indicated that the candidate hibernacula are not known hibernation sites, they are candidate sites that may or may not provide suitable conditions for bat hibernation. Swarming surveys at candidate hibernacula would be conducted between August and September at potential hibernation sites. Baseline acoustic activities at candidate sites would be compared to control and reference sites to determine whether alternate behaviours could be contributing to site use (i.e., foraging). In August, the young of the year are volent and there are many bats on the landscape. Candidate sites are often located in areas where bats could forage or travel through. Golder's concern is that the presence of a SAR bat near a site that may or may not have potential as a hibernaculum would not confirm that the site is a hibernaculum. Recording for 10 nights or more in August would result in the recording of SAR bats at almost any location, resulting in false positives. Swarming activity indicates hibernation habitat, mere presence with no activity thresholds or consideration of activity patterns does not determine if a site is hibernation habitat. Based on the meeting with the MECP on April 12, 2022, it is understood that, should Golder proceed with the approach outlined

Comment #	Reference to Field Plan	Comments (MECP-SARB – April 15, 2022)	Recommendation	Response (Hydro One – May 26, 2022)
		behaviour or consistent with initial evening burst of foraging activity." MECP's SARB is supportive of the proposed approach to monitoring known hibernacula within 10km of the candidate hibernacula to confirm if the monitoring of candidate hibernacula did capture the appropriate timing window for swarming activity within the region, during the year of 2022. However, the intended purposes of acoustic monitoring at (1) activity control stations to differentiate peaks in activity recorded at candidate hibernaculum from activity unrelated to swarming that would reflect high activity due to the presence of a travel corridor or foraging feature on the landscape, and (2) at known hibernacula to use as guidance for cross-referencing to acoustic activity levels recorded at the candidate hibernacula and allow for QA/QC, is unlikely to conclusively determine that documented activity at the entrance of the candidate hibernacula. Rather, documented activity (i.e., bat passes) near the entrance of the candidate hibernacula of species at risk bats should be considered as confirmation that the hibernacula is being used; and should the Project activities be unable to avoid impacts to a hibernacula an authorization under the ESA is likely to be required.		in the field work plan, with the MECP expecting to see additional information on the technical criteria that will be used in the data analysis and thresholds for determining swarming activity (i.e., how are the candidate/control/reference sites being compared, activity thresholds) and additional information on the proposed reference sites and why they are appropriate. It is understood that the MECP would like to have the results presented to it and to allow it time to provide input on the thresholds for analysis. The MECP would like to have more details on how the swarming acoustics will be interpreted and what thresholds will be used to confirm use and it expects to be given opportunity to comment prior to the removal of any candidate sites.
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9.				

Comment #	Reference to Field Plan	Comments (MECP-SARB – April 15, 2022)	Recommendation	Response (Hydro One – May 26, 2022)
10.	Pg. 30 /Section 5.8.2 and Pg. 48 / Section 5.17	The field surveys proposed in the draft Terrestrial Field Work Plan for marsh birds, including Least Bittern, follow the protocols provided in the *Marsh Monitoring Program* (Bird Studies Canada 2009). In some regards, these are not considered sufficient to confidently confirm the presence/absence of Least Bittern. MECP's SARB recommends using the methods outlined in the *National Least Bittern Survey Protocol* (Canadian Wildlife Service, Environment Canada, 2011). We note that Section 5.17 – Schedule indicates that the proponent only plans to conduct one round of Marsh Bird Surveys. Due to their secretive nature, Least Bitterns may remain undetected even after one or two surveys I the same wetland (Bogner and Baldassarre 2002; Meyer et al. 2006; Jobin et al. 2007; Latendresse and Jobin 2007) so repeat visits should be made to enhance the species detection. In order to establish abundance and breeding density of male Least Bitterns in a wetland, three visits should be made to each station (Canadian Wildlife Service, Environment Canada, 2011). Further, as per the *National Least Bittern Survey Protocol* (Canadian Wildlife Service, Environment Canada, 2011) it is recommended that the call response broadcast be 13 minutes point count and should be focussed on Least Bittern to increase the likelihood that Least Bittern will be detected and further support the survey results and subsequent conclusions in the	Update the draft Terrestrial Field Study Plan to reflect appropriate survey methods for Least Bittern consistent with the *National Least Bittern Survey Protocol* (Canadian Wildlife Service, Environment Canada, 2011).	Details of the Least Bittern surveys will be incorporated into the updated Terrestrial FWP. Least Bittern's preferred and most detectable breeding habitat are marshes with tall emergent vegetation such as cattail species (*Typha spp.*) surrounded with open waters, known as a hemi-marsh. This species is known to prefer larger marsh sizes greater than (>) 5 hectares (ha) (COSEWIC 2009). Based on the preferred habitat and low occurrence records of this species within the study area, only marsh habitats that fit the above criteria (i.e., >5 ha) and occur within the LSA will be surveyed for Least Bittern by following the *National Least Bittern Survey Protocol* (Canadian Wildlife Service, Environment Canada, 2011). **References:** COSEWIC. 2009. COSEWIC assessment and update status report on the Least Bittern *Ixobrychus exilis* in Canada. Committee on the Status of Endangered Wildlife in Canada. Ottawa. vi + 36 pp.

Comment #	Reference to Field Plan	Comments (MECP-SARB – April 15, 2022)	Recommendation	Response (Hydro One – May 26, 2022)
		EA.		
11.	Pg. 33 / Section 5.10.2	MECP's SARB understands the proponent plans to undertake Eastern Whip-poor-will surveys between May 18 to 22 and Jun 7 to 21, consistent with the draft Survey Protocol for Eastern Whip- poor-will (*Caprimulgus vociferus*) in Ontario (MNRF 2014). However, spring weather conditions in 2022 (e.g., unusually deep snow conditions) may affect the return of Eastern Whip-poor-will and constrain access. As such, extra consideration should be given to the proposed sampling period of May 18 to 22 and the recommended weather conditions provided in the protocol (e.g., ≥10 °C, no snow, etc.). While the draft Survey Protocol recommends conducting these surveys between May 18 – June 30, it is likely reasonable to avoid the May time period and extend the survey window this year into early July around the week prior to the full moon (i.e., July 13) period (July 6 - July 13).	Consider conducting two (2) surveys for Eastern Whip-poor-will between June 7 to 21 and one (1) survey between July 6 to July 13.	Revisions will be made to the Terrestrial FWP to indicate that the timing will be shifted to having two rounds in June and one round in July.
12.	Pg. 33 / Section 5.10.2 and 5.10.3	The draft Terrestrial Field Work Plan indicates that "*Eighty (80) survey stations will be selected throughout the LSA within candidate [Eastern Whip-poor-will] nesting habitats*." MECP's SARB understands that the results of the surveys will be used to approximate centre of territory which will then be used to apply habitat mapping criteria (as per Eastern Whip-poor-will General Habitat Description [GHD]). While this approach is appropriate to confirming presence/absence of Eastern Whip- poor-will and identify associated habitat, the proposed approach only assesses a small subsample of	Update the draft Terrestrial Field Work Plan to provide rationale to justify the proposed sampling approach; and how this information will be used to characterize baseline conditions for Eastern Whip-poor-will.	The Terrestrial FWP will be updated to indicate that the survey stations were selected based on spatial coverage across the entire project as well as equal coverage across alternative routes. The stations were selected to allow for roadside access for health and safety reasons as these are nighttime surveys.

Comment #	Reference to Field Plan	Comments (MECP-SARB – April 15, 2022)	Recommendation	Response (Hydro One – May 26, 2022)
		candidate Eastern Whip- poor-will nesting habitat, as identified through the pre-field mapping and shown in Appendix E. As such, it is unclear how the proponent plans to use the results from the proposed subsampling approach to further describe Eastern Whip-poor-will habitat across the alternative routes; and the potential adverse affects of the Project on Eastern Whip-poor-will and their habitat. MECP's SARB recommends the proponent describe the rationale for the proposed number of survey stations, the total area of candidate nesting habitat that will be sub-sampled, and provide a clear description of how information collected from the survey stations will be analyzed/used to characterize baseline conditions across the alternative routes for Eastern Whip-poor-will. Furthermore, for areas identified as potential Eastern Whip-poor- will habitat, based on the desktop analysis, which are not surveyed to confirm presence/absence MECP's SARB is likely to consider all these areas as Eastern Whip-poor-will habitat. Should the proponent be unable to avoid vegetation clearing within this habitat during that nesting period (i.e., May 1 to August 31), an authorization under the ESA will likely be required.		
13.	Pg. 34 / Section 5.11	MECP's SARB recognizes that potential denning features for Gray Foxes (e.g., dug or modified burrows of other species, wood piles, brush piles, rock cervices, hollow logs and trees, hollows under shrubs, and/or space beneath anthropogenic structures) may not be limiting within the Project Footprint and broader Local Study Area.	Update the draft Terrestrial Field Work Plan as appropriate.	At a meeting with the MECP on April 12, 2022, Golder provided an overview on the approach to gray fox studies and the participants discussed recommendations made by MECP in the Terrestrial FWP. It was agreed that Golder will proceed with mapping critical habitat in home ranges around occurrence records, and that an

Comment #	Reference to Field Plan	Comments (MECP-SARB – April 15, 2022)	Recommendation	Response (Hydro One – May 26, 2022)
		However, dens are one of the most important habitat features for Gray Fox as they are critical for parturition and pup rearing, and to avoid predators. As such, the area within 100 m of a Gray Fox den are likely to be particularly sensitive to anthropogenic disturbances, including sensory disturbances; and should be avoided during the denning period (estimated to be approximately between February 15 to July 15) to maintain the physical and biological composition, structure and function of the surrounding habitat, and to protect the area in the vicinity of the den (Recovery Strategy for the Gray Fox in Ontario, MECP 2019). Recognizing the potential for denning structures to be present across the Local Study Area (LSA) and practicality of targeted den site investigations, MECP's SARB supports the proponents proposed approach to (opportunistically) identifying potential den sites and, where a potential den is found, monitoring with a (no- glow infrared) trail camera to determine the occupant. Where Gray Fox dens are confirmed, MECP's SARB recommends avoiding vegetation clearing and construction activities within a minimum of 100 metres of the den during the denning period, estimated to be approximately between February 15 to July 15, to avoid adverse impacts to denning Gray Fox. **Presence Surveys** However, MECP's SARB also recognizes that little is known about the distribution of		evolving and iterative discussion will be required as data is collected. A gray fox presence survey program will be added to the baseline field work for the Project. Home ranges will be mapped according to the Recovery Strategy (Recovery Strategy for the Gray Fox in Ontario, MECP 2019). The Terrestrial FWP will be updated to reflect these changes and include this additional field program and analysis for gray fox.

Comment #	Reference to Field Plan	Comments (MECP-SARB – April 15, 2022)	Recommendation	Response (Hydro One – May 26, 2022)
		Gray Fox between the area surrounding the City of Thunder Bay and Atikokan; and there has been little to no survey effort across this area for Gray Fox. As such, MECP's SARB recommends conducting presence surveys between approximately May 1 to October 31 within the LSA associated with Alternative Routes 1, 1A, 1B-1, 1B-2, 1C, 2A, 2B, and 2C using a combination of trail cameras and scent stations to further inform distribution of Gray Fox and appropriately characterize baseline conditions for Gray Fox in the EA. Camera and scent stations can potentially be set up at or near other monitoring stations (e.g., acoustic monitoring stations, etc.) should the habitat be suitable for Gray Fox. A similar study was conducted by the Ministry of Natural Resources ('MNR') on Pelee Island between 2012-2013 using a modified approach to that described in the National Lynx Detection Protocol (pers. comm. J. Bowman 2022) (*note that the hair snag/DNA analysis component described in this protocol was not used in the MNR study and is not recommended as part of these surveys*). Additional information related to the efficacy of this recommended survey approach for Gray Fox can be found in Downey et al. 2007. It is further recommended that the survey be developed such that it provides a reasonable sub-sampling design (e.g., survey stations spaced every 5 or 10 km) to further inform the distribution of Gray Foxes across Alternative Routes 1, 1A, 1B-1, 1B-2,		

Comment #	Reference to Field Plan	Comments (MECP-SARB – April 15, 2022)	Recommendation	Response (Hydro One – May 26, 2022)
		1C, 2A, 2B, and 2C and appropriately characterize baseline conditions for Gray Fox in the EA. Additionally, the recommended timeframe for presence surveys (i.e., approximately May 1 to October 31) is intended to cover a portion of the denning period and dispersal period following independence of the pups, as well as provide the greatest amount of time to collection baseline information within the proponents proposed schedule to support characterization of baseline conditions. **Identifying Home Ranges** Further, MECP's SARB recommends that existing records of Gray Fox (e.g., NHIC, iNaturalist, Thunder Bay Field Naturalists, etc.) and any new observations of Gray Fox identified through the recommended presence survey or other efforts undertaken by the proponent, be used to identify home ranges based on the best available information regarding home range sizes for Gray Fox (e.g., buffer observations by a distance equivalent to the radius of maximum home range sizes). Note that published estimates of home range size for Gray Fox vary widely between <30 ha to over 1000 ha based on habitat quality, sex and season; and Bachmann and Lintack (1982) radio-tracked an unmated male Gray Fox in Ontario and found the home range varied from 210 ha in March- November to 1570 ha January-February (Recovery Strategy for the Gray Fox in Ontario, MECP 2019). **Mapping Habitat**		

Comment #	Reference to Field Plan	Comments (MECP-SARB – April 15, 2022)	Recommendation	Response (Hydro One – May 26, 2022)
		Furthermore, recognizing all areas of continuous potential habitat will not be surveyed through the above approach, MECP's SARB recommends that the proponent: 1. Characterize potential suitable habitat using the best available information and informed further by habitat characteristics within identified home ranges (as per above); and 2. Map potential suitable habitat across the broader distribution of Gray Fox, as determined by existing and new records of Gray Fox, within the LSA associated with Alternative Routes 1, 1A, 1B-1, 1B-2, 1C, 2A, 2B, and 2C. **<u>Mitigation/Avoidance Actions</u>** Furthermore, MECP's SARB recommends avoiding vegetation clearing within identified home ranges and potential habitat during the denning period, estimated to be approximately between February 15 to July 15, to avoid adverse impacts to denning Gray Fox. Should the proponent be unable to avoid vegetation clearing within known home ranges of Gray Fox, or in areas of suitable habitat likely to be used by Gray Fox, an authorization under the ESA is likely to be required.		
14.	Pg. 47 / Section 5.16 Reporting	MECP's SARB strongly encourages the proponent to report all species at risk observations to the Natural Heritage	No immediate action required.	Comment noted.

Comment #	Reference to Field Plan	Comments (MECP-SARB – April 15, 2022)	Recommendation	Response (Hydro One – May 26, 2022)
		Information Centre (NHIC) (NHICrequests@ontario.ca) by completing the "observation reporting spreadsheet" or the "observation reporting geodatabase" found at Report rare species (animals and plants) | ontario.ca.		
15.	General – Access to Private Land	The draft Terrestrial Field Work Plan includes several references to access to private land for targeted species at risk surveys (e.g., bobolink, gray fox, etc.). It is understood that land access will need to be granted to enable such surveys. However, where land access is not granted, the EA should include a map of these candidate habitats for species at risk and describe the habitat conditions based on existing information (e.g., desktop analysis); and the potential for these candidate habitats to be adversely affected by the Project.	Update the draft Terrestrial Field Work Plan to describe how candidate habitat for species at risk will be considered in the EA where land access is not granted to conduct surveys.	Comment noted. The Terrestrial FWP will be updated to include a description of how candidate habitat for species at risk will be considered in the EA where land access is not granted to conduct surveys.
16.	General – Survey timing	While MECP's SARB recognizes the proposed survey timing windows as being appropriate for the species at risk addressed in the Terrestrial Field Work Plan (e.g., Bobolink, Barn Swallow, Bank Swallow, Eastern Whip-poor-will, etc.), spring weather conditions in 2022 (e.g., unusually deep snow conditions) may affect species at risk occupancy and habitat use; and when surveys should be undertaken. As such, the proponent should consider if/how this year's weather conditions may affect planned surveys and adjust accordingly. Additionally, the above makes it especially important to document weather conditions during all surveys to further support the survey results and subsequent conclusions in the EA.	With the exception noted above (comment #11) regarding Eastern Whip-poor-will survey timing, no additional changes required to the draft Terrestrial Field Work Plan at this time; however, consideration should be given to suitable survey conditions when undertaking proposed field work.	Comment noted. Suitable surveys conditions will be a consideration for all proposed field work.

Comment #	Reference to Field Plan	Comments (MECP-SARB – April 15, 2022)	Recommendation	Response (Hydro One – May 26, 2022)
17.	General – Newly Listed Species at Risk	**Red-headed Woodpecker** was re-assessed by COSSARO in August 2020, and subsequently listed as Endangered in January 2022. Red-headed Woodpeckers are cavity-nesters. As such, they rely on an abundance of dead older wood to excavate nests. MECP's SARB recommends breeding bird surveys include consideration of Red-headed Woodpecker and their habitat. Where potential nesting habitat may be adversely impacted by the Project, vegetation clearing should not occur during the nesting period (i.e., May 1 to August 31) to avoid impacts to Red-headed Woodpecker. Additionally, **Black Ash** was assessed by COSSARO in October 2020, and subsequently listed as Endangered in January 2022. However, ESA protection measures for Black Ash were paused for 2 years and will therefore become effective January 2024. As such, should any Project activities (i.e., vegetation clearing) occur after protection measures become effective which may contravene sections 9 and/or 10 for Black Ash, it is advisable that the proponent consider Black Ash in the EA.	Update the draft Terrestrial Field Work Plan to include Red-Headed Woodpecker and Black Ash, as appropriate.	The Terrestrial FWP will be updated to include mention of these two species. In Ontario, records of breeding Red-headed Woodpecker occurs across southern Ontario to the southern edge of the Canadian Shield and in the extreme southwest corner of northwestern Ontario (Cadman et. al. 2007). This known breeding range does not overlap the Project study area and thus this species is not considered in the assessment. However, if Red-headed Woodpecker were expanding their range to within the Project study area, then the planned breeding bird surveys would detect them if present. Planned ELC and botanical inventory will include detection for the presence of Black Ash. **References** Cadman, M.D., D.A. Sutherland, G.G. Beck, D. Lepage and A.R. Couturier (eds.). 2007. Atlas of the Breeding Birds of Ontario, 2001-2005. Bird Studies Canada, Environment Canada, Ontario Field Ornithologists, Ontario Ministry of Natural Resources and Ontario Nature, Toronto, Ontario. xxii + 706 pp.

3A. Indigenous Community Comments: Comments Table – Waasigan Transmission Line Project – Pinchin and Maawandoon Review of Draft Field Work Plans on behalf of Gwayakocchigewin Limited Partnership (GLP) - Pinchin File 294009.00. April 29, 2022.

MEMORANDUM

DATE: April 29, 2022.

MEMO TO: Gwayakocchigewin Limited Partnership (GLP).

FROM: Sebastian Belmar, Mario Buszynski, and James Neville.

RE: Review of the Terrestrial and Aquatic Field Work Plans 2022.

PINCHIN FILE: 294009.00.

In March 2022, Hydro One published the Terrestrial and Aquatic Field Work Plans ("the Plans") for the Waasigan Transmission Line Project ("the Project"). The Plans describe the field work activities that will be conducted to characterize the natural environment in support of the assessment of alternatives of the Project. Specifically, the Plans describe the proposed methods to collect baseline data for wildlife, wildlife habitat, vegetation, wetlands, fish, and fish habitat. Hydro One invited interested parties to submit comments on the Plans until April 15, 2022.

Pinchin Ltd. completed a technical review of the Plans. In this memorandum, the results of this review describe areas where additional information may be required to improve the technical sufficiency of the Plans. In addition, recommendations are made to enhance the clarity of the Plans and facilitate a common understanding by all the interested parties.

Id#	Field Work Plan	Section	Comment	Recommendation
1	**General Comments**		While the Plans states that the purpose of the surveys is to "Incorporate Indigenous Knowledge/Traditional Land and Resource Use (IK/TLRU) as part of the baseline conditions, they do not describe how the integration will be achieved. It is unclear how IK/TLRU will be used as a criterion informing the selection of survey sites. Based on the information presented, and given the restrictive timeline, it is critical that the Proponent presents a solid approach to facilitate the IK/TLRU integration.	Propose an explicit approach to integrating TK/TLRU in the Field Work Plans. Specifically, the approach should include additional engagement with the Protection Committee to discuss its understanding of the environment within the LSA.
2	**General Comments**		The Plans do not provide rationales justifying the selection of sampling efforts. This is critical, because the sufficiency of the field surveys depends on their ability to obtain representative samples of the ecological communities. Because one of the objectives of the field studies is to inform the assessment of alternative routes, it should be considered that the selected effort must adequately sample all the routes under evaluation. Thus, unless an indirect approach to comparing the routes is proposed, the proposed sampling efforts may be inadequate for the assessment. In addition, it should be discussed whether the proposed efforts are adequate to examine the occurrence of rare species, including Species at Risk.	For each component of the Plans, present a solid rational justifying the adequacy of the selected sampling effort, in consideration of the evaluation of alternative routes.

Id#	Field Work Plan	Section	Comment	Recommendation
3	**General Comments**		The Plans do not provide information on what socio-economic field studies will be undertaken, or whether information collected in the proposed studies will be used to support the assessment of socio-economic effects, including effects on traditional and recreational activities (i.e., hunting, trapping, and fishing), and tourism in remote areas.	Indicate if any field studies are proposed to support the socio-economic assessment. Indicate if the information collected by the studies included in the Plans will be used in the socio-economic assessment.
4	**General Comments**		In general, the Plans present a methodological approach to characterize the spatial variation in the ecological communities within the LSA. For example, the proposed breeding bird surveys aim to describe the diversity of bird species along the LSA during the reproductive season. However, the Plans do not consider the temporal variation in each of this communities. It is critical to understand that ecological communities are highly dynamic in space and time. Thus, a characterization of their diversity in this year may not adequately represent the community in the long term. Therefore, in ecological studies such as this baseline characterization, it is fundamental to account for temporal variation in the ecological communities by replicating the sampling effort over time.	Expand the proposed field surveys to include temporal replication, as adequate to each ecological component. The temporal replication may include seasonal and yearly surveys.

Id#	Field Work Plan	Section	Comment	Recommendation
5	**General Comments**		The Plans do not describe an approach to engage the Protection Committee members during the review of the results of the field studies.	It is recommended that the Proponent commits to sharing the field survey results with the Protection Committee and proposes a timeline to do this within each field component.
6	**Terrestrial**	**1.0 Introduction**	This section outlines each of the wildlife components that will be studied in the field surveys. Notably, there are no field surveys planned for mammals, including moose populations.	Provide a rationale justifying the selection of the wildlife components of the Terrestrial Field Work Plan ("the Plan"). Explain why mammals, in general, are not targeted by specific surveys in the Plan. Furbearers and ungulates are of special importance to the First Nations in the Protection Committee. A comprehensive understanding of the potential effects of the Project on the rights of Indigenous peoples must quantify the adverse effects on these wildlife groups. Explain what approach will be used to study moose populations. If the use of existing data is proposed, present a solid rationale supporting this choice. It should be considered that information from winter aerial surveys may not provide suitable

Id#	Field Work Plan	Section	Comment	Recommendation
				information regarding the use of habitat within the LSA throughout the year. Similarly, explain why there are no proposed surveys to examine the occurrence of herpetofauna within the LSA.
7	**Terrestrial**	**1.1 Purpose**	This section states that one of the objectives is to "*Compile sufficient baseline data to enable an assessment of direct and indirect effects from the Project using the wildlife and wildlife habitat, vegetation, and wetlands criteria and indicators.*" However, the Plans do not describe the criteria and indicators that will be used in the assessment. Criteria and indicators are closely linked to the field studies because they determine the information that needs to be collected for the assessment. In the absence of explicit criteria and indicators, a critical review of the Plans is incomplete, as it is not possible to fully assess the adequacy of the proposed methods.	While the criteria and indicators were included in the Terms of Reference, it would be adequate to include them in the Plans. Further, because criteria and indicators are key to determining the approaches to the assessment, they should be explicitly linked to the methodologies presented in each section.

Id#	Field Work Plan	Section	Comment	Recommendation
8	Terrestrial	1.2 Study Area	Regarding the assessment at the RSA level (cumulative effects), the Plan indicates that the boundaries for most wildlife populations are unknown, including bats and birds. Because of this knowledge gap, the Plan proposes that a 5 km buffer around the LSA represents an adequate regional scale (RSA) for wildlife with small to moderate breeding home ranges. However, it is unclear how home ranges would be related to population distribution. In the case of migratory birds, Environment and Climate Change Canada (ECCC) has previously stated that the adequate biological scale to examine cumulative effects on their populations is at the scale of Bird Conservation Regions. It should be mentioned that despite of the assessment of the Project being conducted at the provincial level, the jurisdiction on migratory birds at the federal level has been recognized by the courts, as protection of this group of species is a matter of national concern.	In discussions with the Proponent, it was stated that ECCC did not have any comments regarding the Field Work Plan. Regardless, we recommend that ECCC be consulted specifically on whether the assessment of cumulative effects on migratory birds is most appropriately done at the scale of the Bird Conservation Regions. For other species, provide supporting rationales based on available data, when available, or based on the ecology of comparable species.

Id#	Field Work Plan	Section	Comment	Recommendation
9	Terrestrial	5.3 Bat Maternity Roost Habitat Assessment and Acoustic Monitoring	The locations for acoustic monitoring will be selected using data from the Forest Resource Inventory (FRI). Based on the characteristics of the ecosites, polygons representing adequate habitat will be selected. However, this will result in a very large pool of candidate sites. However, factors other than the vegetation composition may be relevant for the selection of roosts. For example, *Myotis lucifugus* shows more fidelity to feeding areas than to roosting trees. Thus, incorporating the availability of foraging habitat in the selection criteria may help narrow down the pool of candidate sites. It should be noted that maternity roosts are not identified as critical habitat in the federal recovery strategy for bats, because of the lack of knowledge on their location and relevance. Further, Ontario has adopted the federal recovery strategy under the Ontario Species at Risk Act. Nevertheless, an adequate justification of the effort selected (25 stations) should still be presented, given that candidate habitat is common and widespread all over the LSA. The Plan states that a “bat acoustic specialist” will validate the automated classification completed by SonoBat. In this regard, will validation be conducted on a random sample of the total set? While this is important to estimate a rate of error in the classification, the proponent should also consider	What year is the imagery used in the FRI and was the classification adjusted by the age of the dataset? Consider the use of additional criteria in the selection of survey sites, such as a measure of distance to foraging habitat. Provide a rationale supporting the choice of sampling effort for maternity roosts (n = 25). Describe the approach that will be used to validate the automated classification of bat calls. Clarify how the location of roosting trees will be determined and outline the limitations of the selected approach.

Id#	Field Work Plan	Section	Comment	Recommendation
			validating all “rare” occurrences in the dataset, for example, following a frequency-based criteria (i.e., validate all calls assigned to species with relative frequency of less than 10% per station). It is unclear how the measured metrics (average bat passes per night and peak activity) will be used to determine the location of roosting trees. This may be particularly difficult in consideration of the speed at which bats fly and for species that forage far away from their roosts, such as little brown myotis (2,400 m around the maternity site).	
10	**Terrestrial**	**5.5 Barn Swallow Surveys and 5.6 Bank Swallow Surveys**	The approaches proposed to identify features that may support nesting for barn and bank swallows, and to survey the selected locations is adequate. However, as mentioned above, the lack of explicit criteria and indicators makes it challenging to evaluate the suitability of the Plan.	Describe the criteria and indicators that will be used in the assessment of each environmental component.

Id#	Field Work Plan	Section	Comment	Recommendation
11	Terrestrial	5.7 Breeding Bird Surveys	The Plan states that the "*Breeding bird survey effort will consist of 96-point count stations…*" Further, the Plan states that the survey effort will be allocated in proportion to the representation of each ecosite within the LSA. The effort may be adequate if ecosites are grouped into categories. However, grouping would also lead to the loss of fine-scale information regarding habitat-species associations. Further, proportional allocation of the effort may cause rare ecosites within the LSA to receive an inadequate level of effort.	How many different ecosites are found within the LSA and what is their frequency distribution? How will the effort be allocated along the LSA? For instance, will sampling units be distributed randomly along the LSA or will they be aggregated near areas that are easily accessible?
12	Terrestrial	5.7 Breeding Bird Surveys	The vocalizing activity of birds is known to change throughout the breeding season. For instance, acoustic surveys of birds in York, Ontario, conducted in mid-late May detected a significantly larger number of species than surveys in mid-late July. Anecdotally, this reviewer mapped territories of Nashville warblers in northwestern Ontario between late May and early June. By the second week of June, all the regular territorial calls came to a halt. A similar decrease in activity was observed in most bird species, except red-eyed vireo.	If breeding bird surveys are to be conducted throughout the season, a statistical comparison of stations surveyed earlier and later in the season should be conducted. Alternatively, efforts should be made to conduct the surveys as early as possible within the planned survey window.

Id#	Field Work Plan	Section	Comment	Recommendation
13	**Terrestrial**	**5.7 Breeding Bird Surveys**	The minimum distance between stations (250 m) would result in gaps of only 50 m between the closest possible stations. With such a small gap, the likelihood of "double counting" individuals may be high. Further, individuals of species with louder calls could be detected in more than one station, biasing all the recorded metrics.	Revise the proposed minimum distance between survey stations to reduce the likelihood of introducing unaccounted variation in the survey.
14	**Terrestrial**	**5.7 Breeding Bird Surveys**	As with other components, the section on Data Analysis provides little information, other than summarizing some metrics that will be calculated and reported. Critically, this section does not indicate what criteria and indicators will be used in the assessment of effects, making it difficult to determine with certainty what information should be collected.	Describe the criteria and indicators that will be used in the assessment of each environmental component.
15	**Terrestrial**	**5.7 Breeding Bird Surveys**	This section indicates that "*Surveys will not be completed during periods of high winds or inclement weather.*"	Beaufort index and other environmental covariates should be recorded, including time, temperature, and precipitation, as they are known to influence the activity levels of birds and their probability of detection.

Id#	Field Work Plan	Section	Comment	Recommendation
16	**Terrestrial**	**5.8 Marsh Bird Surveys**	The Pre-field Mapping section states that "*Preliminary survey locations will be selected within the LSA in advance of the field program through a desktop analysis of available land cover mapping…*" Later, it states that "*No provincially mapped marsh bird breeding habitat is present within the LSA for the alternative routes.*" As it is noted below for the Wetland Surveys section, the provincial FRI dataset excludes ecosites associated with waterbodies, including important wildlife habitats such as emergent marshes.	Could the Proponent clarify whether the second statement means that the habitat is not considered present based on the FRI or that the provincial mapping is incomplete? Regardless, the limitations of the provincial wetlands inventory come into play here. If the goal is to predetermine appropriate survey locations using the wetlands inventory, delineation of wetland ecosites within waterbodies must be completed.
17	**Terrestrial**	**5.8 Marsh Bird Surveys**	The Plan states that the marsh bird surveys will be conducted during single visits to each site. However, the standardized method included in the Marsh Monitoring Program Participant's Handbook for Surveying Marsh Birds (Bird Studies Canada, 2009), requires of two visits. This approach is concerning, as single-visit surveys on each site may reduce the likelihood of detecting the presence of rare species, including the Species at Risk yellow rail (*Coturnicops noveboracensis*).	The proposed approach to effectively characterize the marsh bird communities should consider, at least, two visits per site.
18	**Terrestrial**	**5.10 Eastern Whip-poor-will Surveys**	The Plan states that suitable habitat for conducting eastern whip-poor-will surveys was identified a priori based on the most recent available FRI data.	Confirm the age of the FRI dataset and whether the stands classification was corrected by the age of the dataset.

Id#	Field Work Plan	Section	Comment	Recommendation
19	Terrestrial	5.10 Eastern Whip-poor-will Surveys	The Plant states that “In addition to this GIS analysis, the most recent available imagery was used, where possible, to verify these ecosites at a desktop level.	Describe how the ecosite verification was conducted. Based on the verification, how accurate was the FRI classification?
20	Terrestrial	5.10 Eastern Whip-poor-will Surveys	The survey effort (n = 80) seems adequate, considering that the Project is located at the edge of the range of this species and that records suggest that density in northwestern Ontario is low. However, the Plan does not describe what criteria will be used to select the location of the survey stations and, if multiple criteria will be used, how they will be combined.	Describe what approach will be used to select the location of the survey stations for this species. Perhaps it would be most adequate to use the presence of suitable habitat combined with former records to identify broad target areas to be surveyed following the roadside protocol with 1 km of distance between stations.
21	Terrestrial	5.10 Eastern Whip-poor-will Surveys	The Plan does not describe what environmental covariates will be recorded during the surveys. Because detectability of eastern whip-poor-will is influenced by several environmental factors, it is critical to record them to evaluate the adequacy of the surveys.	Indicate what environmental covariates will be collected during the surveys, including: - Cloud cover - Precipitation - Percentage of moon illuminated - Wind noise (Beaufort scale) - Temperature

Id#	Field Work Plan	Section	Comment	Recommendation
22	Terrestrial	5.10 Eastern Whip-poor-will Surveys	The Data Analysis section states that triangulation methods based on protocols prepared by the New Hampshire Audubon Society will be used. The locations, combined with a desktop habitat assessment, will then be used to determine the approximate centre of each bird territory. It should be taken into consideration that spot-mapping is a challenging approach that leads to underestimating the size of territories when acoustic detection is not accompanied by visual identification of a bird. In the region, breeding densities of this species are low. However, if there are two or more contiguous territories being defended, spot-mapping could result in large biases if vocal activity is low.	Consider repeated visits to survey stations with confirmed detections of eastern whip-poor-will.
23	Terrestrial	5.11 Gray Fox	The Plan does not propose a targeted survey of gray fox. Instead, it will rely on incidental observations during other field activities.	Has consideration been given to the use of hair traps in some targeted areas where previous observations have been documented? For example, see Castro-Arellano et al. (2008): Hair-Trap Efficacy for Detecting Mammalian Carnivores in the Tropics, and references found within this article.

Id#	Field Work Plan	Section	Comment	Recommendation
24	Terrestrial	5.12 Anuran Call Counts	A challenge of the approach proposed is that the selection based on the FRI dataset will result in a large pool of candidate Significant Wildlife Habitat (SWH) areas. Naturally, it is impractical to aim to survey all candidate areas. Thus, it is important to ensure that the proposed survey effort (n = 80) is allocated throughout a representative sample of the total land base. This means that survey stations should be distributed along ecosites and over the length of the LSA.	Indicate what is the strategy that will be used to allocate the survey effort over the study area.
25	Terrestrial	5.13 Candidate Significant Wildlife Habitat	The field verification approach proposed seems mostly appropriate. However, the fact that 2% of the occurrences will be verified for SWH with more than 30 occurrences could be problematic for rare habitats, including “Rare Tree: Red and Sugar Maple”, “Turtle Nesting”, and “Waterfowl Stopover Staging Areas - Terrestrial”. For example, if a candidate SWH type is represented by 200 occurrences, only 4 of those would be field-verified, and a strong rationale would be required to justify such a low effort.	Consider setting a minimum sample size for all candidate SWH.
26	Terrestrial	5.13 Candidate Significant Wildlife Habitat	The approach described for the consideration of SWH in the Alternative Route evaluation is unclear. For example, for a common candidate SWH type, does the approach mean that the 98% of polygons not verified will still be retained as candidate for the assessment?	Clarify the meaning of the approach described and discuss potential limitations to the assessment imposed by the choice of such approach.

Id#	Field Work Plan	Section	Comment	Recommendation
			If that is the meaning of the approach, then it may unjustifiably bias the assessment in favor of common SWH types. Further, this approach may amplify potential errors in the FRI classification.	
27	**Terrestrial**	**6.0 Vegetation and Wetlands**	The Plan states that "*Efforts will be made to establish at least one survey location in as many of the plant community types as possible.*" If this was to be interpreted as meaning that the sample size for each community type will be at least one, then the survey effort could be very low. Further, the proposed Site Selection assumes that the FRI classification is accurate.	Considering possible errors in the FRI and the age of the dataset, it would be relevant to propose a field approach to verify the accuracy of the classification. For instance, based on the frequency distribution of ecosites within the LSA, it would be possible to select a representative sample of polygons to validate the classification. The field validation would also provide an estimate of error rate in the FRI that would be very helpful to address uncertainty in the surveys.
28	**Terrestrial**	**6.0 Vegetation and Wetlands**	Sustainable Forest License-holders may have updated land classification datasets based on their Forest Management Plans and operations. The information in these datasets may be useful to supplement, update, and verify the accuracy of the FRI used in field planning. Further, information from license-holders may also include plans for roads development and harvest	We recommend that consideration be given to establishing communication channels with the license-holders for the Forest Management Units included in the Project, with the objective of obtaining and making use of their existing data.

Id#	Field Work Plan	Section	Comment	Recommendation
			that may be useful for the assessment of alternatives.	
29	Terrestrial	6.0 Vegetation and Wetlands	Notably, this section does not contain any information regarding the wetland field surveys. As it is mentioned above, it should be noted that the FRI may not include wetland ecosites within waterbodies, such as emergent marshes.	The proponent should verify whether the FRI excludes some wetland ecosites. If confirmed, then an approach should be proposed to address this limitation. Provide information regarding the potential for Provincially Significant Wetlands to be found within the LSA.
30	Aquatic	1.2 Study Area	The Aquatic Plan states that a detailed waterbody crossing list will be created and a subset of the list will be surveyed for fish and fish habitat.	What criteria will be used to select the waterbodies to be surveyed? What proportion of the total or number of waterbodies will be surveyed? Has this approach been consulted with DFO and MNRF, as opposed to a survey of all waterbodies?
31	Aquatic	3.0 Health, Safety, and Environment	Specific information regarding Covid-19 prevention and response measures should be incorporated to the Aquatic Plan.	Does the Aquatic Plan consider making rapid antigen tests for Covid-19 available to field personnel?

Id#	Field Work Plan	Section	Comment	Recommendation
				Does WSP Golder have a vaccine mandate in place for their field crew? What measures will be taken if a field crew member tests positive to Covid-19? Will the measures be based on local (i.e., TBDHU or NWHU), or provincial guidance?
32	**Aquatic**	**4.1 Indigenous Participation**	Field activities require the use of protective gear and specialized outdoors equipment that can be costly. Will Indigenous field crew members be provided protective gear, such as steel-toe shoes, waders, electrofishing gloves, etc.?	Specify what protective gear will be provided to Indigenous field crew members.
33	**Aquatic**	**5.0 Baseline Fish and Fish Habitat Characterization Studies**	The Aquatic Plan states that a subset (25%) of all waterbodies crossed will be surveyed, and that the results will be extrapolated to other waterbodies within the same watershed. However, the fish community observed in a waterbody, for example, may not be representative of other waterbodies within the watershed, if dispersal barriers are present. Further, this section does not explain whether IK/TLRU will inform the selection of waterbodies to be surveyed. The First Nation members of the Protection Committee have a unique and distinct understanding of their Traditional Territory, the aquatic habitat present, and the fish species that occupy it. Not considering IK/TLRU in the selection	As it is mentioned above, the Plans should present an explicit approach to incorporate IK/TLRU in the selection of survey sites. It is recommended that the Proponent engage the Protection Committee members to review the site selection and propose additional waterbodies of interest. Present a rationale justifying the selected sampling effort. Specifically, describe how the effort will be allocated throughout the LSA and within each alternative route.

Id#	Field Work Plan	Section	Comment	Recommendation
			of waterbodies may result in the exclusion of waterbodies that are important for the exercise of rights of the Protection Committee First Nations.	
34	**Aquatic**	**5.3.1 Fish Habitat Assessment**	The Plan states that a detailed assessment will be conducted to determine if the habitat available can support critical life stages of the fish species that may be present in each waterbody. Specifically, the Plan indicates that the habitat availability for small-bodied fish, large-bodied fish, Species at Risk, and Species of Conservation Concern will be assessed. However, the Plan does not mention if the habitat assessment will include species of cultural significance to the First Nation members of the Protection Committee. Also, the assessments should consider that habitat requirements can vary widely among species. Particularly, large-bodied species may have distinct habitat requirements. However, the information presented in the Plan is insufficient to determine if the proposed methods are adequate to evaluate the availability of habitat for all the species potentially present in each waterbody.	The Proponent should compile a list of fish species of cultural significance to the First Nation members of the Protection Committee and commit to assessing the availability of habitat for each of them. Provide a detailed description of the habitat assessment protocol that will be used to adequately account for a potentially wide variation in habitat requirements within the fish community.
35	**Aquatic**	**5.3.2 Fish Community Sampling**	The use of electrofishing sampling is a generally safe technique. However, the safety of the crew and the fish requires that all crew members receive basic training.	Will Indigenous field crew members be trained on the safe operation of electrofishers?

Id#	Field Work Plan	Section	Comment	Recommendation
36	**Aquatic**	**5.3.2 Fish Community Sampling**	The description of the electrofishing methodology lacks details needed to evaluate the sufficiency of the method. Specifically, it should be described whether a single-pass, standard, or multi-pass method will be employed.	Present a detailed description of the electrofishing approaches that will be used, including when each type of survey will be used.
37	**Aquatic**	**5.3.2 Fish Community Sampling**	Holding captured fish over extended periods of time can be stressful and result in fish injure or mortality.	What measures to minimize the holding time of fish will be implemented?
38	**Aquatic**	**5.3.2 Fish Community Sampling**	The Aquatic Plan proposes to weigh and measure the length of the first ten fish captured of each species. However, there are several factors that may result in a biased distribution of fish lengths and weights by using this approach. First, fish of different age classes may prefer different habitats (i.e., Young-of-the-year versus fish one year old and older). Second, some age classes may be much more abundant than others. Third, in the case of electrofishing, the response to a fixed voltage is influenced by fish mass.	Generally, fish length can be measured quickly without significantly increasing the holding time. Thus, if approved by the regulatory agency, consideration should be given to measuring all fish.
39	**Aquatic**	**5.3.2 Fish Community Sampling**	Given the relatively small area to be sampled, some individuals could be shocked twice if they move upstream following their release.	What measures will be taken to prevent “double shocking” of fish?
40	**Aquatic**	**5.3.2 Fish Community Sampling**	The Plan describes the disinfecting procedures to avoid the spread of aquatic invasive species and pathogens. However, clarification is required regarding the frequency of use of the protocols. The Plan states that disinfection will be conducted “*prior*	Include in the Plan a commitment to disinfect the gear each time a new waterbody is to be surveyed. As a good practice, it is recommended that all the gear be

Id#	Field Work Plan	Section	Comment	Recommendation
			to the field survey and then daily." However, if multiple waterbodies are surveyed within the same day, it is essential to disinfect the gear each time a survey is completed. Available distribution information on aquatic invasive species can be found in the Early Detection and Distribution Mapping System (EDDMapS) dataset. It is recommended that screening of this dataset be completed to identify zones of high risk and inform field crews, promoting heightened awareness.	disinfected each time a survey is completed. It is strongly recommended that the surveys be scheduled, when feasible, to prioritize waterbodies with no known aquatic invasive species, leaving those with confirmed presence for later.
41	**Aquatic**	**6.0 Baseline Surface Water Characterization Studies**	The Aquatic Plan states that channel geometry will be measured 50 m upstream and 50 m downstream of the proposed location of the crossing.	Clarify if the location of the crossing is included in the assessment of channel geometry.
42	**Aquatic**	**6.0 Baseline Surface Water Characterization Studies**	The Aquatic Plan proposes the collection of surface water quality and flow during a single season, without seasonal or yearly replication. This is concerning, because this approach may result in an inadequate characterization of the fluctuations in flow and water quality	It is recommended that the Proponent develops a multi-season, multi-year sampling program for surface water, ensuring a more adequate characterization of the temporal variation.

3B. Hydro One Responses: Waasigan Transmission Line Project – Pinchin and Maawandoon Review of Draft Field Work Plans on behalf of Gwayakocchigewin Limited Partnership (GLP) May 26, 2022.

May 26, 2022

Comments Table

Proposal: Waasigan Transmission Line Project – Pinchin and Maawandoon review of draft Field Work Plans on behalf of Gwayakocchigewin Limited Partnership (GLP) - Pinchin File: 294009.00.

Proponent: Hydro One

Commenter Name: Sebastian Belmar, Mario Buszynski, and James Neville

Comment #	Reference to Field Plan	Section	Comments (April 29, 2022)	Recommendation	Response (Hydro One – May 26, 2022)
1	General Comments	-	While the Plans states that the purpose of the surveys is to "Incorporate Indigenous Knowledge/Traditional Land and Resource Use (IK/TLRU) as part of the baseline conditions, they do not describe how the integration will be achieved. It is unclear how IK/TLRU will be used as a criterion informing the selection of survey sites. Based on the information presented, and given the restrictive timeline, it is critical that the Proponent presents a solid approach to facilitate the IK/TLRU integration.	Propose an explicit approach to integrating TK/TLRU in the Field Work Plans. Specifically, the approach should include additional engagement with the Protection Committee to discuss its understanding of the environment within the LSA.	Hydro One will consider Indigenous Knowledge, including TK/TLRU, at all stages of the project. For field work, the field work plans were provided to Indigenous communities for review and input. Hydro One is also providing field notices prior to field work, which include the field survey locations so that Indigenous communities can review and provide input. This could include identifying sensitive areas that a community would like undisturbed, or areas communities believe should be included in the field studies. Hydro One is also planning Indigenous community meetings where the field plans and maps will be available and feedback can be received. Further, Hydro One has been working with Indigenous communities since 2020 to support community led TK/TLRU studies. The results of these studies will be incorporated at key milestones in the Environmental Assessment (EA) process.

Comment #	Reference to Field Plan	Section	Comments (April 29, 2022)	Recommendation	Response (Hydro One – May 26, 2022)
2	General Comments	-	The Plans do not provide rationales justifying the selection of sampling efforts. This is critical, because the sufficiency of the field surveys depends on their ability to obtain representative samples of the ecological communities. Because one of the objectives of the field studies is to inform the assessment of alternative routes, it should be considered that the selected effort must adequately sample all the routes under evaluation. Thus, unless an indirect approach to comparing the routes is proposed, the proposed sampling efforts may be inadequate for the assessment. In addition, it should be discussed whether the proposed efforts are adequate to examine the occurrence of rare species, including Species at Risk.	For each component of the Plans, present a solid rational justifying the adequacy of the selected sampling effort, in consideration of the evaluation of alternative routes.	Rationale justifying the adequacy of the selected sampling effort will be included in the amended field work plans. Efforts have been made to sample equally along all alternative routes for the various aquatic, wildlife and vegetation field programs in order to support an evaluation of the alternative routes using the criteria and indicators as proposed. There is an understanding that the entire study area cannot be sampled, which is consistent with the requirements for previous transmission line projects in northern Ontario. Through many discussions with agencies, we have a mutual understanding that appropriate subsampling of the study area will occur for the purposes of the EA. This also applies to the surveys for species at risk. The adequacy of the proposed field survey effort is felt to be adequate for the purposes of the EA. Additional sampling may be required in the future for permitting depending on the final Project design and layout.

Comment #	Reference to Field Plan	Section	Comments (April 29, 2022)	Recommendation	Response (Hydro One – May 26, 2022)
3	General Comments	-	The Plans do not provide information on what socio-economic field studies will be undertaken, or whether information collected in the proposed studies will be used to support the assessment of socio-economic effects, including effects on traditional and recreational activities (i.e., hunting, trapping, and fishing), and tourism in remote areas.	Indicate if any field studies are proposed to support the socio- economic assessment. Indicate if the information collected by the studies included in the Plans will be used in the socio-economic assessment.	The socio-economic assessment will be informed by information shared through community led TK/TLRU assessments, engagement activities and through the understanding of the land informed by the field programs. As noted in Section 4.2.4 of the Terms of Reference (ToR) for the Project, interviews with key informants may also be planned to supplement available/current data on land and resource use. In addition, visual illustrations using photos taken in the field will be developed to illustrate the anticipated location, height and design of the Project in key areas, including any identified sensitive landscape areas, provincial parks and conservation reserves. Key areas may also include recreational facilities, such as canoe routes and campsites. The focus of the exercise will be on existing viewpoints that are valued by Indigenous communities and the public and those identified through consultation activities as playing a main role in the aesthetic appeal and character of a specific area.
4	General Comments	-	In general, the Plans present a methodological approach to characterize the spatial variation in the ecological communities within the LSA. For example, the proposed breeding bird surveys aim to describe the diversity of bird species along the LSA during the	Expand the proposed field surveys to include temporal replication, as adequate to each ecological component. The temporal replication may include seasonal and yearly surveys.	Seasonal and yearly surveys are not required to sufficiently understand baseline conditions, identify potential effects and mitigation measures for the EA. The proposed approach for this Project is consistent with (and in many cases exceeds) requirements for previous transmission projects in northern Ontario. However, we will use

Comment #	Reference to Field Plan	Section	Comments (April 29, 2022)	Recommendation	Response (Hydro One – May 26, 2022)
			reproductive season. However, the Plans do not consider the temporal variation in each of this communities. It is critical to understand that ecological communities are highly dynamic in space and time. Thus, a characterization of their diversity in this year may not adequately represent the community in the long term. Therefore, in ecological studies such as this baseline characterization, it is fundamental to account for temporal variation in the ecological communities by replicating the sampling effort over time.		background data from secondary sources (e.g., Ontario Breeding Bird Atlas) to compare the results of our field studies and identify annual variations, where possible.
5	General Comments	-	The Plans do not describe an approach to engage the Protection Committee members during the review of the results of the field studies.	It is recommended that the Proponent commits to sharing the field survey results with the Protection Committee and proposes a timeline to do this within each field component.	Comment acknowledged. Hydro One will share the field survey results with the Protection Committee. This will be completed throughout the field season as information is collected and processed.
6	Terrestrial	1.0 Introduction	This section outlines each of the wildlife components that will be studied in the field surveys. Notably, there are no field surveys planned for mammals, including moose populations.	Provide a rationale justifying the selection of the wildlife components of the Terrestrial Field Work Plan ("the Plan"). Explain why mammals, in general, are not targeted by specific surveys in the Plan. Furbearers and ungulates are of special importance to the First Nations in the Protection Committee. A comprehensive understanding of the potential effects of the Project on the	Ontario has a long history of moose management. Moose populations are managed by the Ministry of Northern Development, Mines, Natural Resources and Forestry (NDMNRF) in the province as they are a hunted species. The NDMNRF systematically surveys each Wildlife Management Unit (WMU) to provide estimates of moose populations. This includes documenting the age class (calf or adult) and sex of moose in these areas. The Project is located within Cervid Ecological Zone C1. The moose

Comment #	Reference to Field Plan	Section	Comments (April 29, 2022)	Recommendation	Response (Hydro One – May 26, 2022)
				rights of Indigenous peoples must quantify the adverse effects on these wildlife groups. Explain what approach will be used to study moose populations. If the use of existing data is proposed, present a solid rationale supporting this choice. It should be considered that information from winter aerial surveys may not provide suitable information regarding the use of habitat within the LSA throughout the year. Similarly, explain why there are no proposed surveys to examine the occurrence of herpetofauna within the LSA.	management objective in this zone is to maintain a moderate to high-density population. Population data on moose will be obtained from NDMNRF reports. Targeted surveys of key habitats for moose will also be performed (e.g., moose aquatic feeding areas, moose winter habitats, mineral licks) and incidental sign and sightings of moose will be recorded. While not specifically targeted in one of the species-specific programs, data on other mammals will be documented through various field work programs including the candidate significant wildlife habitat program which details important habitats for furbearers such as den sites through incidental observations. We are also conducting denning surveys for gray fox which could lead to the observation of den sites for other furbearing species (e.g., red fox). We will also be completing a presence survey program targeted at gray fox that includes setting up trail cameras at stations with scent lure attractant and thus we anticipate capturing records of a variety of furbearer predators (e.g., bears, wolves, marten, fisher) through this program. Furbearers-trapline data will be obtained from NDMNRF (annual catches per trapline). Further, trapline data is also expected to be shared as part of the

Comment #	Reference to Field Plan	Section	Comments (April 29, 2022)	Recommendation	Response (Hydro One – May 26, 2022)
					Indigenous Knowledge studies being completed by each Indigenous community. <u>Herptofauna</u> We have expanded our approach for turtles after hearing from Indigenous communities that turtles are a culturally significant species. A turtle basking program is being completed this spring 2022 in which crews will visit wetlands and waterbodies that have potential to support overwintering turtles and visually assess them to determine the abundance and diversity of turtles using these features for basking. The presence of basking turtles early in the spring gives an indication that they use the wetlands/waterbodies for overwintering. Additional proposed turtle surveys include looking in potentially suitable nesting areas for sightings of nesting female turtles or sign of recent nesting activity (e.g., dug soils, presence of egg shells indicating a predated nest). An amphibian call count program is being undertaken at stations throughout the study area. The objective of this program is to determine the diversity and abundance of breeding anurans (frogs and toads). This baseline data can then be the basis for which we predict changes due to the Project. Also as stated, breeding amphibians can be

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					used as an indicator group to monitor long-term environmental changes.
7	Terrestrial	1.1 Purpose	This section states that one of the objectives is to "*Compile sufficient baseline data to enable an assessment of direct and indirect effects from the Project using the wildlife and wildlife habitat, vegetation, and wetlands criteria and indicators.*" However, the Plans do not describe the criteria and indicators that will be used in the assessment. Criteria and indicators are closely linked to the field studies because they determine the information that needs to be collected for the assessment. In the absence of explicit criteria and indicators, a critical review of the Plans is incomplete, as it is not possible to fully assess the adequacy of the proposed methods.	While the criteria and indicators were included in the Terms of Reference, it would be adequate to include them in the Plans. Further, because criteria and indicators are key to determining the approaches to the assessment, they should be explicitly linked to the methodologies presented in each section.	The criteria and indicators included in the ToR are preliminary, which is consistent with the Ministry of the Environment, Conservation and Parks (MECP) Code of Practice for *Preparing and Reviewing Terms of Reference for Environmental Assessments in Ontario* (2014). Hydro One will engage with Indigenous communities, agencies and the public during the EA to request feedback on the preliminary criteria and indicators. The preliminary criteria and indicators will be added as an appendix to the Field Work Plan and additional references to the criteria and indicators will be made throughout the Field Work Plan.
8	Terrestrial	1.2 Study Area	Regarding the assessment at the RSA level (cumulative effects), the Plan indicates that the boundaries for most wildlife populations are unknown, including bats and birds. Because of this knowledge gap, the Plan proposes that a 5 km buffer around the LSA represents an adequate regional scale (RSA) for wildlife with small to moderate breeding home ranges. However, it is unclear how home ranges would be related to population distribution. In the case of migratory birds, Environment and Climate Change	In discussions with the Proponent, it was stated that ECCC did not have any comments regarding the Field Work Plan. Regardless, we recommend that ECCC be consulted specifically on whether the assessment of cumulative effects on migratory birds is most appropriately done at the scale of the Bird Conservation Regions. For other species, provide supporting rationales based on available data, when available, or	Comment acknowledged. We are considering a Bird Conservation Region (BCR)-based approach to assess the local bird populations that interact with our study area. ECCC has provided breeding bird data analysis guidance on other recent projects in a similar geographic location and asked for data to be reported by Landbird Priority species (Government of Canada 2017). Birds Canada has identified Landbird Priority bird species for various regions (BCRs). These are species that are experiencing population declines, or are highly vulnerable to population declines and future threats,

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			Canada (ECCC) has previously stated that the adequate biological scale to examine cumulative effects on their populations is at the scale of Bird Conservation Regions. It- 8 -atased be mentioned that despite of the assessment of the Project being conducted at the provincial level, the jurisdiction on migratory birds at the federal level has been recognized by the courts, as protection of this group of species is a matter of national concern.	based on the ecology of comparable species.	and include Species of Continental Concern (Partners in Flight Continental Watch List) with important populations in a particular region (e.g., bay-breasted warbler [*Setophaga castanea*]), species with small global range and populations that are considered vulnerable to future change (e.g., golden-winged warbler [*Vermivora chrysoptera*]), and common widespread species that have experienced population declines and face ongoing threats on their breeding or wintering grounds (e.g., wood thrush [Hylocichla mustelina]). The Project is situated within BCR-12ON. Therefore, the breeding bird data will be used to determine the relative abundance of Landbird Priority species across various habitat types in the local study area (LSA), which will be useful in the assessment of effects to these vulnerable birds.
9	Terrestrial	5.3 Bat Maternity Roost Habitat Assessment and Acoustic Monitoring	The locations for acoustic monitoring will be selected using data from the Forest Resource Inventory (FRI). Based on the characteristics of the ecosites, polygons representing adequate habitat will be selected. However, this will result in a very large pool of candidate sites. However, factors other than the vegetation composition may be relevant for the selection of roosts. For example, *Myotis lucifugus* shows more fidelity to feeding areas than to roosting trees.	What year is the imagery used in the FRI and was the classification adjusted by the age of the dataset? Consider the use of additional criteria in the selection of survey sites, such as a measure of distance to foraging habitat. Provide a rationale supporting the choice of sampling effort for maternity roosts (n = 25). Describe the approach that will be used to validate the automated	Roosting sites have been identified as critical habitat for species at risk (SAR) bats under the Ontario *Endangered Species Act* (ESA). Golder used forest ecosites in northern Ontario to evaluate preferred habitat criteria. Ecosites were also screened for age class, understanding that older forest have a great likelihood of having cavity trees suitable for roosting. Based on comments received from MECP and NDMNRF, the recommended approach is to focus desktop analysis for potential

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			Thus, incorporating the availability of foraging habitat in the selection criteria may help narrow down the pool of candidate sites. It should be noted that maternity roosts are not identified as critical habitat in the federal recovery strategy for bats, because of the lack of knowledge on their location and relevance. Further, Ontario has adopted the federal recovery strategy under the Ontario Species at Risk Act. Nevertheless, an adequate justification of the effort selected (25 stations) should still be presented, given that candidate habitat is common and widespread all over the LSA. The Plan states that a "bat acoustic specialist" will validate the automated classification completed by SonoBat. In this regard, will validation be conducted on a random sample of the total set? While this is important to estimate a rate of error in the classification, the proponent should also consider validating all "rare" occurrences in the- 9 -atasett, for example, following a frequency-based criteria (i.e., validate all calls assigned to species with relative frequency of less than 10% per station). It is unclear how the measured metrics (average bat passes per night and peak activity) will be used to determine the location of roosting trees. This may be particularly difficult	classification of bat calls. Clarify how the location of roosting trees will be determined and outline the limitations of the selected approach.	habitat based on ecosites only and not screened by forest age class. There are several Forest Management Units (FMUs) within the Project area and each FMU has Forest Resource Inventory (FRI) of a different vintage. Golder is familiar with the proposed approach to consider age class of forest stand, but understands that changes to forestry resources vary from year to year. The collection of field data will be used to confirm ecosite classifications, maturity of forest ecosites, presence of snag, cavity trees, etc. The acoustic monitoring stations for surveys during the bat maternity roosting period do target the juxtaposition of the potential SAR bat maternity roost community and suitable foraging areas to capture bat activity in the general area during this critical season. This is a provincial EA project and, as such, we are following guidance and protocols developed under provincial authority. Regarding validation of automated classification completed by Sonobat, the bat acoustic specialist will validate all high-frequency bat passes, and all passes classified as species with a relative frequency of less than 10% per station.

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			in consideration of the speed at which bats fly and for species that forage far away from their roosts, such as little brown myotis (2,400 m around the maternity site).		Regarding determining the location of roosting trees. The acoustic surveys are not intended to identify the location of specific roosts, as this is not possible with stationary bat acoustic surveys. The intent of these maternity roost acoustic surveys is to determine the distribution and diversity of bat species across the study area during the maternity roost season.
10	Terrestrial	5.5 Barn Swallow Surveys and 5.6 Bank Swallow Surveys	The approaches proposed to identify features that may support nesting for barn and bank swallows, and to survey the selected locations is adequate. However, as mentioned above, the lack of explicit criteria and indicators makes it challenging to evaluate the suitability of the Plan.	Describe the criteria and indicators that will be used in the assessment of each environmental component.	The criteria and indicators included in the ToR are preliminary, which is consistent with the MECP Code of Practice for *Preparing and Reviewing Terms of Reference for Environmental Assessments in Ontario* (2014). Hydro One will engage with Indigenous communities, agencies and the public during the EA to request feedback on the preliminary criteria and indicators. The preliminary criteria and indicators will be added as an appendix to the Field Work Plan and additional references to the criteria and indicators will be made throughout the Field Work Plan.
11	Terrestrial	5.7 Breeding Bird Surveys	The Plan states that the "*Breeding bird survey effort will consist of 96-point count stations…*" Further, the Plan states that the survey effort will be allocated in proportion to the representation of each ecosite within the LSA. The effort may be adequate if ecosites are grouped into categories. However, grouping would also lead to the loss of fine-scale information regarding habitat-species	How many different ecosites are found within the LSA and what is their frequency distribution? How will the effort be allocated along the LSA? For instance, will sampling units be distributed randomly along the LSA or will they be aggregated near areas that are easily accessible?	The ecosites and their frequency of distribution in the LSA will be provided in the baseline report. Breeding Bird Survey (BBS) stations are randomly distributed throughout the LSA, but with efforts made to make sure there are equal numbers of station along route alternatives to allow for a comparison of bird data for the evaluation of a preferred route. The BBS stations will be available for viewing on the webviewer.

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			associations. Further, proportional allocation of the effort may cause rare ecosites within the LSA to receive an inadequate level of effort.		
12	Terrestrial	5.7 Breeding Bird Surveys	The vocalizing activity of birds is known to change throughout the breeding season. For instance, acoustic surveys of birds in York, Ontario, conducted in mid-late May detected a significantly larger number of species than surveys in mid-late July. Anecdotally, this reviewer mapped territories of Nashville warblers in northwestern Ontario between late May and early June. By the second week of June, all the regular territorial calls came to a halt. A similar decrease in activity was observed in most bird species, except red-eyed vireo.	If breeding bird surveys are to be conducted throughout the season, a statistical comparison of stations surveyed earlier and later in the season should be conducted. Alternatively, efforts should be made to conduct the surveys as early as possible within the planned survey window.	Standard breeding bird protocols are being proposed for this work. The surveys will be conducted in accordance with methods outlined in the Canadian Breeding Bird Survey (Downes and Collins 2003) and the Ontario Breeding Bird Atlas (Cadman et al. 2007). According to the Ontario Breeding Bird Atlas (Cadman et al. 2007), the survey window for breeding bird surveys in northern Ontario is June 1 to July 10.
13	Terrestrial	5.7 Breeding Bird Surveys	The minimum distance between stations (250 m) would result in gaps of only 50 m between the closest possible stations. With such a small gap, the likelihood of "double counting" individuals may be high. Further, individuals of species with louder calls could be detected in more than one station, biasing all the recorded metrics.	Revise the proposed minimum distance between survey stations to reduce the likelihood of introducing unaccounted variation in the survey.	Standard breeding bird protocols are being proposed for this work. A 250 m separation between BBS stations is the standard distance between stations and recommend by ECCC. The 250 m distance is a minimum distance recommended to prevent double counting.
14	Terrestrial	5.7 Breeding Bird Surveys	As with other components, the section on Data Analysis provides little information, other than summarizing some metrics that will be calculated and reported. Critically, this section	Describe the criteria and indicators that will be used in the assessment of each environmental component.	The criteria and indicators included in the ToR are preliminary, which is consistent with the MECP Code of Practice for *Preparing and Reviewing Terms of Reference for Environmental*

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			does not indicate what criteria and indicators will be used in the assessment of effects, making it difficult to determine with certainty what information should be collected.		*Assessments in Ontario* (2014). Hydro One will engage with Indigenous communities, agencies and the public during the EA to request feedback on the preliminary criteria and indicators. The preliminary criteria and indicators will be added as an appendix to the Field Work Plan and additional references to the criteria and indicators will be made throughout the Field Work Plan.
15	Terrestrial	5.7 Breeding Bird Surveys	This section indicates that "*Surveys will not be completed during periods of high winds or inclement weather.*"	Beaufort index and other environmental covariates should be recorded, including time, temperature, and precipitation, as they are known to influence the activity levels of birds and their probability of detection.	Comment acknowledged and these environmental conditions will be recorded for each survey.
16	Terrestrial	5.8 Marsh Bird Surveys	The Pre-field Mapping section states that "*Preliminary survey locations will be selected within the LSA in advance of the field program through a desktop analysis of available land cover mapping…*" Later, it states that "*No provincially mapped marsh bird breeding habitat is present within the LSA for the alternative routes.*" As it is noted below for the Wetland Surveys section, the provincial FRI dataset excludes ecosites associated with waterbodies, including important wildlife habitats such as emergent marshes.	Could the Proponent clarify whether the second statement means that the habitat is not considered present based on the FRI or that the provincial mapping is incomplete? Regardless, the limitations of the provincial wetlands inventory come into play here. If the goal is to predetermine appropriate survey locations using the wetlands inventory, delineation of wetland ecosites within waterbodies must be completed.	The statement "*No provincially mapped marsh bird breeding habitat is present within the LSA for the alternative routes"* indicates that the provincial Land Information Ontario (LIO) spatial data that includes records for previously mapped and identified SWH such as marsh bird breeding habitat. For the Project we have used our desktop wetland mapping, as described below, to determine those features that have the potential to support marsh bird breeding and selected a subset within which to do marsh bird breeding surveys and least bittern surveys. Desktop wetland mapping will not rely solely on FRI data but will include a combination of LIO wetland data and

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					data from the Lakehead Region Conservation Authority to provide a more complete account of wetland communities.
17	Terrestrial	5.8 Marsh Bird Surveys	The Plan states that the marsh bird surveys will be conducted during single visits to each site. However, the standardized method included in the Marsh Monitoring Program Participant's Handbook for Surveying Marsh Birds (Bird Studies Canada, 2009), requires of two visits. This approach is concerning, as single-visit surveys on each site may reduce the likelihood of detecting the presence of rare species, including the Species at Risk yellow rail (*Coturnicops noveboracensis*).	The proposed approach to effectively characterize the marsh bird communities should consider, at least, two visits per site.	For the majority of marsh bird breeding surveys, a minimum of three site visits will be completed.
18	Terrestrial	5.10 Eastern Whip-poor-will Surveys	The Plan states that suitable habitat for conducting eastern whip-poor-will surveys was identified a priori based on the most recent available FRI data.	Confirm the age of the FRI dataset and whether the stands classification was corrected by the age of the dataset.	There are numerous FRI datasets being used to cover the Project study area and, as such, there are various years when the FRI classification was completed.
19	Terrestrial	5.10 Eastern Whip-poor-will Surveys	The Plant states that "In addition to this GIS analysis, the most recent available imagery was used, where possible, to verify these ecosites at a desktop level.	Describe how the ecosite verification was conducted. Based on the verification, how accurate was the FRI classification?	Ecosite verification was conducted by a qualified senior avian specialist using visual assessment of aerial imagery. For the most part, the FRI verification was accurate in these potential Eastern Whip-poor Will (EWPW) areas.
20	Terrestrial	5.10 Eastern Whip-poor-will Surveys	The survey effort (n = 80) seems adequate, considering that the Project is located at the edge of the range of this species and that records suggest that density in northwestern Ontario is low. However, the Plan does not describe	Describe what approach will be used to select the location of the survey stations for this species. Perhaps it would be most adequate to use the presence of suitable habitat combined with former records to identify broad target	All EWPW stations were selected at accessible roadside locations to account for health and safety during these nighttime surveys. Where potentially suitable habitat overlaps with a road, stations were selected. Efforts were also made to achieve an equal number of

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			what criteria will be used to select the location of the survey stations and, if multiple criteria will be used, how they will be combined.	areas to be surveyed following the roadside protocol with 1 km of distance between stations.	stations along alternate routes to allow for evaluation of a preferred route based on the field data collected.
21	Terrestrial	5.10 Eastern Whip-poor-will Surveys	The Plan does not describe what environmental covariates will be recorded during the surveys. Because detectability of eastern whip-poor-will is influenced by several environmental factors, it is critical to record them to evaluate the adequacy of the surveys.	Indicate what environmental covariates will be collected during the surveys, including: - Cloud cover - Precipitation - Percentage of moon illuminated - Wind noise (Beaufort scale) - Temperature	All of these environmental covariates will be included in the field data collected during the EWPW surveys.
22	Terrestrial	5.10 Eastern Whip-poor-will Surveys	The Data Analysis section states that triangulation methods based on protocols prepared by the New Hampshire Audubon Society will be used. The locations, combined with a desktop habitat assessment, will then be used to determine the approximate centre of each bird territory. It should be taken into consideration that spot- mapping is a challenging approach that leads to underestimating the size of territories when acoustic detection is not accompanied by visual identification of a bird. In the region, breeding densities of this species are low. However, if there are two or more contiguous territories being defended, spot-mapping could result in large biases if vocal activity is low.	Consider repeated visits to survey stations with confirmed detections of eastern whip-poor-will.	Three rounds of EWPW surveys will be conducted at each station (two rounds in the window around the full moon in June and one round from July 6-13 around the full moon window in July).

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23	Terrestrial	5.11 Gray Fox	The Plan does not propose a targeted survey of gray fox. Instead, it will rely on incidental observations during other field activities.	Has consideration been given to the use of hair traps in some targeted areas where previous observations have been documented? For example, see Castro-Arellano et al. (2008): Hair-Trap Efficacy for Detecting Mammalian Carnivores in the Tropics, and references found within this article.	We will also be completing a presence survey program targeted at gray fox that includes setting up trail cameras at stations with scent lure attractant and thus we anticipate capturing records of a variety of furbearer predators (bears, wolves, marten, fisher) through this program.
24	Terrestrial	5.12 Anuran Call Counts	A challenge of the approach proposed is that the selection based on the FRI dataset will result in a large pool of candidate Significant Wildlife Habitat (SWH) areas. Naturally, it is impractical to aim to survey all candidate areas. Thus, it is important to ensure that the proposed survey effort (n = 80) is allocated throughout a representative sample of the total land base. This means that survey stations should be distributed along ecosites and over the length of the LSA.	Indicate what is the strategy that will be used to allocate the survey effort over the study area.	Anuran Call Count stations are distributed throughout the LSA with a random distribution while screening for: • Wetland in proximity to roads for health, safety, security and environment (HSSE) reasons due to nighttime surveys; • Selected wetland stations according to proportional representation in the LSA (e.g., 50% marsh, 30% swamp, 10% fen, 5% bog, 5% unknown); and • Aim to achieve equal number of stations along alternate route grouping (e.g., 2A / 2B / 2C).
25	Terrestrial	5.13 Candidate Significant Wildlife Habitat	The field verification approach proposed seems mostly appropriate. However, the fact that 2% of the occurrences will be verified for SWH with more than 30 occurrences could be problematic for rare habitats, including “Rare Tree: Red and Sugar Maple”, “Turtle Nesting”, and “Waterfowl Stopover Staging Areas -	Consider setting a minimum sample size for all candidate SWH.	A minimum sample size is being set for the candidate SWH surveys to allow for adequate surveys within rare habitats.

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			Terrestrial". For example, if a candidate SWH type is represented by 200 occurrences, only 4 of those would be field-verified, and a strong rationale would be required to justify such a low effort.		
26	Terrestrial	5.13 Candidate Significant Wildlife Habitat	The approach described for the consideration of SWH in the Alternative Route evaluation is unclear. For example, for a common candidate SWH type, does the approach mean that the 98% of polygons not verified will still be retained as candidate for the assessment? If that is the meaning of the approach, then it may unjustifiably bias the assessment in favor of common SWH types. Further, this approach may amplify potential errors in the FRI classification.	Clarify the meaning of the approach described and discuss potential limitations to the assessment imposed by the choice of such approach.	Yes, all polygons not field verified will remain as candidate SWH for whichever category they were screened as. We are aware of the limitation of the landcover mapping as produced by FRI, but this is the most accurate and detailed land cover mapping that is available for this Project. We have been asked by NDMNRF to do this screening and assessment; however, it should be noted that there are limitations of the broad-based screening criteria for the candidate SWH on a scale the size of the Project and in an area of intact natural habitat.
27	Terrestrial	6.0 Vegetation and Wetlands	The Plan states that "*Efforts will be made to establish at least one survey location in as many of the plant community types as possible.*" If this was to be interpreted as meaning that the sample size for each community type will be at least one, then the survey effort could be very low. Further, the proposed Site Selection assumes that the FRI classification is accurate.	Considering possible errors in the FRI and the age of the dataset, it would be relevant to propose a field approach to verify the accuracy of the classification. For instance, based on the frequency distribution of ecosites within the LSA, it would be possible to select a representative sample of polygons to validate the classification. The field validation would also provide an estimate of error rate in the FRI that would be very helpful to address uncertainty in the surveys.	We have proposed our ELC surveys as a field verification of the FRI ecosite classification. Hydro One agrees that this verification program will help to understand the level of error in the FRI data being used.

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28	Terrestrial	6.0 Vegetation and Wetlands	Sustainable Forest License-holders may have updated land classification datasets based on their Forest Management Plans and operations. The information in these datasets may be useful to supplement, update, and verify the accuracy of the FRI used in field planning. Further, information from license-holders may also include plans for roads development and harvest that may be useful for the assessment of alternatives.	We recommend that consideration be given to establishing communication channels with the license-holders for the Forest Management Units included in the Project, with the objective of obtaining and making use of their existing data.	Hydro One can confirm that license-holders were engaged during the ToR and were notified of the commencement of the EA. Hydro One will continue to engage with them throughout the EA.
29	Terrestrial	6.0 Vegetation and Wetlands	Notably, this section does not contain any information regarding the wetland field surveys. As it is mentioned above, it should be noted that the FRI may not include wetland ecosites within waterbodies, such as emergent marshes.	The proponent should verify whether the FRI excludes some wetland ecosites. If confirmed, then an approach should be proposed to address this limitation. Provide information regarding the potential for Provincially Significant Wetlands to be found within the LSA.	Desktop wetland mapping will not rely solely on FRI data but will include a combination of LIO wetland data and data from the Lakehead Region Conservation Authority (LRCA) to provide a more complete account of wetland communities. The LRCA has mapped PSWs in its jurisdiction. Due to the size and interconnectedness of wetlands in the LSA it is likely that all wetlands would be considered PSWs.
30	Aquatic	1.2 Study Area	The Aquatic Plan states that a detailed waterbody crossing list will be created and a subset of the list will be surveyed for fish and fish habitat.	What criteria will be used to select the waterbodies to be surveyed? What proportion of the total or number of waterbodies will be surveyed? Has this approach been consulted with DFO and MNRF, as opposed to a survey of all waterbodies?	The site selection process for the subset of waterbody crossings will rely primarily on the guidance and procedures under the *Crown Forest Sustainability Act, 1994*, S.O. 1995, c. 25 (CFSA). Please note that sites will be selected in such a manner to capture the following criteria:

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					• Cover a variety of waterbody and watercourse types, watershed classifications and sizes; • Meet the NDMNRF request to not sample waterbodies and watercourses with existing fisheries data; • Areas of cultural significance; and • Where access is obtained. A statistical power analysis was completed to determine the number of targeted sampling sites required to detect changes in the aquatic environment. The results of the power analysis indicated that a sample size equating to 6.5% (i.e., 50 sites) of the desktop estimates would result in sufficient statistical power to detect a 15% difference between the desktop and field estimates. Therefore, a minimum of 15% effect size was deemed suitable to guide the site selection process for the alternative routes field survey. The field programs aim to capture 25% of sites for the alternatives assessment; however, 100% of sites will be sampled once a preferred alternative is selected. Consultation with NDMNRF regarding the Field Work Plan (including site selection) is ongoing; however, this approach has been agreed upon. DFO is not typically consulted at this stage of the

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					process and will be involved later on as appropriate based on potential impacts that may require consideration under the *Fisheries Act.*
31	Aquatic	3.0 Health, Safety, and Environment	Specific information regarding Covid-19 prevention and response measures should be incorporated to the Aquatic Plan.	Does the Aquatic Plan consider making rapid antigen tests for Covid-19 available to field personnel? Does WSP Golder have a vaccine mandate in place for their field crew? What measures will be taken if a field crew member tests positive to Covid-19? Will the measures be based on local (i.e., TBDHU or NWHU), or provincial guidance?	Golder is committed to providing our employees, contractors, partners, clients, and visitors with a safe and healthy workplace. COVID-19 transmission in the workplace is a health risk which Golder strives to control with measures to reduce this risk to as low as reasonably practicable. Although Golder seeks to standardize its COVID-19 controls across Canada, local operations are required to minimally implement controls to satisfy the most stringent requirements of: • Applicable governmental legislation (federal, provincial, territorial, or municipal); • Relevant third party (e.g., client, subcontractors, etc.); and • WSP Canada procedural controls. To mitigate potential exposure to COVID-19 in the field, a self-assessment tool has been developed, as outlined in our Health and Safety and Environment Plan (HaSEP), that aligns with guidance from the Government of Ontario that will be implemented each day by crew members as a cursory method to evaluate personal health and well being.

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					In the event that one or more crew members suspects the potential for COVID-related symptoms, the individual with identified symptoms should stay home (e.g., self-isolate at hotel) and monitor health for improving or worsening conditions. The crew lead will contact the Project Manager immediately (who, in turn, will engage the Health and Safety Lead, Human Resources Representative, and the Division Manager, as required) to determine next steps for field work. Field crew members have not been provided with rapid antigen tests, but are encouraged to carry tests with them in their personal field gear.
32	Aquatic	4.1 Indigenous Participation	Field activities require the use of protective gear and specialized outdoors equipment that can be costly. Will Indigenous field crew members be provided protective gear, such as steel-toe shoes, waders, electrofishing gloves, etc.?	Specify what protective gear will be provided to Indigenous field crew members.	Personal Protective Equipment (PPE) will be specific to each field program which will have specific hazards. If Indigenous field crew members do not have the necessary PPE, then it will be provided to them prior to work commencing and that equipment will be theirs to keep.
33	Aquatic	5.0 Baseline Fish and Fish Habitat Characterization Studies	The Aquatic Plan states that a subset (25%) of all waterbodies crossed will be surveyed, and that the results will be extrapolated to other waterbodies within the same watershed. However, the fish community observed in a waterbody, for example, may not be representative of other waterbodies within the watershed, if dispersal barriers are present.	As it is mentioned above, the Plans should present an explicit approach to incorporate IK/TLRU in the selection of survey sites. It is recommended that the Proponent engage the Protection Committee members to review the site selection and propose additional waterbodies of interest. Present a rationale justifying the	NDMNRF has indicated that our fish collection permit applications will be shared with Indigenous communities as part of the application process. Additionally, we have reached out to Indigenous communities for comment on the Field Work Plan as well as the selected sites. We will continue to look for feedback at appropriate times, especially given that Hydro One is now partnered with GLP for the Project.

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			Further, this section does not explain whether IK/TLRU will inform the selection of waterbodies to be surveyed. The First Nation members of the Protection Committee have a unique and distinct understanding of their Traditional Territory, the aquatic habitat present, and the fish species that occupy it. Not considering IK/TLRU in the selection of waterbodies may result in the exclusion of waterbodies that are important for the exercise of rights of the Protection Committee First Nations.	selected sampling effort. Specifically, describe how the effort will be allocated throughout the LSA and within each alternative route.	Please refer to the response to comment 30 above for partial rationale. Regarding effort throughout the LSA, sampling effort for the alternative route analysis will consist of a 200 m reach (150 m downstream of the crossing location and 50 m upstream), consistent with the principles of other typical, accepted protocols for linear infrastructure such as roads, pipelines and other electrical transmission or distribution lines. This reach length provides a characterization of the area that is anticipated to have the potential for direct impacts, based on tested and commonly accepted approaches. Additional details are provided in the revised Field Work Plan.
34	Aquatic	5.3.1 Fish Habitat Assessment	The Plan states that a detailed assessment will be conducted to determine if the habitat available can support critical life stages of the fish species that may be present in each waterbody. Specifically, the Plan indicates that the habitat availability for small- bodied fish, large-bodied fish, Species at Risk, and Species of Conservation Concern will be assessed. However, the Plan does not mention if the habitat assessment will include species of cultural significance to the First Nation members of the Protection Committee. Also, the assessments should consider that habitat requirements can vary widely among species.	The Proponent should compile a list of fish species of cultural significance to the First Nation members of the Protection Committee and commit to assessing the availability of habitat for each of them. Provide a detailed description of the habitat assessment protocol that will be used to adequately account for a potentially wide variation in habitat requirements within the fish community.	As mentioned in comment response 33 above, sampling effort for the alternative route analysis will consist of a 200 m reach (150 m downstream of the crossing location and 50 m upstream), consistent with the principles of other typical, accepted protocols for linear facilities such as roads, pipelines and other electrical transmission or distribution lines. The habitat data are collected from a reach perspective rather than species-specific so that the reach can be characterized in a manner that accounts for the wide variation in habitat requirements within the fish community. Additional details are provided in the revised Field Work Plan.

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			Particularly, large-bodied species may have distinct habitat requirements. However, the information presented in the Plan is insufficient to determine if the proposed methods are adequate to evaluate the availability of habitat for all the species potentially present in each waterbody.		
35	Aquatic	5.3.2 Fish Community Sampling	The use of electrofishing sampling is a generally safe technique. However, the safety of the crew and the fish requires that all crew members receive basic training.	Will Indigenous field crew members be trained on the safe operation of electrofishers?	Yes. All aquatic crew leads will be qualified and certified Class 2 electrofisher operators. A standard part of site safety discussion (at each site) involves testing all the safety features, allowing crew members to see that the equipment is functioning as intended. For those crew members who are new to electrofishing, additional time will be spent showing them the basics of an electrofisher and electrofishing, allowing time for questions and discussion.
36	Aquatic	5.3.2 Fish Community Sampling	The description of the electrofishing methodology lacks details needed to evaluate the sufficiency of the method. Specifically, it should be described whether a single-pass, standard, or multi-pass method will be employed.	Present a detailed description of the electrofishing approaches that will be used, including when each type of survey will be used.	A summary of the methods is as follows: as described in the MNR Class 2 Electrofishing Manual, habitat sweep surveys will completed, whereby the crew will start at the downstream limit of the sample site, proceed upstream to the upstream limit while sweeping back and forth across the width of the watercourse, focusing on notable habitat features that will typically hold fish (e.g., pools, undercut banks, vegetation, log jams etc.). In the rare instances the site is not suitable for electrofishing, alternate methods will be used (e.g., seine net, minnow traps). Further details are provided in the revised Field Work Plan.

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37	Aquatic	5.3.2 Fish Community Sampling	Holding captured fish over extended periods of time can be stressful and result in fish injure or mortality.	What measures to minimize the holding time of fish will be implemented?	As described in the revised Field Work Plan, measures to minimize holding time include: regular sampling (i.e., ceasing electrofishing part way through the reach, processing fish and releasing them), use of portable bubblers (to introduce oxygen into the holding containers), and focusing on releasing any sensitive or obviously stressed fish before processing less sensitive or stressed fish.
38	Aquatic	5.3.2 Fish Community Sampling	The Aquatic Plan proposes to weigh and measure the length of the first ten fish captured of each species. However, there are several factors that may result in a biased distribution of fish lengths and weights by using this approach. First, fish of different age classes may prefer different habitats (i.e., Young-of-the-year versus fish one year old and older). Second, some age classes may be much more abundant than others. Third, in the case of electrofishing, the response to a fixed voltage is influenced by fish mass.	Generally, fish length can be measured quickly without significantly increasing the holding time. Thus, if approved by the regulatory agency, consideration should be given to measuring all fish.	Since we are proposing to complete fish community assessments from a presence/absence perspective, measuring the first 10 individuals of each species was deemed the most appropriate to provide a cursory understanding of the species makeup related to age/size. The age/size of the species is not expected to change the impact assessment since habitat assessments are not based entirely on the species present, but the habitat suitability for all types/groups (small bodied, large bodied, sport fish), with notes being made as necessary for particularly sensitive species observed or captured at any given site.
39	Aquatic	5.3.2 Fish Community Sampling	Given the relatively small area to be sampled, some individuals could be shocked twice if they move upstream following their release.	What measures will be taken to prevent “double shocking” of fish?	Moving upstream through the sampling reach, combined with releasing fish downstream of the sampling reach is a tested and successful method of reducing the risk of double shocking fish. This method will be used at all sites where electrofishing is being conducted.
40	Aquatic	5.3.2 Fish	The Plan describes the disinfecting procedures to avoid the spread of	Include in the Plan a commitment to disinfect the gear each time a	Comment acknowledged. Textrelated to disinfection has been updated in the

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		Community Sampling	aquatic invasive species and pathogens. However, clarification is required regarding the frequency of use of the protocols. The Plan states that disinfection will be conducted "*prior to the field survey and then daily*." However, if multiple waterbodies are surveyed within the same day, it is essential to disinfect the gear each time a survey is completed. Available distribution information on aquatic invasive species can be found in the Early Detection and Distribution Mapping System (EDDMapS) dataset. It is recommended that screening of this dataset be completed to identify zones of high risk and inform field crews, promoting heightened awareness.	new waterbody is to be surveyed. As a good practice, it is recommended that all the gear be disinfected each time a survey is completed. It is strongly recommended that the surveys be scheduled, when feasible, to prioritize waterbodies with no known aquatic invasive species, leaving those with confirmed presence for later.	revised Field Work Plan to stipulate disinfection between sites. We do not anticipate sampling sites with known aquatic invasive species, as the NDMNRF has indicated the program is only to sample sites where fish community data are not present.
41	Aquatic	6.0 Baseline Surface Water Characterization Studies	The Aquatic Plan states that channel geometry will be measured 50 m upstream and 50 m downstream of the proposed location of the crossing.	Clarify if the location of the crossing is included in the assessment of channel geometry.	Yes, the crossing location is included in the assessment of channel geometry.
42	Aquatic	6.0 Baseline Surface Water Characterization Studies	The Aquatic Plan proposes the collection of surface water quality and flow during a single season, without seasonal or yearly replication. This is concerning, because this approach may result in an inadequate characterization of the fluctuations in flow and water quality	It is recommended that the Proponent develops a multi-season, multi-year sampling program for surface water, ensuring a more adequate characterization of the temporal variation.	It is acknowledged that there is substantial diurnal and seasonal variation in water quality parameters. Given that typical potential effects on surface water quality parameters associated with transmission line construction and operation are restricted to potential deleterious substance release during construction (e.g., from construction equipment) and potential increases in silt and sediment (e.g., from bare soil, bank failure or equipment working in water), water quality parameters are not anticipated to change

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					following construction. Collection of in-situ water quality data is meant to provide a point in time, cursory indication of general water quality at each site, with specific water quality parameters to be measured at a pre-determined frequency during construction to establish appropriate baseline conditions immediately prior to construction. The recommended minimum frequency will be included in the mitigation measures section of the EA document.

4A. Indigenous Community Comments: Comments Table – Waasigan Transmission Line Project – Grand Council Treaty #3 Feedback on Hydro One's Proposed Field Studies for Environmental Assessment. April 29, 2022.

GICHI OZHIBIIGE OGAAMIC
ADMINISTRATIVE OFFICE

GRAND COUNCIL TREATY #3 FEEDBACK
HYDRO ONE'S PROPOSED FIELD STUDIES
FOR ENVIRONMENTAL ASSESSMENT
APRIL 29, 2022

Sarah Cohanim
Environmental Programs and Approvals
Hydro One Networks Inc.
483 Bay Street, 8th Floor
TORONTO, Ontario M5G 2P5

Re: Review and Comments on Proposed Field Work - Environmental Assessment, Waasigan Transmission Line

Dear Sarah Cohamin,

Background: The comments below are representative of the Territorial Planning Unit (TPU) of Grand Council Treaty #3 (GCT#3) for the proposed Field Work for the Environmental Assessment for the Waasigan Transmission Line. GCT#3 is the Traditional Government of the Anishinaabe Nation of Treaty #3 and represents 28 First Nations across the Territory. Grand Council's mandate is to protect the future of the Anishinaabe people by ensuring the protection, preservation, and enhancement of inherent and treaty rights.

The TPU is a department within the Grand Council that works with the Treaty #3 Leadership to protect the lands, water, and resources within the 55,000 square miles of Treaty #3 Territory. The TPU is guided by Anishinaabe Inakonigaawin - Manito Aki Inakonigaawin (Great Earth Law) and Treaty #3 Nibi (water) Declaration.

Governance: Treaty #3 territory is governed by Anishinaabe law, called Manito Aki Inakonigaawin (Great Earth Law), and the Nibi declaration. Manito Aki Inakonigaawin represents respect, reciprocity, and responsibilities with all relations in regards to Mother Earth. The law signifies the duty to respect and protect lands affected by over-usage, degradation, and unethical processes. The law is unique to Treaty #3 territory and passed on through our elders and knowledge keepers.

The Nibi Declaration represents respect, love, and the sacred relationship with nibi (water) and the life that it brings. It is based on teachings about water, lands, other elements like air and wind, and creation. The declaration is meant to preserve and share knowledge with youth and future generations. The

declaration guides us in our relationship with nibi so we can take action individually, in our communities, and as a nation to help ensure healthy, living nibi for all creation.

UNDERSTANDING OF THE PURPOSE OF WAASIGAN ENVIRONMENTAL ASSESSMENT AND RELATED FIELD STUDIES:

- Confirm the preferred route and conceptual design of the Project
- Consideration and documentation of the impacts to the natural and socio-economic environment as a result of construction, operation, maintenance and retirement of the Project
- Consideration and documentation of the appropriate and necessary mitigation measures to eliminate, minimize or avoid potential adverse Project-related impacts
- Consultation

The feedback is structured to reflect the major themes set out in Hydro One's proposed field studies, and included other factors of concern, such as socio-economic and human health concerns. As stated in past feedback for the Terms of Reference for the Environmental Assessment, the studies undertaken to address the Natural, Socio-Economic, Indigenous Communities (Cultural) and Technical (Policy/Institutional), considerations are the very foundation of an Environmental Assessment. As such, our feedback reflects our concerns as they relate to these factors that are being studied and considered for decision-making related to the Waasigan Transmission Line. Therefore, on the basis of GCT3's understanding of the purposes of the Environmental Assessment, and the field studies that will inform the assessment, the following feedback is provided:

1. **PRINCIPLES OF APPROACH TO FIELD STUDIES:** Inclusion of Anishinaabe Inakonigaawin and traditional knowledge- The Nation is extremely rich with Anishinaabe Knowledge, which is completely unique to the region. This knowledge in our area is mostly unwritten and can only be learned through discussions with Elders and Knowledge Keepers. One application of the traditional laws is Manito Aki Inakonigaawin, which is a guiding framework in the decision making process of the Anishinaabe Nation as it relates to activities impacting the Treaty #3 Territory. In this Anishinaabe framework, there is a both a community decision making process and a Nation based decision making process that is outlined which are: application, engagement/consultation, authorization, and compliance and monitoring. This significantly increases the value-added to continue to support and invest in the Nation of Treaty #3 as this information is not accessible through any other mechanism.

2. **Provision of Information** - GCT3, TPU expects that the results of the field studies, including the preliminary base-line environmental studies and desk-top data sets of information be provided to our offices upon completion, and be available to any of the 28 communities upon request.

3. **Over-Use of Desk-Top Data** – GCT3, TPU expresses concern about the over-reliance of desk-top data sets provided by third parties. The concern rests in the use of out-dated data, computer-generated data models that are not representative of Anishinaabe knowledge and processes.

4. **Hiring of Technical Support** – With Golder hiring technical support for the field work, GCT3, TPU expects that people will be hired from the Anishinaabe Nation in Treaty #3 or at a minimum those with unique knowledge sets of Northwestern Ontario to ensure governance and decision making is reflective of the Treaty #3 Territory

5. **Trap-Line Holders** - GCT3, TPU expects that any trap line holders be fully informed of the Project and fully engaged in the TK/TKLU and archaeological studies. Engagement of the trap-line holders would facilitate TK/TRLU community input.

6. **Species at Risk** - GCT3, TPU expects that special consideration be given to Species at Risk in this Project, and that efforts be made above and beyond the requirements set out in Ontario's Endangered Species Act (ESA) and the federal Species at Risk Act (SARA). The intentions of Treaty #3 communities and Manito Aki Inakonigaawin, are to protect all living beings in Treaty #3 Territory, and this change to Ontario legislation gives no comfort that the work to be conducted for the clearing of any lands for the purpose of transmission lines will respect Anishinaabe laws and processes.

7. **'Lands Taken Up – Cumulative Impacts'** - GCT3, TPU expects that Hydro One gives due consideration to all impacts to land and development in Treaty #3 Territory in terms of the Project's contribution to the ongoing cumulative impacts on the natural and built up environment by means of measuring the additional lands to be disturbed, (i.e. widening the Corridor).

8. **Visual Mapping of Impacts** - To facilitate GCT3, TPU expectation re: ongoing and overall development and a thorough understanding of impacts of the Project gained through the field studies, the TPU expects to see the anticipated impacts resulting from the field studies, mapped for visual representation.

9. **Cease Use of Glyphosate/Chemical Agents** - As the field studies contribute to the environmental assessment and then progresses towards construction, once again, GCT3, TPU emphasises that the clearing and maintenance of the Right-of-ways of the transmission lines must be done without the use of herbicides (glyphosate, or other similar chemical agents). These chemicals compromise the life of animals and humans alike, as well vegetation (blueberries, medicines, etc.) which are a vital aspect of Treaty #3 culture. In the Terms of Reference stage, Hydro One committed to examining operations and maintenance activities for the Right-of-way in the Environmental

Assessment, but made no commitment to cease the use of glyphosate and/or other similar chemical agents. Operations and maintenance activities that involve the use of herbicides (glyphosate, or other similar chemical agents) have a very significant impact on Treaty #3 members from a health, cultural, economic, environmental and social perspective.

A. WILDLIFE:

1. Over-emphasis on birds and birds of non-relevance from a cultural perspective. That being said, there is an absence of mention of great blue heron. Turtles and other reptiles are not identified for study. .
2. Amphibians are not identified for study and are an important indicator species for environmental impacts and changes.
3. While Moose and Grey Fox are targeted for monitoring there is a severe lack of mammal monitoring for the project in general. Many other fur-bearers are of cultural significance (i.e. moose, bear, red fox, and wolves) and were not identified for study. .
4. Activities of the key species identified should be considered in studies, (i.e. moose breeding and calving areas, wildlife denning sites, feeding areas), to consider their life support requirements throughout life cycles.
5. Wolverine are a key species and a core indicator of prey abundances, which are indicators of a health ecosystem. GCT3, TPU expects that wolverine will be included in the wildlife study.

B. WILDLIFE HABITAT:

1. Habitat of key species is important to be considered seasonally. As the species migrate with the seasons, the habitats that support them must be protected, or the species will be impacted.
2. Due to the disturbance on the land and removal of tree and surrounding habitat to expand the corridor, the likelihood of flooding and/or fires increases. GCT3, TPU expects that any disturbance on the land will be mapped so mitigation and preventative measures can be put into place to minimize the impact. In addition, great blue heron rookeries have become subject to loss of habitat due to development and land disturbances, which GCT3, TPU expects would be minimized. A buffer of 200 feet is not adequate to protect these critical habitats.
3. Of particular note is the importance of habitat corridors for wildlife. Hydro transmission lines are a significant factor in disrupting these critical habitats and healthy wildlife populations.

C. VEGETATION:

1. GCT3, TPU would expect culturally significant vegetation, such as blueberries and traditional medicines would be given important consideration in their protection, because of their significant relevance to the Anishinaabe Nation in Treaty #3.
2. Of particular importance to Anishinaabe Nation in Treaty #3, is the wild rice, which should be included in the field study.

D. WETLANDS:

1. Wetlands are viewed as underrepresented. This is a critical habitat for many of the species of concern, especially, Species At Risk.
2. Water levels are subject to significant change throughout the spring to fall seasons, and from year to year. The water levels determine the species and health of a species that live in the marshlands, birds, amphibians, and vegetation, i.e. wild rice. Consideration should be given to water levels over more than one to two seasons in a year, and more than one year, three at minimum, to determine the species that thrive or falter especially under the lens of climate change.

E. FISH:

1. Different species of fish should be prioritized, especially those most relevant to the communities, i.e. whitefish, walleye, muskie, sturgeon and trout, at a minimum.
2. Fish are a species that is key to monitoring pollutants. Consideration should be given to this criteria. The Experimental Lakes Area would be a good collaborative relationship to foster for this aspects of the studies.

F. FISH HABITAT:

1. The TPU sees the percentage of water-bodies and water-crossings being surveyed as not adequate. This is a point of consideration for inclusion of TK and TLRU to ensure cultural values are not compromised.
2. Surface water testing must be done in all seasons for the data to be relevant. There are significant variations of water temperature in the mix of seasons that support the fish and the quality of fish habitat.
3. Recent research on climate change indicates that fish are getting smaller due to the levels of oxygen in the lakes. In addition, water levels vary significantly from season to season and year to year. Consideration should be given to oxygen and water levels over more than one to two seasons in a year, and more than one year, three at minimum, to determine the fish species that thrive or falter.
4. Benthic Macroinvertebrates should be monitored for, both before and after the project. They are an excellent indicator for water quality, and specifically to this project potential

impacts of erosion and sedimentation stemming from project activities in/or around water bodies.

G. SOCIO-ECONOMIC AND CULTURAL CONCERNS:

1. Manito Aki Inakonigaawin, the Nibi declaration and other traditional knowledge as directed by communities must be included
2. Whether or not considered in the field studies, specifically, GCT3, TPU expects that socio-economic and cultural considerations, both positive and negative, will be taken into account, for consideration in the Environmental Assessment, i.e. access to social services, medical care, housing, reliable energy, clean water and nutritious foods (determinants of health), economic development opportunities, opportunities for training and increased drug trafficking,
3. Some cultural areas are more sensitive than others, requiring protection (environmental and confidentiality), i.e. burial sites, pictographs, ceremonial sites, etc.
4. Consideration of the perpetuation of cultural activities are important for cultural integrity, i.e. hunting, fishing, trapping, and foraging, i.e. blueberries. All of these activities are considered cultural norms that would compromise the quality of life in the communities if minimized in any way due to the Project.

H. HUMAN HEALTH CONCERNS:

1. Every effort must be made to prevent the release of pollutants, such as oil and gas spills, and especially glyphosate and alternative chemicals that will compromise the ecosystem and human health
2. Electromagnetic exposure from the end-product transmission lines pose a significant health concern to human health. GCT3, TPU expects every effort will be made to locate transmission lines away from human habitat.

The TPU submits this feedback after due consideration of the material provided and learning more about this stage of the Project and the potential outcomes.

Additionally to note, GCT3, TPU has not received some of the information that we have requested as the Project has been progressing, i.e. LiDAR data that was collected in the fall of 2021.

The TPU continues to support Gwayakochiigewin LP, and will make every effort to support them in their efforts to succeed. COVID-19 has hampered the ability to proceed as originally planned and it needs to be continually addressed the continuing impacts of the global

pandemic. The most effective means of engaging communities is in person. It is imperative, however that in-person engagement does take place.

In conclusion, the above feedback is intended to help understand the process better, protect the interests of the Treaty #3 communities and to work towards the best outcome possible for everyone concerned.

We appreciate your consideration of the above input. If any further information or questions are required please contact myself at Michelle.Shephard@treaty3.ca.

Miigwetch,

Michelle Shephard, Regulatory Specialist
Territorial Planning Unit, Grand Council Treaty #3
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4B. Hydro One Responses: Grand Council Treaty #3 Feedback on Hydro One's Proposed Field Studies for Environmental Assessment. May 26. 2022.

May 26, 2022

Comments Table

Proposal: Waasigan Transmission Line Project – Grand Council Treaty #3 Feedback on Hydro One's Proposed Field Studies for Environmental Assessment April 29, 2022
Proponent: Hydro One

Commenter Name: Territorial Planning Unit (TPU) of Grand Council Treaty #3 (GCT#3)

Comment #	Reference to Field Plan	Section	Comments (April 29, 2022)	Response (Hydro One – May 26, 2022)
GENERAL				
1	**Principles Of Approach to Field Studies**	-	Inclusion of Anishinaabe Inakonigaawin and traditional knowledge- The Nation is extremely rich with Anishinaabe Knowledge, which is completely unique to the region. This knowledge in our area is mostly unwritten and can only be learned through discussions with Elders and Knowledge Keepers. One application of the traditional laws is Manito Aki Inakonigaawin (Great Earth Law), which is a guiding framework in the decision making process of the Anishinaabe Nation as it relates to activities impacting the Treaty #3 Territory. In this Anishinaabe framework, there is a both a community decision making process and a Nation based decision making process that is outlined which are: application, engagement/consultation, authorization, and compliance and monitoring. This significantly increases the value-added to continue to support and invest in the Nation of Treaty #3 as this information is not accessible through any other mechanism.	Hydro One will consider Indigenous knowledge, including traditional knowledge/traditional lands and resource use (TK/TLRU), at all stages of the Project. For field work, the field work plans were provided to Indigenous communities for review and input. Hydro One is also providing field notices prior to field work, which include the field survey locations so that Indigenous communities can review and provide input. This could include identifying sensitive areas that a community would like undisturbed, or areas communities believe should be included in the field studies. Hydro One is also planning Indigenous community meetings where the field plans and maps will be available, and feedback can be received. Further, Hydro One has been working with Indigenous communities since 2020 to support community led TK/TLRU studies. The results of these studies will be incorporated at key milestones in the Environmental Assessment (EA) process. We appreciate the opportunity to continue to work with Grand Council Treaty #3 (GCT3) and First Nation communities on the integration of TK/TLRU.
2	**Provision of Information**	-	GCT3, TPU expects that the results of the field studies, including the preliminary base-line environmental studies and desk-top data sets of information be provided to our offices upon completion, and be available to any of the 28 communities upon request.	The baseline data collected for the Aquatic, Vegetation and Wetlands, and Wildlife and Wildlife Habitat components will be made available to GCT3 offices and the communities upon completion of our baseline reporting and effects assessment report.

Comment #	Reference to Field Plan	Section	Comments (April 29, 2022)	Response (Hydro One – May 26, 2022)
3	**Over-Use of Desk-Top Data**	-	GCT3, TPU expresses concern about the over-reliance of desk-top data sets provided by third parties. The concern rests in the use of out-dated data, computer-generated data models that are not representative of Anishinaabe knowledge and processes.	We understand the limitation of the desktop data being used and are only relying on it as a first step in the baseline characterization process. We will be relying more heavily on field collected data to inform the baseline and effects assessment.
4	**Hiring of Technical Support**	-	With Golder hiring technical support for the field work, GCT3, TPU expects that people will be hired from the Anishinaabe Nation in Treaty #3 or at a minimum those with unique knowledge sets of Northwestern Ontario to ensure governance and decision making is reflective of the Treaty #3 Territory	The Golder technical teams working on the Waasigan Project have significant experience working in Northwestern Ontario including working on major transmission projects such as Wataynikaneyap and East-West-Tie Transmission Projects. Golder is actively working with First Nation communities to identify Indigenous people so that they can participate in field work as equal members of the team. This will include community members hired directly by their community as well as community members hired directly by Golder.
5	**Trap-Line Holders**	-	GCT3, TPU expects that any trap line holders be fully informed of the Project and fully engaged in the TK/TKLU and archaeological studies. Engagement of the trap-line holders would facilitate TK/TRLU community input.	Hydro One looks forward to working with any trapline holders identified by Indigenous communities or who may self-identify that wish to participate in discussion on approach to archaeological studies or who offer their knowledge through engagement or community-led TK/TLRU studies. As contact information is not publicly available, rights, permits, and/or licence holders from Crown land dispositions, trap lines, bait fish blocks, and bear management areas will receive EA Project Notices (i.e., Notice of Commencement of EA) through mailings from the Ministry of Northern Development, Mines, Natural Resources and Forestry (NDMNRF).
6	**Species at Risk**	-	GCT3, TPU expects that special consideration be given to Species at Risk in this Project, and that efforts be made above and beyond the requirements set out in Ontario's Endangered Species Act (ESA) and the federal Species at Risk Act (SARA). The intentions of Treaty #3 communities and Manito Aki Inakonigaawin, (Great Earth Law) are to protect all living beings in Treaty #3 Territory, and this change to Ontario	All species at risk (SAR) with potential to interact with the Project study area are being considered in the baseline data collection and effects assessment for the Project. Our proposed field programs include robust and detailed surveys for these SAR. Field program results, assessment findings and potential mitigation measures related to SAR will be shared for

Comment #	Reference to Field Plan	Section	Comments (April 29, 2022)	Response (Hydro One – May 26, 2022)
			legislation gives no comfort that the work to be conducted for the clearing of any lands for the purpose of transmission lines will respect Anishinaabe laws and processes.	consideration and input through the EA process. We appreciate the opportunity to learn with you how these findings are understood through Anishinaabe laws and processes.
7	**'Lands Taken Up- Cumulative Impacts'**	-	GCT3, TPU expects that Hydro One gives due consideration to all impacts to land and development in Treaty #3 Territory in terms of the Project's contribution to the ongoing cumulative impacts on the natural and built up environment by means of measuring the additional lands to be disturbed, (i.e. widening the Corridor).	The EA will include a cumulative effects assessment that assesses the potential for the effects of other future reasonably foreseeable projects to combine cumulatively with the net effects of the Project.
8	**Visual Mapping of Impacts**	-	To facilitate GCT3, TPU expectation re: ongoing and overall development and a thorough understanding of impacts of the Project gained through the field studies, the TPU expects to see the anticipated impacts resulting from the field studies, mapped for visual representation.	Results of field studies, including mapping, will be made available to Indigenous communities. This will include, but not be limited to, community meetings, newsletters and review of the draft and final EA reports. Hydro One is working with each Indigenous community to understand how they want to be involved throughout the EA.
9	**Cease Use of Glyphosate/Chemical Agents**	-	As the field studies contribute to the environmental assessment and then progresses towards construction, once again, GCT3, TPU emphasises that the clearing and maintenance of the Right-of-ways of the transmission lines must be done without the use of herbicides (glyphosate, or other similar chemical agents). These chemicals compromise the life of animals and humans alike, as well vegetation (blueberries, medicines, etc.) which are a vital aspect of Treaty #3 culture. In the Terms of Reference stage, Hydro One committed to examining operations and maintenance activities for the Right-of-way in the Environmental Assessment, but made no commitment to cease the use of glyphosate and/or other similar chemical agents. Operations and maintenance activities that involve the use of herbicides (glyphosate, or other similar chemical agents) have a very significant impact on Treaty #3 members from a	Hydro One understands the importance of this concern and will work with Indigenous communities further during the EA in defining specific operation and maintenance activities, including the use of herbicides and alternatives to herbicides, such as manual clearing techniques.

Comment #	Reference to Field Plan	Section	Comments (April 29, 2022)	Response (Hydro One – May 26, 2022)
			health, cultural, economic, environmental and social perspective.	
A. WILDLIFE				
1	-	-	Over-emphasis on birds and birds of non-relevance from a cultural perspective. That being said, there is an absence of mention of great blue heron. Turtles and other reptiles are not identified for study.	The proposed baseline program for birds includes the survey of habitat that has the potential to support great blue herons (e.g., candidate significant wildlife habitat (SWH) program will confirm the sites that have the potential to be used for heronries. SWH type called Colonially Nesting Bird Breeding: Trees Shrubs) and other wetland surveys (e.g., marsh birds surveys, vegetation surveys in wetlands) have the potential to document the presence of great blue heron throughout the study area. We have also expanded our approach for turtles after hearing from Indigenous communities that turtles are a culturally significant species. A turtle basking program is being completed this spring 2022 in which crews will visit wetlands and waterbodies that have potential to support overwintering turtles and visually assess them to determine the abundance and diversity of turtles using these features for basking. The presence of basking turtles early in the spring gives an indication that they use the wetlands/waterbodies for overwintering. Additional proposed turtle surveys include looking in potentially suitable nesting areas for sightings of nesting female turtles or sign of recent nesting activity (e.g., dug soils, presence of egg shells indicating a predated nest).
2	-	-	Amphibians are not identified for study and are an important indicator species for environmental impacts and changes.	An amphibian call count program is being undertaken at stations throughout the study area. The objective of this program is to determine the diversity and abundance of breeding anurans (frogs and toads). This baseline data can then be the basis for which we predict changes due to the Project. Also as stated, breeding amphibians can be used as an indicator group to monitor long-term environmental changes.

Comment #	Reference to Field Plan	Section	Comments (April 29, 2022)	Response (Hydro One – May 26, 2022)
3	-	-	While Moose and Grey Fox are targeted for monitoring there is a severe lack of mammal monitoring for the project in general. Many other fur-bearers are of cultural significance (i.e. moose, bear, red fox, and wolves) and were not identified for study.	While not specifically targeted in one of the species-specific programs, data on other mammals will be documented through various field work programs, including the candidate SWH program which details important habitats for furbearers such as den sites through incidental observations. We are also conducting denning surveys for gray fox which could lead to the observation of den sites for other furbearing species (e.g., red fox). We will also be completing a presence survey program targeted at gray fox that includes setting up trail cameras at stations with scent lure attractant and thus we anticipate capturing records of a variety of furbearer predators (e.g., bears, wolves, marten, fisher) through this program.
4	-	-	Activities of the key species identified should be considered in studies, (i.e. moose breeding and calving areas, wildlife denning sites, feeding areas), to consider their life support requirements throughout life cycles.	Through the candidate SWH program and incidental observations recorded during various other planned wildlife and vegetation field surveys, we will document important habitats for a variety of wildlife such as den sites, potential moose calving areas, browse areas/ feeding areas (e.g., moose aquatic feeding areas). Additionally, through the gray fox denning program we have the potential to identify dens for a variety of other wildlife species.
5	-	-	Wolverine are a key species and a core indicator of prey abundances, which are indicators of a health ecosystem. GCT3, TPU expects that wolverine will be included in the wildlife study.	Although wolverine (*Gulo gulo*) has been identified as a SAR concern for the Project, the Project lies approximately 75 km south of the current Ontario distribution of wolverine at its closest point (COSEWIC 2014). Wolverines are known to inhabit intact ecosystems and avoid anthropogenic areas. With the majority of the Project located between two main highways (Highway 11 and Highway 17) and in close proximity to three towns/cities (Dryden, Atikokan and Thunder Bay) it is unlikely that wolverines will inhabit the local study area (LSA). However, incidental observations will be included in the field surveys.
B. WILDLIFE HABITAT				

Comment #	Reference to Field Plan	Section	Comments (April 29, 2022)	Response (Hydro One – May 26, 2022)
1	-	-	Habitat of key species is important to be considered seasonally. As the species migrate with the seasons, the habitats that support them must be protected, or the species will be impacted.	Hydro One agrees with this comment and we are striving to consider all life history stages of wildlife and seasonal habitat use and movement in the baseline characterizations as well as predict the potential impacts the Project will have on these habitats and behaviours.
2	-	-	Due to the disturbance on the land and removal of tree and surrounding habitat to expand the corridor, the likelihood of flooding and/or fires increases. GCT3, TPU expects that any disturbance on the land will be mapped so mitigation and preventative measures can be put into place to minimize the impact. In addition, great blue heron rookeries have become subject to loss of habitat due to development and land disturbances, which GCT3, TPU expects would be minimized. A buffer of 200 feet is not adequate to protect these critical habitats.	Hydro One acknowledges and agrees that disturbance of habitat increases the risk of flooding and fires and the EA will identify mitigation measures, including avoidance of sensitive features such as great blue heron rookeries.
3	-	-	Of particular note is the importance of habitat corridors for wildlife. Hydro transmission lines are a significant factor in disrupting these critical habitats and healthy wildlife populations.	Hydro One acknowledges and agrees that disturbance of habitat of the kind that comes from the development of the transmission corridor has the potential to disrupt critical habitats and wildlife through various pathways (e.g., giving predators easier access to prey crossing through open corridor). Potential effects of the Project on wildlife and wildlife habitats will be considered in the effects assessment of the Project and appropriate design measures, avoidance measures and mitigation measures will be identified to lessen or eliminate those effects.
C. VEGETATION				
1	-	-	GCT3, TPU would expect culturally significant vegetation, such as blueberries and traditional medicines would be given important consideration in their protection, because of their significant relevance to the Anishinaabe Nation in Treaty #3.	The proposed baseline characterization for vegetation includes the documentation and recording of culturally important plants and vegetation communities throughout the study area. The effects assessment will identify the potential effects of the Project on these plants and communities in order to appropriately avoid and mitigate those effects.

Comment #	Reference to Field Plan	Section	Comments (April 29, 2022)	Response (Hydro One – May 26, 2022)
2	-	-	Of particular importance to Anishinaabe Nation in Treaty #3, is the wild rice, which should be included in the field study.	Wild rice stands will be field surveyed and identified through the vegetation program as well as the targeted SWH field program.
D. WETLANDS				
1	-	-	Wetlands are viewed as underrepresented. This is a critical habitat for many of the species of concern, especially, Species At Risk.	Field surveys of wetlands are included in the proposed field program in various ways, including: ecological land classification (ELC) and botanical surveys in wetlands, wildlife surveys in wetlands, specifically: amphibian breeding surveys, turtle basking surveys, breeding bird surveys in wetlands, marsh bird surveys, and least bittern (a SAR) surveys.
2	-	-	Water levels are subject to significant change throughout the spring to fall seasons, and from year to year. The water levels determine the species and health of a species that live in the marshlands, birds, amphibians, and vegetation, i.e. wild rice. Consideration should be given to water levels over more than one to two seasons in a year, and more than one year, three at minimum, to determine the species that thrive or falter especially under the lens of climate change.	Field surveys will document the current water level in all waterbodies at the time of the survey. Measurements (height and width of crossing) will be documented based on the high-water mark. This information will provide an estimate of the water level fluctuation and maximum width of the feature in the study area (as seen in recent years).
E. FISH				
1	-	-	Different species of fish should be prioritized, especially those most relevant to the communities, i.e. whitefish, walleye, muskie, sturgeon and trout, at a minimum.	Thank you for providing a preliminary list of fish species of relevance to the community. We look forward to receiving a full list for inclusion and consideration. Fish species of importance to the community can be categorized under the Species of Conservation Concern or as a separate category of Indigenous importance during the EA and given additional focus during the assessment.
2	-	-	Fish are a species that is key to monitoring pollutants. Consideration should be given to this criteria. The Experimental Lakes Area would be a good	Hydro One agrees that fish and aquatic species can be used to monitor changes in environmental conditions from various pollutants and particularly those such as metals or

Comment #	Reference to Field Plan	Section	Comments (April 29, 2022)	Response (Hydro One – May 26, 2022)
			collaborative relationship to foster for this aspects of the studies	organics where changes occur on a measurable scale to be able to detect differences in the fish population (ECCC 2012). Fish are considered as a criterion for the effects assessment for the EA. The Experimental Lakes Area has a long-standing history of scientific research and a collaboration with them would be welcomed. The effects anticipated to the fish and aquatic environment are anticipated to be minimal after the application of appropriate best management practices, avoidance, mitigation measures and measures to protect fish and fish habitats (DFO 2019); however, specific conclusions and mitigation measures will be identified during the detailed design process and any information collected as a result of collaboration with the Experimental Lakes Area group will be included and considered.
F. FISH HABITAT				
1	-	-	The TPU sees the percentage of water-bodies and water-crossings being surveyed as not adequate. This is a point of consideration for inclusion of TK and TLRU to ensure cultural values are not compromised.	Comment acknowledged. The percentage of sites selected for survey result from MNRF-Fisheries and Oceans Canada (DFO) approved methodology. The site selection process for the subset of waterbody crossings will rely primarily on the guidance and procedures under the *Crown Forest Sustainability Act, 1994*, S.O. 1995, c. 25 (CFSA). Please note that sites will be selected in such a manner to capture the following criteria: • Cover a variety of waterbody and watercourse types, watershed classifications and sizes; • Meet the NDMNRF request to not sample waterbodies and watercourses with existing fisheries data; • Areas of cultural significance; and • Where access is obtained.

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				A statistical power analysis was completed to determine the number of targeted sampling sites required to detect changes in the aquatic environment. The results of the power analysis indicated that a sample size equating to 6.5% (i.e., 50 sites) of the desktop estimates would result in sufficient statistical power to detect a 15% difference between the desktop and field estimates. Therefore, a minimum of 15% effect size was deemed suitable to guide the site selection process for the alternative routes field survey. The field programs aim to capture 25% of sites for the alternatives assessment; however, 100% of sites will be sampled once a preferred alternative is selected.
2	-	-	Surface water testing must be done in all seasons for the data to be relevant. There are significant variations of water temperature in the mix of seasons that support the fish and the quality of fish habitat.	Seasonal and even diurnal variation exists within the waterbodies crossed by the Project. The Project does not anticipate having a significant impact on the thermal regimes of waterbodies, with the proper implementation of avoidance, mitigation, best management practices and the application of measures to protect fish and fish habitat (DFO 2019). Therefore, seasonal thermal monitoring is not proposed. However, thermal regime can be inferred through the sampling of the fish community and based on the fish community assemblages captured. This can be used to aid in determining sensitivity of the waterbodies present within the Project LSA.

Comment #	Reference to Field Plan	Section	Comments (April 29, 2022)	Response (Hydro One – May 26, 2022)
3	-	-	Recent research on climate change indicates that fish are getting smaller due to the levels of oxygen in the lakes. In addition, water levels vary significantly from season to season and year to year. Consideration should be given to oxygen and water levels over more than one to two seasons in a year, and more than one year, three at minimum, to determine the fish species that thrive or falter.	Comment acknowledged. Water quality can play a critical role in the health of an aquatic ecosystem and the species in habituating these waterbodies. The type of effects anticipated from the construction of the Project are not anticipated to result in changes to the water quality (specifically temperature or dissolved oxygen levels). Water quality results from the baseline studies will be examined during the EA for potential Project-related effects and will be compared to national and provincial water quality guidelines and objectives for the protection of aquatic life. It is anticipated that the risk of Project-related effects can be reduced through the effective implementation of avoidance, mitigation, best management practices and the application of measures to protect fish and fish habitat (DFO 2019). Additionally, it is anticipated that any follow-up monitoring conducted in seasons and/or years during post-construction will serve to confirm assessments completed during the EA.
4	-	-	Benthic Macroinvertebrates should be monitored for, both before and after the project. They are an excellent indicator for water quality, and specifically to this project potential impacts of erosion and sedimentation stemming from project activities in/or around water bodies.	Benthic invertebrate community studies are not typically completed for transmission line projects. These studies are seen more often on projects where there is a project-related water discharge/effluent such as mining projects or where disturbance of benthic invertebrates and the benthic habitat will occur that may impact the fish food resources on such a scale that observable changes would be visible in the fish population (ECCC 2012). Typical project effects from transmission projects have been found to be more related to the construction phase (e.g., sediment and erosion and disturbing habitat) where potential construction impacts are limited to a relatively small site or segment on any single waterbody and would be anticipated to have a localized effect or small portion of ecological unit. Benthic invertebrate communities are typically resilient to minor or short-term environmental disturbances (e.g., road crossings) (Volez et al. 2000). Benthic invertebrates are anticipated to rapidly recover (i.e., < 2 years) following disturbance of habitat if suitable habitat is available for recolonization (Volez et al.

Comment #	Reference to Field Plan	Section	Comments (April 29, 2022)	Response (Hydro One – May 26, 2022)
				2000). Although specific detailed designs have not been drafted, measures to protect fish and fish habitats from construction-related effects will be recommended (e.g., restoration of disturbed aquatic habitat to a similar or better condition than it was pre-construction) as part of the effects assessment process and are also protective of other freshwater biota such as benthic invertebrates (DFO 2019 and Chapman et al 2017). Therefore, it was determined that benthic invertebrate sampling would not yield meaningful data to inform the EA process. **References:** Environment and Climate Change Canada (ECCC). 2012. Metal Mining Technical Guidance for Environmental Effects Monitoring. National Environmental Effects Monitoring Office. Ottawa, ON, Canada. Available at: https://www.ec.gc.ca/esee-eem/default.asp?lang=En&n=AEC7C481-1. Voelz, N.J., Shieh, SH. & Ward, J. Long-term monitoring of benthic macroinvertebrate community structure: a perspective from a Colorado river*. Aquatic Ecology 34, 261–278 (2000). https://doi.org/10.1023/A:1009989510721. DFO. 2019. Measures to Protect Fish and Fish Habitat. Measures to protect fish and fish habitat (dfo-mpo.gc.ca). Chapman, P.M., Hayward, and J. Faithful. 2017/ Total Suspended Solids Effects on Freshwater Lake Biota Other than Fish. Bulletin of Environmental Contamination and Toxicology · August 2017.
G. SOCIO-ECONOMIC AND CULTURAL CONCERNS				
1	-	-	Manito Aki Inakonigaawin (Great Earth Law), the Nibi (water) declaration and other traditional knowledge as directed by communities must be included	Hydro One will consider TK/TLRU at all stages of the Project. For field work, the field work plans were provided to Indigenous communities for review and input. Hydro One is also providing field notices prior to field work, which include

Comment #	Reference to Field Plan	Section	Comments (April 29, 2022)	Response (Hydro One – May 26, 2022)
				the field survey locations so that Indigenous communities can review and provide input. This could include identifying sensitive areas that a community would like undisturbed, or areas communities believe should be included in the field studies. Hydro One is also planning Indigenous community meetings where the field plans and maps will be available and feedback can be received. Further, Hydro One has been working with Indigenous communities since 2020 to support community led TK/TLRU studies. The results of these studies will be incorporated at key milestones in the EA process. We appreciate the opportunity to continue work with GCT3 and First Nation communities on the integration of TK/TLRU.
2	-	-	Whether or not considered in the field studies, specifically, GCT3, TPU expects that socio-economic and cultural considerations, both positive and negative, will be taken into account, for consideration in the Environmental Assessment, i.e. access to social services, medical care, housing, reliable energy, clean water and nutritious foods (determinants of health), economic development opportunities, opportunities for training and increased drug trafficking.	As described in the Terms of Reference (ToR), the EA will characterize the baseline environment and identify potential effects and mitigation related to the socio-economic environment. The main features included as per Table 7-1 of the ToR are: • Provincial and municipal policy; • Community well-being; • Economy, land and resource use; • Aesthetics; • Infrastructure and community services; • Indigenous community rights/interests and use of land and resources for traditional purposes; and • Cultural heritage resources.
3	-	-	Some cultural areas are more sensitive than others, requiring protection (environmental and confidentiality), i.e. burial sites, pictographs, ceremonial sites, etc.	Comment acknowledged.
4	-	-	Consideration of the perpetuation of cultural activities are important for cultural integrity, i.e. hunting, fishing, trapping, and foraging, i.e. blueberries. All of these	Comment acknowledged. Hydro One has been working with Indigenous communities since 2020 to support community-led TK/TLRU studies. The results of these studies will be

Comment #	Reference to Field Plan	Section	Comments (April 29, 2022)	Response (Hydro One – May 26, 2022)
			activities are considered cultural norms that would compromise the quality of life in the communities if minimized in any way due to the Project.	incorporated at key milestones in the EA process. We appreciate the opportunity to continue work with GCT3 and First Nation communities on the integration of TK/TLRU.
H. HUMAN HEALTH CONCERNS				
1	-	-	Every effort must be made to prevent the release of pollutants, such as oil and gas spills, and especially glyphosate and alternative chemicals that will compromise the ecosystem and human health.	Accidental spills, including identifying appropriate mitigation measures, will be considered as part of the EA.
2	-	-	Electromagnetic exposure from the end-product transmission lines pose a significant health concern to human health. GCT3, TPU expects every effort will be made to locate transmission lines away from human habitat.	Hydro One is committed to maintaining safe electric and magnetic field (EMF) exposure levels for all of their assets and facilities. EMF levels are taken into consideration during the design of any new assets. This commitment ensures that Hydro One employees maintaining its assets and facilities, as well as people in the vicinity of these assets and facilities, are not exposed to elevated EMF levels. The EA will include additional information related to the Project and EMF.

5A. Indigenous Community Comments: Comments Table – Waasigan Transmission Line Project – Lac des Mille Lacs First Nation (LDMLFN) Review of the Aquatic and Terrestrial Field Work Plans for the Waasigan Transmission Line Environmental Assessment. May 27, 2022.

Review of the Aquatic and Terrestrial Field Work Plans for the Waasigan Transmission Line Environmental Assessment

1. How will baseline data from the EA be used in the conservation of aquatic and terrestrial ecology for the project?
2. We still require a copy of the maps for the field work plans.
3. Will we be able to get a copy of the plans for the temporary and permanent access roads?
4. Where are the plans for the quarry/aggregate pits?
5. What is the plan if unexpected values are found?
6. Will we have access to the detailed waterbody crossing list?
7. How will the results of the E.A. help mitigate risks for SAR? What strategies are there to mitigate risks for SAR?
8. How will surveys be used to measure impacts? How will impacts be mitigated?
9. Will baseline information be shared publicly or with other organizations to help with the advancement of science? Will this impact FN values?
10. Will the results of the EA be shared with the FN? What would this look like?
11. The field work plans indicate that field crews will be given Indigenous cultural awareness training. Training should include what to look for on the ground in terms of Indigenous values. Would we be able to get a copy of the resources used in the training? Perhaps we could add to it?
12. Its important to recognize that the lack of SAR data in the Northwest should in no way inhibit the science and monitoring possible. It must be recognized that what little information is available, is directly a result of limited human presence and vast forested areas. Citizen science including the observations of local hunters, fishers, and the indigenous population should be incorporated into the science. Traditional knowledge and local knowledge in these circumstances must be taken into account.
13. It is important to acknowledge that Traditional Ecological Knowledge is of equal importance in comparison to western scientific approaches and should be treated as such, by being given equal credibility.

14. It is evident that there are constraints associated with monitoring of wildlife due to a lack of background data and information. Alternative information sources should be considered in these cases.
15. LDMLFN could help by providing information regarding wildlife values as well as indicate any other sensitive sites that have the potential to be impacted.
16. It would be beneficial to have someone from LDMLFN go on some of the field surveys, especially where values may be impacted.
17. The statement made in the *Terrestrial Draft Waasigan Transmission Line Field Work Plan,* "Genetic results from a rare cougar carcass found near Thunder Bay in 2017 support this conclusion, indicating the individual came from an American population (CBC 2017)" has no scientific merit and should be omitted from the document as well as the statement "in the absence of an established population". There are no resident cougar DNA samples to compare the sample to, so it is impossible to tell if the cougar was a resident or not. Certainly, all North American cougars will share very similar DNA. There are not enough DNA samples from cougars to support the assumption that the cougar found on Boreal Road, outside of Thunder Bay was in fact from the American population. Furthermore, cougars are known to occupy large ranges and are often sighted by local residents. For example, the First Nation has documented some cougar sightings in the area, and last year a resident from Thunder Bay caught a cougar on a trail cam.
18. The author's reference of Rosatte, R. needs to be edited as it currently reads, "*Evidence to support the presence of Cougars (Puma concolor) in Ontario, Canada*", when the article is in fact titled, "*Evidence Confirms the Presence of Cougars (Puma concolor) in Ontario, Canada*". The author's reference of Rosatte's article in order to support the statement, "no confirmed observations of cougar were made", is completely misleading considering the conclusions of Rosatte's article/study was that cougars ARE PRESENT in Ontario.
19. "When roads are adjacent to waterbodies, it is recommended that the road alignment include a 30m setback between the road and any waterbodies to minimize the potential for any accidental release and delivery of sediments or deleterious substances to the waterbodies and to preserve existing riparian vegetation and bank conditions." – How is this measured? Distance must be measured at a flat angle (180 degrees) as opposed to a slope. It is important that field crews know this.

20. During field surveys for fish and fish habitat, and surface water; time of year as well as origin should be considered. How will this be reflected in baseline data?

21. As indicated in the *Waasigan Transmission Line Field Work Plan – Terrestrial*, Significant Wildlife Habitat (SWH) in Ontario is protected by the Provincial Policy Statement (2020), which includes animal movement corridors. Can ungulate crossings be surveyed for and/or noted with the possibility of being incorporated into development plans (areas where vegetation is left high enough that ungulates can use the cover to cross)? Corridor crossing protection would help mitigate the risk to ungulate populations as linear fragmentation over landscapes favors predators.

22. American white pelican has been observed more frequently in the last 10 years in Northwestern Ontario. Last year pelicans were seen on Lac des Mille Lacs as well.

23. The primary cause for decline in turtle species is due to fatalities from motor vehicles when crossing roads or railways. It is important to note where roads, especially permanent roads are built in relation to turtle nesting areas. It is also important to notify workers to watch for turtles on roads and highways or avoid certain roads during nesting season. The snapping turtle, a species of special concern, is prevalent along the preferred route in certain areas.

24. Black ash is now listed as endangered and occurs throughout the region. However, there are no plants to monitor for it in the field work plan, which should be remedied.

25. Beavers like to build dams in culverts. Hiring indigenous trappers to help keep culverts clear of debris from beaver activities would be beneficial as it will also help fish populations, especially if done before the early spring run. Could the E.A. make note of this?
26. There should be more flexibility in regard to time limits for breeding bird surveys. Limiting point count surveys to 10 minutes per plot (50 meter radius) may be difficult in order to achieve accurate data due to the forest cover/type.
27. How many breeding bird surveys are being done?
28. Information from the McKellar Island Bird Observatory could be a good resource for additional species related information.
29. "No amphibian SAR occur in northwestern Ontario" should be amended to say no known amphibian SAR occur in northwestern Ontario. It would be beneficial to science to stop assuming and limiting science based on the fact that there is less species specific information available in the north.

30. Why are there only 3 anuran call count surveys being done? This does not seem like enough. Would more be done if there was an anuran SAR identified in northwestern Ontario?
31. The monitoring of Significant Wildlife Habitat (SWH) by ground truthing to determine if the areas should or should not be included as SWH has the potential for biased interpretation. How can bias be avoided? How is SWH determined at the field level?
32. Are all species at risk being surveyed for, or just the ones indicated on the Terms of Reference and in the Field plans? Black ash is now listed as an endangered species in Ontario. There are many black ash trees in northwestern Ontario but there are no mentions of monitoring for it in the field work plans. There is also no mention of snapping turtles, golden eagles, salamanders, etc.. The list of SAR that exist or have the potential to exist in the study area is lacking, which is concerning.
33. How many general wildlife surveys are planned?
34. Does the EA include any plans for archeological surveys?
35. If a value of potential value is found that could be of particular interest to the First Nation, are their plans to share this information?
36. The schedule for field surveys is not very detailed. How many survey days will be dedicated each of the surveys listed? Is there a set number of days in which surveys need to be completed? Are there time constraints that could impede research? Is time spent on surveys for different species/species type fairly distributed?
37. Where is the information about wildlife surveys? As indicated in the *Waasigan Transmission Line Field Work Plan - Terrestrial*, "Candidate Significant Wildlife Surveys (SWH) – to be conducted in conjunction with other planned wildlife surveys. General wildlife surveys that will result in incidental observations of wildlife and wildlife sign, wildlife habitats including SWH that are encountered while performing all other surveys". How will there be enough time to monitor for wildlife while performing other surveys? Time constraints and difference in approach for various surveys may make monitoring for wildlife at the same time difficult.
38. Can we add to the list of traditional use plants? If traditional use plants or SAR are found, what are the plans for conservation and/or mitigation?

Incorporating Indigenous TEK and Land and Resource Use into Baseline Conditions:

1. How will we provide values data?
2. If I go on field surveys, which surveys would be most beneficial to the First Nation that I go on? Some areas that are very close to values may require an elder that remembers the values in the area.
3. Could we provide a list of traditional use plants and species of concern specific to the First Nation?
4. We could potentially add to the Indigenous cultural awareness training
5. Are there specific areas that should be avoided or studied further based on information help by the First Nation?

5B. Hydro One Responses: Lac des Mille Lacs First Nation (LDMLFN) Review of the Aquatic and Terrestrial Field Work Plans for the Waasigan Transmission Line Environmental Assessment. June 24, 2022.

June 24, 2022

Comments Table

Proposal: Waasigan Transmission Line Project – Lac des Mille Lacs First Nation (LDMLFN) Review of the Aquatic and Terrestrial Field Work Plans for the Waasigan Transmission Line Environmental Assessment

Proponent: Hydro One

Commenter Name: Lac des Mille Lacs First Nation (LDMLFN)

Comment #	Reference to Field Plan	Section	Comments (May 27, 2022)	Recommendation	Response (Hydro One – June 24, 2022)
1			How will baseline data from the EA be used in the conservation of aquatic and terrestrial ecology for the project?		Baseline data collected for the EA will be shared* and available for use in the conservation of aquatic and terrestrial ecological values by increasing and improving our understanding and knowledge of these relatively under-documented values. The baseline data collection will document details about the distributions, ecology, and status of the ecosystem values, in such a way that the data could be used for future monitoring purposes. This same approach will also enable use of the data in studies by others (e.g., consultants, researchers, or Indigenous communities) and can support future community and land use planning, including evaluating potential impacts from development and climate change in the area. *Protocols will be followed such that sensitive data, such as the location of a species at risk (SAR), will not be shared publicly.
2			We still require a copy of the maps for the field work plans		Maps of field survey locations have been provided as part of the Field Work Notices issued to Indigenous communities. A link to a webviewer, where the field survey locations can be reviewed, is also available in the Field Work Notices.

Comment #	Reference to Field Plan	Section	Comments (May 27, 2022)	Recommendation	Response (Hydro One – June 24, 2022)
3			Will we be able to get a copy of the plans for the temporary and permanent access roads?		It is anticipated that the temporary and permanent access roads will be developed and shared in the fall of 2022 once a preferred route is selected and the access roads proposed to be used for the Project are identified.
4			Where are the plans for the quarry/aggregate pits?		It is anticipated that the proposed plans for the quarry/aggregate pits will be developed and shared in the fall of 2022 once a preferred route is selected and the quarry/aggregate pits proposed to be used for the Project are identified.
5			What is the plan if unexpected values are found?		For all survey types, the findings will be considered in the evaluation of alternatives and the EA. For terrestrial resources specifically, all unexpected values will be recorded and photographed (if possible), a waypoint created, and an incidental datasheet filled out. SAR recorded will be reported to the Ministry of Northern Development, Mines, Natural Resources and Forestry (NDMNRF) Natural Heritage Information Centre (NHIC). These findings will be considered in the evaluation of alternatives and the EA. For the aquatic surveys, in the event that unmapped waterbodies are identified in the field, a GPS location, photographs and data regarding waterbody type, permanency, and fish habitat presence will be recorded. If SAR or species of conservation concern (SOCC) are determined to be present in the field, the Ministry of the Environment, Conservation and Parks (MECP) or NDMNRF (as appropriate) will be notified, fishing activities will cease and all licence conditions will be followed. Should invasive aquatic species presence be determined in the field, the NDMNRF will be notified and fishing activities, euthanization and disposal will follow the licence conditions provided. Invasive plant

Comment #	Reference to Field Plan	Section	Comments (May 27, 2022)	Recommendation	Response (Hydro One – June 24, 2022)
					species will be recorded and reported in the baseline assessment. Should non-SAR/SOCC fish be captured outside their typical range, voucher photographs will be collected and verified by senior aquatic ecology staff or sent to an Assistant Curator of Ichthyology (Erling Holm) at the Royal Ontario Museum for fish requiring further confirmation of identification. This information will be provided to the NDMNRF within the mandatory reporting guidelines.
6			Will we have access to the detailed waterbody crossing list?		Details of the sites selected for the baseline surveys will be provided to the agencies and Indigenous communities through the NDMNRF Licence to Collect Fish for Scientific Purposes applications and Field Work Notices. The temporary and permanent waterbody crossing list will be determined once a preferred route is selected and the access roads proposed to be used for the Project are confirmed. The detailed waterbody crossing list will be used for the EA and appended to the baseline EA report.

Comment #	Reference to Field Plan	Section	Comments (May 27, 2022)	Recommendation	Response (Hydro One – June 24, 2022)
7			How will the results of the E.A. help mitigate risks for SAR? What strategies are there to mitigate risks for SAR?		If SAR species or habitat are documented through background data review or encountered in the field, the findings will be considered in the evaluation of alternatives and the EA. Relevant agencies, such as the MECP, will be consulted regarding the approvals required and measures recommended to protect the species. Site-specific and species-specific measures will be recommended in the EA and would become a condition of the EA approval, and permit applications would be submitted to the regulators where required. Strategies or measures to avoid or mitigate risk include habitat avoidance, respecting restricted activity periods, increasing monitoring during construction, implementing species-specific setbacks from sensitive locations (e.g., nesting, roosting or denning locations). For many species, there are many well-documented and frequently used mitigation measures that have proven to be effective at reducing the risk of impacts to SAR species. A full list of mitigation measures will be presented in the draft EA which will be available for review. The final list of mitigation measures will then be mapped spatially on construction work sheets for the purposes of instructing contractors and informing environmental monitors of mitigation commitments.

Comment #	Reference to Field Plan	Section	Comments (May 27, 2022)	Recommendation	Response (Hydro One – June 24, 2022)
8			How will surveys be used to measure impacts? How will impacts be mitigated?		Baseline data will be collected based on established, effective species-specific or group-specific (e.g., breeding birds, reptiles and amphibians) protocols. For example, time/season appropriate surveys for breeding birds will be conducted to identify the diversity of birds using specific habitat types for breeding and nesting. The proposed Project footprint will then be compared to the breeding habitats and used to measure how much habitat will be removed or altered (e.g., fragmented) by the Project. Then, using previous documented research and observations of the changes to a breeding birds community from habitat disturbances or habitat removal, we will predict what the Project level of disturbance is likely to do to these individuals and populations. Similar processes will be applied to the other values to be assessed in the EA. Established and effective mitigation measures will be presented in the EA and will be implemented to reduce risks to the organisms. Also refer to the response to comment #7 with regard to the general approach for avoidance and mitigation.

Comment #	Reference to Field Plan	Section	Comments (May 27, 2022)	Recommendation	Response (Hydro One – June 24, 2022)
9			Will baseline information be shared publicly or with other organizations to help with the advancement of science? Will this impact FN values?		Baseline information will be presented in the EA, which will be submitted to MECP and available for public review. Data collected for the preparation of the EA, such as fish collection records, will be submitted to the NDMNRF, and will then be available to others who are conducting research, sampling, or other activities. As noted in response to comment #1, protocols will be followed such that sensitive data, such as the location of a SAR, will not be shared publicly to prevent harm to the value. SAR records will be provided to the NHIC, which in turn shares the data in compliance with its protocols. Consideration of the potential impacts to First Nation values is important to this Project. Discussion with Indigenous communities regarding their values and potential impacts to their values is an important part of the EA process. Input received from field monitors and community engagement will be considered during the assessment and communicated with sensitivity in our documentation.

Comment #	Reference to Field Plan	Section	Comments (May 27, 2022)	Recommendation	Response (Hydro One – June 24, 2022)
10			Will the results of the EA be shared with the FN? What would this look like?		Engagement sessions are planned throughout the EA process and include sessions in fall 2022 to share the results of the alternative route evaluation and identification of the preferred route. The draft EA Report will then be prepared, based on the findings of the field studies and the preferred route selection. This draft EA Report is expected to be available for review and comment by Indigenous communities in Q1 2023. Hydro One will consider the feedback received and incorporate that into the final EA Report, which will also be distributed for review and comment by Indigenous communities prior to a government decision.
11			The field work plans indicate that field crews will be given Indigenous cultural awareness training. Training should include what to look for on the ground in terms of Indigenous values. Would we be able to get a copy of the resources used in the training? Perhaps we could add to it?		The Hydro One and WSP Golder teams have taken part in Indigenous cultural awareness through different means, including: - Senior leadership at WSP Golder participated in a one-day cultural awareness training session led by external Indigenous consultants. - Technical leads with a field component and the Project Management/EA team participated in a half-day cultural sensitivity training session led by external Indigenous consultants. - All field crew members have viewed the Walk a Mile docuseries (partnership between the City of Thunder Bay and Thunderstone Pictures) that focuses on a higher level of cultural education. - All WSP Golder employees have taken an Inclusion and Diversity training module. - Members of the Project team, including field crew members, have taken cultural awareness

Comment #	Reference to Field Plan	Section	Comments (May 27, 2022)	Recommendation	Response (Hydro One – June 24, 2022)
					training and will participate in a ceremony arranged by Wabigoon Lake Ojibway Nation before completing work in their traditional territory. As well, by incorporating Indigenous participants and monitors in our field programs, we are hoping to gain some direct input into what to look for on the ground in terms of Indigenous values, and we would welcome any additional resources or feedback from LDMLFN to share with our team members to help us better understand values of importance to LDMLFN.
12			It's important to recognize that the lack of SAR data in the Northwest should in no way inhibit the science and monitoring possible. It must be recognized that what little information is available, is directly a result of limited human presence and vast forested areas. Citizen science including the observations of local hunters, fishers, and the indigenous population should be incorporated into the science. Traditional knowledge and local knowledge in these circumstances must be taken into account.		Agreed, citizen science results, local and Indigenous Knowledge play a key role in providing background information where traditional science is lacking. Information collected during the field programs is intended to help fill data gaps and supplement the information that is currently available to us. Where permitted, our crew members will note any local and Indigenous Knowledge shared during the field program to provide a comprehensive characterization of the area. This data will be incorporated into the EA baseline reporting as well as impact assessment and identification of suitable mitigation measures. Citizen science data reported through programs such as clam counter, i-Naturalist, eBird, NDMNRF Fish ON-Line are being collated and considered during the baseline desktop assessments for the alternative route evaluation and inclusion in the EA as well.
13			It is important to acknowledge that Traditional Ecological Knowledge is of equal importance in comparison to western scientific approaches and should be treated as such, by being given equal credibility.		We acknowledge that Traditional Ecological Knowledge (TEK) is of equal importance to western scientific approaches and look forward to working with communities and incorporating TEK that is shared with us so we have an EA process that is as well informed and reflective of the local area.

Comment #	Reference to Field Plan	Section	Comments (May 27, 2022)	Recommendation	Response (Hydro One – June 24, 2022)
14			It is evident that there are constraints associated with monitoring of wildlife due to a lack of background data and information. Alternative information sources should be considered in these cases.		At the request of the NDMNRF, fish habitat and community field surveys will be restricted to locations where there are no existing data, to bolster the existing, but limited northern Ontario dataset. For other species or groups, in-field surveys have been proposed that are intended to collect data concerning wildlife and their habitat. Where background data (including Indigenous Knowledge) are lacking due to the constraints you have identified, the in-field surveys are intended to be an alternative information source and to facilitate documentation of potential impacts for assessment. When field crews are in the field, they are also responsible for documenting incidental observations (e.g., undocumented raptor nests, heronries, incidental wildlife encounters, etc.) to create a more complete dataset.
15			LDMLFN could help by providing information regarding wildlife values as well as indicate any other sensitive sites that have the potential to be impacted.		Thank you for the offer. We would be very happy to receive any information regarding wildlife values or other sensitive sites that LDMLFN is willing to provide, and to work with you to ensure it is accurately reflected in the assessment.
16			It would be beneficial to have someone from LDMLFN go on some of the field surveys, especially where values may be impacted.		Indigenous field crew members have been present on most of the field work completed so far in 2022 and the plan is to continue working closely with Indigenous communities to identify field participants for the remainder of the field season. This includes multiple full-time Indigenous hires, including one LDMLFN member at WSP Golder, to support field work. We would welcome further participation by LDMLFN in the field studies and acknowledge the benefit of having participants that can assist with identifying features of Indigenous value.

Comment #	Reference to Field Plan	Section	Comments (May 27, 2022)	Recommendation	Response (Hydro One – June 24, 2022)
17			The statement made in the *Terrestrial Draft Wassigan Transmission Line Field Work Plan,* "Genetic results from a rare cougar carcass found near Thunder Bay in 2017 support this conclusion, indicating the individual came from an American population (CBC 2017)" has no scientific merit and should be omitted from the document as well as the statement "in the absence of an established population". There are no resident cougar DNA samples to compare the sample to, so it is impossible to tell if the cougar was a resident or not. Certainly, all North American cougars will share very similar DNA. There are not enough DNA samples from cougars to support the assumption that the cougar found on Boreal Road, outside of Thunder Bay was in fact from the American population. Furthermore, cougars are known to occupy large ranges and are often sighted by local residents. For example, the First Nation has documented some cougar sightings in the area, and last year a resident from Thunder Bay caught a cougar on a trail cam.		We agree with the comment and will remove the statement "Genetic results from a rare cougar carcass found near Thunder Bay in 2017 support this conclusion, indicating the individual came from an American population (CBC 2017)". Our intent was to provide context on the current state of cougar research in Ontario, including the low likelihood that targeted surveys would record the species.

Comment #	Reference to Field Plan	Section	Comments (May 27, 2022)	Recommendation	Response (Hydro One – June 24, 2022)
18			The author's reference of Rosatte, R. needs to be edited as it currently reads, "*Evidence to support the presence of Cougars (Puma concolor) in Ontario, Canada*", when the article is in fact titled, "*Evidence Confirms the Presence of Cougars (Puma concolor) in Ontario, Canada*". The author's reference of Rosatte's article in order to support the statement, "no confirmed observations of cougar were made", is completely misleading considering the conclusions of Rosatte's article/study was that cougars ARE PRESENT in Ontario.		The revision to the title of the article will be made Available evidence suggests observations of cougar in Ontario may not represent an established population, with possible origins including escaped pets and immigrants from the west, though some native individuals may exist (Rosatte 2011). In the unlikely event of an incidental sighting during field investigations, details will be recorded.
19			"When roads are adjacent to waterbodies, it is recommended that the road alignment include a 30m setback between the road and any waterbodies to minimize the potential for any accidental release and delivery of sediments or deleterious substances to the waterbodies and to preserve existing riparian vegetation and bank conditions." – How is this measured? Distance must be measured at a flat angle (180 degrees) as opposed to a slope. It is important that field crews know this.		Since the intent of the statement was not to provide a precisely measured field parameter, we would propose to revise the FWP as follows: When roads are adjacent to waterbodies, it is recommended that the road alignment include an approximate 30 m setback between the road and any waterbodies to reduce the risk of accidental release and delivery of sediments or deleterious substances to the waterbodies and to preserve existing riparian vegetation and bank conditions. This distance is provided as a general guide and is only anticipated to be applied (in a very approximately manner) in field surveys where waterbodies are found in the field that have not been identified during desktop or aerial surveys.

Comment #	Reference to Field Plan	Section	Comments (May 27, 2022)	Recommendation	Response (Hydro One – June 24, 2022)
20			During field surveys for fish and fish habitat, and surface water; time of year as well as origin should be considered. How will this be reflected in baseline data?		Field surveys are being completed during the summer months to allow for fish collections and to enable field crews to characterize water features at the lowest water flow levels that may inhibit fish movements and surface water flows. Fish movement and water flow is one potential pathway of effect being examined during the EA process for impacts to surface water, fish and fish habitat. Crews will be collecting data that typically facilitates characterization of water features with extrapolation to seasons when data were not collected (e.g., recording observed “trash” lines where maximum flood waters occur, completing channel surveys to quantitatively characterize the channel dimensions and allow desktop hydraulic assessments to be completed). An additional reason the baseline data collections are planned for the period from June 15 to September 1 (a special exemption to extend the program to September 30 is being sought) is to predominantly work within the accepted in-water work fisheries timing window (July 15 to September 1) to avoid sensitive life history events (i.e., spawning) and egg/larval development periods. The use of in-water work timing windows is proven effective mitigation to avoid sensitive time periods. Headwaters or origins of waterbodies can be considered sensitive features and can be an important feature that supports specialized fisheries life processes (i.e., Brook Trout rearing). Sensitive features, such as headwaters, backwaters, springs/seeps, groundwater input, presence of watercress and iron staining, will be documented during the field survey if observed and considered during the impact identification and assessment processes.

Comment #	Reference to Field Plan	Section	Comments (May 27, 2022)	Recommendation	Response (Hydro One – June 24, 2022)
21			As indicated in the *Wassigan Transmission Line Field Work Plan – Terrestrial*, Significant Wildlife Habitat (SWH) in Ontario is protected by the Provincial Policy Statement (2020), which includes animal movement corridors. Can ungulate crossings be surveyed for and/or noted with the possibility of being incorporated into development plans (areas where vegetation is left high enough that ungulates can use the cover to cross)? Corridor crossing protection would help mitigate the risk to ungulate populations as linear fragmentation over landscapes favors predators.	-	Section 5.15 of the Waasigan Transmission Line Field Work Plan – Terrestrial (the Terrestrial Field Work Plan) presents specific items for consideration as Significant Wildlife Habitat (SWH) including identifying existing Animal Movement Corridors to inform the baseline characterization for the Project. The incorporation of corridor crossing protection in the design of the right-of-way is a common mitigation measure to decrease predation risk and will be recommended in the final design.
22			American white pelican has been observed more frequently in the last 10 years in Northwestern Ontario. Last year pelicans were seen on Lac des Mille Lacs as well.		Thank you for this information. As mentioned in the response to comment #15 above, we are planning on incorporating Indigenous Knowledge into the EA and would be happy to receive all data the community is willing to share with us. This includes incidental observations that would be considered in the EA.
23			The primary cause for decline in turtle species is due to fatalities from motor vehicles when crossing roads or railways. It is important to note where roads, especially permanent roads are built in relation to turtle nesting areas. It is also important to notify workers to watch for turtles on roads and highways or avoid certain roads during nesting season. The snapping turtle, a species of special concern, is prevalent along the preferred route in certain areas.		Thank you for the information regarding presence of snapping turtles. Information collected during the EA will inform the need to adjust, relocate or mitigate Project elements based on potential impacts to sensitive features. Pre-construction activities will include presentation of training material and training session with construction crews, including avoidance actions, such as identifying species of concern, avoiding certain areas or being especially vigilant, and safe handling procedures for susceptible wildlife such as turtles (i.e., proper handling techniques to move snapping turtles out of harm's way). Typically, this is also included as a condition of

Comment #	Reference to Field Plan	Section	Comments (May 27, 2022)	Recommendation	Response (Hydro One – June 24, 2022)
					approval from some agencies (e.g., as a condition in a permit granted under the *Endangered Species Act, 2007*).
24			Black ash is now listed as endangered and occurs throughout the region. However, there are no plants to monitor for it in the field work plan, which should be remedied.		Section 6.1 of the Terrestrial Field Work Plan has been revised to clarify this. Black Ash is a tree species that will be surveyed for during the planned vegetation community and botanical inventory program. These surveys will identify appropriate habitat for black ash so that mitigation measures can be determined through the impact assessment process. In our experience, this is a commonly accepted approach that protects the relevant species and its habitat from an increased risk of impact.
25			Beavers like to build dams in culverts. Hiring indigenous trappers to help keep culverts clear of debris from beaver activities would be beneficial as it will also help fish populations, especially if done before the early spring run. Could the E.A. make note of this?		Skilled trappers are often hired as part of the post-EA, pre-construction process to help prepare sites by removing unwanted beavers and dams. Where appropriate, the EA will include recommendations regarding activities such as this and these recommendations can also include using Indigenous trappers.
26			There should be more flexibility in regard to time limits for breeding bird surveys. Limiting point count surveys to 10 minutes per plot (50 meter radius) may be difficult in order to achieve accurate data due to the forest cover/type.		Breeding bird surveys are being completed based on well-established and proven methods outlined in the Canadian Breeding Bird Survey (Downes and Collins 2003) and the Ontario Breeding Bird Atlas (Cadman et al. 2007). Cadman et al. (2007) requires five-minute point counts; however, we have doubled the time to ten minutes to improve detection. Additionally, it should be noted that the survey stations consist of a 50 m radius circular plot, with an additional 50 m “buffer” for a total of 100 m radius surveyed. The methods described in Downes and Collins (2003), Cadman et al. (2007), and as modified for this Project (as described immediately above and in Section 5.7 of the Field Work Plan) are independent of forest cover and type as they rely on documenting acoustic

Comment #	Reference to Field Plan	Section	Comments (May 27, 2022)	Recommendation	Response (Hydro One – June 24, 2022)
					observations. Based on the proposed methods, 10 minutes per plot provides scientifically defensible, statistically sound results.
27			How many breeding bird surveys are being done?		Based on current planning (subject to field refinement), approximately 104 upland breeding bird surveys will be completed and 192 wetland breeding bird surveys will be completed.
28			Information from the McKellar Island Bird Observatory could be a good resource for additional species related information.		As mentioned above, we greatly appreciate information like this and will assess its applicability to the EA.
29			"No amphibian SAR occur in northwestern Ontario" should be amended to say no known amphibian SAR occur in northwestern Ontario. It would be beneficial to science to stop assuming and limiting science based on the fact that there is less species specific information available in the north.		Agreed. Language will be revised in the Terrestrial Field Work Plan to reflect this.
30			Why are there only 3 anuran call count surveys being done? This does not seem like enough. Would more be done if there was an anuran SAR identified in northwestern Ontario?		To clarify, three rounds of surveys are being completed at each of the 80 call count stations for a total of 240 call count surveys. The Terrestrial Field Work Plan will be updated to clarify this. The call counts take place during spring and early summer to capture early, mid-season, and late season calling amphibians. This same or similar protocol would be applied if there was an Anuran SAR being surveyed for.
31			The monitoring of Significant Wildlife Habitat (SWH) by ground truthing to determine if the areas should or should not be included as SWH has the potential for biased interpretation. How can bias be avoided? How is SWH determined at the field level?		To clarify, we are not doing species-specific SWH surveys to confirm SWH but we are ground truthing the ecosites that guidance provided by provincial agency (NDMNRF) considered potential as "candidate" SWH to determine if the ecosite is actually "candidate" SWH. The process to determine if habitat is confirmed SWH is also provided by the NDMNRF in the SWH Technical

Comment #	Reference to Field Plan	Section	Comments (May 27, 2022)	Recommendation	Response (Hydro One – June 24, 2022)
					Guide (MNR 2000) as well as the Ecoregion Criteria Schedules (MNRF various dates). Bias would presumably have been considered by NDMNRF when developing the guidance documents and protocols established using subjective characteristics and based on field data collection. Each type of SWH has specific inclusion criteria associated with its designation. Data to determine the presence of these criteria is collected during field investigations according to the requirements set out in the SWH Technical Guide (MNR 2000). The methods vary by candidate SWH type, but generally consist of targeted surveys for species/suitable habitat, as well as other characteristics such as vegetation community.
32			Are all species at risk being surveyed for, or just the ones indicated on the Terms of Reference and in the Field plans? Black ash is now listed as an endangered species in Ontario. There are many black ash trees in northwestern Ontario but there are no mentions of monitoring for it in the field work plans. There is also no mention of snapping turtles, golden eagles, salamanders, etc. The list of SAR that exist or have the potential to exist in the study area is lacking, which is concerning.		The list of SAR that are being considered as part of the Terrestrial Field Work Plan considers background information about the known distribution range of species, any previously reported occurrence records, incidental information, and public records (e.g., iNaturalist), in addition to feedback received after several rounds of agency review and Indigenous community review. Black Ash is a tree species that will be surveyed for during the planned vegetation community and botanical inventory program. Section 6.1 of the Field Work Plan has been revised to clarify this. These surveys will identify appropriate habitat for black ash so that mitigation measures can be determined through the impact assessment process. Snapping turtle were previously being targeted through turtle nesting surveys and now we have added in turtle visual encounter surveys to identify habitat within which turtles are overwintering.

Comment #	Reference to Field Plan	Section	Comments (May 27, 2022)	Recommendation	Response (Hydro One – June 24, 2022)
					The study area is outside the Golden eagle breeding range and so is not anticipated to impact habitat for this key life process. There are no species at risk amphibians (i.e., salamanders) with ranges that overlap the study area. Survey targets are presented in Table 5-1 of the Terrestrial Field Work Plan. Sections 5.3 through 5.14 present the SAR/SOCC recorded within the study area, as well as a detailed approach to surveys for each species. Where it has been determined that surveys are inappropriate or unfeasible, rationale are presented for their exclusion and how they will be dealt with in the EA, as applicable.
33			How many general wildlife surveys are planned?		General wildlife surveys and habitat assessment will be conducted concurrent with all the other species specific, group specific, or habitat specific field investigations outlined in the Terrestrial Field Work Plan. General wildlife surveys will include a visual encounter survey (including observations of track and sign), an area search in selected habitats, and documentation of incidental wildlife observations. As these surveys will largely be incidental or opportunistic while doing other targeted surveys, it is hard to accurately quantify the number of surveys. Overall, general wildlife surveys and observations of wildlife sign will be taken throughout the months (and years) of field surveys planned for the Project.
34			Does the EA include any plans for archeological surveys?		A Stage 1 Archaeology Assessment is currently underway. We want to ensure opportunities are provided for Indigenous community involvement in this process, as a result, would welcome a meeting with LDMLFN to discuss the scope of this assessment and share any questions, suggestions, concerns or sources

Comment #	Reference to Field Plan	Section	Comments (May 27, 2022)	Recommendation	Response (Hydro One – June 24, 2022)
					of information that should be considered. The results of this assessment will be incorporated into the EA report. Further archaeological assessments (e.g., Stage 2) will be undertaken, as required, on the preferred route once selected.
35			If a value of potential value is found that could be of particular interest to the First Nation, are their plans to share this information?		If there are values of importance to your community, we can share this information with LDMLFN, provided we can do so in compliance with protocols to protect sensitive data.
36			The schedule for field surveys is not very detailed. How many survey days will be dedicated each of the surveys listed? Is there a set number of days in which surveys need to be completed? Are there time constraints that could impede research? Is time spent on surveys for different species/species type fairly distributed?		Detailed field survey calendars are being finalized, and will be considered 'living documents' as implementation is based on many factors such as weather conditions, land access, etc. The number of days dedicated to each survey will depend greatly on the requirements of the protocol being used to complete the survey, as well as field crew members and Indigenous participants available. As such, the number of days is highly variable. The use of appropriate, proven sampling protocols is intended to result in surveys that are "evenly distributed". The survey duration and frequency will always be consistent with the relevant protocol being used such that results of the surveys will be scientifically robust and defensible.
37			Where is the information about wildlife surveys? As indicated in the *Wassigan Transmission Line Field Work Plan - Terrestrial*, "Candidate Significant Wildlife Surveys (SWH) – to be conducted in conjunction with other planned wildlife surveys. General wildlife surveys that will result in incidental observations of wildlife and wildlife sign, wildlife habitats including SWH that are encountered while performing all other surveys". How will there be enough time to monitor for wildlife while performing other surveys?		"Candidate Significant Wildlife Habitat Surveys (SWH)" are now being completed as a stand-alone field program, as well as in conjunction with other planned wildlife surveys. As described in the response to comment #31, we are not doing species-specific SWH surveys to confirm SWH, but are ground truthing the ecosites that guidance provided by the NDMNRF considers potential as "candidate" SWH to determine if the ecosite is actually "candidate" SWH. This ecosite confirmation exercise can be performed quite effectively in conjunction with the vegetation community surveys as they are essentially collecting the same ecosite classification data.

Comment #	Reference to Field Plan	Section	Comments (May 27, 2022)	Recommendation	Response (Hydro One – June 24, 2022)
			Time constraints and difference in approach for various surveys may make monitoring for wildlife at the same time difficult.		When wildlife field crews are out on various field programs (e.g., breeding birds, gray fox den surveys), they are using the walk to and from stations, plus their assessment of each survey station to collect incidental data on other wildlife species seen, sign seen, species heard, etc. For instance, if a birder is listening for calling birds and a moose walks out from the shoreline, or while setting up gray fox station we note an abundance of bear scat near blueberry bushes, this data will be collected. Incidental wildlife observation is a typical approach to this type of data collection. Trained and experienced field biologists have substantial observation skills which facilitates collection of incidental, data while completing targeted surveys.
38			Can we add to the list of traditional use plants? If traditional use plants or SAR are found, what are the plans for conservation and/or mitigation?		Data from Indigenous communities and peoples is always appreciated and considered equally important to the data we collect through western science. All areas of traditional use plants and SAR plants will be documented and considered in the EA. Our initial considerations would be avoidance of disturbance to traditional use and SAR plants as a means to conserve them and avoid contravening prohibitions set out in legislation. If impacts of the Project on traditional use and/or SAR plants cannot be avoided, then additional ways to mitigate impacts will be considered. With SAR plants, this will mean consultation with the MECP and fulfilling obligations set out in the *Endangered Species Act, 2007* (e.g., applying for a permit and abiding by conditions, as required). Mitigation measures to promote conservation of traditional use plants and SAR plants may include transplanting, seeding, or plantings after construction and during restoration activities.

Comment #	Reference to Field Plan	Section	Comments (May 27, 2022)	Recommendation	Response (Hydro One – June 24, 2022)
					We invite input from Indigenous communities to identify traditional use plants for consideration in the EA. If sensitive plant communities can be identified early on in the process, then there is a higher probability that the plants can be avoided by the Project development. We also invite Indigenous communities to provide input into ways to mitigate disturbance of traditional use plants.

6A. Indigenous Community Comments: Comment Table – Waasigan Transmission Line Project – Metis Nation of Ontario (MNO) Review of the Aquatic and Terrestrial Field Work Plans for the Waasigan Transmission Line Environmental Assessment. June, 22, 2022.

Métis Nation of Ontario
Lands, Resources and Consultations

June 22, 2022

Devi Shantilal
Manager, Indigenous Relations
Hydro One Networks, Inc.
483 Bay St. (South Tower)
8th Floor Reception
Toronto, ON M5G 2P5

VIA ELECTRONIC MAIL: devi.shantilal@hydroone.com

Dear Ms. Shantilal:

RE: NWOMC and SNSMC Comments on the Waasigan Field Work Plans (Aquatic and Terrestrial)

Please find attached a review of the Aquatic and Terrestrial Field Work Plans (the "Field Work Plans") for the Waasigan Transmission Line Project (the "Project"). This review was conducted by MNP LLP ("MNP") at the request of the Northwestern Ontario Métis Community ("NWOMC") and the Superior North Shore Métis Community ("SNSMC"). MNP focused on how the Field Work Plans included Métis rights and interests and use of land and resources—which is set out in the Amended Terms of Reference for the environmental assessment as a component of the socioeconomic environment to be studied.

The attached review identifies several matters of serious concern for the NWOMC and SNSMC. While these Field Work Plans contemplate studies that are technical in nature, they will provide the foundation for subsequent study and analyses and will have direct consequences for how the Project environmental assessment will consider the rights and interests of our citizens.

The Field Work Plans as currently drafted do not indicate how the studies will collect the baseline data that is necessary to assess Project impacts to Métis rights and interests or use of land and resources. As a result, there is a strong likelihood that there will be material gaps or misalignments between any studies conducted according to these Field Work Plans and what is required for the assessment of potential Project impacts to Métis rights and interests.

The Field Work Plans contemplate Indigenous participation and the collection of information related to, for example, Indigenous Knowledge and traditional land use. They also provide for the study of components of the physical environment that are fundamental to Métis rights and interests. However, no data from the NWOMC and SNSMC has been collected or considered to date. Again, this creates real risk that the baseline data will be insufficient or inappropriate to assess Project impacts on our citizens. Further, the NWOMC and SNSMC do not currently have

an agreement with Hydro One Networks Inc. (“HONI”) in place to support the kind of work necessary to correct these deficiencies.

Another shortcoming of the Field Work Plans is that the proposed approach to data collection mischaracterizes Indigenous Knowledge as only a component of study, something to be “collected.” The proper application and consideration of Indigenous Knowledge further requires its application as a basis for understanding environmental components and conditions, including their significance to Métis rights and interests.

The NWOMC and SNSMC are aware that some components of the field work have already begun, and we have started receiving updates of studies completed to date. In fact, representatives from the NWOMC and SNSMC recently received a field work update which drew a concerning conclusion about barn swallow behaviour. This is just one minor example of why it is critical that representatives from the NWOMC and SNSMC and representatives from HONI meet to discuss how the Field Work Plans can better support the assessment and understanding of Project impacts to Métis rights and interests, and work toward resolving the matters of concern raised in this letter and in the attached review prior to the finalization of these Field Work Plans and prior to further field work being conducted.

Please contact Charlene Wagenaar, Consultation Advisor, Region 1 at charlenew@metisnation.org at your earliest convenience to arrange a meeting.

Sincerely,

Theresa Stenlund
Regional Councillor for the Northwestern Ontario Métis Community & Chair of the Treaty #3/Lake of the Woods/Lac Seul/Rainy Lake and Rainy River Consultation Committee

Tim Sinclair
Regional Councillor for the Superior North Shore Métis Community & Chair of the Lakehead/Nipigon/Michipicoten Traditional Territories Consultation Committee

c.c.:

Treaty #3/Lake of the Woods/Lac Seul/Rainy Lake and Rainy River Consultation Committee Members:

Marlene Davidson, President of Atikokan Métis Council
Liz Boucha, President of Kenora Métis Council
Janet Hipfner, President of Northwest Métis Council
Brady Hupet, President of Sunset Country Metis Council
Sandy Triskle, Captain of the Hunt, Region 1

Lakehead/Nipigon/Michipicoten Traditional Territories Consultation Committee Members:

William Gordon, President of Greenstone Métis Council
Trent Desaulnier, President of North Shore Métis Council
Wendy Houston, President of Thunder Bay Métis Council
Phil McGuire, Captain of the Hunt, Region 2

MNO Lands, Resources and Consultations Staff:

Linda Norheim, Director
Charlene Wagenaar, Consultation Advisor, Region 1
Nicholas Richard, Consultation Assessment Advisor, Region 2

Hydro One Networks, Inc.:

Penny Favel, Vice President, Indigenous Relations
Matthew Jackson, Director, Indigenous Relations
Stephanie Ash, Waasigan Indigenous Engagement Coordinator
Bruce Hopper, Waasigan Transmission Line Project Manager

May 17, 2022

Linda Norheim
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Charlene Wagenaar
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RE: Review of the Waasigan 2022 Field Work Plans for Aquatic and Terrestrial, 2022 Field Work Plans Notice, Positions, Field Schedule, and Work Summary

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Dear Linda and Charlene,

As per our Contract of Services we have reviewed the Waasigan 2022 Field Work Plans and associated documentation (referenced above) for sufficiency in addressing the concerns of the Métis Nation of Ontario ("MNO"), in particular Region 1 and Region 2.

It is our understanding that the main objective of the field work is to collect and document sufficient baseline information to support the upcoming Environmental Assessment ("EA") and an evaluation of potential project impacts. Our review focused on inclusion of the Métis Valued Component ("VCs") of *Métis Rights/Interests and Use of Land and Resources* in the field work, opportunities for involvement, and any additional gaps or deficiencies of note.

Please see below for a summary of key comments for consideration; as well as more detailed review tables located in Appendix A – Review of the Waasigan Transmission Line Field Work Plan – Aquatics and Appendix B – Review of the Waasigan Transmission Line Field Work Plan - Terrestrial.

Field Work Plans

Both field work plans omit the Métis specific Valued Component of *Métis Rights/Interests and Use of Land and Resources*. This is problematic as some indicators of change (e.g., increased physical disturbance, increased avoidance behaviors, changes to harvesting of culturally crucial species considering displacement of wildlife or reduction or change in vegetation) can be supported through the data collection during the field work and, therefore, should have been targeted as part of the identified surveys.

Region 1 and Region 2 have not been provided sufficient funding or have the capacity to conduct a parallel environmental assessment to evaluate the net effects on their Valued Component and will rely heavily on information collected by Hydro One, in conjunction with information collected from Métis harvesters and land users throughout the consultation/engagement process. This means that, where pathways exist, Golder Associates Ltd., must support collaborative data collection and partnership.

Further, within the field work plans, Indigenous knowledge is referred to as a supplementary aspect to the work being done. Instead, Indigenous knowledge should be thought of as a ***framework*** for assessment rather than a ***component*** of baseline data collection and assessment; whereby ecosystem level information, based in principles of sustainability and stewardship, are consistently applied to link the aspects of assessment together. For example, how water quality is connected to a network of other aspects including governance of resources through stewardship, wildlife sustainability, subsistence harvesting and overall ecosystem health. Indigenous knowledge is a foundation; a starting point from which all other knowledge flows and would contribute to the characterization of the existing aquatic and terrestrial conditions. Western science processes such as EAs seek to compartmentalize the environment into easily evaluated pieces (e.g., surface water, fish and fish habitat). While necessary for assessment, it can result in a lack of understanding of tangible connections between those environmental components and how the ecosystem functions on a broader level which could be accomplished through using an Indigenous knowledge based framework to structure the data collection overall.

Further, references to IK/TLU within the field work plans is also problematic as it consistently indicates that this information will be in the future/has been integrated. However, Region 1 and Region 2 have yet to finalize a satisfactory/new capacity funding agreement and the Regions require additional assurances from Hydro One prior to the execution of TKLUS data collection; therefore incorporation of IK/TLU as part of baseline conditions is unlikely in relation to Region 1 and Region 2.

Finally, moving forward with information collected during the field work program, information must be provided back to Region 1 and Region 2 in a timely manner to allow for collaborative discussion. This will ensure that the Regions have an oversight role in the process throughout. Additionally, Hydro One, Golder Associates Ltd., and Region 1 and Region 2 must work in an expedited manner (see below notes on Schedule) in order to allow for participation in the execution of the field work.

Notice

This notice provides information on how to submit comments on the field work plans and notes that a summary of the findings will be provided after the surveys are complete. No timeline for this review has been given. As per the comments in Appendix A and Appendix B and above, all information, particularly in relation to Region 1 and Region 2 IK/TLU data must be confirmed with the Regions prior to integration into the EA to ensure a complete understanding. To facilitate this review, the information should be provided to Region 1 and Region 2 with sufficient time to allow for collaborative internal and external discussion (e.g., 45 – 60 days prior to EA integration).

Positions

The positions listed are identified as employees of Golder Associates Ltd.. This is strictly a position which a Métis citizen can apply for and is not related to ongoing consultation/engagement with Region 1 or Region 2. Métis rights are held collectively and must be addressed collectively. Therefore it should be noted in discussions with Hydro One and/or Golder Associates Ltd. that should a Métis citizen be hired for one or more of the positions provided, it does not and cannot address impacts to the collective rights of the Métis and is not an economic mitigation measure.

Schedule and Summary

Many of the surveys have already started, including Wildlife (May 2), Anuran [Frog and Toad Acoustic Monitoring] (May 1-15), with additional surveys beginning in late May. Organization of Region 1 and Region 2 participation must be expedited with Hydro One in order to ensure data can be gathered to support the assessment of the identified Métis Valued Component. This is particularly important as the Aquatics surveys target only 60 days duration and the Terrestrial only 105 days duration.

Overall, we hope that these comments can support the ongoing consultation/engagement between Region 1, Region 2 and Hydro One and facilitate a collaborative assessment process overall.

Sincerely,

Germaine Conacher

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Appendix A – Review of the Waasigan Transmission Line Field Work Plan - Aquatics

#	Waasigan Transmission Line Field Work Plan – Aquatics Section	Details/Quotation	Region 1 and Region 2 Comment
1.	1.0 Introduction, Page 1	"This document provides the field work plan proposed by Hydro One and Golder Associates Ltd., a member of WSP (Golder), to collect baseline data for surface water and aquatic ecology, support the alternative route evaluation for the selection of a preferred route, and ultimately to support the assessment of potential Project effects on fish and fish habitat and surface water criteria and indicators."	This section specifies that the aquatics field work will support the assessment of potential Project effects on fish and fish habitat and surface water criteria and indicators. However, there is no mention of this field work support the assessment of potential Project effects on the identified Valued Component *Métis Rights/Interests and use of Lands and Resources*, criteria *Loss of Land/Change in Priority Rights* or *Harvesting/Sites*. As per Region 1 and Region 2 comments on the final Terms of Reference (Comment #8) field work should be conducted to collect specific data related to Métis rights and interests. This was directed as an item for further discussion with the Métis Nation of Ontario through the Regional Consultation Committees and Lands, Resource and Consultation Branch to identify the preferred method of data collection and discuss aspects of rights to be considered (e.g., Métis-specific Criteria supportive information).
2.	1.1 Purpose, Page 5	"The purpose of baseline field surveys is to gather data about the surface water, fish and fish habitat components of the environment to support the evaluation of route alternatives and completion of a comprehensive EA for the Project."	See Comment #1
3.	1.1 Purpose, Page 5	"Overall, the surface water, fish and fish habitat baseline field surveys are designed to meet the following objectives: • Characterize existing aquatic conditions in the area of the Project; …"	Indigenous knowledge is a basis; a starting point from which all other knowledge flows and would contribute to the characterization of the existing aquatic conditions. Indigenous knowledge provides a connection to the environment, holistically, and can provide insight into potentially overlooked interconnections. Western science processes such as Environmental Assessments seek to compartmentalize the environment into easily evaluated pieces (e.g., surface water, fish and fish habitat). While necessary for assessment, it can result in a lack of understanding of tangible connections between those environmental components and how the ecosystem functions on a broader level.

#	Waasigan Transmission Line Field Work Plan – Aquatics Section	Details/Quotation	Region 1 and Region 2 Comment
			In order to restore those connections, Indigenous knowledge should be thought of as a framework for assessment rather than a component of assessment; whereby ecosystem level information, based in principles of sustainability and stewardship, are consistently applied to link the aspects of assessment together. For example, how water quality is connected to a network of other aspects including governance of resources through stewardship, wildlife sustainability, subsistence harvesting and overall ecosystem health. This is a necessary step in decolonizing assessment methodology.
4.	1.1 Purpose, Page 5	"Overall, the surface water, fish and fish habitat baseline field surveys are designed to meet the following objectives: • … • Incorporate Indigenous Knowledge/traditional land and resource use (IK/TLRU) as part of baseline conditions, where possible; …"	See Comment #3. Additionally, please note that Region 1 and Region 2 have yet to finalize a satisfactory/new capacity funding agreement and requires additional assurances from Hydro One prior to the execution of TKLUS data collection; therefore incorporation of IK/TLU as part of baseline conditions is unlikely.
5.	1.2 Study Area, Page 5-6	"Preliminary local study areas (LSAs) are defined as areas outside of the preliminary Project footprint where measurable changes to the environment resulting from the proposed activities from any Project phase may be anticipated." "For fish and fish habitat and surface water, the field surveys will focus on the preliminary Project footprint described above and the immediate upstream and downstream environment."	This section indicates that the LSA is an area where measurable changes to the environment from the Project phases may be anticipated, but that the field surveys will focus only on the Project footprint. How can Project impacts be accurately categorized if no baseline conditions for the LSA are identified? The baseline field work must be expanded to include fish bearing waterbodies within the LSA. This will ensure an accurate baseline for species available, habitat, and distribution for assessment.
6.	1.2 Study Area, Page 7	"Golder will endeavour to survey 200 m, including 50 m upstream from the crossing and 150 m downstream from the crossing"	It appears from this passage that only water bodies impacted through direct crossings will be considered. This is inappropriate as waterbodies in proximity to the project footprint, particularly during construction, could be susceptible to increased avoidance behaviors of Métis harvesters accessing these waterbodies in the exercise of their rights. Hydro One must undertake further consultation with Region 1 and Region 2 to understand potential avoidance distances from the project footprint during construction, operation and

#	Waasigan Transmission Line Field Work Plan – Aquatics Section	Details/Quotation	Region 1 and Region 2 Comment
			maintenance and ensure waterbodies within this avoidance zone are assessed.
7.	2.0 Baseline Characterization Schedule, Page 11	"Desktop analysis to support the alternative route evaluation started in fall 2020 and focused on 150 m alternative route corridors."	No data from Region 1 or Region 2 has been included in the desktop analysis, to date, as the Regions have yet to finalize a satisfactory/new capacity funding agreement and requires additional assurances from Hydro One prior to the execution of TKLUS data collection.
8.	2.0 Baseline Characterization Schedule, Page 11	"IK/TLRU studies are being completed by Indigenous communities for the Project and IK/TLRU information will be used to support the baseline characterization in the EA as it is shared. These studies are expected to become available throughout the preparation of the EA, with varying timelines for different Indigenous communities. Hydro One will work with Indigenous communities to integrate their IK/TLRU information into the EA and into Project decisions, as it is received. Hydro One is also working with interested Indigenous communities to discuss the sharing of information ahead of planned field programs to inform the desktop analysis and alternative route evaluation."	See Comment #3 and Comment #4
9.	4.0 Engagement, Page 13	"A summary of the findings of the 2022 surveys will be included in the documentation of the EA. As well, these findings will be shared through Community Open House events and community meetings planned to support the EA, as identified in Section 10.0 of the Amended ToR."	A summary of the findings of the 2022 surveys must be shared with Regions 1 and 2 in advance of integration into the EA.
10.	4.1 Indigenous Participation, Page 13	Hydro One believes that the Project will benefit greatly with the active engagement of Indigenous communities since they hold IK/TLRU information for the area. Section 4.2.3.6 of the Amended ToR provides a detailed description on how Indigenous knowledge will be obtained and incorporated into the Project."	This section outlines generic Indigenous participation; however, based on the existing relationship with Hydro One, Region 1 and Region 2 require commitment that Indigenous participation means participation of Region 1 and Region 2 Métis field crews.
11.	4.1 Indigenous Participation, Page 13	• "Data collection will include an opportunistic shoreline survey with key questions to capture information regarding fish and fish habitats from local fisherman and Indigenous communities regarding Indigenous knowledge, value of the fishery, key fish and other aquatic species, and issues relating to water and fish from existing transmission lines in the area; • Inclusion of Indigenous names of species (i.e., for plants, wildlife, and fish) and waterbodies in the EA; • Real-time mapping, as practicable; and …"	Any data collected from Métis field crews must be provided back to Region 1 and Region 2 for confirmation prior to integration into the EA to ensure this information is properly characterized and not subject to terms of an Information Sharing Agreement.

#	Waasigan Transmission Line Field Work Plan – Aquatics Section	Details/Quotation	Region 1 and Region 2 Comment
12.	4.1 Indigenous Participation, Page 14	"Indigenous knowledge related to wildlife, vegetation, fish and fish habitat and surface water resources will be highlighted and incorporated in the baseline studies and effects assessments, where it is shared by Indigenous communities for inclusion. Indigenous Knowledge may be shared through a variety of sources, including from Indigenous field crew members, IK/TLRU studies completed by Indigenous communities and/or through engagement with Indigenous communities."	See Comment #1
13.	5.1 Purpose, Page 15	"The objective of the fish and fish habitat field survey for the Project is to characterize the existing fish habitat and fish communities, including Species at Risk (SAR) and Species of Conservation Concern (SOCC) fish, within the preliminary Project footprint of each alternative route and the immediate downstream environment to support the EA for the Project."	There is no objective listed with regards to characterizing fish and fish habitat of importance to Métis harvesters in the exercise of their rights. This illustrates a fundamental disconnect between the field program and the assessment of potential impacts of the Project on Métis rights. Without this necessary information and necessary interrelation supported by Indigenous knowledge, the EA will not facilitate the assessment of Project-related effects on Métis rights.
14.	5.2 Desktop Analysis and Field Planning, Page 15	"Existing literature and digital data provided by Hydro One, available in-house at Golder, and obtained through published reports and grey literature, as well as IK/TLRU studies received from Indigenous communities and the results of the 2020 aerial reconnaissance, will be reviewed and compiled to support the fish and fish habitat baseline characterization."	See Comment #7
15.	5.2 Desktop Analysis and Field Planning, Page 15	"Much of this data compilation and review is currently being completed to support the alternative route evaluation process, including the preparation of a detailed waterbody crossing list and survey site selection. In addition, a list of fish species documented in each tertiary watershed crossed by the alternative routes will be collated."	See Comment #6
16.	5.2 Desktop Analysis and Field Planning, Page 15	"The desktop analysis includes screening to identify the fish species, including fish of Indigenous significance (e.g., fish for subsistence)…"	As Region 1 and Region 2 have not compiled or provided Hydro One with a list of fish species of significance due to capacity limitations, this will not be included in the current desktop analysis. How will species of importance to Region 1 and Region 2 be added to the assessment at a later date when this information is available?
17.	5.2 Desktop Analysis and Field Planning, Page 16	"A SAR screening will also be completed as part of the desktop analysis to identify SAR with moderate to high potential to occur in the LSA based on range overlap,	Similar to this, a screening must also be completed for species of significance to Region 1 and Region 2 with moderate to high potential to occur in the LSA. Once

#	Waasigan Transmission Line Field Work Plan – Aquatics Section	Details/Quotation	Region 1 and Region 2 Comment
		documented occurrences, critical habitat mapping and presence of suitable habitat determined from aerial imagery and mapping (e.g., DFO Aquatic Species at Risk mapping)."	completed, this information must be verified with Region 1 and Region 2 prior to inclusion in the EA.
18.	5.2.1 Site Selection, Page 16	"The field survey will target a subset of waterbodies that are crossed by the preliminary Project footprint for each alternative route (rather than the full list of crossing locations). Waterbodies that are adjacent to the preliminary Project footprint for each alternative route, but not crossed by them, will not be surveyed as temporary workspaces included in the Project design will incorporate a 30 m setback between the preferred route and any adjacent waterbodies where feasible, and these waterbodies will not be directly impacted."	See Comment #6
19.	5.2.1 Site Selection, Page 17	"Based on the desktop analysis and aerial reconnaissance, there are approximately 993 waterbody crossings along the transmission line ROW for the alternative routes. Of these, 772 are located in sections where there is more than one route alternative, whereas the remaining 221 waterbody crossings are located in the sections where there are no alternative routes." "Of the 772 waterbody crossings, background fish and/or fish habitat data are available for 160 of the waterbody crossings along the alternative routes. Therefore, 612 waterbody crossings (i.e., 79%) have no known historical fish or fish habitat information. These waterbodies will be the focus of the field surveys."	All 993 locations must be provided to Region 1 and Region 2 on map sheets for review to ensure any key locales of importance to Region 1 and Region 2 can be identified prior to the execution of the field program.
20.	5.2.1 Site Selection, Page 18	"Therefore, survey sites will be selected at waterbodies where: • Temporary (e.g., one time ford, temporary culvert) or permanent (e.g., installing a permanent culvert) works would be proposed below the high watermark; • Permanent crossing structures would be proposed to be installed above the high watermark; and • Removal of critical riparian vegetation would be proposed."	In addition to the specified criteria, survey sites must also be selected at waterbodies where destruction or alteration of fish habitat may occur, as is loosely referenced (regulatory approvals from DFO). Please add this additional criterion to the listing to ensure the field work plan is explicit.
21.	5.2.2 Access and Field Maps, Page 20	"The location of waterbody crossing locations to be surveyed will be provided in a water crossing list and a map book of the waterbodies on the crossing list will be created once the full preliminary Project footprint is available (i.e., after the access roads and supporting infrastructure is designed)."	See Comment #19

#	Waasigan Transmission Line Field Work Plan – Aquatics Section	Details/Quotation	Region 1 and Region 2 Comment
22.	5.3.1 Fish Habitat Assessment, Page 20	"The length of the section surveyed will depend on the size of the waterbody. The field crew will endeavour to survey 200 m of each waterbody, including 50 m upstream from the crossing and 150 m downstream from the crossing on watercourses and 200 m along the shoreline of lakes/ponds. If 200 m cannot be surveyed due to site logistics (e.g., dense forest, land access issues), the field crew will endeavor to survey as much of the site as is safely accessible, up to 200 m."	Please confirm whether overflights will be completed for survey sites to confirm any major obstructions to fish migration, record general habitat conditions and any other significant constraints that might be present. This section only specifies that "If a helicopter is used…" which implies this will not be a typical undertaking.
23.	5.3.1 Fish Habitat Assessment, Page 22	"Basic in-situ water quality parameters (conductivity, pH, temperature, and dissolved oxygen) will be measured using a multi-parameter water quality meter. A visual estimate of water clarity will also be completed."	Will turbidity or Total Dissolved Solids (TDS) be assessed beyond a visual estimate of water clarity?
24.	5.3.1 Fish Habitat Assessment, Page 22	"Type of riparian vegetation present, average height, and if any critical riparian vegetation cover is present will be visually assessed."	Will riparian vegetation supplement future vegetation habitat and/or species field work?
25.	5.3.1 Fish Habitat Assessment, Page 23	"Large-bodied fish that are targeted by anglers and Indigenous communities for subsistence (e.g., species from the Acipenseridae and Salmonidae families) are considered sport fish."	While fish are harvested in the exercise of Métis rights for subsistence purposes, this statement minimizes the overall interconnection of fishing with other aspects of Métis rights such as governance (e.g., ongoing stewardship of species of importance and waterbodies), cultural (e.g., transmission of knowledge), etc. Further, fish targeted by Métis harvesters in the exercise of their rights are not limited to sport fish. Both must be updated and reflected in the field work plan as well in future iterations of the EA.
26.	5.6 Data Analysis and Reporting, Page 27	"The report will be used to characterize existing conditions for fish and fish habitat as part of the EA and to support future permitting requirements for the Project. As part of the EA reporting and to provide an estimate of the overall habitat quantity in square metres of each criteria species in the preliminary Project footprint, the estimated bank-full width at each waterbody crossing will be multiplied by a width of the proposed disturbance."	See Comment #6 As this report will be used to characterize the existing conditions, there must be an understanding of avoidance behaviors influenced by construction, operation and maintenance and how this will influence Métis use of waterbodies in proximity to the project footprint.
27.	6.2 Desktop Analysis and Field Planning, Page 28	"Review and analysis of publicly available background data from the following sources: … Indigenous Knowledge received through engagement with Indigenous communities, including IK/TLRU studies."	See Comment #3 and #4

Appendix B – Review of the Waasigan Transmission Line Field Work Plan - Terrestrial

#	Waasigan Transmission Line Field Work Plan – Terrestrial	Details/Quotation	Region 1 and Region 2 Comment
1.	1.0 Introduction, Page 1	"This document provides the field work plan proposed by Hydro One and Golder Associates Ltd. a member of WSP (Golder), to collect baseline data for the assessment of wildlife and wildlife habitat, vegetation and wetlands to support the alternative route evaluation for the selection of a preferred route, and ultimately to support the assessment of potential project effects."	As noted in Appendix A in relation to Aquatics, this section specifies that the terrestrial field work will support the assessment of potential Project effects on wildlife and wildlife habitat, vegetation and wetlands. However, there is no mention of how this field work will support the assessment of potential Project effects on the identified Valued Component *Métis Rights/Interests and use of Lands and Resources*, criteria *Loss of Land/Change in Priority Rights* or *Harvesting/Sites*. As per Region 1 and Region 2 comments on the final Terms of Reference (Comment #8) field work should be conducted to collect specific data related to Métis rights and interests. This was directed as an item for further discussion with the Métis Nation of Ontario through the Regional Consultation Committees and Lands, Resource and Consultation Branch to identify the preferred method of data collection and discuss aspects of rights to be considered (e.g., Métis-specific Criteria supportive information).
2.	1.1 Purpose, Page 5	"The purpose of baseline field surveys is to gather data about the wildlife and wildlife habitat, vegetation and wetlands components of the environment to support the evaluation of route alternatives and completion of a comprehensive EA for the Project."	See Comment #1
3.	1.1 Purpose, Page 5	"Overall, the wildlife and wildlife habitat, vegetation and wetlands baseline field surveys are designed to meet the following objectives: • Characterize existing terrestrial conditions in the area of the Project; …"	As this section is largely identical, see Comment #3 of Appendix A
4.	1.1 Purpose, Page 5	"Overall, the wildlife and wildlife habitat, vegetation and wetlands baseline field surveys are designed to meet the following objectives: • … • Incorporate Indigenous Knowledge/traditional land and resource use (IK/TLRU) as part of baseline conditions, where possible; …"	As this section is largely identical, see Comment #3 and Comment #4 of Appendix A
5.	1.2 Study Areas, Page 7	"The LSA is designed to capture the area where direct and immediate indirect effects from the Project on soils, vegetation and wildlife, will occur at the local scale. Direct effects include mortality to individuals from Project-related hazards (e.g., towers, transmission lines and	This section does not refer to the Valued Component of Métis Rights/Interests and Use of Lands and Resources when illustrating direct and indirect effects. Please confirm that baseline information related to Métis indicators related to

#	Waasigan Transmission Line Field Work Plan – Terrestrial	Details/Quotation	Region 1 and Region 2 Comment
		vehicles), and physical changes to terrain, soils, vegetation and wildlife habitat from construction, operation and maintenance of the Project. Indirect effects from the Project may extend beyond the physical footprint, such as air and dust emissions that can alter soil and water chemistry and plant communities. Sensory disturbances (e.g., noise, lights, and smells) from the Project can also influence wildlife movement and behaviour. Some animals may perceive the presence of human activity as a decrease in habitat quality and avoid the area. Therefore, sensory disturbance can reduce habitat availability for wildlife even where vegetation remains structurally and functionally intact."	wildlife, vegetation and wetlands will also be collected during the field surveys.
6.	1.2 Study Areas, Page 7	"The 1 km buffer of the preliminary Project footprint for each alternative route has been proposed for the LSA to capture the area where immediate indirect effects of the Project on wildlife and wildlife habitat, vegetation and wetlands are likely based on available evidence from literature. For example, effects of dust on vegetation have been detected within 50 m of roads, with some lesser effects outward to 500 m (Meininger and Spatt 1988; Walker and Everett 1987)."	Please describe any Indigenous knowledge used in the definition of the 1 km buffer LSA.
7.	2.0 Baseline Characterization Schedule, Page 12	"Desktop analysis to support the alternative route evaluation started in fall 2020 and focused on the 150 m alternative route corridors."	As this section is largely identical, see Comment #7 of Appendix A
8.	2.0 Baseline Characterization Schedule, Page 12	"IK/TLRU studies are being completed by Indigenous communities for the Project and IK/TLRU information will be used to support the baseline characterization in the EA, as it is shared. These studies are expected to become available throughout the preparation of the EA, with varying timelines for different Indigenous communities. Hydro One will work with Indigenous communities to integrate their IK/TLRU information into the EA and into Project decisions, as it is received. Hydro One is also working with interested Indigenous communities to discuss the sharing of information ahead of planned field programs to inform the desktop analysis and alternative route evaluation."	As this section is largely identical, see Comment #3 and Comment #4 of Appendix A
9.	3.0 Health, Safety and Environment, Page 13	"Field surveys will be completed with a minimum of two trained environmental specialists (e.g., biologists), and at least one Indigenous field crew member, where possible."	The limiting language within this section is concerning as there is interest from Region 1 and Region 2 to participate, and likely interest of other Indigenous nations as well. One Indigenous field crew member is insufficient and the qualifier of 'where possible' must be explained.

#	Waasigan Transmission Line Field Work Plan – Terrestrial	Details/Quotation	Region 1 and Region 2 Comment
10.	4.0 Engagement, Page 14	"A summary of the findings of the 2022 surveys will be included in the documentation of the EA. As well, these findings will be shared through Community Open House events and community meetings planned to support the EA, as identified in Section 10.0 of the Amended ToR."	As this section is largely identical, see Comment #9 of Appendix A
11.	4.1 Indigenous Participation, Page 14	"Incorporation of Indigenous participation and other considerations in the field work will include the following:…"	This section includes Indigenous field crews, plural, but within Section 3.0 it specifies that field surveys will be completed with at least one Indigenous field crew member, where possible. Please explicitly describe the make-up of the field crew and anticipated Indigenous involvement.
12.	4.1 Indigenous Participation, Page 14	"Hydro One believes that the Project will benefit greatly with the active engagement of Indigenous communities since they hold IK/TLRU information for the area. Section 4.2.3.6 of the Amended ToR provides a detailed description on how Indigenous knowledge will be obtained and incorporated into the Project."	As this section is largely identical, see Comment #10 of Appendix A
13.	4.1 Indigenous Participation, Page 14	"Indigenous Knowledge related to wildlife, vegetation, fish and fish habitat and surface water resources will be highlighted and incorporated in the baseline studies and effects assessments, where it is shared by Indigenous communities for inclusion. Indigenous Knowledge may be shared through a variety of sources, including from Indigenous field crew members, IK/TLRU studies completed by Indigenous communities and/or through engagement with Indigenous communities."	As this section is largely identical, see Comment #11 of Appendix A
14.	5.1 Purpose, Page 15	"The purpose of the wildlife and wildlife habitat field surveys for the Project is to characterize the existing environment for wildlife for each alternative route to support the alternative route evaluation and EA for the Project. In particular, the main objective of the field work is to gather sufficient information to develop a comprehensive understanding of the existing wildlife and habitat prior to any potential influence from Project construction or operation (i.e., baseline conditions)."	There is no purpose identified that is linked to data collection supporting the identified Valued Component *Métis Rights/Interests and use of Lands and Resources*, criteria *Loss of Land/Change in Priority Rights* or *Harvesting/Sites.* This illustrates a fundamental disconnect between the field program and the assessment of potential impacts of the Project on Métis rights. Without this necessary information and necessary interrelation supported by Indigenous knowledge, the EA will not facilitate the assessment of Project-related effects on Métis rights.
15.	5.1 Purpose, Page 15	"Secondary source data acquired and data collected in the field will be used to characterize the existing environment as it relates to wildlife by describing the presence, distribution, and relative abundance (where possible) of taxa with a particular focus on wildlife species at risk (SAR), as well as to	In addition to a focus on wildlife SAR, culturally critical species of importance to Region 1 and Region 2 must also be a focus of the field surveys to ensure sufficient data is collected to assess Project-related effects on Métis rights.

#	Waasigan Transmission Line Field Work Plan – Terrestrial	Details/Quotation	Region 1 and Region 2 Comment
		characterize and quantify wildlife habitat within the LSA, with focus on SAR habitat and SWH."	As Region 1 and Region 2 are not responsible for, or provided capacity to complete, a parallel assessment, the Regions will rely on data collected by Hydro One during the field work in order to facilitate this assessment. While it is noted within this section (page 17) that data regarding species of concern to Indigenous communities will be gathered, more information is required on how this will be completed.
16.	5.2 Desktop Analysis and Field Planning, Page 17	"Existing literature and digital data provided by Hydro One, available in-house at Golder, and obtained through publicly available databases, published reports and grey literature, as well as IK/TLRU studies received from Indigenous communities, are being reviewed and compiled to determine which data are available to support the requirements for the wildlife baseline."	As this section is largely identical, please see Comment #7 of Appendix A
17.	5.2 Desktop Analysis and Field Planning, Page 18	"Results from the fall 2020 aerial reconnaissance and mine site survey (Golder 2021b) are also being reviewed, compiled, and analyzed, and mapping refined."	As Region 1 and Region 2 have not participated in aerial reconnaissance or mine site survey – nor has Region 1 or Region 2 provided input to ensure the methodology is responsive to the identified Valued Component *Métis Rights/Interests and use of Lands and Resources*, criteria *Loss of Land/Change in Priority Rights* or *Harvesting/Sites,* there is a gap in the existing information being accessed.
18.	5.2.2 Access and Field Maps, Page 18	"A map book of proposed survey locations will be created once the preliminary Project footprint for each alternative route is available (i.e., after the access roads and supporting infrastructure are designed). As such, maps of proposed survey locations are not currently available to accompany this field work plan."	Upon availability, the map book of proposed survey locations must be provided to Region 1 and Region 2 for review and confirmation.
19.	5.10 Candidate Significant Wildlife Habitat, Page 37	"Criteria schedules have not been prepared for the ecoregions that the Project overlaps. In the absence of criteria schedules for these ecoregions, the draft criteria schedules for Ecoregion 3W, as well as the Significant Wildlife Habitat Technical Guide (MNR 2000), have been consulted."	As criteria schedules have not been prepared for the ecoregions the Project overlaps, Region 1 and Region 2 require participation in the field program planned to determine if the candidate SWH screened at a desktop level can be confirmed as candidate SWH.
20.	5.10 Candidate Significant Wildlife Habitat, Page 37	"Of those candidate SWH types that had greater than 30 occurrences, a random selection of approximately 2% of the total number of occurrences of each SWH type across all route alternatives will be selected once the alternative route footprints become available. Given the objective of the field survey to ground-truth the desktop screening of the ecosite	Region 1 and Region 2 require review of the 2% randomly selected occurrences to ensure coverage of important areas to Métis harvesters and land users. This slightly modified approach is allowed for to ensure spatial coverage across the routes and can also be applied to ensure coverage of areas of known importance to the Métis.

#	Waasigan Transmission Line Field Work Plan – Terrestrial	Details/Quotation	Region 1 and Region 2 Comment
		types in the SWH criteria reports (MNRF 2017a), not to confirm the sites are significant habitat, a random selection of sites allows for an unbiased approach to ground-truthing. However, sites will be reviewed and slightly modified to have spatial coverage across the routes (see Appendix F)."	
21.	5.14 General Wildlife Surveys and Habitat Assessments, Page 44	"General wildlife surveys and habitat assessment will be conducted concurrent with the other field investigations. These surveys will gather data for various species, including species groups and SAR not specifically targeted through the surveys described above."	Region 1 and Region 2 must have input into the general wildlife surveys to ensure that species of importance to Métis harvesters and land users are targeted, particularly mammals and avifauna typically harvested in the exercise of Métis rights. If a particular species of importance is identified, additional survey work may be warranted as incidental sightings during other survey work may not be sufficient to collect data to assess change to Métis indicators.
22.	6.1 Purpose, Page 49	"The purpose of the vegetation and wetlands field survey for the Project is to characterize the existing environment for vegetation and wetlands to support the EA for the Project. Baseline characterization will consist of combining and summarizing existing available information (i.e., desktop analysis, imagery interpretation and FRI classification) with data gathered from field surveys within the LSA."	There is no purpose identified that is linked to data collection supporting the identified Valued Component *Métis Rights/Interests and use of Lands and Resources*, criteria *Loss of Land/Change in Priority Rights* or *Harvesting/Sites.* This illustrates a fundamental disconnect between the field program and the assessment of potential impacts of the Project on Métis rights. Without this necessary information and necessary interrelation supported by Indigenous knowledge, the EA will not facilitate the assessment of Project-related effects on Métis rights.
23.	6.1 Purpose, Page 49	"Vegetation community mapping is required to identify potential habitat for SAR, rare plants and rare vegetation communities, and traditionally used plants identified through IK/TLRU studies received from Indigenous communities and communicated through engagement with Indigenous communities…"	No data from Region 1 or Region 2 has been included in the desktop analysis, to date, as Region 1 and Region 2 have yet to finalize a satisfactory/new capacity funding agreement and requires additional assurances from Hydro One prior to the execution of TKLUS data collection.
24.	6.2 Desktop Analysis and Field Planning, Page 49	"Existing literature and digital data provided by Hydro One, available in-house at Golder, and obtained through published reports and grey literature, as well as IK/TLRU studies received from Indigenous communities, will be reviewed and compiled to determine which data are available to support the requirements for the vegetation and wetlands baseline."	See Comment #23
25.	6.2.1 Site Selection, Page 50	The following variables will be factored into survey location selection: • Size and distribution of each plant community type; • Unique plant communities;	Plants of importance to Region 1 and Region 2 must also be a variable that is factored into survey location selection.

#	Waasigan Transmission Line Field Work Plan – Terrestrial	Details/Quotation	Region 1 and Region 2 Comment
		• Surveys for rare plants and critical landform/vegetation associations; and • Access constraints.	
26.	6.2.2 Access and Field Maps, Page 50	"A map book of proposed survey locations will be created once the preliminary Project footprint for each alternative route is available (i.e., after the access roads and supporting infrastructure are designed). As such, maps of proposed survey locations are not currently available to accompany this field work plan."	See Comment #18
27.	6.3.2 Botanical Survey, Page 51	Traditional use plants include berries, edible mushrooms, Labrador tea (Rhododendron groenlandicum), paper birch (Betula papyrifera), sugar maple (Acer saccharum), white cedar (Thuja occidentalis), and various grasses including wild rice (Zizania palustris) and sweet grass (Hierochloe odorata). Additional traditional use plants and species of importance to Indigenous communities, as identified through IK/TLRU studies and community engagement, will be included.	As Region 1 and Region 2 have yet to finalize a satisfactory/new capacity funding agreement and require additional assurances from Hydro One prior to the execution of TKLUS data collection, any listings of traditional use plants must be verified with Métis harvesters and land users through the respective RCCs to ensure all relevant species are noted. Further, should additional species be identified through the execution of the TKLUS, provisions for additional botanical surveys must be made.

6B. Hydro One Responses: Metis Nation of Ontario (MNO) Review of the Aquatic and Terrestrial Field Work Plans for the Waasigan Transmission Line Environmental Assessment. July, 20, 2022.

July 20, 2022

Comments Table

Proposal: Waasigan Transmission Line Project – Métis Nation of Ontario (MNO) Review of the Aquatic and Terrestrial Field Work Plans for the Waasigan Transmission Line Environmental Assessment

Proponent: Hydro One

Commenter Name: Métis Nation of Ontario (MNO) Lands, Resources and Consultations

Comment #	Reference to Field Plan	Section	Comments (June 22, 2022)	Recommendation	Response (Hydro One – July 20, 2022)
Appendix A - #1	Aquatic Field Work Plan	1.0 Introduction, Page 1	Details/Quotation: "This document provides the field work plan proposed by Hydro One and Golder Associates Ltd., a member of WSP (Golder), to collect baseline data for surface water and aquatic ecology, support the alternative route evaluation for the selection of a preferred route, and ultimately to support the assessment of potential Project effects on fish and fish habitat and surface water criteria and indicators." Region 1 and Region 2 Comment: This section specifies that the aquatics field work will support the assessment of potential Project effects on fish and fish habitat and surface water criteria and indicators. However, there is no mention of this field work support the assessment of potential Project effects on the identified Valued Component Métis Rights/Interests and use of Lands and Resources, criteria Loss of Land/Change in Priority Rights or Harvesting/Sites.		An exhaustive list of Valued Component (VCs) is not provided in the Field Work Plans (FWPs), but rather is included in the Terms of Reference (ToR) for the overall EA. The field work will support the description of the baseline environmental setting for the assessment of potential effects on a variety of the criteria and indicators in the ToR; exclusion of a specific list within any of the FWPs is not intended to give the impression that certain criteria will not be used in assessment of effects. Further information to inform the collection of data related to Métis rights and interests are welcomed from the MNO. Additionally, Indigenous Knowledge (IK) and Traditional Land and Resource Use (TLRU) data are welcomed and will be considered in the background data sections and applicable effects assessments of the respective VCs (e.g., fish and fish habitat, wildlife, vegetation, and their interconnections with Métis Rights/Interests and use of Lands and Resources, etc.). Hydro One would like to meet with the Regional Consultation Committees and Lands, Resource and Consultation Branch to discuss this further if you could please provide your availability to meet.

Comment #	Reference to Field Plan	Section	Comments (June 22, 2022)	Recommendation	Response (Hydro One – July 20, 2022)
			As per Region 1 and Region 2 comments on the final Terms of Reference (Comment #8) field work should be conducted to collect specific data related to Métis rights and interests. This was directed as an item for further discussion with the Métis Nation of Ontario through the Regional Consultation Committees and Lands, Resource and Consultation Branch to identify the preferred method of data collection and discuss aspects of rights to be considered (e.g., Métis-specific Criteria supportive information).		
Appendix A - #2	Aquatic Field Work Plan	1.1 Purpose, Page 5	Details/Quotation: "The purpose of baseline field surveys is to gather data about the surface water, fish and fish habitat components of the environment to support the evaluation of route alternatives and completion of a comprehensive EA for the Project." Region 1 and Region 2 Comment: See Comment #1		Please refer to the response to comment #1.

Appendix A - #3	Aquatic Field Work Plan	1.1 Purpose, Page 5	Details/Quotation: "Overall, the surface water, fish and fish habitat baseline field surveys are designed to meet the following objectives: • Characterize existing aquatic conditions in the area of the Project; …" Region 1 and Region 2 Comment: See Comment #1 Indigenous knowledge is a basis; a starting point from which all other knowledge flows and would contribute to the characterization of the existing aquatic conditions. Indigenous knowledge provides a connection to the environment, holistically, and can provide insight into potentially overlooked interconnections. Western science processes such as Environmental Assessments seek to compartmentalize the environment into easily evaluated pieces (e.g., surface water, fish and fish habitat). While necessary for assessment, it can result in a lack of understanding of tangible connections between those environmental components and how the ecosystem functions on a broader level. In order to restore those connections, Indigenous knowledge should be thought of as a framework for assessment rather than a component of assessment; whereby ecosystem level information, based in principles of sustainability and stewardship, are		Thank you for the insights you provided. We acknowledge that the FWPs were written to be in keeping with standard EA methodology. We understand and agree that the intent of the overall EA process is to assess the Project as a whole (i.e., assessment of linkages and potential impacts to the broader landscape), while considering its potential effects to individual, compartmentalized disciplines. While the EA process does not rely solely on Indigenous assessment frameworks, it recognizes that the VC-specific material collected during background data reviews and field investigations cannot be assessed in isolation from each other. Technical specialists use the results of their studies, as well as other inputs such as IK and TLRU data, to inform and integrate with other disciplines in the EA when considering net effects of the Project. For example, effects on a watercourse would consider IK, fish habitat, surface water, groundwater, climate change, air quality and anthropogenic influences in the assessment. Hydro One would like to discuss this further with the MNO if you could please provide your availability to meet.

Comment #	Reference to Field Plan	Section	Comments (June 22, 2022)	Recommendation	Response (Hydro One – July 20, 2022)
			consistently applied to link the aspects of assessment together. For example, how water quality is connected to a network of other aspects including governance of resources through stewardship, wildlife sustainability, subsistence harvesting and overall ecosystem health. This is a necessary step in decolonizing assessment methodology.		
Appendix A - #4	Aquatic Field Work Plan	1.1 Purpose, Page 5	Details/Quotation: "Overall, the surface water, fish and fish habitat baseline field surveys are designed to meet the following objectives: • … • Incorporate Indigenous Knowledge/traditional land and resource use (IK/TLRU) as part of baseline conditions, where possible; …" Region 1 and Region 2 Comment: See Comment #3. Additionally, please note that Region 1 and Region 2 have yet to finalize a satisfactory/new capacity funding agreement and requires additional assurances from Hydro One prior to the execution of TKLUS data collection; therefore incorporation of IK/TLU as part of baseline conditions is unlikely.		Please refer to the response to comment #3. It is recognized that a new capacity funding agreement has not been finalized; however, incorporation of IK/TLRU is not restricted to the current time period and the collection of baseline data is ongoing; therefore, it is hoped that an agreement will be reached in the near future and IK/TLRU from the MNO can be incorporated. If IK/TLRU from the MNO is received after the draft EA is completed, attempts will be made to incorporate the MNO input into the final EA.
Appendix A - #5	Aquatic Field Work Plan	1.2 Study Area, Page 5-6	Details/Quotation: "Preliminary local study areas (LSAs) are defined as areas outside of the preliminary Project footprint where measurable changes to		The intent of the last statement in the quoted text, which says: "For fish and fish habitat and surface water, the field surveys will focus on the preliminary Project footprint described above **and the immediate**

Comment #	Reference to Field Plan	Section	Comments (June 22, 2022)	Recommendation	Response (Hydro One – July 20, 2022)
			the environment resulting from the proposed activities from any Project phase may be anticipated." "For fish and fish habitat and surface water, the field surveys will focus on the preliminary Project footprint described above and the immediate upstream and downstream environment." <u>Region 1 and Region 2 Comment:</u> This section indicates that the LSA is an area where measurable changes to the environment from the Project phases may be anticipated, but that the field surveys will focus only on the Project footprint. How can Project impacts be accurately categorized if no baseline conditions for the LSA are identified? The baseline field work must be expanded to include fish bearing waterbodies within the LSA. This will ensure an accurate baseline for species available, habitat, and distribution for assessment.		**upstream and downstream environment.**" (*emphasis added*) was to indicate that areas upstream and downstream of the immediate Project footprint will be surveyed. These surveys, as described in the FWP, will entail collection of data to characterize potential impacts beyond the Project footprint, and develop or recommend suitable mitigation measures. The text immediately following that paragraph states: "A desktop analysis for the EA will also include an assessment of fish communities, fish habitat and surface water conditions within the limits of the Local Study Area (LSA) of the preferred route. Data collected during the aerial reconnaissance in 2020 will be incorporated at the desktop level to facilitate planning." This is indicating that the EA will incorporate historical and recent background data for the Project footprint and LSA, in addition to the aforementioned field investigations, to provide both a fine level and gross level understanding of the study area, in this case, from a fish and fish habitat and surface water perspective. As indicated in responses above, interconnections with other VCs and criteria will also be considered.
Appendix A - #6	Aquatic Field Work Plan	1.2 Study Area, Page 7	<u>Details/Quotation:</u> "Golder will endeavour to survey 200 m, including 50 m upstream from the crossing and 150 m downstream from the crossing" <u>Region 1 and Region 2 Comment:</u> It appears from this passage that only water bodies impacted through direct		Section 1.2, page 7, addresses this through the text that immediately follows the text you have quoted: "…the Project design will incorporate the 30 m setback between the preliminary Project footprint and any adjacent waterbodies (i.e., waterbodies not crossed by the preliminary Project footprint but are beside it). Potential impacts to these waterbodies have standard mitigation measures that can reduce the risk of Project-

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			crossings will be considered. This is inappropriate as waterbodies in proximity to the project footprint, particularly during construction, could be susceptible to increased avoidance behaviors of Métis harvesters accessing these waterbodies in the exercise of their rights. Hydro One must undertake further consultation with Region 1 and Region 2 to understand potential avoidance distances from the project footprint during construction, operation and maintenance and ensure waterbodies within this avoidance zone are assessed.		related effects and as such, will not be surveyed. Waterbodies where the 30 m setback cannot be applied will be surveyed using the same methods as waterbodies that are crossed. The field surveys are designed to capture the area where direct and immediate indirect effects from the Project on fish and fish habitat and surface water are anticipated". As appropriate or applicable to each site, potential impacts on harvesting behaviours, including increased avoidance, will be taken into account in the EA document, based on background data collection (including IK/TLRU) and field investigations.

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Appendix A - #7	Aquatic Field Work Plan	2.0 Baseline Characterization Schedule, Page 11	Details/Quotation: "Desktop analysis to support the alternative route evaluation started in fall 2020 and focused on 150 m alternative route corridors." Region 1 and Region 2 Comment: No data from Region 1 or Region 2 has been included in the desktop analysis, to date, as the Regions have yet to finalize a satisfactory/new capacity funding agreement and requires additional assurances from Hydro One prior to the execution of TKLUS data collection.		Please see response to comment #4.

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Appendix A - #8	Aquatic Field Work Plan	2.0 Baseline Characterization Schedule, Page 11	Details/Quotation: "IK/TLRU studies are being completed by Indigenous communities for the Project and IK/TLRU information will be used to support the baseline characterization in the EA as it is shared. These studies are expected to become available throughout the preparation of the EA, with varying timelines for different Indigenous communities. Hydro One will work with Indigenous communities to integrate their IK/TLRU information into the EA and into Project decisions, as it is received. Hydro One is also working with interested Indigenous communities to discuss the sharing of information ahead of planned field programs to inform the desktop analysis and alternative route evaluation." Region 1 and Region 2 Comment: See Comment #3 and Comment #4		Please see response to comments #3 and #4.

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Appendix A - #9	Aquatic Field Work Plan	4.0 Engagement, Page 13	Details/Quotation: "A summary of the findings of the 2022 surveys will be included in the documentation of the EA. As well, these findings will be shared through Community Open House events and community meetings planned to support the EA, as identified in Section 10.0 of the Amended ToR." Region 1 and Region 2 Comment: A summary of the findings of the 2022 surveys must be shared with Regions 1 and 2 in advance of integration into the EA.		Agreed. As per the quoted text: "…findings will be shared through Community Open House events and community meetings…" and this will include events and meetings prior to the release of the draft EA. Section 10.4.3, Table 10-3 of the Amended ToR presents a list of planned Indigenous community engagement, including anticipated milestones, activities, input, and timing. The table includes community open house events and meetings as one potential engagement activity, but also includes other potential engagement activities with many proposed to occur prior to finalization of the EA such that Indigenous communities are provided an opportunity to review and provide meaningful input. This engagement work is supported through the budgets in the capacity funding agreement.

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Appendix A - #10	Aquatic Field Work Plan	4.1 Indigenous Participation, Page 13	Details/Quotation: Hydro One believes that the Project will benefit greatly with the active engagement of Indigenous communities since they hold IK/TLRU information for the area. Section 4.2.3.6 of the Amended ToR provides a detailed description on how Indigenous knowledge will be obtained and incorporated into the Project." Region 1 and Region 2 Comment: This section outlines generic Indigenous participation; however, based on the existing relationship with Hydro One, Region 1 and Region 2 require commitment that Indigenous participation means participation of Region 1 and Region 2 Métis field crews.		Section 4.2.3.6 of the Amended ToR provides a detailed approach for involving Indigenous communities rather than community-specific approaches. This is due to the differences in approach, framework and preferences of each community and is intended to facilitate an engagement process that is community-specific, meeting the unique needs of each. Hydro One continues to extend engagement opportunities to both Region 1 and 2 to participate in these activities. Hydro One is committed to providing opportunities for Indigenous participation in the field studies, including Métis involvement. Hydro One provided the MNO with job descriptions from their environmental consultant, WSP Golder, to participate in field studies. One MNO candidate was identified by the MNO and was offered a position. There continues to be opportunity for the MNO to participate in field studies either through members joining the field crew or through site visits where multiple MNO members can join the crew to discuss the planned work. Hydro One welcomes discussion regarding the inclusion of Métis staff or citizens on field crews and other ways to be involved in the field work and Project as a whole.
Appendix A - #11	Aquatic Field Work Plan	4.1 Indigenous Participation, Page 13	Details/Quotation: • "Data collection will include an opportunistic shoreline survey with key questions to capture information regarding fish and fish habitats from local fisherman and Indigenous communities regarding Indigenous knowledge, value of the fishery, key fish and other aquatic species, and issues relating to water and fish		Any data collected from Métis field crews will be provided back to Region 1 and Region 2 for confirmation prior to integration into the EA to ensure this information is properly characterized and not subject to terms of an Information Sharing Agreement. Information that is not approved will not be incorporated into the EA.

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			from existing transmission lines in the area; • Inclusion of Indigenous names of species (i.e., for plants, wildlife, and fish) and waterbodies in the EA; • Real-time mapping, as practicable; and …" Region 1 and Region 2 Comment: Any data collected from Métis field crews must be provided back to Region 1 and Region 2 for confirmation prior to integration into the EA to ensure this information is properly characterized and not subject to terms of an Information Sharing Agreement.		
Appendix A - #12	Aquatic Field Work Plan	4.1 Indigenous Participation, Page 14	Details/Quotation: "Indigenous knowledge related to wildlife, vegetation, fish and fish habitat and surface water resources will be highlighted and incorporated in the baseline studies and effects assessments, where it is shared by Indigenous communities for inclusion. Indigenous Knowledge may be shared through a variety of sources, including from Indigenous field crew members, IK/TLRU studies completed by Indigenous communities and/or through engagement with Indigenous communities." Region 1 and Region 2 Comment: See Comment #1		Please refer to the response for comment #1.

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Appendix A - #13	Aquatic Field Work Plan	5.1 Purpose, Page 15	Details/Quotation: "The objective of the fish and fish habitat field survey for the Project is to characterize the existing fish habitat and fish communities, including Species at Risk (SAR) and Species of Conservation Concern (SOCC) fish, within the preliminary Project footprint of each alternative route and the immediate downstream environment to support the EA for the Project." Region 1 and Region 2 Comment: There is no objective listed with regards to characterizing fish and fish habitat of importance to Métis harvesters in the exercise of their rights. This illustrates a fundamental disconnect between the field program and the assessment of potential impacts of the Project on Métis rights. Without this necessary information and necessary interrelation supported by Indigenous knowledge, the EA will not facilitate the assessment of Project-related effects on Métis rights.		Hydro One acknowledges that not all Project assessment criteria or objectives have been explicitly listed in the FWPs and understand how this has been perceived as not inclusive, which was not the intent. The focus of the FWPs has been to outline one of several methods that will be used to characterize the baseline environmental setting; it is not intended to set out the methodology for the EA itself. In this case, the FWP indicates that fish habitat and fish communities will be characterized for the purpose of supporting and informing an effects assessment. Characterization includes cultural characteristics such as IK or TLRU. Also, as previously mentioned, these effects assessment criteria include potential effects on Métis rights, traditions, and activities as they pertain to any relevant VCs.
Appendix A - #14	Aquatic Field Work Plan	5.2 Desktop Analysis and Field Planning, Page 15	Details/Quotation: "Existing literature and digital data provided by Hydro One, available in-house at Golder, and obtained through published reports and grey literature, as well as IK/TLRU studies received from Indigenous communities and the results of the 2020 aerial reconnaissance, will be reviewed and compiled to support the fish and fish habitat baseline characterization."		Please refer to the response to comment #7.

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			Region 1 and Region 2 Comment: See Comment #7		
Appendix A - #15	Aquatic Field Work Plan	5.2 Desktop Analysis and Field Planning, Page 15	Details/Quotation: "Much of this data compilation and review is currently being completed to support the alternative route evaluation process, including the preparation of a detailed waterbody crossing list and survey site selection. In addition, a list of fish species documented in each tertiary watershed crossed by the alternative routes will be collated." Region 1 and Region 2 Comment: See Comment #6		Please refer to the response to comment #6.
Appendix A - #16	Aquatic Field Work Plan	5.2 Desktop Analysis and Field Planning, Page 15	Details/Quotation: "The desktop analysis includes screening to identify the fish species, including fish of Indigenous significance (e.g., fish for subsistence)…" Region 1 and Region 2 Comment: As Region 1 and Region 2 have not compiled or provided Hydro One with a list of fish species of significance due to capacity limitations, this will not be included in the current desktop analysis. How will species of importance to Region 1 and Region 2 be added to the assessment at a later date when this information is available?		The desktop analysis is typically an ongoing task with the majority completed prior to field investigations, but as with other EAs or other environmental studies, desktop screening and background data review occur when new data are provided or found, as feasible. If IK/TLRU from the MNO is received after the draft EA is completed, attempts will be made to incorporate MNO's input into the final assessment document.

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Appendix A - #17	Aquatic Field Work Plan	5.2 Desktop Analysis and Field Planning, Page 16	Details/Quotation: "A SAR screening will also be completed as part of the desktop analysis to identify SAR with moderate to high potential to occur in the LSA based on range overlap, documented occurrences, critical habitat mapping and presence of suitable habitat determined from aerial imagery and mapping (e.g., DFO Aquatic Species at Risk mapping)." Region 1 and Region 2 Comment: Similar to this, a screening must also be completed for species of significance to Region 1 and Region 2 with moderate to high potential to occur in the LSA. Once completed, this information must be verified with Region 1 and Region 2 prior to inclusion in the EA.		Section 5.2 of the Amended ToR states: "The desktop analysis includes screening to identify the fish species, including fish of Indigenous significance…". As such, it is intended that species of Indigenous significance (including those significant to Region 1 and Region 2) are part of the screening and assessment process. Hydro One would appreciate receiving information about species of significance to Region 1 and Region 2 so that their consideration can be included.

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Appendix A - #18	Aquatic Field Work Plan	5.2.1 Site Selection, Page 16	Details/Quotation: "The field survey will target a subset of waterbodies that are crossed by the preliminary Project footprint for each alternative route (rather than the full list of crossing locations). Waterbodies that are adjacent to the preliminary Project footprint for each alternative route, but not crossed by them, will not be surveyed as temporary workspaces included in the Project design will incorporate a 30 m setback between the preferred route and any adjacent waterbodies where feasible, and these waterbodies will not be directly impacted." Region 1 and Region 2 Comment: See Comment #6		Please refer to the response to comment #6.
Appendix A - #19	Aquatic Field Work Plan	5.2.1 Site Selection, Page 17	Details/Quotation: "Based on the desktop analysis and aerial reconnaissance, there are approximately 993 waterbody crossings along the transmission line ROW for the alternative routes. Of these, 772 are located in sections where there is more than one route alternative, whereas the remaining 221 waterbody crossings are located in the sections where there are no alternative routes." "Of the 772 waterbody crossings, background fish and/or fish habitat data are available for 160 of the waterbody crossings along the alternative routes. Therefore, 612		Hydro One is providing Field Notices to Indigenous communities prior to the commencement of field work that described the work to be completed, including timing, and provided a link to PDF maps and a webviewer where the proposed survey locations could be viewed.

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			waterbody crossings (i.e., 79%) have no known historical fish or fish habitat information. These waterbodies will be the focus of the field surveys." Region 1 and Region 2 Comment: All 993 locations must be provided to Region 1 and Region 2 on map sheets for review to ensure any key locales of importance to Region 1 and Region 2 can be identified prior to the execution of the field program.		

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Appendix A - #20	Aquatic Field Work Plan	5.2.1 Site Selection, Page 18	Details/Quotation: "Therefore, survey sites will be selected at waterbodies where: • Temporary (e.g., one time ford, temporary culvert) or permanent (e.g., installing a permanent culvert) works would be proposed below the high watermark; • Permanent crossing structures would be proposed to be installed above the high watermark; and • Removal of critical riparian vegetation would be proposed." Region 1 and Region 2 Comment: In addition to the specified criteria, survey sites must also be selected at waterbodies where destruction or alteration of fish habitat may occur, as is loosely referenced (regulatory approvals from DFO). Please add this additional criterion to the listing to ensure the field work plan is explicit.		If destruction or alteration of fish habitat may occur, those specific sites will be surveyed, either as part of the 2022 field surveys, or subsequent surveys if required.
Appendix A - #21	Aquatic Field Work Plan	5.2.2 Access and Field Maps, Page 20	Details/Quotation: "The location of waterbody crossing locations to be surveyed will be provided in a water crossing list and a map book of the waterbodies on the crossing list will be created once the full preliminary Project footprint is available (i.e., after the access roads and supporting infrastructure is designed)." Region 1 and Region 2 Comment: See Comment #19		Please refer to the response to comment #19

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Appendix A - #22	Aquatic Field Work Plan	5.3.1 Fish Habitat Assessment, Page 20	Details/Quotation: "The length of the section surveyed will depend on the size of the waterbody. The field crew will endeavour to survey 200 m of each waterbody, including 50 m upstream from the crossing and 150 m downstream from the crossing on watercourses and 200 m along the shoreline of lakes/ponds. If 200 m cannot be surveyed due to site logistics (e.g., dense forest, land access issues), the field crew will endeavor to survey as much of the site as is safely accessible, up to 200 m." Region 1 and Region 2 Comment: Please confirm whether overflights will be completed for survey sites to confirm any major obstructions to fish migration, record general habitat conditions and any other significant constraints that might be present. This section only specifies that "If a helicopter is used…" which implies this will not be a typical undertaking.		Helicopters will not be a typical undertaking and will only be used to transport crews to sites where land access is not feasible due to vegetation density, access issues in getting to approved properties (i.e., through properties where access has not been granted) or distance from a road or trail. Opportunistic data will be collected during overflights of these sites related to watercourse obstructions or other substantial, visible characteristics, as feasible based on visibility. Ground-based site surveys, combined with aerial photo interpretation, will be the primary means to identify major obstructions to fish passage, general habitat conditions and other significant site characteristics.
Appendix A - #23	Aquatic Field Work Plan	5.3.1 Fish Habitat Assessment, Page 22	Details/Quotation: "Basic in-situ water quality parameters (conductivity, pH, temperature, and dissolved oxygen) will be measured using a multi-parameter water quality meter. A visual estimate of water clarity will also be completed." Region 1 and Region 2 Comment: Will		Yes, water quality meters used for the surveys are AquaTroll models with turbidity measurement capabilities. Turbidity will be recorded in the field in Nephelometric Turbidity unit (NTUs), i.e., the unit used to measure the turbidity of a fluid or the presence of suspended particles in water.

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			turbidity or Total Dissolved Solids (TDS) be assessed beyond a visual estimate of water clarity?		
Appendix A - #24	Aquatic Field Work Plan	5.3.1 Fish Habitat Assessment, Page 22	Details/Quotation: "Type of riparian vegetation present, average height, and if any critical riparian vegetation cover is present will be visually assessed." Region 1 and Region 2 Comment: Will riparian vegetation supplement future vegetation habitat and/or species field work?		Yes, the riparian data collected will be used in conjunction with ELC and other terrestrial vegetation data to provide a comprehensive understanding of the site characteristics to support the effects assessment.
Appendix A - #25	Aquatic Field Work Plan	5.3.1 Fish Habitat Assessment, Page 23	Details/Quotation: "Large-bodied fish that are targeted by anglers and Indigenous communities for subsistence (e.g., species from the Acipenseridae and Salmonidae families) are considered sport fish." Region 1 and Region 2 Comment: While fish are harvested in the exercise of Métis rights for subsistence purposes, this statement minimizes the overall interconnection of fishing with other aspects of Métis rights such as governance (e.g., ongoing stewardship of species of importance and waterbodies), cultural (e.g., transmission of knowledge), etc. Further, fish targeted by Métis harvesters in the exercise of their rights are not limited to sport fish.		Thank you for the insights you provided. The text will be updated in the final FWP and throughout the EA to be defined as: "Large bodied fish includes predator fish species, which generally have fork lengths (length of a fish measured from the tip of the snout to the end of the middle caudal fin rays) greater than 200 mm when they are adults, and would include species from such families as Acipenseridae (e.g., Lake Sturgeon [Acipenser fulvescens]), Salmonidae (e.g., Brook Trout [Salvelinus fontinalis]), and Catostomidae (e.g., White Sucker [Catostomus commersonii])." Reference to the types of fish harvested in the exercise of Métis rights for subsistence purposes will be removed from the definition of large-bodied fish and a more fulsome description of Métis connections to fish will be included in the EA, with input from Métis people, where available.

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			Both must be updated and reflected in the field work plan as well in future iterations of the EA.		
Appendix A - #26	Aquatic Field Work Plan	5.6 Data Analysis and Reporting, Page 27	Details/Quotation: "The report will be used to characterize existing conditions for fish and fish habitat as part of the EA and to support future permitting requirements for the Project. As part of the EA reporting and to provide an estimate of the overall habitat quantity in square metres of each criteria species in the preliminary Project footprint, the estimated bank-full width at each waterbody crossing will be multiplied by a width of the proposed disturbance." Region 1 and Region 2 Comment: See Comment #6 As this report will be used to characterize the existing conditions, there must be an understanding of avoidance behaviors influenced by construction, operation and maintenance and how this will influence Métis use of waterbodies in proximity to the project footprint.		Please refer to the last sentence in the response to comment #6 Appendix A, which states, "as appropriate or applicable to each site, potential impacts on harvesting behaviours, including avoidance, will be taken into account in the EA document, based on background data collection (including IK/TLRU) and field investigations."
Appendix A - #27	Aquatic Field Work Plan	6.2 Desktop Analysis and Field Planning, Page 28	Details/Quotation: "Review and analysis of publicly available background data from the following sources: … Indigenous Knowledge received through engagement with Indigenous		Please refer to responses to comments #3 and #4

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			communities, including IK/TLRU studies." Region 1 and Region 2 Comment: See Comment #3 and #4		
Appendix B - #1	Terrestrial Field Work Plan	1.0 Introduction, Page 1	Details/Quotation: "This document provides the field work plan proposed by Hydro One and Golder Associates Ltd. a member of WSP (Golder), to collect baseline data for the assessment of wildlife and wildlife habitat, vegetation and wetlands to support the alternative route evaluation for the selection of a preferred route, and ultimately to support the assessment of potential project effects." Region 1 and Region 2 Comment: As noted in Appendix A in relation to Aquatics, this section specifies that the terrestrial field work will support the assessment of potential Project effects on wildlife and wildlife habitat, vegetation and wetlands. However, there is no mention of how this field work will support the assessment of potential Project effects on the identified Valued Component *Métis Rights/Interests and use of Lands and Resources*, criteria *Loss of Land/Change in Priority Rights* or *Harvesting/Sites.* As per Region 1 and Region 2 comments on the final Terms of Reference (Comment #8) field work		As presented in Appendix A, an exhaustive list of VCs is not provided in the Terrestrial FWP, but rather is included in the ToR for the overall EA. The field work will support the description of the baseline environmental setting for the assessment of potential effects on a variety of the criteria and indicators in the ToR; exclusion of a specific list within any of the FWPs is not intended to give the impression that certain criteria will not be used in assessment of effects. Initial field work has been planned according to the approved ToR which does include input from Indigenous communities. To meet seasonal limitations, field work commenced prior to input from the MNO. Additional input to refine the field work approach and participate in the field work are welcomed and will be incorporated where applicable to the specific tasks. Further information to inform the collection of data related to Métis rights and interests are welcomed from the MNO. Additionally, IK/TLRU data will be considered in the background data sections and applicable effects assessments of the respective VCs (e.g., fish and fish habitat, wildlife, vegetation, and their interconnections with Métis Rights/Interests and use of Lands and Resources, etc.). Hydro One would like to meet with the MNO Regional Consultation Committees and Lands, Resource and Consultation Branch to discuss this further if you could please provide your availability to meet.

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			should be conducted to collect specific data related to Métis rights and interests. This was directed as an item for further discussion with the Métis Nation of Ontario through the Regional Consultation Committees and Lands, Resource and Consultation Branch to identify the preferred method of data collection and discuss aspects of rights to be considered (e.g., Métis-specific Criteria supportive information).		
Appendix B - #2	Terrestrial Field Work Plan	1.1 Purpose, Page 5	Details/Quotation: "The purpose of baseline field surveys is to gather data about the wildlife and wildlife habitat, vegetation and wetlands components of the environment to support the evaluation of route alternatives and completion of a comprehensive EA for the Project." Region 1 and Region 2 Comment: See Comment #1		Please refer to the response to comment #1.
Appendix B - #3	Terrestrial Field Work Plan	1.1 Purpose, Page 5	Details/Quotation: "Overall, the wildlife and wildlife habitat, vegetation and wetlands baseline field surveys are designed to meet the following objectives: • Characterize existing terrestrial conditions in the area of the Project; …" Region 1 and Region 2 Comment: As this section is largely identical, see Comment #3 of Appendix A		As in our response to Appendix A comment #3, we thank you for the insights you provided, and we acknowledge that the FWPs were written to be in keeping with standard EA methodology. We understand and agree that the intent of the overall EA process is to assess the Project as a whole (i.e., assessment of linkages and potential impacts to the broader landscape), while considering its potential effects to individual, compartmentalized disciplines. While the EA process does not rely solely on Indigenous assessment frameworks, it recognizes that the VC-specific material collected during background data reviews and field investigations cannot be

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					assessed in isolation from each other. Technical specialists use the results of their studies, as well as other inputs such as IK and TLRU data, to inform and integrate with other disciplines in the EA when considering net effects of the Project. For example, effects on a wetland would consider IK, plant species composition and function as well as wildlife habitat, surface water, groundwater, climate change, air quality and anthropogenic influences in the assessment.
Appendix B - #4	Terrestrial Field Work Plan	1.1 Purpose, Page 5	Details/Quotation: "Overall, the wildlife and wildlife habitat, vegetation and wetlands baseline field surveys are designed to meet the following objectives: • … • Incorporate Indigenous Knowledge/traditional land and resource use (IK/TLRU) as part of baseline conditions, where possible; …" Region 1 and Region 2 Comment: As this section is largely identical, see Comment #3 and Comment #4 of Appendix A		Please refer to the response to Appendix A comment #3 and Appendix B comment #3. Similarly to the response provided for comment #4 in the Aquatic FWP, we offer the following: it is recognized that a new capacity funding agreement has not been finalized; however, incorporation of IK/TLRU is not restricted to the current time period and the collection of baseline data is ongoing; therefore, it is hoped that an agreement will be reached in the near future and IK/TLRU from the MNO can be incorporated. If IK/TLRU from the MNO is received after the draft EA is completed, attempts will be made to incorporate the MNO input into the final EA.
Appendix B - #5	Terrestrial Field Work Plan	1.2 Study Areas, Page 7	Details/Quotation: "The LSA is designed to capture the area where direct and immediate indirect effects from the Project on soils, vegetation and wildlife, will occur at the local scale. Direct effects include mortality to individuals from Project- related hazards (e.g., towers, transmission lines and vehicles), and physical changes to terrain, soils, vegetation		The overall assessment of Project effects on Métis Rights/Interests and Use of Lands and Resources will be undertaken in a study area appropriate to the VCs as outlined by the MNO. Baseline information related to Métis indicators associated with wildlife, vegetation and wetlands will be used to assess these effects.

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			and wildlife habitat from construction, operation and maintenance of the Project. Indirect effects from the Project may extend beyond the physical footprint, such as air and dust emissions that can alter soil and water chemistry and plant communities. Sensory disturbances (e.g., noise, lights, and smells) from the Project can also influence wildlife movement and behaviour. Some animals may perceive the presence of human activity as a decrease in habitat quality and avoid the area. Therefore, sensory disturbance can reduce habitat availability for wildlife even where vegetation remains structurally and functionally intact." Region 1 and Region 2 Comment: This section does not refer to the Valued Component of Métis Rights/Interests and Use of Lands and Resources when illustrating direct and indirect effects. Please confirm that baseline information related to Métis indicators related to wildlife, vegetation and wetlands will also be collected during the field surveys.		
Appendix B - #6	Terrestrial Field Work Plan	1.2 Study Areas, Page 7	Details/Quotation: "The 1 km buffer of the preliminary Project footprint for each alternative route has been proposed for the LSA to capture the area where immediate indirect effects of the Project on wildlife and wildlife habitat, vegetation and wetlands are		IK was not available at the time the LSA buffer was defined. Timing and seasonal constraints necessitated commencement of field work in its absence. Hydro One will continue to incorporate information provided by Region 1 and Region 2 into decision-making as it becomes available.

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			likely based on available evidence from literature. For example, effects of dust on vegetation have been detected within 50 m of roads, with some lesser effects outward to 500 m (Meininger and Spatt 1988; Walker and Everett 1987)." Region 1 and Region 2 Comment: Please describe any Indigenous knowledge used in the definition of the 1 km buffer LSA.		
Appendix B - #7	Terrestrial Field Work Plan	2.0 Baseline Characterization Schedule, Page 12	Details/Quotation: "Desktop analysis to support the alternative route evaluation started in fall 2020 and focused on the 150 m alternative route corridors." Region 1 and Region 2 Comment: As this section is largely identical, see Comment #7 of Appendix A		Please refer to the response to comment # 4 Appendix B.
Appendix B - #8	Terrestrial Field Work Plan	2.0 Baseline Characterization Schedule, Page 12	Details/Quotation: "IK/TLRU studies are being completed by Indigenous communities for the Project and IK/TLRU information will be used to support the baseline characterization in the EA, as it is shared. These studies are expected to become available throughout the preparation of the EA, with varying timelines for different Indigenous communities. Hydro One will work with Indigenous communities to integrate their IK/TLRU information into the EA and into Project decisions, as it is received. Hydro One is also working		Please refer to responses to comments #3 and #4 Appendix B.

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			with interested Indigenous communities to discuss the sharing of information ahead of planned field programs to inform the desktop analysis and alternative route evaluation." Region 1 and Region 2 Comment: As this section is largely identical, see Comment #3 and Comment #4 of Appendix A		
Appendix B - #9	Terrestrial Field Work Plan	3.0 Health, Safety and Environment, Page 13	Details/Quotation: "Field surveys will be completed with a minimum of two trained environmental specialists (e.g., biologists), and at least one Indigenous field crew member, where possible." Region 1 and Region 2 Comment: The limiting language within this section is concerning as there is interest from Region 1 and Region 2 to participate, and likely interest of other Indigenous nations as well. One Indigenous field crew member is insufficient and the qualifier of 'where possible' must be explained.		Please note that the quoted text says "…and **at least** one Indigenous field crew member…" indicating that if more than one Indigenous crew member is identified and available, they can and will be incorporated into field crews. Regarding our statement of "where possible", this qualifier is to address the potential situation where Indigenous crew members are not available for any part of the program due to a variety of unforeseen circumstances or a particular community collectively decides that they would rather participate in other aspects of the Project but not field work. It is not intended in any way to limit or suggest a limit on the participation of Indigenous crew members as we agree that many Indigenous communities are likely interested in participating and the Project would benefit greatly from this participation.
Appendix B - #10	Terrestrial Field Work Plan	4.0 Engagement, Page 14	Details/Quotation: "A summary of the findings of the 2022 surveys will be included in the documentation of the EA. As well, these findings will be shared through Community Open House events and community meetings planned to support the EA, as identified in Section 10.0 of the Amended ToR."		As provided in the response to comment #9 of Appendix A: Agreed. As per the quoted text: "…findings will be shared through Community Open House events and community meetings…" and this will include events and meetings prior to the release of the draft EA. Section 10.4.3, Table 10-3 of the Amended ToR presents a list of planned Indigenous community engagement, including anticipated milestones, activities, input, and timing. The table includes

Comment #	Reference to Field Plan	Section	Comments (June 22, 2022)	Recommendation	Response (Hydro One – July 20, 2022)
			Region 1 and Region 2 Comment: As this section is largely identical, see Comment #9 of Appendix A		community open house events and meetings as one potential engagement activity, but also includes other potential engagement activities with many proposed to occur prior to finalization of the EA such that Indigenous communities are provided an opportunity to review and provide meaningful input.
Appendix B - #11	Terrestrial Field Work Plan	4.1 Indigenous Participation, Page 14	Details/Quotation: "Incorporation of Indigenous participation and other considerations in the field work will include the following:…" Region 1 and Region 2 Comment: This section includes Indigenous field crews, plural, but within Section 3.0 it specifies that field surveys will be completed with at least one Indigenous field crew member, where possible. Please explicitly describe the make-up of the field crew and anticipated Indigenous involvement.		To clarify, the goal is for **each** field crew to contain **at least** one Indigenous crew member in addition to the appropriate number of WSP Golder ecologists required for each survey type. Hydro One has provided job descriptions to all Indigenous communities and continues to reach out to communities to identify potential candidates that could participate in field work. Further, Hydro One is also interested in coordinating site visits with Indigenous communities where multiple members of a community can visit with a field crew to discuss the work being completed.
Appendix B - #12	Terrestrial Field Work Plan	4.1 Indigenous Participation, Page 14	Details/Quotation: "Hydro One believes that the Project will benefit greatly with the active engagement of Indigenous communities since they hold IK/TLRU information for the area. Section 4.2.3.6 of the Amended ToR provides a detailed description on how Indigenous knowledge will be obtained and incorporated into the Project." Region 1 and Region 2 Comment: As this section is largely identical, see Comment #10 of Appendix A		As provided in the response to comment #10 of Appendix A, Section 4.2.3.6 of the Amended ToR provides a detailed approach for involving Indigenous communities rather than community-specific approaches. This is due to the differences in approach, framework and preferences of each community and is intended to facilitate an engagement process that is community-specific, meeting the unique needs of each. Hydro One is committed to providing opportunities for Indigenous participation in the field studies, including Métis involvement. Hydro One has provided the MNO with job descriptions from Hydro One's environmental consultant, WSP Golder, to participate in field studies. One MNO candidate was identified by the MNO and

Comment #	Reference to Field Plan	Section	Comments (June 22, 2022)	Recommendation	Response (Hydro One – July 20, 2022)
					was offered a position. There continues to be opportunity for the MNO to participate in field studies either through members joining the field crew or through site visits where multiple MNO members can join the crew to discuss the planned work. Hydro One welcomes discussion regarding the inclusion of Métis staff or citizens on field crews and other ways to be involved in the field work.
Appendix B - #13	Terrestrial Field Work Plan	4.1 Indigenous Participation, Page 14	Details/Quotation: "Indigenous Knowledge related to wildlife, vegetation, fish and fish habitat and surface water resources will be highlighted and incorporated in the baseline studies and effects assessments, where it is shared by Indigenous communities for inclusion. Indigenous Knowledge may be shared through a variety of sources, including from Indigenous field crew members, IK/TLRU studies completed by Indigenous communities and/or through engagement with Indigenous communities." Region 1 and Region 2 Comment: As this section is largely identical, see Comment #11 of Appendix A		Any data collected from Métis field crews will be provided back to Region 1 and Region 2 for confirmation prior to integration into the EA to ensure this information is properly characterized and not subject to terms of an Information Sharing Agreement. Information that is not approved will not be incorporated into the EA.
Appendix B - #14	Terrestrial Field Work Plan	5.1 Purpose, Page 15	Details/Quotation: "The purpose of the wildlife and wildlife habitat field surveys for the Project is to characterize the existing environment for wildlife for each alternative route to support the alternative route evaluation and EA for the Project. In particular, the main objective of the field work is to gather sufficient information to develop a		We acknowledge that not all Project assessment criteria or objectives have been explicitly listed in the FWPs and understand how this has been perceived as not inclusive, which was not the intent. The focus of the FWPs has been to outline one of several methods that will be used to characterize the baseline environmental setting; it is not intended to set out the methodology for the EA itself. In this case, the

Comment #	Reference to Field Plan	Section	Comments (June 22, 2022)	Recommendation	Response (Hydro One – July 20, 2022)
			comprehensive understanding of the existing wildlife and habitat prior to any potential influence from Project construction or operation (i.e., baseline conditions)." Region 1 and Region 2 Comment: There is no purpose identified that is linked to data collection supporting the identified Valued Component *Métis Rights/Interests and use of Lands and Resources*, criteria *Loss of Land/Change in Priority Rights* or *Harvesting/Sites.* This illustrates a fundamental disconnect between the field program and the assessment of potential impacts of the Project on Métis rights. Without this necessary information and necessary interrelation supported by Indigenous knowledge, the EA will not facilitate the assessment of Project-related effects on Métis rights.		FWP indicates that terrestrial ecology elements (e.g., breeding birds, ELC communities) will be characterized for the purpose of supporting and informing an effects assessment. Characterization includes cultural characteristics such as IK or TLRU. Also, as previously mentioned, this effects assessment includes potential effects on Métis rights, traditions, and activities.
Appendix B - #15	Terrestrial Field Work Plan	5.1 Purpose, Page 15	Details/Quotation: "Secondary source data acquired and data collected in the field will be used to characterize the existing environment as it relates to wildlife by describing the presence, distribution, and relative abundance (where possible) of taxa with a particular focus on wildlife species at risk (SAR), as well as to characterize and quantify wildlife habitat within the LSA, with focus on SAR habitat and SWH."		Characterization of flora and fauna is intended to include cultural characteristics such as IK or TLRU. Collection of this data will occur in various ways, each of which will be heavily dependent on the preferred approach of the individual Indigenous group or nation. Examples previously referred to include community meetings, provision of site-specific IK by Indigenous field crew (where available and freely given) and use of databases or mapping software. Also, as previously mentioned, the effects assessment that will be presented in the EA includes potential effects on Métis rights, traditions, and activities.

Comment #	Reference to Field Plan	Section	Comments (June 22, 2022)	Recommendation	Response (Hydro One – July 20, 2022)
			Region 1 and Region 2 Comment: In addition to a focus on wildlife SAR, culturally critical species of importance to Region 1 and Region 2 must also be a focus of the field surveys to ensure sufficient data is collected to assess Project-related effects on Métis rights. As Region 1 and Region 2 are not responsible for, or provided capacity to complete, a parallel assessment, the Regions will rely on data collected by Hydro One during the field work in order to facilitate this assessment. While it is noted within this section (page 17) that data regarding species of concern to Indigenous communities will be gathered, more information is required on how this will be completed.		
Appendix B - #16	Terrestrial Field Work Plan	5.2 Desktop Analysis and Field Planning, Page 17	Details/Quotation: "Existing literature and digital data provided by Hydro One, available in-house at Golder, and obtained through publicly available databases, published reports and grey literature, as well as IK/TLRU studies received from Indigenous communities, are being reviewed and compiled to determine which data are available to support the requirements for the wildlife baseline." Region 1 and Region 2 Comment: As this section is largely identical, please see Comment #7 of Appendix A		Please see response to comment #4 of Appendix A.

Comment #	Reference to Field Plan	Section	Comments (June 22, 2022)	Recommendation	Response (Hydro One – July 20, 2022)
Appendix B - #17	Terrestrial Field Work Plan	5.2 Desktop Analysis and Field Planning, Page 18	Details/Quotation: "Results from the fall 2020 aerial reconnaissance and mine site survey (Golder 2021b) are also being reviewed, compiled, and analyzed, and mapping refined." Region 1 and Region 2 Comment: As Region 1 and Region 2 have not participated in aerial reconnaissance or mine site survey – nor has Region 1 or Region 2 provided input to ensure the methodology is responsive to the identified Valued Component *Métis Rights/Interests and use of Lands and Resources*, criteria *Loss of Land/Change in Priority Rights* or *Harvesting/Sites,* there is a gap in the existing information being accessed.		Hydro One reached out to the MNO to identify if there was interest in participating in the aerial reconnaissance and mine site surveys, which included providing job descriptions. Hydro One welcomes any further information the MNO can share.
Appendix B - #18	Terrestrial Field Work Plan	5.2.2 Access and Field Maps, Page 18	Details/Quotation: "A map book of proposed survey locations will be created once the preliminary Project footprint for each alternative route is available (i.e., after the access roads and supporting infrastructure are designed). As such, maps of proposed survey locations are not currently available to accompany this field work plan." Region 1 and Region 2 Comment: Upon availability, the map book of proposed survey locations must be provided to Region 1 and Region 2 for review and confirmation.		Hydro One is providing Field Notices to Indigenous communities prior to the commencement of field work that described the work to be completed, including timing, and provided a link to PDF maps and a webviewer where the proposed survey locations could be viewed.
Appendix B - #19	Terrestrial Field Work Plan	5.10 Candidate Significant	Details/Quotation: "Criteria schedules have not been prepared for the ecoregions that the Project		Hydro One is committed to providing opportunities for Indigenous participation in the field studies, including Métis involvement. Hydro One provided the MNO with

Comment #	Reference to Field Plan	Section	Comments (June 22, 2022)	Recommendation	Response (Hydro One – July 20, 2022)
		Wildlife Habitat, Page 37	overlaps. In the absence of criteria schedules for these ecoregions, the draft criteria schedules for Ecoregion 3W, as well as the Significant Wildlife Habitat Technical Guide (MNR 2000), have been consulted." <u>Region 1 and Region 2 Comment:</u> As criteria schedules have not been prepared for the ecoregions the Project overlaps, Region 1 and Region 2 require participation in the field program planned to determine if the candidate SWH screened at a desktop level can be confirmed as candidate SWH.		job descriptions from Hydro One's environmental consultant, WSP Golder, to participate in field studies. One MNO candidate was identified by the MNO and was offered a position. There continues to be opportunity for the MNO to participate in field studies either through members joining the field crew or through site visits where multiple MNO members can join the crew to discuss the planned work. We welcome discussion regarding the inclusion of Métis staff or citizens on field crews and other ways to be involved in the field work.
Appendix B - #20	Terrestrial Field Work Plan	5.10 Candidate Significant Wildlife Habitat, Page 37	<u>Details/Quotation:</u> "Of those candidate SWH types that had greater than 30 occurrences, a random selection of approximately 2% of the total number of occurrences of each SWH type across all route alternatives will be selected once the alternative route footprints become available. Given the objective of the field survey to ground-truth the desktop screening of the ecosite types in the SWH criteria reports (MNRF 2017a), not to confirm the sites are significant habitat, a random selection of sites allows for an unbiased approach to ground-truthing. However, sites will be reviewed and slightly modified to have spatial coverage across the routes (see Appendix F)."		Hydro One is providing Field Notices to Indigenous communities prior to the commencement of field work that described the work to be completed, including timing, and provided a link to PDF maps and a webviewer where the proposed survey locations could be viewed.

Comment #	Reference to Field Plan	Section	Comments (June 22, 2022)	Recommendation	Response (Hydro One – July 20, 2022)
			Region 1 and Region 2 Comment: Region 1 and Region 2 require review of the 2% randomly selected occurrences to ensure coverage of important areas to Métis harvesters and land users. This slightly modified approach is allowed for to ensure spatial coverage across the routes and can also be applied to ensure coverage of areas of known importance to the Métis.		
Appendix B - #21	Terrestrial Field Work Plan	5.14 General Wildlife Surveys and Habitat Assessments, Page 44	Details/Quotation: "General wildlife surveys and habitat assessment will be conducted concurrent with the other field investigations. These surveys will gather data for various species, including species groups and SAR not specifically targeted through the surveys described above." Region 1 and Region 2 Comment: Region 1 and Region 2 must have input into the general wildlife surveys to ensure that species of importance to Métis harvesters and land users are targeted, particularly mammals and avifauna typically harvested in the exercise of Métis rights. If a particular species of importance is identified, additional survey work may be warranted as incidental sightings during other survey work may not be sufficient to collect data to assess change to Métis indicators.		Hydro One would appreciate receiving information about species of significance to Region 1 and Region 2 so that their consideration can be included.

Comment #	Reference to Field Plan	Section	Comments (June 22, 2022)	Recommendation	Response (Hydro One – July 20, 2022)
Appendix B - #22	Terrestrial Field Work Plan	6.1 Purpose, Page 49	Details/Quotation: "The purpose of the vegetation and wetlands field survey for the Project is to characterize the existing environment for vegetation and wetlands to support the EA for the Project. Baseline characterization will consist of combining and summarizing existing available information (i.e., desktop analysis, imagery interpretation and FRI classification) with data gathered from field surveys within the LSA." Region 1 and Region 2 Comment: There is no purpose identified that is linked to data collection supporting the identified Valued Component *Métis Rights/Interests and use of Lands and Resources*, criteria *Loss of Land/Change in Priority Rights* or *Harvesting/Sites.* This illustrates a fundamental disconnect between the field program and the assessment of potential impacts of the Project on Métis rights. Without this necessary information and necessary interrelation supported by Indigenous knowledge, the EA will not facilitate the assessment of Project-related effects on Métis rights.		We acknowledge that not all Project assessment criteria or objectives have been explicitly listed in the FWPs and understand how this has been perceived as not inclusive, which was not the intent. The focus of the FWPs has been to outline one of several methods that will be used to characterize the baseline environmental setting; it is not intended to set out the methodology for the EA itself. In this case, the FWP indicates that terrestrial ecology elements (e.g., breeding birds, ELC communities) will be characterized for the purpose of supporting and informing an effects assessment. Characterization includes cultural characteristics such as IK or TLRU. Also, as previously mentioned, this effects assessment includes potential effects on Métis rights, traditions, and activities.
Appendix B - #23	Terrestrial Field Work Plan	6.1 Purpose, Page 49	Details/Quotation: "Vegetation community mapping is required to identify potential habitat for SAR, rare plants and rare vegetation communities, and traditionally used plants identified through IK/TLRU		Hydro One looks forward to receiving information from the MNO to incorporate into the FWPs and EA document. Hydro One has been working with MNO since June 2021 to receive a proposal on updated capacity funding needs for Region 1 and Region 2. Hydro One has continually outreached to MNO over the

Comment #	Reference to Field Plan	Section	Comments (June 22, 2022)	Recommendation	Response (Hydro One – July 20, 2022)
			studies received from Indigenous communities and communicated through engagement with Indigenous communities…" Region 1 and Region 2 Comment: No data from Region 1 or Region 2 has been included in the desktop analysis, to date, as Region 1 and Region 2 have yet to finalize a satisfactory/new capacity funding agreement and requires additional assurances from Hydro One prior to the execution of TKLUS data collection.		past 12 months to advance the capacity funding agreement discussions and existing budgets have remained available to the Regions for their ongoing participation. Hydro One was pleased to recently receive information from MNO on a new budget proposal and is keen to finalize the agreements in the coming weeks in order to ensure meaningful participation throughout the EA.
Appendix B - #24	Terrestrial Field Work Plan	6.2 Desktop Analysis and Field Planning, Page 49	Details/Quotation: "Existing literature and digital data provided by Hydro One, available in-house at Golder, and obtained through published reports and grey literature, as well as IK/TLRU studies received from Indigenous communities, will be reviewed and compiled to determine which data are available to support the requirements for the vegetation and wetlands baseline." Region 1 and Region 2 Comment: See Comment #23		Please refer to the response to comment #23.
Appendix B - #25	Terrestrial Field Work Plan	6.2.1 Site Selection, Page 50	Details/Quotation: The following variables will be factored into survey location selection: • Size and distribution of each plant community type; • Unique plant communities; • Surveys for rare plants and critical landform/vegetation associations; and Access constraints.		Hydro One is providing Field Notices to Indigenous communities prior to the commencement of field work that described the work to be completed and provided a link to PDF maps and a webviewer where the proposed survey locations could be viewed.

Comment #	Reference to Field Plan	Section	Comments (June 22, 2022)	Recommendation	Response (Hydro One – July 20, 2022)
			Region 1 and Region 2 Comment: Plants of importance to Region 1 and Region 2 must also be a variable that is factored into survey location selection.		
Appendix B - #26	Terrestrial Field Work Plan	6.2.2 Access and Field Maps, Page 50	Details/Quotation: "A map book of proposed survey locations will be created once the preliminary Project footprint for each alternative route is available (i.e., after the access roads and supporting infrastructure are designed). As such, maps of proposed survey locations are not currently available to accompany this field work plan." Region 1 and Region 2 Comment: See Comment #18		Please refer to the response to comment #25.
Appendix B - #27	Terrestrial Field Work Plan	6.3.2 Botanical Survey, Page 51	Details/Quotation: Traditional use plants include berries, edible mushrooms, Labrador tea (Rhododendron groenlandicum), paper birch (Betula papyrifera), sugar maple (Acer saccharum), white cedar (Thuja occidentalis), and various grasses including wild rice (Zizania palustris) and sweet grass (Hierochloe odorata). Additional traditional use plants and species of importance to Indigenous communities, as identified through IK/TLRU studies and community engagement, will be included. Region 1 and Region 2 Comment: As Region 1 and Region 2 have yet to finalize a satisfactory/new capacity		Hydro One looks forward to receiving information from the MNO to incorporate into the FWPs and EA document. Section 4.2 of the FWP indicates the following: "Hydro One will consider Indigenous Knowledge, including traditional knowledge/traditional lands and resource use (IK/TLRU), at all stages of the Project…input could include identifying sensitive areas that a community would like undisturbed, or areas communities believe should be included in the field studies."

Comment #	Reference to Field Plan	Section	Comments (June 22, 2022)	Recommendation	Response (Hydro One – July 20, 2022)
			funding agreement and require additional assurances from Hydro One prior to the execution of TKLUS data collection, any listings of traditional use plants must be verified with Métis harvesters and land users through the respective RCCs to ensure all relevant species are noted. Further, should additional species be identified through the execution of the TKLUS, provisions for additional botanical surveys must be made.		

7. Indigenous Community Comment and Hydro One Response: Mitaanjigamiing First Nation Comment shared during April 14, 2022 Project Update call on the Aquatic and Terrestrial Field Work Plans for the Waasigan Transmission Line Environmental Assessment.

Question	Response
Which guidance is being used to define the significant wildlife habitat (SWH) considered? Is this region 4W?	The draft criteria schedules for Ecoregion 3W (MNRF 2017) will be consulted to define specific SWH types. Criteria schedules have not been prepared for the ecoregions that the Project overlaps. In the absence of criteria schedules for these ecoregions, the draft criteria schedules for Ecoregion 3W, as well as the Significant Wildlife Habitat Technical Guide (MNR 2000), have been consulted. References: MNR. 2000. Significant Wildlife Habitat Technical Guide. 151 p. MNRF. 2017. Significant Wildlife Habitat Criteria Schedules for Ecoregion 3W. Draft October 2017. Ontario Ministry of Natural Resources and Forestry, Peterborough, Ontario. 65 pp.

8. Indigenous Community Comment and Hydro One Response: Red Sky Metis Independent Nation Comments shared during April 14, 2022 Project Update call on the Aquatic and Terrestrial Field Work Plans for the Waasigan Transmission Line Environmental Assessment.

Question	Response
Can you provide more information on electrofishing? Seems like it could harm fish, is this a best practice?	Electrofishing is a widely used sampling method that is generally considered to be one of the most effective and benign ways to capture fish. The backpack electrofishers that are used have fully adjustable settings so that the electrical current output can be tailored to the water conductivity as well as the best settings to capture the desired species or group of species, resulting in a reduced risk of harm or mortality. Each backpack electrofisher operator is certified in its use and has taken a course that focuses on how the electricity affects fish, such that they can readjust during sampling if it is determined that fish are reacting adversely. Assuming protocols are followed, there is substantially less risk of mortality using this method than other traditional methods such as minnow traps, seine nets or gill nets. An explanation of how electrofishing works and why it is one of the best methods is more complex than the information provided here and we would be happy to provide additional detail as appropriate to each community's needs.
How are the surface water field sites identified?	The field survey will target a subset of waterbodies that are crossed by the preliminary Project footprint for each alternative route (rather than the full list of crossing locations). The field surveys will target approximately 25% of the total estimated number of mapped and unmapped waterbody crossings along the preliminary Project footprint of each alternative route, which includes both the transmission line corridor and access roads. The site selection process for the subset of waterbody crossings will rely primarily on the guidance and procedures under the *Crown Forest Sustainability Act, 1994*, S.O. 1995, c. 25 (CFSA). Site selection will also consider a scaled approach, with a plan to select a representative number of waterbody crossings under three different categories of watershed size: small (areas of 1 km^2 to 50 km^2), medium (areas of 50 to 500 km^2), and large (areas greater than 500 km2) will be applied. The scaled approach to the site selection process will offer the opportunity to extrapolate the field data from a particular watershed category to other waterbody crossing locations in the same category. Further detail can be found in Section 5.2.1 of the Draft Waasigan Field Work Plan – Aquatic.
Can you share more on the QA procedures for data collection?	As described in the Draft Waasigan Field Work Plans (Terrestrial and Aquatic), data collected during the baseline field survey will undergo a Quality Assurance/Quality Control (QA/QC) process for consistency and accuracy. The specific tasks for field data QA/QC include: 1. Field data will be ideally collected on digital data forms via tablet where feasible. Hardcopies of the datasheets will also be carried in the field as a contingency measure in the event of tablet failure, breakage, loss, or poor weather (i.e., rain). Some field data require physical documentation due to the complexity of the data (e.g., anuran call surveys) 2. Field equipment (e.g., electronic scales and water quality meters, acoustic monitors) will be calibrated according to manufacturer's recommendations. 3. Prior to leaving each survey site, the biologist/technician/specialist will QA/QC each digital or physical datasheet collected for completeness. At the end of each field day, the biologist/technician/specialist will QA/QC the digital or physical datasheets for the day to confirm completeness and accuracy. The digital datasheets will be uploaded to the Golder server daily. The GPS files and photos will be downloaded onto a laptop and uploaded to the Golder server, where suitable internet access is available.

Question	Response
	4. Data will subsequently be reviewed by a qualified, experienced office-based Golder employee to identify any errors or omissions that may have been missed by the field staff. The data will also be reviewed by a Golder senior biologist or specialist as appropriate. 5. Equipment will be checked daily (as appropriate; for example, acoustic monitors will only be checked during deployment and collection) to confirm it is operating within the allowable range and that the calibration records are up to date.
Why isn't red headed woodpecker listed? Aren't they a local SAR species also?	In Ontario, records of breeding Red-headed Woodpecker occurs across southern Ontario to the southern edge of the Canadian Shield and in the extreme southwest corner of northwestern Ontario (Cadman et. al. 2007). This known breeding range does not overlap the Project study area and thus this species is not considered in the assessment. If your community has additional information to share on this species, we welcome the sharing of that information for consideration in field planning. References: Cadman, M.D., D.A. Sutherland, G.G. Beck, D. Lepage, and A.R. Couturier, Editors. 2007. Co-published by Bird Studies Canada, Environment Canada, Ontario Field Ornithologists, Ontario Ministry of Natural Resources, and Ontario Nature, Toronto, xxii + 706 pp. ISBN 978-1-896059-15-0.
What is the difference between the LSA and RSA relative to field programs?	For the EA, it will consider three different study areas: Project footprint, Local Study Areas (LSAs) and Regional Study Areas (RSAs). For the purposes of the Project, the Project footprint will be the smallest and most refined study area and will include the right-of-way and supporting infrastructure (e.g., access roads and laydown areas). Local study areas (LSAs) are defined as areas outside of the Project footprint where measurable changes to the environment resulting from the proposed activities from any Project phase may be anticipated. Regional study areas (RSAs) are defined as areas within which the potential effects of the Project may interact with the effects of other projects, resulting in the potential for cumulative effects. Both the LSA and RSA can be specific to each environmental discipline. For aquatics, field work will focus on sites crossed by the Project footprint and LSA because the majority of potential Project-related effects are expected to occur within those areas. For wildlife and wildlife habitat, vegetation and wetlands, field surveys will focus on the LSA. The LSA is designed to capture the area where direct and immediate indirect effects from the Project on soils, vegetation and wildlife, will occur at the local scale. On the other hand, the RSA for wildlife criteria is intended to capture an area in which populations of wildlife that interact with the Project exist. For example, for a wide-ranging species like moose whose populations are highly managed, they will be assessed in the RSA defined by wildlife management units that overlap with the Project.