APPENDIX 4.0-A

Draft Environmental Assessment Comment Responses

ATTACHMENT 4.0-A-1

Government Review Team Comment Responses

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Table 1: Environment Canada and Climate Change – Ravi Patel – May 19, 2023

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1	n/a	Hi Sarah, Hope you are doing well. I am the Environmental Assessment Officer in ECCC-EPOD assigned this file. I am reaching out to understand if there are any project crossovers with First Nation communities or federal lands? Please let us know if there are any SARA implications as well. Thank you, Ravi Patel	n/a	Hi Ravi, Thank you for your email. I can confirm that the project does not cross any First Nation reserve land or federal land. With regard to implications relating to the *Species at Risk Act* (SARA), the wildlife species under ECCC's mandate that we have identified in the Project study area and are listed as endangered, threatened and extirpated species in Schedule 1 of the Act are summarized in the attached table. We have also included comments in relation to the *Migratory Birds Convention Act, 1994* where applicable. To see the details in the Draft Environmental Assessment report, refer to Section 6.5 Wildlife and Wildlife Habitat, and Appendix 6.4-A Terrestrial Baseline Report. Kind regards,

Table 2: Ministry of the Environment, Conservation and Parks - Environmental Permissions Branch - Mahdi Zangeneh, Senior Noise Engineer – June 15, 2023

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1	n/a	**Description, Map and Figures:** the project involves several components. The introduction section of the report should include a description / listing of all the project components. These include but may not be limited to: Lakehead Transformer Station (TS) in the Municipality of Shuniah; Hydro One Mackenzie Transmission Station; Dryden Transformer Station; two transmission lines, etc. The locations of these project components should be clearly (not approximately) shown in figures (aerial photographs) c/w scale and legend.	n/a	Section 3.0 (Project Description) of the Draft EA Report included a description of the Project components and detailed figures of the Project including aerial imagery were provided in Appendix 3.0-B. Section 6.9.5.2 (Spatial Boundaries) lists the spatial boundaries assessed in the noise assessment including the Project footprint that lists the Project components considered for the noise and vibration assessment. Additional figures specific to Section 6.9 (Acoustic and Vibration Environment) were also included in Appendix 6.9-A of the Draft EA report.
2	n/a	**Ministry Documents:** attached (Guideline and supporting documentation) are two Ministry documents guidelines for the assessment of high-voltage transmission lines projects. Please ensure that your noise report and assessment take these two Ministry documents into consideration. <u>Ministry documents:</u> A) Part C- NPC-360, (Protocol for Predicting Audible Noise from HV Transmission Lines), of the document entitled: Protocol for the Measurement and Prediction of Audible Noise from HV Transmission Lines (Final Draft)- Publication NPC-360 dated March 31, 2011 (Ver. 2); and B) The example acoustic assessment report for high voltage transmission lines entitled “Acoustic Assessment Report, ACME Power Generation, Proposed Green Valley High Voltage Transmission Line, Main Road to Secondary Road Anytown, Ontario” dated April 6, 2011.	n/a	The MECP reviewed the Acoustic Environment workplan for the Project in November 2022, where the guidance documents and approach that would be considered for the noise assessment were outlined. The workplan approach for transmission line operations was that a qualitative assessment was to be carried out considering the Ontario Hydro Protocol. The MECP confirmed they had no comments on this approach in November 2022. In addition, the MECP reviewed the draft and final Terms of Reference and did not identify these Ministry guidelines during that review. These two Ministry guidelines were also not raised on other recent northern Ontario transmission projects. A qualitative assessment of noise from the operations of the transmission line was carried out and documented in the Draft EA Report. It includes the commitment that the Project will be designed and operated to meet the requirements of the Ontario Hydro Protocol, which provides the same noise limit (55 dBA) as the MECP’s NPC-360. The outcome of this assessment would not be expected to change if NPC-360 were considered. Based on the above and meeting with the MECP on July 20, 2023, the assessment approach presented in the Final EA Report will continue to be consistent with the workplan reviewed by MECP.
3	n/a	**Points of Reception:** list all points of reception on both sides of the proposed two transmission lines. It should be noted that an assessment of predicted audible noise (i.e., operational audible noise) is not required for transmission lines of 600 kV or less where a point of reception exceeds 200 m from the closest edge of the right of way (Part A of Ref. item 2A above). The construction noise as noted in the report requires assessment.	n/a	Based on discussion with the MECP on July 20, 2023, representative noise-sensitive points of reception (PORs) will be identified and listed in the noise section of the Final EA Report. Not all potential PORs currently identified in the noise section of the EA will be listed or shown. As per the discussion with the MECP on July 20th, the construction noise assessment carried out in the noise section of the EA is sufficient.
4	n/a	**Vacant lots:** noise sensitive vacant lots and approved (future) developments were not considered in the noise report. The noise and vibration report should assess these points of reception.	n/a	Based on discussion with the MECP on July 20, 2023, vacant lots will be discussed in the noise section of the Final EA Report. However, each vacant lot along the transmission line alignment will not be identified. It is expected that the existing representative PORs are representative of any potential vacant lots.

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5	n/a	**Vibration:** identify buildings / receptors that are in sensitive to vibration due to construction blasting and piling.	n/a	Based on discussion with the MECP on July 20, 2023, representative vibration-sensitive points of reception (PORs) have been identified and listed in the vibration section of the Final EA Report. This is related primarily to the construction operations. Per the discussion with the MECP, locations of probable construction blasting are not currently known. Assumptions regarding the likely blast designs and known construction equipment have been used to estimate stand-off distances where vibration monitoring will be required.
6	n/a	**Assessment:** the noise and vibration impact assessments of all the project components referenced in item 1 above should be included in the report. The noise assessment should follow the guidance in item 2A and 2B above. The vibration assessment should follow the guidelines in Publication NPC-119 for blasting and Publication NPC-207 for piling (impulse vibration).	n/a	The noise and vibration assessment considered all the Project components which were described in detail in Section 3.0 (Project Description) of the Draft EA Report. Please refer to the response to Comment #1 for additional information. Based on discussion with the MECP on July 20, 2023, the vibration assessment continues to consider the Project components presented in the EA according to the rationale that was included in the EA. The Final EA Report has been updated to include additional information on why these were appropriate.
7	n/a	**UTM coordinates of the transmission lines and PORs**: considering the extensive length of the two transmission lines, which spans over 300 km, we request the provision of UTM coordinates for all selected points of reception and vacant lots / transmission lines. To ensure efficient data management, we ask for the coordinates to be provided in an Excel file format.	n/a	Excel files with the UTM coordinates of the transmission line, all potential PORs and the representative PORs will be provided to the MECP.

Table 3: Ministry of Environment, Conservation and Parks - Technical Support Branch, Northern Branch– Scott Parker Surface Water Specialist – June 23, 2023

#	Document, Section and Page Number	Comment	Request/Recommendation	Hydro One Response
1	n/a	**Mitigating Environmental Impacts** Most, if not all, operational impacts to surface water quantity and quality may be mitigated by utilizing best management practices (BMPs) during the construction phase of the Project and by the inclusion of riparian vegetation buffer strips and erosion control measures along streams that intersect the RoW to attenuate runoff from the RoW, reduce sedimentation and erosion and provide shade cover thereby reducing stream temperature. As the Waasigan Transmission Line project moves forward, uncertainty can be reduced by making conservative assumptions, planning implementation of effective mitigation and monitoring measures and using available adaptive management measures to address potential unforeseen circumstances should they arise. Mitigation measures need to be based on proven and recognized best management practices, standard protocols for stream crossings, land clearing and/or working near water with machinery that are well understood and have been applied to transmission line construction projects throughout northern Ontario. The Draft EA indicates that an Environmental Protection Plan (EPP) will be developed for the project that describes industry standards, best management practices (BMPs) and site-specific mitigation and protection that will be implemented during construction. It is recommended that the EPP summarizes mitigation measures and a strategy for their effective implementation that includes contingency planning. Inspection, monitoring, and follow-up should occur throughout the Project duration to evaluate the effectiveness of mitigation measures and modify or enhance measures as necessary through adaptive management. Due to the variability of water crossings and ancillary areas, the proposed construction mitigation measures presented in the EPP does not need to be site specific except near waterbody crossings identified as a potentially sensitive watercourse or area of concern. Confirmatory field sampling/testing of bed and bank materials near waterbody crossings of concern or in sensitive areas may be required. The collection and sampling of stream water to characterize background water quality for locations of concern prior to commencing construction activities at the site may also	n/a	As outlined in the EA, surface water monitoring will be completed at waterbodies that include greater sensitivity or implications to change, with a plan to identify the specific monitoring locations during the permitting and design phases of the Projects and to complete the monitoring for pre-, in-, and post-construction phases of the work as required. The monitoring for the surface water discipline will be focused on water quantity and quality alone and include the physical sampling and testing for TSS (using turbidity as a real-time proxy/analog), as well as visual inspections to confirm the presence or absence of oil or sheen. Contingency plans will be developed in the event of an unexpected change to water quantity or quality (e.g., increase in turbidity in accordance with CCME standards). The identified monitoring program was targeted at specific environmental indicators (surface water quantity and quality) and expressions of change that have the greatest likelihood to be influenced by Project activities.

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		be required. In these cases, samples should be analyzed for the following parameters: • pH, conductivity, alkalinity, turbidity, total suspended solids, total dissolved solids, cations, anions, total metals; and • Field temperature and dissolved oxygen measurements.		
2	n/a	**Guidance for Road and Water Crossing Construction** The Project must be carried out in compliance with the best management practices for road construction and operation and will be constructed in accordance with the MNRF's Environmental Guidelines for Access Roads and Water Crossings (1995), Crown Land Bridge Management Guidelines (MNR 2008), Northern Land Use Guidelines – Access: Roads and Trails (INAC 2010) and Fish-Stream Crossing Guidebook (B.C. Ministry of Forests, Lands and Natural Resource Operations, B.C. Ministry of Environment and Fisheries and Oceans Canada 2012). It is recommended that the Canadian Council of Ministers of the Environment (CCME) Canadian Water Quality Guideline for the Protection of Aquatic Life for suspended sediment and turbidity be followed where bankside, in-stream and/or dewatering work is required. In these locations, trigger/threshold values should be established, and sampling should occur in potentially sensitive receivers before, during and after such work is undertaken. It is also recommended that the following Ontario Provincial Standard Specifications be included to the requirements related to road, bridge and ancillary area construction: C) Ontario Provincial Standard Specification (OPSS 805) – Construction Specifications for Temporary Erosion and Sediment Control Measures D) Ontario Provincial Standard Specification (OPSS 182) – General specifications for Environmental Protection for Construction in Waterbodies and on Waterbody Banks **E)** Ontario Provincial Standard Specification (OPSS 518) – Construction Specifications for Control of Water from Dewatering Operations	n/a	It is acknowledged that the identified guidance documents OPSS documents will be relied on to inform the construction and maintenance of water body crossing structures. Further to this and in the case of waterbodies targeted for in-water works, water quantity and quality monitoring (e.g., monitoring of streamflows and/or water levels, turbidity, etc.) will be completed during the pre-, in-, and post-construction phases of the work as required. The turbidity monitoring will be aligned to CCME standards, noting that contingency plans will be developed in the event of an unexpected change to water quantity or quality conditions.
3	n/a	**General Requirements for Development in Ontario** In addition to the requirements and BMPs listed above, the following practices are general requirements for the construction and operation of transmission line projects in Ontario:	n/a	It is acknowledged that all water taking and discharge activities will be conducted in accordance with the requirements of PTTW, EASR and/or ECA, and, as part of this, be guided by appropriate mitigation and monitoring programs. Further to this and in the case of waterbodies targeted for in-water works, water quantity and quality monitoring (e.g., monitoring of streamflows and/or water levels, turbidity, etc.) will be completed during the pre-, in-, and post-construction phases of the work as required.

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		F) Any water taking (for road construction, water crossings, foundation dewatering, etc.) must be carried out in compliance with the conditions for registration on the Environmental Activity and Sector Registry (EASR) or a Permit to Take Water (PTTW) as applicable. If dewatering for tower foundations is required, excavation dewatering must not be discharged into any surface water feature. The discharge should be located down-gradient, into a low-lying vegetated area to promote infiltration. Mitigation measures such as filter fabric on inlet pump head and/or straw bale/filter fabric device or equivalent should be utilized to minimize sediment transport during excavation/construction dewatering. G) Similarly, any surface water diversion used to create and maintain a dry work area to facilitate the installation or improvement of water crossings should consist of a closed system (pump), taking water from above the proposed crossing, pumping the water around the construction area and returning the water to a nearby downstream point with no significant change to water quantity or quality. This generally requires temporary stream channel impoundment above the proposed water crossing. The pump intake should be screened to prevent sediment uptake. Erosion control and energy dissipation measures must be implemented at the proposed discharge location to disperse flow over a broad area to minimize surface scour of the streambed, sediment transport and deposition in the downstream watercourse. Where discharge water cannot meet CCME guidelines for suspended solids and turbidity, additional treatment, approved by the Ministry of Environment, Conservation and Parks (MECP) may be necessary. H) Consideration should be given far enough in advance to allow enough time to prepare and submit applications to the MECP for PTTWs and/or ECAs if required. This is especially important where surface water and hydrogeological technical studies are required. Site-specific surveys of waterbodies requiring crossings should be completed well in advance of requiring such approvals. This will also help in the identification of any sensitive waterbodies that may require additional provisions respecting water crossing construction and monitoring.		The turbidity monitoring will be aligned to CCME standards, noting that contingency plans will be developed in the event of an unexpected change to water quality conditions.

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		I) Road construction will require the removal of unsuitable subsoil, earthworks at waterbody crossings, excavation and placement of bedding and/or backfill materials for bridge foundations and culverts and fill to construct road embankments and travel surfaces. Excavated materials must not be stored or stockpiled in areas near the surface water feature to minimize the potential for sediment laden runoff. Similarly, the stockpiling of required aggregates (sand, gravel, rock, crushed rock) for the construction of the road bed, temporary access roads and ancillary work areas, and construction and the installation of water body crossings must not be near surface water features for the same reason. J) Provisions for domestic sewage (septic) waste/treatment from construction camps, laydown areas and other associated ancillary construction areas for the Project must be carried out in compliance with an ECA (for each location) as required. K) Spill management planning and mitigation must be developed and implemented for the transportation, storage and handling of hazardous materials during the construction and operational phase of the Project. Hazardous materials may include but are not limited to fuels and batteries for vehicle and equipment operation; oils, grease and liquid chemicals for vehicle and equipment maintenance; and explosives for blasting activities. Furthermore, the development of a contingency plan is required to inform decision making in the event mitigation measures are not effective. **L)** Mitigation measures must remain in place until final rehabilitation of temporary work areas is completed. Similarly, mitigation measures are required at construction and/or laydown sites and non-temporary water crossings during the indefinite operational period of the project or until they are remediated or reclaimed to minimize the potential for off-site movement of sediment-laden water and any contaminant toward any surface water feature. Stormwater management during the construction phase must also be designed to effectively mitigate road-bed stormwater runoff.		

Table 4: Ontario Parks – Sarah Lyons, Planner - June 1 2023

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1	App 2.0 b, Section 1	Clarification is needed; the language is misleading. Paragraph 3 on page 1 says the project is proposing to cross Quetico Provincial Park. Should change to “project area” or “a section of the access road.”	n/a	The language in Section 1 of Appendix 2.0-B has been changed to clarify that an access road of the Project footprint crosses Quetico Provincial Park.
2	App 2.0 b. 2.3	Question- Campus Lake Management Direction is that the existing corridor may continue to be used, but does not mention that expansion of corridor is permitted. Will the twinning of the line expand the current footprint of transmission corridor?	n/a	Yes, an additional 46 m wide right-of-way (ROW) will be required adjacent to the existing transmission line ROW.
3	App 2.0 b. 3.2.1	Geographical error- reference to crossing QPP north of Win Lake is geographically incorrect. The ROW runs adjacent to the park boundary north of Win Lake.	n/a	The language in Section 3.2.1 of Appendix 2.0-B has been revised to state that the Project footprint for the preferred route runs adjacent to Quetico Provincial Park in one location north of Win Lake.
4	Section 7.1 Pg 159 and 174	Win Lake geographical error shows up again. There appears to be no consideration of viewscapes for backcountry canoeists on Pickerel Lake within Quetico Provincial Park, or where the proposed WTL crosses Turtle River White Otter Lake Provincial Park with the current preferred route. Quetico is the province's second busiest wilderness canoeing destination and is an international canoeing destination. We requested previously that visual impacts on the wilderness canoeing experience in Quetico be considered. Recommend clarification on whether aesthetics and viewscapes were considered in these areas and how a decision was made. This comment also pertains to the consideration of the option to align the TL with older linear infrastructure north of Eva Lake.	n/a	Hydro One has revised the geographical error noted by Ontario Parks at Win Lake and made the recommended changes to Section 7.1.9.1.1 (Changes to Protected Areas). Revised to note *“The Project footprint crosses Quetico Provincial Park in one location north of Win Lake where the ROW runs adjacent to the park boundary.”* The distance of potential receptors was considered within the visual/aesthetic and acoustic and vibration spatial boundaries. For example, the LSA (1.5 km setback) for Section 6.9 (Acoustic Environment) was developed based on professional judgement and guidance provided by AER Directive 038: Noise Control Directive (Directive 038) (AEUB 2007) for noise assessments in Alberta (no similar guidelines for Ontario have been established). Additionally, the LSA for Section 7.4 (Aesthetics) was developed to capture the potential local direct and indirect effects of the Project on the visual aesthetics criteria that may extend beyond the Project footprint. The area is established to assess the potential effects of the Project from foreground (1 km from the ROW) viewing distances. Where visual details are most easily discernible by viewers. Feedback during the Terms of Reference and EA stages were that the Project should parallel existing linear developments to the extent practicable to limit adverse effects. This includes the co-location of linear infrastructure to limit visual effects. Approximately 96% of the Project parallels an existing transmission line, including all crossings of protected areas. Section 7.4 (Visual Aesthetics) acknowledged that the Project will be visible at certain points and mitigation was included to limit adverse effects to the extent possible. The visibility mapping completed for the Project (Appendix 7.4-B) showed that the Project will be visible to campers and recreational users within protected areas and parks to some extent depending on distance to the Project. Hydro One has revised Section 7.4.7.3.1.3 (Visual Impact of the Project) to provide additional details on the visibility of the Project within protected areas and the canoe route (Path of the Paddle Route) that may have visibility of the project from Quetico Provincial Park in the Final EA. The views from lakes and rivers within parks and protected areas would be similar to viewscape simulations where transmission line infrastructure will be visible above the tree line, and at some locations, ROW clearing may also be more visible. Further, Hydro One has added additional mitigation measures in the Final EAin Section 7.4.7.3.2 (Mitigation Measures)

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				related to the consideration of viewscapes for campers and recreational users within parks and protected areas located within the ROW, Project footprint and LSA. Hydro One has also revised the Final EA Section 7.1 (Land and Resource Use) to reflect these changes. Regarding the former 115-kilovolt transmission line corridor east of Atikokan (north of Eva Lake) – the corridor was decommissioned approximately 30 years ago and has now become revegetated with species including alder and birch. Utilization of this corridor would reintroduce habitat fragmentation and impact wildlife and wildlife habitat. Additionally, the land was released back to the Crown and Hydro One would need to acquire new land rights along this corridor (including from private landowners). The former corridor also crosses an active aggregate operation which could result in significant business loss. Since engagement for the Project began in Spring 2019, the preference based on feedback received has been to align the proposed Project with existing infrastructure to reduce permanent effects on the natural and socio-economic environment (i.e., visual, recreational impacts).
5		Consideration of the impacts on backcountry canoeing posed by the visual impacts of new transmission towers on the wilderness canoeing experience seem to be lacking in the draft EA. Visual impacts will be an issue on Pickerel Lake within Quetico Provincial Park, where there is a sightline to the current preferred route and also where the line crosses Turtle River-White Otter Lake Provincial Park with the current preferred route. Quetico is the province's second busiest wilderness canoeing destination and is an international canoeing destination. Recommend visual impacts on the wilderness canoeing experience in Quetico be addressed and consideration be given to routing the WTL adjacent to older linear infrastructure north of Eva Lake.	n/a	Please refer to the response to Comment #4.
6	APP 2.0-B 2.1-2	Clarification- Proponent states that “”…fly yards will not be located within provincial parks and conservations reserves”. Fly yards are not well defined in section 3.3. What is the difference between a helicopter pad and a fly yard?	n/a	Helicopter pads are areas required for safe landing and take-off where helicopter activities are required (e.g., stringing). Fly yards are larger clearings where structures are assembled and flown to the structure locations to be erected using helicopter rather than assembling the structure at the end location and erected using cranes. Additional fly yards were included in the final EA, outside of provincial parks and conservation reserves, to facilitate helicopter construction operations based on the current construction schedule and to better enable vegetation clearing outside of sensitive wildlife timing windows, to the extent practicable. Additional details will be added to Section 3.3.

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7	6.4.6	Ecosystem loss and alteration values are reported at the scale of the entire project footprint. Recommend including enhanced detail on how negligible impacts to Parks and CRs were determined based on enhanced protections afforded by the PPCRA and site-specific management direction. Clarification should include quantifying the ecosystem alteration and loss specific to the PP and CRs where the WTL is proposed to cross these areas to better understand the local impacts and effects.	n/a	The final EA will include additional clarification on ecosystem alteration and loss specific to protected areas. Quantification of this information is specific to provincial parks and conservation reserves that overlap/intersect the Project ROW and Project footprint. Additional analysis related to these areas was completed and summarized in a table and a discussion about the analysis was also provided in Section 6.4.7.2.1 and Section 6.4.7.3.1. Additionally, information specific to lands in parks and protected areas crossed by the ROW was added to Section 7.1 of the EA. This includes the approximate forested area to be cleared. Updates include Section 7.1.7.1.1 (Parks and Protected Areas Within the Study Areas) and Section 7.1.9.1.1 (Changes to Protected Areas).
8	APP 2.0-B 3.2.3 (pg 13)	Campus Lake Resource Management Plan states “controlled access is a fundamental principle in management of the area”. The draft EA indicates that new access roads within the CR are temporary but also states that existing roads will be improved and maintained permanently. The current state of existing roads may be limiting access to the area but any improvements may increase access to the area. Recommend mitigation measures to impede access to the CR once construction is complete.	n/a	Approximately 96% of the Project parallels an existing transmission line, including all crossings of protected areas. By nature of following the existing transmission line corridor, including existing access to that corridor, access to the Campus Lake Conservation Reserve will not be materially different than current conditions due to the Project. Existing access trails that are improved to facilitate construction activities will be decommissioned to a state that deters repeated use similar to its current state. This will include removal of watercourse crossing structures, reclamation of any improved road grade, and installation of other erosion protection measures as appropriate (e.g., cross drains, placement of large woody material for soil stabilization, etc.).
9		New access road (proponent`s preferred option), R_2583, deviates from the ROW and from existing cleared land, coming very close to the west side of Campus Lake. This will involve additional land clearing, and it is unclear why the existing access road is not being utilized instead of this new section of road. This new section of access road would also create the opportunity for increased access. Recommend exploring opportunities to utilize the existing access road or implement mitigation measures where new access roads adjacent to parks/CRs are required.	n/a	The existing trail referenced is narrow and passes through an existing structure making it unsuitable for construction traffic. There is no opportunity to widen the trail due to the presence of exposed bedrock that would likely need blasting in the vicinity of existing structures. The proposed ROW is too steep to follow with an access road. Hydro One considered adjusting the existing access to traverse further east around the structure but the presence of guy wires and the steep terrain negated that option. The new access road (R_2583) follows an existing trail that will be reclaimed after construction and was identified as the best option in this location to minimize overall impacts.
10	Section 3.4.1.11 3.4-25	Under Clean-up and Rehabilitation, the proponent states: “Unless prompt revegetation is required for erosion control, most areas will be left to naturally revegetate following grading and stabilizing activities. However, rehabilitation will also include site-specific measures to promote the nature revegetation of disturbed areas, as appropriate.” Temporary helicopter landing areas and access roads are proposed within CRs and PPs. Recommend utilizing enhanced vegetation recovery methods to return these areas to their natural condition through native tree planting and native ground cover to help return the impacted sites to their original state in a faster manner than natural seed-in. Species	n/a	As described in Appendix 2.0-B, no helicopter pads are planned within provincial parks. One helicopter pad is located within the Campus Lake Conservation Reserve. There were previously two helicopter pads in this area, but this was reduced to one based on feedback from Ontario Parks. Hydro One will plant seedlings along new off-ROW access roads in conservation reserves and provincial parks. This is limited to roads that require new clearing and new construction. Where existing roads and trails are used, these areas will be reclaimed to their pre-existing condition to the extent practicable. In addition, Hydro One will plant seedlings in the one temporary helicopter pad within the Campus Lake Conservation Reserve following construction.

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		used should be a mix of native tree species and ground cover that is planted throughout impacted areas of the CR and PP (e.g., NOT clover, grasses, or fescue, a.k.a. MTO seed mix) to avoid the introduction of non-native species and to ensure the site is returned to a condition that reflects what was originally in place.		New, on-ROW trails will be reclaimed, and topsoil will be rolled back over the reclaimed road. Areas that are subject to erosion, and waterbody crossing locations that have been removed after construction will all be seeded with an approved forestry seed mix. The reclaimed on-ROW access road will naturally revegetate along with the remainder of the right-of-way and will be managed to support vegetation that is compatible with the safe operation of the transmission line.
11	Section 6.4.7.2.1 6.4 Pg 64/65	The use of herbicides and pesticides on the WTL footprint is currently being considered. The importance of not applying this treatment in a manner that will impact First Nations is referenced and states that "herbicides may be used as an efficient measure for controlling noxious weeds within the ROW." Applying chemical vegetation control is inconsistent with the park or CR values. Therefore, it is recommended that alternate methods of vegetation control be employed in both provincial parks and conservation reserves during the construction, operation, and maintenance phases. Additionally, equipment cleaning protocols are suggested to be implemented to mitigate the introduction/spread of invasive species during construction/operations/maintenance phases. Using faster methods of vegetation recovery than natural seed-in and using only native species for this enhanced revegetation within PPs and CRs.	n/a	Please refer to the response to comment #10 for additional details on seeding in provincial parks and conservation reserves. Through engagement during the draft EA process, we heard feedback from Indigenous communities and stakeholders regarding concerns with the use of herbicides to remove and manage vegetation on the Project. After extensive consideration of this feedback, herbicides will not be used during construction of the Project or for future maintenance of this transmission line, including within protected areas. The final EA has been updated to reflect this. Mitigation measures were included in Section 6.4.7 (Potential Effects, Mitigation Measures, and Net Effects) to limit the potential to introduce non-native invasive plant species into new areas.
12	6.6 Fish & Fish Habitat 6.6.7 Pg 81	The document states, "In sections where the Project crosses provincial parks, access roads will be located along existing roads, within the proposed ROW or the adjacent existing transmission ROW to the extent reasonably possible." Recommend also including this wording for CRs.	n/a	This sentence has been amended to the following: "In sections where the Project crosses provincial ***parks and conservation reserves,*** access roads will be located along existing roads, within the proposed ROW or the adjacent existing transmission ROW to the extent reasonably possible."
13	APP 2.0-B	Appendix 2.0-B is intended to demonstrate how the EA meets the requirements of Section 21 of the PPCRA with respect to utility lines in PPs/CRs. However, there are some deficiencies with respect to the "mitigation of environmental effects." For example, several log fill crossings and one culvert crossing are proposed within the PPs and CR. However, clear-span crossings are preferred as they maintain stream bed/substrate/habitat. Recommend consideration of/include information about crossing types and enhanced mitigation measures that will apply in PPs and CRs.	n/a	Log fills are prescribed only in wet areas where there are no defined channels and are intended only to maintain natural drainage patterns. There will be no log fills installed in any actual waterbody. The culvert, likewise, is prescribed in an area where there is no discernible channel but where there may be surface flow at various times of the year. Culvert installation and removal is deemed to be instream work and therefore cannot be conducted during restricted activity periods. If work cannot be scheduled to avoid instream work during the restricted activity period, then a clear span structure will be installed. All crossings will be field surveyed and confirmed prior to construction. In the event that an unidentified waterbody is encountered during project execution, it will be assessed and an appropriate crossing method selected and submitted to the governing regulatory authority for review and approval.

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14	APP 2.0-B	Appendix 2.0-B is intended to demonstrate how the EA meets the requirements of Section 21 of the PPCRA with respect to utility lines in PPs/CRs. However, there are some deficiencies with respect to the "mitigation of environmental effects." For example, the need to confine/limit grubbing and stripping topsoil to as minimal an area as possible (I.e., only on the tower sites). Increased use of helicopters to build, operate, and maintain the line would eliminate/reduce the need for new/upgraded access roads and/or reduce the need for grubbing/stripping the topsoil within the ROW. In accordance with section 21 of the PPCRA, we recommend greater consideration for the use of helicopters in the construction/ operation/maintenance of the WTL.	n/a	Additional fly yards were included in the final EA, outside of provincial parks and conservation reserves, to facilitate helicopter construction operations based on the current construction schedule and to better enable vegetation clearing outside of sensitive wildlife timing windows, to the extent practicable. However, increased helicopter use will not avoid access road construction because ground crews for foundations will still require conventional (road) access to each tower site. Grubbing and topsoil stripping will be limited to temporary access and at tower locations and increased helicopter use will decrease the amount of grubbing, stripping and grading at the tower sites. For work completed in the winter, the overall amount of grubbing and grading will be reduced for all activities.
15	7.1 Land & Resource Use Table 7.1-4 Pg 19	Possible error on calculations for Quetico & TRWOLPP- areas provided in LSA and RSA are identical for each park.	n/a	The final EA has been revised accordingly.
16	Section 7.1 7.1.7.1.2 Pg 40	Edit: Should read "Ontario Parks: Planning and Management Policies (1992)" rather than *The Ontario Parks: Planning and Management Policies (1992)*	n/a	The final EA has been revised accordingly. Updated to "Ontario Parks: Planning and Management Policies (1992)".
17	7.1 Land & Resource Use - Figure 7.1.2-4 Protected Areas in the Study Areas - Table 7.1.6 Pg 47 7.4 Aesthetics 7.4.5.2.1 Pg 13	Recommend including details on potential project impacts to Aaron Provincial Park. Although not within the project footprint, park management direction should be considered, as external development can affect internal park values. E.g. aesthetics & viewscapes, acoustics (particularly during park operating seasons), etc.	n/a	Utility provisions considered for provincial parks and protected areas are outlined in Table 7.1-6 (Provisions for Utility Infrastructure in Parks and Protected Areas in the Project footprint). Aaron Provincial Park is not located within the land and resource use LSA (Section 7.1 [Land and Resource Use]), therefore, potential impacts to this park were not considered within this section. However, potential impacts related to visual impacts related to Turtle River-White Otter Lake Provincial Park, Campus Lake Conservation Reserve, Quetico Provincial Park, Aaron Lake Provincial Park, Kashabowie Provincial Park, the White Otter Enhanced Management Area, and the Swamp River ANSI are assessed in Section 7.4 (Aesthetics). The LSA for the acoustic environment is a 1.5 km buffer on the Project footprint, including access roads, and was developed based on professional judgement and guidance provided by AER Directive 038: Noise Control Directive (Directive 038) (AEUB 2007) for noise assessments in Alberta (no similar guidelines for Ontario have been established). Aaron Provincial Park is located outside this area. Since noise and vibration attenuate with distance, potential noise and vibration effects from the Project are expected to be the highest in the LSA, and any measurable noise and vibration effects due to the Project are predicted to be generally limited to the LSA.

#	Document, Section and Page Number	Comment	Request/Recommendation	Hydro One Response
18	Section 7.1 Figure 7.1.7-2	Edit: Map legend should not read ‘Designated Camping Site” as these sites are not designated. They are known and frequently utilized camping sites. Suggested change would be to re-word to *Camping Site*.	n/a	An updated figure is included in the final EA.
19	Section 7.1 7.1-169 Operations and Maintenance Stage and Table 7.1-35 Pg 184	Hydro One’s vegetation standard- Recommend including wording on how vegetation will be managed in provincial parks & CRs- E.g. no application of chemicals within park or CR boundaries.	n/a	Please refer to the response to comment #11.
20	Section 7.1 Table 7.1-35 Pg 182	Edit: Duplication- To support ongoing park use, signs will be installed on the ROW.	n/a	Comment acknowledged. The duplicate has been removed from the table.
21	Throughout	In the Draft EA, the proponent uses a “conservative approach” that identifies all possible locations for all types of infrastructure to choose locations that will be used later (possibly at the permitting stage). This approach is not ideal and may be problematic, as we cannot understand the project's actual effects at this stage. As the RSA/LSA did not include analysis of parks and CRs, this approach may prevent both the proponent and reviewers from understanding in detail the sensitive areas that will require additional/special mitigation measures or the design/operation/construction changes. The final EA should include specific project details about the locations of infrastructure, construction methods, and mitigation measures within PPs and CRs in order for MECP to conduct a thorough review of site-specific impacts and for the EA to demonstrate that all the conditions of Section 21 of the PPCRA are met.	n/a	Additional information related to potential effects and mitigation measures proposed in provincial parks and conservation reserves has been added to the final EA as described in the previous comment responses. The Project footprint included in the final EA is based on the most up to date information available and includes field verification. However, additional engineering design and further field verification will be completed during the detailed design stage, which is typical for large and complex linear projects. As a result, the final EA includes a conservative footprint. This can be seen in the access plan where multiple access road options have been included. However, generally, only one access road to each structure is expected.
22	WTL Interactive Project Map	The proposed ROW for the WTL runs adjacent to and within 20m of the northern Quetico Park boundary. This does not leave a lot of room for error and increases the likelihood of illegal access. A new access road is proposed near this location, and a small yet significant incursion to within the park boundary occurs. The pull sites located east of this area are also identified as coming within 11m of the park boundary. Recommend amending the location of the proposed road and pull-sites and realigning the WTL ROW north of the existing ROW to allow for a greater buffer of the park’s northern boundary and, therefore less chance of error/incursion.	n/a	The access road in this area was adjusted to follow the proposed ROW and no longer crosses Quetico Provincial Park. The updated access road alignment is included in the final EA. The existing transmission line is currently located close to the border of Quetico Provincial Park and the addition of the second ROW is not anticipated to significantly change the level of access to the park.

Table 5: Ministry of the Environment, Conservation and Parks - Environmental Permissions Branch - Bryan Armstrong, Program Analyst - Conservation and Source Protection Branch – June 29, 2023

#	Document, Section and Page Number	Comment	Request/Recommendation	Hydro One Response
1	Section 6.3	**Source Protection Requirements** The Clean Water Act, 2006 (CWA) aims to protect existing and future sources of drinking water. To achieve this, several types of vulnerable areas are delineated around surface water intakes and wellheads for every municipal residential drinking water system that is located in a source protection area. These vulnerable areas are known as a Wellhead Protection Areas (WHPAs), and surface water Intake Protection Zones (IPZs). Other vulnerable areas that can be delineated under the CWA for municipal drinking water systems include Significant Groundwater Recharge Areas (SGRAs) and Highly Vulnerable Aquifers (HVAs). In addition, event-based modelling areas (EBAs) and Issues Contributing Areas (ICAs) may also occur, overlapping with one of the four above-named vulnerable areas. Projects that are subject to the Environmental Assessment Act that fall under a Class EA, or one of the Regulations, have the potential to impact sources of drinking water if they occur in designated vulnerable areas or in the vicinity of other at-risk drinking water systems (i.e. systems that are not municipal residential systems), and source protection plan policies could apply. Specifically electrical transmission lines projects that result from environmental assessments may include activities that, if located in a vulnerable area, may be considered a threat to sources of drinking water (i.e. have the potential to adversely affect the quality or quantity of drinking water sources) and could be subject to policies in a source protection plan. Where an activity poses a risk to drinking water, policies in the local source protection plan may impact how or where that activity is undertaken. Policies may prohibit certain activities, or they may require risk management measures for these activities. Municipal Official Plans, planning decisions and prescribed instruments must conform with policies that address significant risks to drinking water and must have regard for policies that address moderate or low risks. For further information on the characteristics and the technical aspects associated with the drinking water sources, we encourage the proponent to contact the	n/a	The Lakehead Region Conservation Authority (LRCA) was contacted for a response to this comment. Their reply, received on August 9, 2023, indicated that the proposed Project did not cross any WHPA or IPZ and, as such, the LRCA had no concerns with the Project relating to source water protection.

#	Document, Section and Page Number	Comment	Request/Recommendation	Hydro One Response
		source protection Watershed Manager Melissa Hughson at 1-807-344-5857 ext 223 for the Lakehead Region Conservation Authority to seek further information concerning the assessment reports, its technical appendix and source protection plan policies (if any is appliable).		
2	Section 6.3	**Waasigan Transmission Line Project** In the Draft Environmental Assessment Report for the Waasigan Transmission Line Project, the proponent has discussed source water protection thoroughly as part of Section 6.3 Ground Water and Section 6.3.5.2.1.2 Source Water Protection and Well Supply. The proponent has noted that the eastern part of the project is located within the Lakehead Source Protection Area (LSPA) and that parts of the project cross several areas designated as significant groundwater recharge areas (SGRAs) and Highly Vulnerable Aquifers (HVAs). The proponent has mapped these areas in Appendix 6.3-C of the report. The proponent has also noted the potential project-environment interactions in section 6.3.6 of the report to assess impacts on the ground water during the construction and maintenance aspects of the project. In addition to this the proponent identified the potential effects to groundwater quality from spills with proposed mitigation measures, and the potential change effects to groundwater quality and quantity from excavations and dewatering activities with proposed mitigation measures. It is suggested that the report make specific reference to associated mitigation measures for activities that may alter recharge (e.g. vegetation cleaning or road construction) in SGRAs. The report currently does not specifically account for the potential water quantity impacts in SGRAs.	n/a	Mitigation measures to address potential changes to groundwater levels and flows from altered recharge rates due to vegetation clearing, and road and structure construction are included in the Final EA and apply to the entire Project area, including SGRA. An additional mitigation measure to avoid locating Project facilities involving large areas of hardened surfaces, such as construction camps and laydown yards, in designated SGRA to the extent practicable has also been added to the Final EA to specifically address potential water quantity impacts to SGRA.

Table 6: Ministry of the Environment, Conservation and Parks – Northern Region – Guowang Qui, Ph.D, Air Quality Analyst – June 30, 2023

#	Document, Section and Page Number	Comment	Request/Recommendation	Hydro One Response
1	Section 6.7.3. d) of Table 6.7-3	It states that Suspended Particulate Matter SPM in Ontario is defined as Suspended Particulate Matter (less than 44 µm diameter). It should be noted that the ministry's ambient air quality criteria (AAQC) list has removed the <44 µm for suspended particulate matter (SPM) (https://www.ontario.ca/page/ontarios-ambient-air-quality-criteria).	n/a	The footnote under Table 6.7-3 has been removed.
2	Section 6.7.3.	The report indicates that ozone baseline data is used to calculate the NO2 emissions from the Project. However, no information was provided in the report about how the modelled NOx concentrations were converted to NO2 concentrations.	n/a	Ozone data was used to estimate the conversion of NOx to NO_2. Further details have been added to Section 6.7.7.1.
3	Section 6.7.5.	The report indicated that there are no major human-made influences on air quality within the LSA except for the Atikokan Generating Station. It is unclear how far the Atikokan Generating Station is from the proposed transmission line, and if the baseline air quality from the station in Thunder Bay can provide a conservative representation of existing air quality for the study area, especially for receptors near the Atikokan Generating Station. Emissions from the Atikokan Generating Station should be included to assess the cumulative impacts of the project if the proposed transmission line is close to the generating station and there are sensitive receptors near the transmission line.	n/a	There are no major human-made influences on air quality within the LSA, with the exception of the Atikokan Generating Station. The Atikokan Generation Station is over 2.5 km away from the ROW and there were no sensitive receptors identified in between the transmission line and the Atikokan Generating Station. This is stated in Section 6.7.5. The only sources that could potentially influence the Project include naturally occurring sources and those from long range transport. The predominant west wind limits contributions are from southern Ontario and the Atikokan Generating Station; therefore, the Thunder Bay Station is considered most appropriate to characterize the air quality in this area. This station is located in a much more urban environment than most of the Project and is therefore considered to provide a conservative representation of existing/background air quality in the study area.
4	Section 6.7.5: Monitoring Station Information Table 6.7-5	For the approximate distance and direction from the project site, it is unclear how the distance between the station and the project site was calculated. It seems the station in Thunder Bay is close to the project site near Lakehead Transformer Station.	n/a	Table 6.7-5 has been updated with revised distances
5	Section 6.7.5: Air Quality Background Concentrations. Table 6.7-7	For the background concentrations shown in Table 6.7-7, it is unclear whether these concentrations are for NO2 or NOx. It should be noted that the Ontario Ambient Air Quality Criteria are for NO2, instead of NOx.	n/a	This data is NO_2. Table 6.7-7 has been updated to avoid confusion

#	Document, Section and Page Number	Comment	Request/Recommendation	Hydro One Response
6	Section 6.7.7.1	It seems all emission rates are calculated using 24-hr averaging based on the information from the report. This method may underestimate air quality effects for contaminants with 1-hr criteria, standards or guidelines as construction activities will occur during the daytime, not over a 24-hr period. For example, for SO2 and NO2, the emission rates should be calculated using 1-hr averaging to obtain more accurate/conservative modelling results for a 1-hr averaging period	n/a	1-hour average emission rates for CO, NOx and SO2 have been added to Table 6.7-18 and were used for comparison to 1 hour or 8-hour project criteria
7	Section 6.7.7.1	It was assumed that, as a worst case, all activities could occur within any 24 hours and an approximate 10 km stretch along the ROW, and emission rates were modelled as a series of volume sources located along a 10 km stretch of the transmission line to represent the emission sources operating at once in the same volume of air. The emissions will likely be diluted too much if emissions from the construction activities spread over 10 km stretch as the stretch is usually less than 1 km for each construction activity over 24-hr (for example land clearing, access road construction, staking, geotechnical investigations or foundation installation, etc.). MECP previously raised a concern about using emissions spread over 5 km stretch for other transmission line projects. Please provide detailed data to support the assumption that the use of emissions spread over 10 km stretch is reasonable and conservative for this case.	n/a	As requested, the assessment has been revised to consider a smaller construction area of 5km in distance with all activities potentially occurring simultaneously. This still results in approximately 70 vehicles operating exclusively within a 5 km stretch of construction, which is considered very conservative and impractical. In reality, not all equipment would be operated concurrently within the same area, it is likely to be more spread out with multiple areas of the Project being constructed simultaneously and idling will be minimized where practical. The assessment has been updated accordingly.
8	Section 6.7.7.1	A screening assessment was conducted to assess the potential effects on local air quality from the Project. The predicted concentrations at 100 m from Right-of-Way are close to the applicable criteria, standards or guidelines for some contaminants. It is assumed that the modelled concentrations will be above the applicable criteria, standards or guidelines for some sensitive receptors within 100 m from Right-of-Way. It is recommended that the maximum modelled concentrations be provided for the sensitive receptor(s) closest to the Right-of-Way. And more detailed mitigation measures should be included and a management plan including complaints response procedures should be developed before the construction of the Project.	n/a	As requested, modelled concentrations at 50 m from the ROW were added to the assessment, along with the corresponding number of potential receptors within 50 m. It should be noted, however, that the series of potential air sensitive receptors were identified using Ministry of Natural Resources and Forestry (MNRF) Land Information Ontario (LIO) datasets. The MNRF LIO spatial dataset identifies existing structures that include, but are not limited to, dwellings, garages, sheds and barns. These structures have been conservatively considered as sensitive receptors, but it is anticipated that a number of these structures may not qualify as sensitive receptors and would require further verification. In addition, conservation reserves, conservation authority administrative areas, First Nation reserve lands, provincial parks, Ontario trail network segments and Ministry of Health service provider locations were also identified using these datasets and included as potential sensitive receptors. Hydro One or its contractor(s) will prepare and implement a Dust Control/Air Quality Plan prior to construction, this will include a complaints response protocol.

#	Document, Section and Page Number	Comment	Request/Recommendation	Hydro One Response
9	Section 6.8.3 Pages 6.8-5 – 6.8-6	There are some typos for Global Warming Potential (GWP). The GWP for CH4 should be 28, and the GWP for NO2 should be 265. Please correct the typos and verify the GWP values used in the calculation of GHG emissions.	n/a	These values have been corrected in Section 6.8.3. It has been confirmed that the correct values were used in all calculations.
10	Error in the note of Tables 6.8-9, 6.8-10	N2O is nitrous oxide instead of nitrogen dioxide.	n/a	The term ‘nitrogen dioxide’ has been corrected to ‘nitrous oxide’ for Tables 6.8-9 and 6.8-10. It was confirmed that this error does not occur elsewhere in Section 6.8.

Table 7: Ministry Of Energy – June 22, 2023

#	Document, Section and Page Number	Comment	Request/Recommendation	Hydro One Response
1	Executive Summary P.24/25 Conclusion	The document notes the following – "*The selection of the Project as the preferred alternative is supported by the identification of the Project as a priority project for the province.*" Hydro One should clarify in their Environmental Assessment that while the project was referred to as a priority in the 2013 Long Term Energy Plan, it is not considered a priority project under Section 96.1 of the Ontario Energy Board Act. For clarity, there are two interpretations of having a transmission project labelled as a priority. The Waasigan Project (previously referred to as the Northwest Bulk Project) was labelled a priority in the Ministry of Energy's 2013 Long Term Energy Plan. This label was utilized to provide Hydro One with certainty to move ahead with development work on the project. However, in 2015, the Ontario Energy Board Act was amended to establish Section 96.1 which provides Cabinet the power to issue an Order-In-Council (OIC) to designate a transmission project as a priority project. For projects designed as priority projects with the use of an OIC, the Ontario Energy Board's determination on project need is waived when reviewing a Leave to Construct application.	n/a	Comment noted. This sentence has been updated in the Final EA as follows: "*The selection of the Project as the preferred alternative is supported by the identification of the Project as a priority project for the province in the 2013 Long Term Energy Plan.*"
2	Introduction p. 5/31 Project Overview	The document notes the following – "*In 2016, 2017 and 2022, the Ministry of Energy and IESO reassessed the scope and schedule of the Project and reconfirmed the need for the Project to support growth and maintain reliable electricity supply in northwestern Ontario. The Project was identified as a priority project by the IESO based on technical, economic, and other considerations*." Hydro One should clarify in their Environmental Assessment that while the project was referred to as a priority in the Ministry of Energy's 2013 Long Term Energy Plan, it is not considered a priority project under Section 96.1 of the Ontario Energy Board Act.	n/a	Comment noted. The Final EA has been revised to clarify that while the Project was referred to as a priority in the Ministry of Energy's 2013 Long Term Energy Plan, it is not considered a priority project under Section 96.1 of the *Ontario Energy Board Act*.

#	Document, Section and Page Number	Comment	Request/Recommendation	Hydro One Response
		As with the first comment, the Waasigan Project (previously referred to as the Northwest Bulk Project) was labelled a priority in the Ministry of Energy's 2013 Long Term Energy Plan. This label was utilized to provide Hydro One with certainty to move ahead with development work on the project. However, in 2015, the Ontario Energy Board Act was amended to establish Section 96.1 which provides Cabinet the power to issue an Order-In-Council (OIC) to designate a transmission project as a priority project. For projects designed as priority projects with the use of an OIC, the Ontario Energy Board's determination on project need is waived when reviewing a Leave to Construct application.		
3	Alternatives p. 7/28 Advantages and Disadvantages of Alternatives to the Project	The document notes the following – "*The selection of the Project as the preferred alternative is supported by the identification of the Project as a priority project for the province.*" Hydro One should clarify in their Environmental Assessment that while the project was referred to as a priority in the Ministry of Energy's 2013 Long Term Energy Plan, it is not considered a priority project under Section 96.1 of the Ontario Energy Board Act. As with the first comment, the Waasigan Project (previously referred to as the Northwest Bulk Project) was labelled a priority in the Ministry of Energy's 2013 Long Term Energy Plan. This label was utilized to provide Hydro One with certainty to move ahead with development work on the project. However, in 2015, the Ontario Energy Board Act was amended to establish Section 96.1 which provides Cabinet the power to issue an Order-In-Council (OIC) to designate a transmission project as a priority project. For projects designed as priority projects with the use of an OIC, the Ontario Energy Board's determination on project need is waived when reviewing a Leave to Construct application.	n/a	Comment noted. This sentence has been updated in the Final EA as follows: "*The selection of the Project as the preferred alternative is supported by the identification of the Project as a priority project for the province in the 2013 Long Term Energy Plan.*"

#	Document, Section and Page Number	Comment	Request/Recommendation	Hydro One Response
4	Conclusions p.6/13 Advantages and Disadvantages	The document notes the following – "*The selection of the Project as the preferred alternative is supported by the identification of the Project as a priority project for the province*" Hydro One should clarify in their Environmental Assessment that while the project was referred to as a priority in the Ministry of Energy's 2013 Long Term Energy Plan, it is not considered a priority project under Section 96.1 of the Ontario Energy Board Act. As with the first comment, the Waasigan Project (previously referred to as the Northwest Bulk Project) was labelled a priority in the Ministry of Energy's 2013 Long Term Energy Plan. This label was utilized to provide Hydro One with certainty to move ahead with development work on the project. However, in 2015, the Ontario Energy Board Act was amended to establish Section 96.1 which provides Cabinet the power to issue an Order-In-Council (OIC) to designate a transmission project as a priority project. For projects designed as priority projects with the use of an OIC, the Ontario Energy Board's determination on project need is waived when reviewing a Leave to Construct application.	n/a	Comment noted. This sentence has been updated in the Final EA as follows: "*The selection of the Project as the preferred alternative is supported by the identification of the Project as a priority project for the province in the 2013 Long Term Energy Plan.*"
5	Section 7.7 First Nations Rights, Interests and Use of Land and Resources p.8 7.7.1.2 Section 35 Rights	The document notes the following – "*In recognition of these rights, the Governments of Canada and Ontario hold the duty to consult Indigenous communities about this Project. However, while the Government of Ontario holds the fiduciary responsibility for ensuring adequate and appropriate consultation and accommodation."* The second sentence is only a fragment and requires revision. Secondly, its clarity would be improved by the removal of the term 'fiduciary'. The Supreme Court of Canada has stated that '…*while the Crown's fiduciary obligations and its duty to consult and accommodate share roots in the principle that the Crown's honour is engaged in its relationship with Aboriginal peoples, the duty to consult is distinct from the fiduciary duty that is owed in relation to particular cognizable Aboriginal interests.'*	n/a	Comment noted. This paragraph has been updated in the Final EA as follows: *"In recognition of these rights, the Governments of Canada and Ontario hold the duty to consult Indigenous communities about this Project. The Crown may delegate to a proponent the procedural aspects of consultation, but the ultimate legal responsibility to meet the duty to consult lies with the Crown."*

#	Document, Section and Page Number	Comment	Request/Recommendation	Hydro One Response
		As written, the sentence is unclear, and ENERGY would recommend that Hydro One revise the sentence. For example: *'The Crown may delegate to a proponent the procedural aspects of consultation, but the ultimate legal responsibility to meet the duty to consult lies with the Crown'.*		
6	Section 7.8 Métis Rights, Interests and Use of Land and Resources p.8 7.8.1.2 Section 35 Rights	The document notes the following – "*In recognition of these rights, the Governments of Canada and Ontario hold the duty to consult Indigenous communities about this Project. However, while the Government of Ontario holds the fiduciary responsibility for ensuring adequate and appropriate consultation and accommodation."* The second sentence is only a fragment and requires revision. Secondly, its clarity would be improved by the removal of the term 'fiduciary'. The Supreme Court of Canada has stated that '…*while the Crown's fiduciary obligations and its duty to consult and accommodate share roots in the principle that the Crown's honour is engaged in its relationship with Aboriginal peoples, the duty to consult is distinct from the fiduciary duty that is owed in relation to particular cognizable Aboriginal interests.'* As written, the sentence is unclear, and ENERGY would recommend that Hydro One revise the sentence. For example: *'The Crown may delegate to a proponent the procedural aspects of consultation, but the ultimate legal responsibility to meet the duty to consult lies with the Crown'.*	n/a	Comment noted. This paragraph has been updated in the Final EA as follows: *"In recognition of these rights, the Governments of Canada and Ontario hold the duty to consult Indigenous communities about this Project. The Crown may delegate to a proponent the procedural aspects of consultation, but the ultimate legal responsibility to meet the duty to consult lies with the Crown."*

Table 8: Ministry of Tourism, Culture and Sport, Jim Antler, Policy Advisor – June 30, 2023

#	Document, Section and Page Number	Comment	Request/Recommendation	Hydro One Response
1	Section 3.4.1.11 Decommissioning of Temporary Construction Infrastructure Page 3.4-24	Draft EA - Approximately 30% of access roads and trails outside of the ROW will remain in place to provide access for operation and maintenance activities. All others will be decommissioned and rehabilitated. *Comment – Positive that most access roads and trails will be decommissioned and rehabilitated. For the roads/trails that need to remain, it will be important to minimize any potential impacts to remote tourism facilities/activities and remote values of the area.*	n/a	Comment acknowledged.
2	Section 5.6.5 Assess the Significance of Net Effects	Draft EA - Table 5.6-2 outlines definitions of significant net effects for each criteria. For noise, vibration and visual landscape - net effect would be considered significant if it is assessed as: • high magnitude; • long-term to permanent in duration; and • occurring at any geographic extent. For Recreation and commercial tourism – significant if assessed as: • high magnitude; • medium to long-term in duration; and • occurring at any geographic extent. *Comment – Understand the focus on longer-term, more significant effects. However, short-term noise impacts (i.e. blasting, heavy equipment) can also impact the enjoyment of tourists and potentially lead to guest complaints, early cancellations etc.* *Section 7.1.9.8 outlines that noise concerns will be addressed as they arise through a complaint resolution mechanism by contacting Hydro One. While this is appreciated, the key will be how quickly these can be addressed.* *From a visitor perspective, industrial noises can degrade the wilderness experience, particularly in remote areas. Given the short-term nature of vacations, timely responses will be critical. This will be further complicated by the fact that many remote facilities will not have*	n/a	Throughout the EA process, Hydro One has been engaging with Indigenous communities, government agencies, landowners, and relevant stakeholders to identify concerns related to noise in order to address them in advance of construction through the addition of mitigation or avoidance measures. As stated in Table 6.9-23 of the noise section of the EA, Indigenous communities, landowners, and relevant stakeholders along the Project will be notified of the planned construction schedule prior to the start of construction and prior to specific noisy activities, such as implosion operations (e.g., cable splicing), in order to reduce potential effects. These measures aim at identifying as many concerns as possible in advance of construction recognizing the challenges related to communication and remoteness and how that would impact individuals making their concerns known. In addition as part of the complaint resolution mechanism established for construction, timelines will be established to ensure any grievances received are resolved in a timely manner.

#	Document, Section and Page Number	Comment	Request/Recommendation	Hydro One Response
		phones, internet or other ways for guests to communicate their concerns until the trip is over.		
3	Section 6.6.7.6 Changes to Public Access to Fish Habitats - Sub-section 6.6.7.6.1: Potential Effects Pages 6.6-112 and 113)	Draft EA - The improvement of existing access roads and development of new access roads for the Project could result in a negative effect on the abundance of fish species, through increased access to waterbodies where populations are present. Access to previously undisturbed areas introduces opportunity for recreational fishing and baitfish harvest in populations that have not previously experienced such pressure. Increase in commercial outfitters – As harvest pressure may increase from local recreational fishers, guided outfitters, who operate commercially and have benefited from exclusive or limited access to certain areas (i.e., creating visitor experiences based on values of remoteness and wilderness), are likely to see the expansion of access to have a negative effect on their activities. *Comment – appreciate the acknowledgement of potential impacts to remote businesses. Use of the term "exclusive access" is problematic and should be avoided going forward. Remote operators do not have exclusive access to Crown lands. It is the method of access to the area that may be limited to the areas they utilize (i.e. no existing roads or trails so access needs to be by air or water).* *We recognize there are some in the tourism sector (i.e. road-based businesses) that may benefit from increased road/trail access to Crown lands. However, we encourage Hydro One to maintain remoteness as much as possible, especially where remote tourism operators are located.*	n/a	Hydro One has committed to the use of existing access roads to the extent possible to limit project disturbances on local businesses and removal of temporary access infrastructure upon project completion (Section 6.6). Section 6.6.7.6 of the Final EA Report has been amended to remove the "exclusive access" text.
4	Section 6.9.6 Description of the Existing Environment – Sub-section 6.9.6.1: Methods Page 6.9-21	Draft EA - The potential PORs (points of reception) in the Local Study Area for the acoustic and vibration environment include sensitive land uses with human activity, including dwellings, campsites or campgrounds, sensitive institutional uses or sensitive commercial uses (e.g., hotel or motel). *Comment – Please clarify if tourism lodges, camps and outposts are considered "sensitive commercial uses."*	n/a	The locations of representative points of reception will be included in the noise section of the EA. The land use of these representative points of reception will be provided, however the information is limited to the level of detail available through the MNRF LIO datasets (i.e., buildings identified but unknown type/purpose). The representative points of reception are expected to represent the worst-case noise-sensitive land uses including lodges, camps and outposts.

#	Document, Section and Page Number	Comment	Request/Recommendation	Hydro One Response
		In addition we did not find information on where the PORs will be located or what type of location they are (i.e. dwelling, tourism facility).		
5	Section 7.1.7.4 Hunting, Trapping, and Fishing Sub-section 7.1.7.4.1: Regulatory Context and Regional Overview Pages 7.1-104 and 105	Draft EA – quotes a 2015 report talking about fishing as a key economic driver for northwestern Ontario and that the remote fishing experience is considered a 'signature experience' for northern regions, offering many sport fishing opportunities at drive-in, boat-in, and fly-in access lodges or outposts. *Comment - how will the project maintain, or not degrade, that existing remoteness?*	n/a	Feedback received during the Terms of Reference and EA stages indicated that there was preference for the Project to be co-located with existing linear developments to the extent practicable to limit adverse effects, including those on tourism and "remoteness". Approximately 96% of the Project parallels an existing transmission line, thereby minimizing the area of remote land that will be affected by the Project. In addition, Hydro One will minimize adverse effects to the existing remoteness through a number of mitigation measures described throughout the EA sections including committing to the use of existing access roads to the greatest extent possible to limit project disturbances on the biophysical environment, local businesses, tourism operators, and land users. This includes the removal and/or reclamation of temporary access infrastructure and access roads where practicable.
6	Section 7.1.7.5.2.2 Camping, Commercial Tourism, and Recreational Infrastructure Pages 7.1-144, 145 and 146	Draft EA – There are several paragraphs describing Regional Tourism Organizations (RTOs) and visitor stats for angling from 2019. Page 7.1-146 then notes that "recent information regarding visitors to RTO 13c was not available…" and, instead, quotes a 2015 Tourism Northern Ontario report on angling visitors. *Comment – 2020 is latest year data is available due to time lag in receiving statistics from Stats Canada – our Ministry utilizes their National and Visitor Travel Surveys for visitation data. But travel fell substantially in 2020 due to COVID.* *Note that our regional/sub-regional data does not include US visitation data. The quality of the data describing US visits to Ontario is particularly low and as such the ministry has not released US data at the sub-provincial level since 2014. However, US spending information is available. Visitor statistics at the RTO level are available here - https://www.ontario.ca/document/tourism-regions. Select the region of interest and download the related regional tourism profile.*		The latest visitor data available for the RTO 13c subregion at the time of writing was from 2019 and was sourced from the MTCS link below. (https://www.ontario.ca/document/tourism-regions/region-13c-northwest-ontario). Visitor data for RTO 13c from 2019 is likely a more accurate representative of visitor activity in the region under normal conditions in comparison to the 2020-2021 years as numbers during this time were likely much lower than average due to various provincial, national, and international travel restrictions that were implemented during the COVID-19 pandemic. Hydro One acknowledges that regional/sub-regional data does not include United States (US) visitation data and that the quality of data describing US visits to Ontario is low as the ministry has not released US data at the sub-provincial level since 2014. Hydro One will revise the reference to the 2015 Tourism Northern Ontario Report to include the most recent data available from Statistics Canada regarding provincial, national, and international spending information.

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7	Section 7.1.9.6.1 Changes to the Quantity and Quality of Lands Available for Recreation and Commercial Tourism Activities Page 7.1-175	Draft EA - as construction progresses along the line, outdoor tourism and recreational land users will gain general public access to new access roads, which could be used for a variety of activities (e.g. ATVing, hiking, fishing). This is predicted to increase net land availability and access for commercial tourism and recreational land use in the LSA, opening new areas to tourism users or a broader range of individuals and groups. *Comment - Increased access can open opportunities but it can also cause issues for the remote sector as noted above.* *Page 7.1-177 does say the following – "Guided outfitters and tourism establishment areas may lose uncompetitive or select access to certain areas of the LSA or experience a perceived decrease in the level of remoteness in areas of existing use, due to increased access and use of other outdoor tourism and recreational users."* *Given the potential decrease in remoteness and impacts to outfitters, what is the mitigation or solution should impacts occur?*	n/a	Feedback received during the Terms of Reference and EA stages indicated that there was preference for the Project to be co-located with existing linear developments to the extent practicable to limit adverse effects, including those on tourism and "remoteness". Approximately 96% of the Project parallels an existing transmission line, thereby minimizing the area of remote land that will be affected by the Project. The access plan developed for the Project aims to minimize opening previously inaccessible areas to users. New access roads are to be built as temporary and restored when no longer in use, except those required for ongoing operations and maintenance of the new transmission line.
8	Section 7.4.5.2 Results Sub-section 7.4.5.2.1: Regulatory and Policy Setting Page 7.4-13	Draft EA - Management Guidelines for Forestry and Resource-Based Tourism (MNRF 2022c) were reviewed as they describe a range of practices, tools, and techniques for protecting resource-based tourism values, which include visual aesthetics and scenic views. They indicate that visual effects (e.g., harvest areas or logging roads visible from resource-based tourism lakes or waterbodies) are an issue of importance at the resource-based tourism/forestry interface. *Comment – It is positive that Hydro One reviewed the Guidelines but what was learned and/or utilized from that review and how did it shape the management of viewscapes for the project from a tourism perspective?*	n/a	The Draft EA Report included mitigation measures aligned with Section 3.5 (Visual Aesthetics/Views) of the Management Guidelines for Forestry and Resource-Based Tourism such as retaining vegetation and landforms to the extent practicable to provide screening of activity and Project components. Additional mitigation measures from this document have been added to the land and resource use and visual aesthetics EA sections (Table 7.1-48 and Table 7.4-12, respectively) such as adjusting locations of transmission structures to reduce effects to visual quality, where practicable.

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9	Section 10.6 Adaptive Management Page 10.6-14	Draft EA - Table 10.6-1: Construction Monitoring Program - notes that for land and resource use the objective is to monitor complaints and use issue resolution through: • Encouraging land and resources users to share any issues and concerns with Hydro One and its contractor during the construction stage. *Comment - Issue resolution should be available during the planning phase. Waiting until construction means Hydro One will be approved to do a variety of activities so any complaints will only be dealt with via modifications of already approved activities (which may not satisfy those with concerns).*	n/a	Issues and concerns identified during the planning phase would be received through engagement during the EA which would be addressed by modifying the Project footprint, activities, mitigation measures and/or commitments included in the EA. Those identified after EA approval would be addressed through an adjustment to Project activities and/or mitigation, and would be incorporated into the Environmental Protection Plan (EPP) for construction. Text in the EA will be adjusted as follows: “Hydro One will encourage land and resources users to share any issues and concerns with Hydro One and its contractor during the planning of the project (i.e., through the EA process or post-EA engagement) and throughout the construction stage.”

Table 9: Ministry of Natural Resources and Forestry - Londa Mortson, Land Use Planning and Strategic Issues Manager, Northwest Region – July 7, 2023

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1	General - Administrative	The Ministry of Natural Resources and Forestry District boundaries and names have changed. Thunder Bay District is now Thunder Bay-Ignace District, Dryden and Fort Frances Districts have amalgamated to become Dryden-Fort Frances-Atikokan District.	When referencing specific Districts, please ensure the correct District name is used. i.e., Thunder Bay-Ignace District, and Dryden-Fort Frances-Atikokan District. MNRF will provide a map showing the new District boundaries.	Hydro One has revised the applicable text throughout the EA to reflect the updated MNRF district names.
2	General - Administrative	Clarification of technical terms used in the Draft EA will improve readers understanding. A glossary or definitions section would be a beneficial addition to this document. Example – The EA should clearly define the structure of each water crossing type, including the difference between a Clear Span and Clear Span Causeway.	Please include a section for definitions of uncommonly used terms in the Final EA. Suggested terms: logfill, clearspan, clearspan causeway, culvert causeway, road access easement, borrow pit, fly yard vs helipad.	Comment acknowledged, This will be included in the Final EA Report as part of the glossary. The definitions of the terms requested are also provided below. Logfill: water crossing type used for small drainage areas that allows water to move under/through the crossing structure. Consists of logs being laid in the lowest area covered by a layer of geotextile and fill material. Clearspan: a structure that spans the entire watercourse without any instream work required. Temporary bridge structures, steel rig mats or other similar structures can be used to achieve a clearspan across a watercourse. Causeway: an anthropogenic section of raised road across low or wet ground. Road Access Easement: agreement reached with land rights holder to use designated area for construction access. Borrow Pit: Source of material used typically for access construction when suitable in situ materials are not available. Fly Yard: designated area used for assembly of transmission line towers. Towers are flown in from the fly yard to the designated tower locations when using heli-erection techniques. Size of fly yards will range in size typically from ~3 ha to 15 ha depending on land availability and project need. Helipad: designated area for safe landing and takeoff of helicopters when performing stringing activities. Typical dimensions are 60m x 60m.
3	General - Indigenous	MNRF will be reviewing the Final EA to ensure concerns brought forward by Métis Nation of Ontario and Indigenous Communities regarding herbicide use, resource harvesting areas, and culturally sensitive areas, have been addressed.	Ontario has delegated the procedural aspects of consultation to HONI and MNRF will be reviewing the Consultation Record and Final EA to ensure concerns brought forward have been addressed.	Comment acknowledged
4	General - Project Description	There is limited information in the EA that details decommissioning, rehabilitation, mitigation, or compliance. The document often indicates that components will be “decommissioned in accordance with	The EA should contain commitments that detail what standards and methodologies will be used to ensure adequate decommissioning of temporary sites. The EA needs	Section 3.4.1.11 of the Final EA Report has been updated to include additional information on

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		applicable regulatory requirements". MNRF is not able to fully assess whether our mandated interested are being addressed or net effects being appropriately considered.	to include a more robust plan that outlines what standards rehabilitation will follow. The MNRF is requesting an Environmental Protection Plan be submitted with the Final EA This will allow the Ministry to understand proposed mitigation measures, project impacts and ensure an appropriate compliance and monitoring plan	reclamation for the Project based on the information below. Rough clean-up and interim reclamation activities will take place throughout the construction of the Project. These activities will include, but not be limited to, removing refuse, grading disturbed areas, contouring disturbed slopes to a stable profile, and re-establishing natural drainage patterns. Final reclamation will be completed outside of frozen conditions as soon as weather and soil conditions permit. Reclamation efforts within and near wetlands will be completed as soon as reasonably possible to reduce the potential impact and to take advantage of access. Flagging, signage and other markings will be removed upon construction completion. Likewise, all waste, geotextile, silt fencing, filter fabric, wood debris, and other Project waste will be removed from Project Site and will be properly disposed. A detailed Project Reclamation Plan will be developed, based on reclamation requirements established through the regulatory process, including input from stakeholders, and regulators. As a component of the Reclamation Plan, a post-construction assessment process will be established. The following general reclamation measures, at minimum, will apply: • Re-grade areas with rutting and erosion gullies. • Re-contour disturbed areas to restore drainage patterns and the approximate preconstruction profile. • Restoration measures, including cultivation or otherwise, to alleviate soil compaction on areas affected by construction, will be undertaken in consultation with the landowner, as appropriate, following the completion of construction and removal of temporary construction access where soil compaction issues are present. • Replace topsoil evenly over all areas that have been stripped. Postpone topsoil replacement

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				during wet conditions or high winds to prevent damage to soil structure or erosion of topsoil. • Natural revegetation will be used as the preferred method of reclamation. Seeding and planting will be limited to erosion-prone areas (e.g., steep slopes), or where required by landowner commitments, or regulatory authorization. • Waterbody crossing locations that have been removed after construction will be restored to pre-construction drainage patterns and seeded/planted with native vegetation (wetland seed mix and shrub stock appropriate for the site conditions and surrounding vegetation community). • Temporary watercourse crossing structures and all materials will be removed upon project completion in accordance with approvals from MNRF, DFO and Conservation Authorities as warranted. Banks may be recontoured, as needed. • Snowfill and ice bridge removals will comply with DFO's Interim code of practice: temporary stream crossings. • All permit requirements and applicable measures from DFO's Measures to Avoid Causing Harm to Fish and Fish Habitat including Aquatic Species at Risk will be followed. • Disturbed areas will be stabilized and restored to prevent erosion, Erosion and sediment control measures will be kept in place until all disturbed ground has been stabilized.
5	General - Appendices	There appears to be several attachments missing in the appendix that are being referred to in the text Example: *(Attachment 6.5-B-7, in Appendix 6.5-B). Referenced in the Wildlife and Wildlife Habitat Section 6.5-53* Example: page 10.4-7 *"The list of environmental commitments for the Project are summarized in Appendix 10.0-A. This list includes commitments summarized in Appendix E of the ToR, as well as those identified through the preparation of the Draft EA Report."* – Appendix 10.0 A did not include a list of commitments.	Please ensure all applicable appendices and referenced information is included in the Final EA.	Comment acknowledged.

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6	General - Invasive species	Invasive species	The Draft EA does not specify how the dispersal of invasive species will be mitigated. For example, a pathway of spread for some species like the Spongy moth (i.e., gypsy moth, *Lymantria dispar*) is through human facilitated movements on transports etc. Section 3.3.6 in the project description (equipment/material laydown areas) indicates that most material will be transported by truck to sites along the ROW, but it is unclear where the building materials will be sourced from.	Section 6.4 (Vegetation and Wetlands) of the Final EA Report includes multiple sections on assessing the potential effects and identification of appropriate mitigation measures for the introduction and spread of noxious and invasive plan species. Additional details have been added on the proposed mitigation measures including the information below. All equipment and vehicles destined for the Project will arrive in clean condition (i.e., free of soil and/or plant material) and will adhere to the Clean Equipment Protocol for Industry (Halloran, et al., 2013). From there, biosecurity planning for the Project follows with an assessment of the potential pathogens, invasive species, and the areas of risk, overlain by the Project footprint, the access plan, and especially the access points from public roadways. Best practices will be employed to limit the potential for spread of invasive weed species and soil-borne pathogens throughout the Project, as well as consideration of more intensive measures on a site-specific basis, as needed. The contractor will minimize the number of vehicles and equipment travelling across lands within areas of concern as much as reasonably possible. All ROW traffic will be restricted to a single, established travel lane and only use approved access routes. Transmission line materials are often specialized and are only available from specific suppliers. Many of the major materials (i.e., tower steel, conductor, foundation materials) will be sourced from manufacturers outside of North America. Reference: Halloran, J., Anderson, H., and Tassie, D. 2013. *Clean Equipment Protocol for Industry*. Peterborough Stewardship Council and Ontario Invasive Plant Council. Peterborough, ON.

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7	General - Former Steep Rock Mine Site	Former Steep Rock Mine Site	At this time, MNRF projects that the Steep Rock pit lake will decant into the greater environment at approximately 394-395m above mean sea level (amsl) with an approximate date of 2070. Upon review of the mapping information, we have the following concerns. • Tower 2A-025 construction elevation is 378.1m (assuming amsl). This tower base will be approximately 16.9m below the estimated final elevation of the Steep Rock pit lake. • Tower 2A-026 construction elevation is 381.3m. This tower base will be approximately 13.7m below the estimated final elevation of the Steep Rock pit lake. • Tower 2A-038 construction elevation is 386.3m. This tower base will be approximately 8.7m below the estimated final elevation of the Steep Rock pit lake. Access Roads R_5013, 5012, 5014, 5059 are proposed to be in an area that is closed under the Public Lands Act (PLA) (please note that the road head is gated and signed) as the area produces large amounts of Acid Rock Drainage (ARD) and is contaminated with metals in soil and we do not want the area to be further disturbed. Additional activity in this area will increase ARD and will lead to contaminating undisturbed areas.	Information provided has been noted. Hydro One has evaluated the potential impacts of the anticipated future lake levels on the project. The area will continue to be monitored and any flooding, if/when it materializes, and any warranted mitigation will be considered collectively with all of Hydro One's system assets.
8	Main Report Page ES-7	"Herbicides will be restricted within the waterbody buffer zone (30 m) unless the herbicide application is conducted by ground application equipment or otherwise approved by the relevant regulatory agency." FMPs require a min of 60m for aerial tending and up to 120m for sensitive water features. Additional text regarding this is also included on ES-11 in relation to fish and fish habitat.	MNRF recommends a 60m buffer from waterbodies, with ground spray application used within that 60 m distance. In the Final EA please include the minimum buffer distance from a water feature with ground application and suggested timing restrictions.	Through engagement during the Draft EA process, Hydro One heard feedback from Indigenous communities and stakeholders regarding concerns with the use of herbicides to remove and manage vegetation on the Project. After extensive consideration of this feedback, herbicides will not be used during construction of the Project or for future maintenance of this transmission line. The Final EA Report has been updated to reflect this change.
9	Main Report Page ES-8 Page ES-9	"A Vegetation Management Plan including measures to protect rare plants and rare vegetation communities will be developed and implemented." "Suitable vegetation management procedures will be implemented to avoid and minimize the introduction and spread of noxious and invasive plants." "Vegetation removal activities will be avoided within wildlife restricted activity periods, to the extent practicable."	MNRF would like to see a Vegetation Management Plan included in the Final EA to more fully describe proposed mitigation measures and avoid potential permitting delays. This should include considerations of compatible vs incompatible vegetation, if there is any intention to relocate vegetation, and monitoring of management procedures after completion. Please identify in the Final EA what mitigations will be implemented in situations where avoidance is not practicable. Please elaborate on what is considered "compatible"	Compatible vegetation includes vegetation beneath and within the ROW that will grow to a height that will not interfere with the safe operation of transmission lines. This includes groundcover vegetation and shrub species. Additional information on vegetation management has been included in the Final EA in Sections 3.4.2.3, including information on compatible versus non-compatible vegetation species. Currently,

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		“Compatible vegetation will be allowed to grow back in the ROW to provide cover and reduce line of sight for predators.”		there is no intention to relocate vegetation, unless identified by Indigenous communities. Monitoring of restoration will be included in the EPP which will be available at least 90 days in advance of construction. Where avoidance of wildlife restricted activity periods is not possible, Hydro One will obtain any necessary permits and approvals (e.g., permits under the *Endangered Species Act)* in order to complete the work.
10	Main Report Page ES-9	“Construction of temporary (e.g., access roads) and permanent (e.g., towers) structures will be limited in wetlands or within 30 m setback from a wetland to the extent practicable.”	The Final EA should identify the locations of access roads and tower locations that will be proposed to be constructed within the 30m setback from a wetland.	Approximately 113 ha of access roads extend into non-PSW wetlands and 356 ha occurs within the 30 m buffer, according to mapping data. Approximately 30% of access roads and trails outside of the ROW will remain in place to provide access for operation and maintenance activities. All others will be decommissioned and rehabilitated using applicable and appropriate methods and standards as discussed in the Final EA Report. Tower locations proposed in the EA are not within PSWs; however, 109 towers are proposed to be located within wetlands, according to mapping data. One tower is proposed within 30 m of a PSW, while 170 towers are proposed within 30 m of a wetland. The above information has been added to the Final EA per MNRF’s comment. Mitigation measures are included in Section 6.4.7.3 regarding work within wetlands.
11	Main Report Page ES-9	“Further, despite some increase in fragmentation, most ecosystems that host plant SAR, plant SOCC and plant species of traditional use are expected to remain abundant and well connected across the LSA. Therefore, with the implementation of avoidance and mitigation measures, the net effects on vegetation and wetlands (i.e., upland, wetland and riparian ecosystems, SAR, SOCC and traditional plant species) are not expected to result in significant adverse effects.”	Please identify the mitigation planned for areas where fragmentation is anticipated to help reduce the isolation of these features from each other, especially in relation to vegetation with limited reproductive mobility.	Less than 1% of each of SAR and SOCC habitat occurs within the Project footprint. Additionally, there will be less than 1% change to available habitat associated with Traditional Use plants. SAR, SOCC and Traditional Use plants occur throughout the RSA such that the Project is unlikely to impact dispersal trends across the landscape. Recommended mitigation strategies within the EA, and the future EPP will support natural

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				regeneration of native species in areas with stable ground to allow re-establishment of local, compatible species within the ROW. Standard mitigation strategies, including and not limited to, arrival to site with clean machinery, will prevent colonization of invasive species, further promoting natural regeneration.
12	Executive Summary Page 13	It is unclear in the Draft EA, what the potential is for road closures or restricted access during construction. Note that authorizations to re-establish road networks that are closed for resource management purposes (such as Ann Bay Road, for example) will be required from MNRF.	MNRF permits and authorizations are required for these items and planning processes would need to be undertaken to establish road closures and no hunting zones. Including more detailed information in the EA about these potential requirements will streamline the permitting and planning process as it will address information/application requirements and public and Indigenous consultation requirements.	Unless otherwise directed by regulatory agencies, Hydro One does not anticipate requiring closure of any public roads during construction operations. Traffic control may be required from time-to-time which may cause short duration interruptions/delays to road users.
13	Executive summary Page 17	The EA specifies that a communications plan will be implemented that will set out standards regarding communications on project updates and community relations, such as providing advance notice of construction activities. While it is recognised that specific information on certain communications may not be known at this time, information such as how are in advance affected/interested parties will be notified of construction activities should be included in the EA. The EA states a commitment to avoid or minimize adverse effects and disturbances to resource users (table 5.2-1; EA approach- page 17).	Include in the Final EA, the timing of notification about construction activities, and the mechanism of how these notifications will roll out (newspaper add, mail out, etc.)	Minimum 48-hour notification in advance of major activities commencing will be provided to Indigenous Communities, directly affected landowners, or as otherwise required by permits/approvals. Notification will typically be completed via email or phone call. Signage will be posted identifying active construction areas along public roadways to better communicate hazards to local road users. Details of construction activities/schedule are anticipated to be made available via Hydro One's project website; however, this will be confirmed closer to construction.
14	Executive summary Page 18	It appears that the Rainy River District was omitted in the community well being, infrastructure, and economy Assessment Results discussion. For example, the population status in the Rainy River district, where a large portion of this project occurs, is not discussed. Tourism is also a major contributor to the local economy and employer in this area and does not appear to be discussed in this section. The town of Atikokan, and communities in unorganised areas, such as Sapawe, are not discussed. Furthermore, the effects to quality of life may be underestimated in the EA and not be restricted to short term effects as suggested in the draft EA, as permanent components will affect some stakeholders permanently. Also noted that this sentence in the EA is not complete and reads "Given the nature of the Project, the potential nuisance effects to quality of life and effects to (no item specified?) are expected to be short term in duration".	As a large portion of this project occurs in the Rainy River District, it is important to include this area in the assessment to create a wholesome EA that outlines what communities will be affected by the project. For transparency, it is also important to acknowledge that the project will result in a long-term occupation of the landscape and not all nuisance effects experienced by stakeholders will be short term in nature.	The spatial boundaries for the population and demographics LSA, quality of life LSA, Transportation and Infrastructure LSA, and community facilities LSA describes in Section 7.2 (Community Well-Being) were selected based on the following rationale: • Ability (and size) of Indigenous and non-Indigenous communities within commuting distance of the Project and construction segments to accommodate temporary supply; • Extent in which potential nuisance and public safety effects are expected; • Extent in which effects to transportation and energy infrastructure are expected; and • Ability (and size) of Indigenous and non-Indigenous communities from which the Project

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				may source water, waste, or emergency services for the Project (based on their service capacity and proximity to the Project).
				
				The spatial boundaries for the labour force and local economy LSA and government finances LSA described in Section 7.3 (Economy) were selected based on the following rationale:
				• The area from which the direct construction and operation workforce could be drawn;
				• The area from which materials, goods, and services needed to construct and operate the Project could be sourced (acknowledging that specialized materials, goods, and services are not likely to be readily available in the area); and
				• Indigenous communities affected by the Project (i.e., communities potentially affected by employment and procurement opportunities).
				
				Communities considered within the EA included the following:
				• The **District of Thunder Bay** which considers Indigenous communities and unincorporated/unorganized rural settlement areas and townships including:
				  • Thunder Bay Metropolitan Area (which includes the Municipality of Oliver Paipoonge, Municipality of Neebing, and the townships of Shuniah, Conmee, O'Connor, and Gillies);
				  • Townships such as Finmark, East Gorham (which consists of the townships of Gorham, Jacques, and Lappe), Kabaigon, Kaministiqua, Kashabowie, Mabella, North Mcintyre, Shabaqua, Shabaqua Corners, Shebandowan, Sistonnes Corners, Sunshine, Toimela, Uppsala; and
				  • Indigenous communities including Fort William First Nation, Ojibway Nation of Saugeen, Lac des Mille Lacs First Nation, and Métis Nation offices for MNO Region 1 (Northwestern Ontario Métis Community),

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				MNO Region 2 (North Superior Métis Community), and Red Sky Métis Independent Nation.
				• The **District of Kenora** which considers Indigenous communities and unincorporated/unorganized rural settlement areas and townships including:
				  ◦ City of Dryden;
				  ◦ Townships such as Borpus Corners, Butler, Dinorwic, Dyment, Greater Oxdrift (which consists of the townships of Aubrey, Britton, Brownbridge, Eton, Rugby, Van Horne, Wainwright, and Zealand), Two Mile Corner, and Wabigoon; and
				  ◦ Indigenous communities including Migisi Sahgaigan (Eagle Lake First Nation), Lac Seul First Nation, and Wabigoon Lake Ojibway Nation.
				• Communities within the **District of Rainy River** limited to the Town of Atikokan and Indigenous communities and unincorporated/unorganized rural settlement areas including Sapawe, Kawene, Couchiching First Nation, Seine River First Nation, Mitaanjigamiing First Nation, Nigigoonsiminikaaning First Nation, and Lac La Croix First Nation.
				
				It should be noted that the Project is not expected to result in adverse impacts to Indigenous and non-Indigenous communities within the District of Rainy River outside of those considered within the assessment as in Table 7.2-4 (Community Well-Being Spatial Boundaries) and Table 7.3-3 (Economy Spatial Boundaries). Communities not listed above are likely to have limited or no service capacity and the Project will not draw resources from these settlement areas.
				
				Based on the above rationale for the spatial boundaries, the inclusion of the whole Rainy River District in the Community Well-being and Economy assessments was not deemed necessary.

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				Standard transmission line routing principles were used to define the most favorable Project footprint that would have the least overall impacts from an Indigenous culture, values and land Use, socio-economic, natural environment, and technical and cost perspective. This included following existing infrastructure and utilizing existing access roads (where practicable) to minimize vegetation clearing, disturbances to land and resource users, and avoid impacts to the environment. Hydro One has prioritized the minimization of negative effects of the Project on the environment for the entirety of the Project and recognizes the importance of maintaining ecological integrity, cultural values, and recreation opportunities, particularly within protected areas. This has led to the identification of site-specific design changes and mitigation measures to limit permanent adverse effects to Indigenous communities and stakeholders including the development of mutually beneficial agreements (where appropriate) with affected rights holders, stakeholders, tenure holders, including guided outfitters and BMA/BHA licence holders. Hydro One has also corrected the text in the executive summary from “Given the nature of the Project, the potential nuisance effects to quality of life and effects to (no item specified?) are expected to be short term in duration.” To “Given the nature of the Project, the potential nuisance effects to quality of life and effects to community well-being are expected to be short term in duration.” Additionally, Hydro One met with MNRF on August 18th, 2023 to discuss comments on the draft EA including Comment #14 (Table 9 – Ministry of Natural Resources and Forestry - Londa Mortson, Land Use Planning and Strategic Issues Manager, Northwest Region - July 7, 2023). MNRF acknowledged the rationale provided above and did not provide additional comments and/or feedback.

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15	S. 0.0, p. ES-3, ES-13, S. 1.1, p. 3 S. 7.1, p. 69 p. 98, Table 7.2-27	To extract aggregate under the Aggregate Resources Act, an aggregate licence is required for private land and an Aggregate permit is required to operate a pit or quarry on Crown land. If a new permit/licence be required, an application must be submitted with MNRF. Additional approvals may be required during the application process through various legislation/regulations, including Planning Act, Ontario Water Resources Act, Environmental Protection Act, Endangered Species Act.	Review the requirements for an aggregate application and ensure they are reflected in the text. Please refer to the cover letter for links to requirements.	The Final EA will be updated to identify that aggregate pit applications will follow the MNRF process outlined at https://www.ontario.ca/page/aggregate-resources#section-7.

16	Introduction Table 1.7-1	Table 1.7-a: Summary of Potential Provincial Permits, Approvals and Authorizations
		This table requires updating for conciseness and providing additional text to accurately reflect the permits and approvals MNRF administers. Examples: Additional text is required, stating that aggregate permits are required to operate pits on quarries on Crown land and private land in designated parts of the province
			MNRF recommends the following edits:
			
			Public Lands Act (PLA), 1990
			
			Clarifying that work permits are required for
			
			• Construction and improvement of roads, trails, and water crossings
			Work planned in-water or on shoreland on both Crown and private land Clarifying that occupational authority (e.g., land use permit) is required for
			
			• temporary construction camps, laydown areas, helipads, etc. Clarifying that other authorizations PLA may be required
			  • Travel permits for restricted roads
			  • Consents to deposit
			  • Letters of authorization
			  • Memorandum Of Understanding (MOU)
			Fish and Wildlife Conservation Act (FWCA), 1997
			
			Listing the potential authorizations that may be required to support the project:
			
			• Licence to Collection Fish for Scientific Purposes
			• Wildlife Scientific Collector's Permit
			• Authorization to Destroy/Take/Possess Nests or Eggs
			• Authorization to Interfere With/Destroy a Black Bear or Furbearing Mammal Den, Beaver Dam
			• Term Agent or Individual Authorization to trap nuisance beaver
				The requested edits have been incorporated into the Final EA.

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			• Notice of Possession to possess a dead animal **Crown Forest Sustainability Act (CFSA), 1994** Remove the duplication of Forest Resource Licenses referenced in the table. **Aggregate Resources Act (ARA), 1990** Additional text to identify the permit require for pits and quarries. • Permit for the extraction of aggregate on Crown land • Permit for the operation of pits and quarries on Crown land and on private land in designated parts of the province. **Forest Fires Prevention Act (FFPA), 1990** Clarifying that tree clearing is regulated under the Crown Forest Sustainability Act, while burning is regulated under the Forest Fires Prevention Act. Exclude the reference to a work permit issued under the Forest Fires Prevention Act. Additionally, Public Lands Acts is incorrectly labelled in this table as part of MECP's mandate. This should be corrected to reflect that the PLA is administered by MNRF. More information on which permits are required under which Acts can be found by looking up the respective Acts in E-laws and reviewing the applicable legislation and regulations.	
17	Evaluation of Alternatives Table 2.2-3 Page 2.2-21	Table 2.2-3: Criteria Categories and Criteria Please note that Barn Swallows are now listed as Special Concern on Ontario's Species at Risk List.	Going forward, please adjust as needed to reflect this change in *Endangered Species Act* status.	Comment acknowledged. Barn swallow is listed as Threatened under the SARA and was included as a SAR species.
18	Evaluation of alternatives	For clarity, the forms of land use occupational authority on Crown Land that will be granted for components of the project (land use permits, for the most part) do not grant right, title or interest in the land. The document frequently refers to the "land rights" that will be required/acquired as part of the project (for example on page 2.2-17).	Suggest to re-phrase to land use occupational authority when referencing land tenure on Crown Land to avoid confusion.	Comment acknowledged. The text will be updated to "private land rights and occupational authority on Crown land" where appropriate.
19	Project Description 3.3.5 Waterbody Crossings Page 3.3-11	"Removal of riparian vegetation will be limited to the extent necessary, and to the requirement of the access road or trail width only. Removal of compatible vegetation at waterbody crossings along the transmission line alignment ROW will generally be limited to a 6 m-wide ROW for equipment access to waterbody crossing structures (e.g., temporary bridges). Additional removal of incompatible vegetation may be required for technical or safety reasons as appropriate."	Please clarify what the intended ROW will be for clearing along waterways, as there are discrepancies between sections of the main report as currently written.	Section 3.3.5 has been updated to indicate a 10 m-wide ROW for equipment access to waterbody crossing structures.

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		Previously, the Executive Summary (ES-10) stated that “Clearing at water crossings along the ROW will generally be limited to a 10 m wide ROW for equipment access to water crossing structures (e.g., temporary bridges).”		
20	Project Description Waterbody crossings (s. 3.3.5) Executive Summary S. 3.3.10	The TOR indicates that Memorandums of Understandings (MOUs) may be required (table 11-1 page 207) for road use and the EA states that approximately 30% of roads outside the ROW will be required to remain in place for operation and maintenance activities (project description s. 3.4.1.11). All Memorandum of Understanding (MOU) engaged for access need to consider current use and authorizations. Use of forestry roads need to consider the authorization under the Forest Management Plan. If use, potential upgrades, or permanency are anticipated to change, amendments to the approved FMP may be required under the Crown Forest Sustainability Act(1994). Similarly, amendments to existing Road Use management strategies may be required for potential upgrades, use and permanency with Crown land road administered under the Public Lands Act (1990). It is noted that the routine inspections of the ROW and access roads will occur on an annual basis that will monitor erosion in table 10.6.2. It is also recognised that the EA acknowledges that in addition to MOUs with the Crown, Agreements may be required between/among the various entities of road owners and custodians (e.g., groups with existing MOUs, SFL holder, other stakeholders with road interests etc.). In MNRF’s review of the Draft EA, site selection for temporary uses was not described. MNRF notes that some temporary laydown areas identified were recently planted/regenerated. MNRF encourages site selection in previously disturbed locations vs undisturbed.	Many of the roads identified for access are included in Forest management Plans and managed by SFL holders or other interested parties. The MNRF will require confirmation that agreements have been made with other MOU holders to ensure road use, maintenance and monitoring is consistent with road agreements and forest management plans. MNRF will require confirmation that agreements are in place with SFL holders. MNRF recommends these discussions occur prior to the Final EA so that sites can be appropriately selected for our review and approval.	Approximately 30% of access roads and trails outside of the ROW will remain in place to provide access for operation and maintenance activities. All others will be decommissioned and rehabilitated using applicable and appropriate methods and standards. At this stage in the Project, it is unknown which access roads will be left in place to support operations and maintenance of the transmission line. Engagement with Indigenous communities and appropriate stakeholders, including the MNRF, will occur prior to determining which roads will not be removed and any necessary permits/approvals will be obtained. Agreements with SFL holders or other MOU holders will be established prior to construction activities commencing. For SFL holders, no road use will occur until after an overlapping licence agreement is signed and submitted to the MNRF. For other owned roads, use will be covered in an MOU or road use agreement and confirmed with the MNRF as required. Temporary use sites will likewise be covered under agreements with SFL holders and other stakeholders as required and permitted through the MNRF. It is not possible to conclude these agreements prior to the submission of the Final EA.
21	Project Description Equipment/ material Laydown areas (s. 3.3.6)	The EA does not indicate if lighting used in the laydown areas will be considerate of reducing light pollution or how will they be powered (e.g., solar). Have the effects of lighting in these areas on terrestrial species been considered in the EA?	Please describe the potential impacts of industrial lighting on terrestrial species in laydown areas or ancillary locations, and what measures will be taken to reduce those impacts.	Electricity for lighting at laydown areas will form part of the overall load of the construction camp / laydown area. Electricity will be supplied through grid connected power or generators as appropriate. LED lighting will be used to focus light downward and reduce wasted light. The impact of Project lighting on wildlife was assessed as a project interaction under sensory disturbance. This interaction was considered for all criteria in Section 6.5.7, 6.5.8 and 6.5.10

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22	Project description Construction Camps (s. 3.3.8) Temporary Construction Camps Page 3.3-12	The TOR indicates that worker camps are expected to be established along the transmission line in select locations along the preferred route. The EA mapping product doesn't show camp locations being along the lines, and there do not appear to be proposed alternative camp locations for each section of the line. It is unclear what the occupancy of each campsite is. Further detail is needed regarding occupancy and projected length of use. The EA specifies that water sources will be obtained from municipal sources where possible, or from groundwater wells. Due to the remoteness of a large portion of this line, it is not anticipated that municipal sources will be easily utilized. Likewise with municipal sewage disposal services. "Camps will be located at least 30 m from any waterbodies and will be located within previously disturbed areas, to the extent practicable."	To facilitate review of impacts and mitigation measures, the MNRF will need to see camp site locations proposed on Crown land. If construction camps are to be located 30m from any waterbodies, it is anticipated that right of ways to water sources will be required to facilitate water supply to the camp. The ROW requirements should be described in the corresponding EPP (will waterlines be buried, or lain on top of the ground). Please provide more information related to the establishment of temporary construction camps, such as management of overburden.	Revised construction camp locations are included in the Final EA report based on additional field reconnaissance completed and the suitability of the proposed sites. Eleven potential locations are included in the Final EA Report and only three construction camps are expected to be required. The remaining locations with either not be used or could be used as laydown areas during construction. At peak construction periods, the temporary construction camp is expected to house up to 350 people. Plans for wastewater management include on-site treatment and disposal in a septic bed. Application for the use of this septic bed will be submitted to NWHU and MECP. The source of water will either be a drilled well or sourced from the nearest waterbody or stream. Municipal waste will be disposed of either through a registered carrier or using approved on-site incinerators. Upon Project completion, the site will be reclaimed in accordance with standards agreed upon by Hydro One, their contractor, and applicable regulatory agencies (e.g., MECP, and MNRF).
23	Project Description Temporary construction camps (s. 3.3.8)	The Draft EA indicates that these camps will be established along the transmission line (size approximately 400x400m and 30m from waterbodies). The camp located along highway 622, south of Clearwater West Lake does not fit into this criteria (21.3ha). It is located within a previously harvested block, along highway 622.	MNRF strongly recommends that alternative areas for camp locations are considered and included in the Final EA. MNRF recommends sites located with Forest Management Plans and managed by SFLs should be agreed upon between parties. The SFLs will have the most up to date information regarding road conditions, accessibility, and rehabilitation plans.	Please refer to the response to Comment #22 regarding alternative locations. Camp locations were planned in consideration of existing access, proximity to a power source and water, general site characteristics (e.g., level, favourable soil types, etc.), and proximity to the Project ROW. All sites have been located within previously disturbed sites (e.g., new or regenerated cutblocks). Topsoil will be stored and used as part of reclamation activities.
24	Project Description 3.3.6 Equipment/ Material Laydown Areas Page 3.3- 11/12	The Project Description text for Equipment/Material Laydown Areas indicates that "the preference will be to use previously disturbed areas or the ROW for these areas where practicable." In addition, "to minimize adverse effects, Hydro One commits to progressively restoring areas to be used on a temporary basis during construction, such as laydown areas, pull sites, and helipads, located on previously undisturbed lands."	The text suggests there is a plan for progressive restoration of undisturbed areas but refrains from clearly indication how previously disturbed areas will be treated when no longer in use. Please elaborate on how previously disturbed areas will be decommissioned and/or restored. The MNRF wishes to see any Crown land used for temporary laydown areas returned to the productive land base (or as previously planned for) as soon as possible, following	Previously disturbed sites will be reclaimed once they are no longer required; they will be returned to a similar land capacity to that of the pre-construction condition. While areas with minimal disturbance (e.g., tension puller sites) will be left to naturally regenerate, large disturbed areas (i.e., camps/laydowns) will be subject to decompaction and recontouring as necessary and replanted with appropriate tree species in accordance with

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		For example, MNRF wishes to understand how a harvest area (i.e., a forest cut block) may be decommissioned and/or restored when it is no longer required as a laydown yard. Will the site be rehabilitated to restore it to the productive land base through activities such as overburden redistribution and tree planting? MNR notes that some temporary laydown areas identified were recently planted/regenerated. MNRF encourages site selection in previously disturbed areas.	construction completion. Please elaborate on how this will be achieved for undisturbed sites through progressive restoration and for previously disturbed sites where the restoration intentions are unclear.	Overlapping License Agreements with the SFL holders as appropriate Additional details regarding reclamation have been added to Section 3.4.1.11 of the Final EA Report.
25	Project Description 3.3.7 Fuelling Areas Page 3.3-12	"Generally, vehicles will be fuelled at the camp; however, if fuelling of vehicles and other mobile equipment is required at the site then fuelling will not be permitted within 30 m of a temporary waterbody and 100 m from a permanent waterbody unless a spill prevention plan is in place."	Please define what is considered a "temporary" versus "permanent" waterbody to better understand any potential impacts to these features if a spill was to occur.	Permanent waterbodies are defined as those having year-round standing or flowing water or watercourses having a defined channel. Temporary waterbodies include ephemeral draws whereby standing or flowing water are only present during wet weather events or immediately following spring snow thaw. Section 3.3.7 of the Final EA Report has been updated accordingly.
26	Project Description 3.3.8 Temporary Construction Camps Page 3.3-14	"It is anticipated that potable water for construction camps will be obtained from municipal sources, where available, or from groundwater wells." "Municipal sewage disposal services will be used where available and where they are not, septic fields, on-site treatment and trucking off-site are options for sewage disposal."	Where construction camps are temporary in nature and the land will be returned to the Crown, MNRF is interested in how the Project proceeds with sourcing water and disposing of sewage. Will any groundwater wells and/or septic field installations occur within the footprint of temporary constructions camps?	Plans for wastewater management include on-site treatment and disposal in a septic bed. An application for the use of septic beds will be submitted to NWHU and MECP. The source of water will either be a drilled well or sourced from the nearest waterbody or stream. Municipal waste will be disposed of either through a registered carrier or using approved on-site incinerators. Ground water wells and septic field installations are planned to occur within the footprint of temporary construction camps. Section 3.3.8 of the Final EA Report has been updated accordingly.
27	Project Description 3.4.1.2 Vegetation Removal, Grubbing, and Grading the ROW Page 3.4-19 Page 3.4-19	"Trees of merchantable value will be felled, de-limbed, mulched, or piled at the edge of the ROW according to clearing contract requirements. Hydro One will work with local communities and Forest Management Units to manage merchantable timber cleared by the Project. Small trees and branches will be dispersed on the ROW or piled and burned on-site in accordance with the Ontario *Forest Fires Prevention Act* and *Regulation 207/96 Outdoor Fires* under this Act. Where slash and debris are stockpiled in windrows, it will be a few metres from the edge of the ROW and compacted to a height no greater than 0.5 m. The windrows will be left open at all roads or access trails, along property lines, and along wetlands and watercourses to provide access for wildlife not capable of crossing the low vegetation pile. Felled trees from clearing the ROW may be used to build corduroy access where	MNRF wishes to see slash and debris depths reduced to no greater than 0.3m, as deeper than this can result in loss of productive land, especially in areas where activities are temporary in nature. Describe how the debris will be disposed of when mulching occurs. MNRF can provide a technical note for information on debris best management practices if requested. MNRF wishes to see regular breaks in the windrow all along the ROW line to facilitate animal movement, in addition to the areas already mentioned (property lines, wetlands and watercourses). Movement of species across the line at regular intervals is important for maintaining local biodiversity and ensuring continues connectivity of smaller wildlife populations.	Residual logging debris and timber not reserved for landowner use may be mulched in place and spread on the ROW or piled and burned contingent on the approval of a burn plan. Designated tree species (if applicable) will be disposed of in accordance with local or provincial regulations. If burning is the appropriate method of disposal, care will be taken to ensure piles are pushed up properly to promote adequate drying and to minimize the inclusion of dirt. Any residual material following burning will be buried or spread on the ROW. Appropriate burning permits will be acquired from the provincial and/or municipal regulatory

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		required and for erosion control. The windrows will be allowed to decompose naturally."		agencies. Burning operations will adhere to the *Forest Fires Prevention Act*, R.S.O. 1990, c. F.24. Unless to be used to meet other environmental objectives, chips are to be spread as soon as reasonably possible and are not to exceed a spread depth of 18 cm. Other slash and debris resulting from mechanical clearing operations will be spread to ensure depths do not exceed 0.3 m or will be piled and burned. In areas that are hand felled only, trees will be bucked and delimbed to lie close to the ground. Section 3.4.1.2 of the Final EA Report has been updated accordingly.
28	Project Description 3.4.1.11 Decommissioning of Temporary Construction Infrastructure Page 3.4- 24/25	Temporary Access Roads, Trails, and Bridges "Approximately 30% of access roads and trails outside of the ROW will remain in place to provide access for operation and maintenance activities." "Upon removal of waterbody crossings, the waterbody banks will be returned to a stable condition if necessary."	MNRF is interested in what percentage of these access roads and trails will be new construction. Please elaborate, if possible, on what percentage of this 30% will be new and what will be existing access and trails? MNRF wishes to see waterbody banks returned to their natural slope, while ensuring they are at a stable angle of repose.	At this stage in the Project, it is unknown which access roads will be left in place to support operations and maintenance of the transmission line. Engagement with Indigenous communities and appropriate stakeholders, including the MNRF, will occur prior to determining which roads will not be removed and any necessary permits/approvals will be obtained. Removal of waterbody crossings as part of reclamation activities will ensure that slopes are recontoured and stabilized to maintain similar hydrologic function and drainage as pre-construction condition.
29	Project Description 3.4.1.11 Decommissioning of Temporary Construction Infrastructure Page 3.4-25	Staging and Laydown Areas "All in-ground infrastructure will be decommissioned in accordance with applicable regulatory requirements."	Please include decommissioning for in-ground infrastructure in the Decommissioning Plan.	In-ground infrastructure, other than fences and waterbody crossings, are not anticipated in laydown areas. Section 3.4.1.11 of the Final EA has been updated accordingly.
30	Project Description 3.4.1.11 Decommissioning of Temporary Construction Infrastructure Page 3.4-25	"Unless prompt revegetation is required for erosion control, most areas will be left to naturally revegetate following grading and stabilizing activities. However, rehabilitation will also include site-specific measures to promote the natural revegetation of disturbed areas, as appropriate."	Please elaborate on how areas where aggregate has been placed on the surface will be rehabilitated to ensure there is not delayed natural revegetation? Will topsoil and overburden be redistributed across these surfaces?	Areas that have had aggregate placed will be recontoured as necessary to return hydrology and drainage to pre-construction conditions. The stored topsoil and organic material will be spread over the surface. All sites will be left in a stable and self-sustaining condition though areas that may be prone to erosion will be seeded with a suitable seed mix to ensure prompt revegetation.

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31	Section 3.0 – Project Description S. 3.4.1.12	The EA does not contain a clear **construction and post-construction monitoring plan** that allows MNRF to determine if our mandate, legislative requirements and/or interests have been addressed. *"Hydro One, with their contractor, **will** prepare and implement a post-construction monitoring plan after the **completion** of the construction activities."* A monitoring program is a key component of environmental assessment and is based on the findings of the EA. The EA must determine what monitoring will be needed and must present a monitoring plan for those components. It is understood that monitoring plans would be refined at permitting, however at a minimum the detailed draft/conceptual plan should be in the EA.	MNRF will review and approve a detailed construction and post-construction monitoring plan prior to permit any construction activities. The plan should address: • Type of monitoring that will be needed, i.e., which valued ecosystem components and associated indicators, or socio-economic components of the environmental will be monitored, • how project effects and effectiveness of mitigation and reclamation measures be monitored and evaluated, • what indicators and methodology will be used? • how these relate to the indicators used and assessment of impacts in the EA, etc. The monitoring plan must also address all phases of the project, i.e., construction, operation and maintenance and decommissioning of temporary components. To meet consultation and engagement requirements and avoid permitting delays, this should be included in the Final EA.	Section 10.0 of the Draft and Final EA include the proposed monitoring framework for the Project. This includes the monitoring proposed per environmental criteria. The proposed monitoring in the EA will be incorporated into an Environmental Monitoring and Reporting Plan that will be included as part of the EPP and will be provided to the MNRF in advance of construction.
32	Project Description 3.4.3.1 Potential Emissions, Discharges and Waste Page 3.5-31	Liquid effluent and domestic solid waste are listed as anticipated during project retirement.	Please elaborate on where these wastes originate and how they will be disposed of during this phase.	Liquid effluent is not expected to be a waste product during retirement and has been removed from Section 3.4.3.1. Oil waste products would be expected from the retirement of oil-filled electrical equipment, such as from reactors and breakers. Domestic solid waste such as soil, concrete, steel, plastic and wood would originate from the decommissioning of buildings, foundations, structures and civil works. All waste would be disposed of in accordance with laws and regulations at the time, such as through appropriate recycling, reuse and landfill facilities.
33	Procurement opportunities 3.6.3	It is noted that there are many instances where proposed aggregate pits are adjacent to existing licenced pits, particularly along the highway 622 corridor. Has the feasibility of sourcing aggregate, where applicable, from existing sources rather than from these proposed pit locations been considered? It is noted that locally sourced aggregate is not included in this section of the EA.	The EA should consider existing sources of aggregates.	Aggregate from existing pits is preferred over the development of new sources. New aggregate pit locations were identified along the project corridor within reasonable distance from the proposed transmission route in order to ensure an adequate supply of aggregate for the development of the transmission line and access infrastructure. In some cases, there are new aggregate pits proposed in the vicinity of existing ones. However, many of those existing sites are either inactive or owned by the MTO.

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				The MTO does not generally allow their pits to be used for other projects. The aggregate from those pits is typically reserved for new MTO road construction projects and for road maintenance. Where new pits are proposed in the general vicinity of existing, active pits, the aggregate from those existing pits will be the preferred source, up to the required volume, if it is available. In summary, additional aggregate pit locations for potential development were included in the EA to ensure that alternative sources would be available if privately sourced aggregate could not be procured.
34	Project Schedule 3.5 Page 3.6-31	"Construction activities are expected to occur throughout the year with staging to avoid or minimize potential effects on environmentally sensitive areas or wildlife breeding cycles (e.g., breeding bird period, fisheries windows, etc.), where possible. Specific timing, sequencing, and staging will be determined during the detailed planning phase."	Please clarify and include recommended timing windows for various identified environmentally sensitive areas and wildlife breeding cycles in the Final EA.	Additional details on the construction schedule have been added to Section 3.5 of the Final EA report.
35	Section 3.0 – Project Description & Mapping Products & Section 6.5 Wildlife and Wildlife Habitat & Section 6.6 Fish and Fish Habitat	MNRF notes that upon review of the Access EA Mapping Information and submitted Shapefiles many of the roads described as 'Existing Access – Potential Improvements" are not present on the landscape and therefore new roads will have to be built. In some cases, these roads have been long overgrown rendering them impassable. In addition, trails that can only accommodate ATVs have been identified as existing roads. These will require significant improvements. The EA states in Section 3.0 page 3.3-9 *"All access roads will be built or upgraded to have an average 6 m wide driving surface and an average 20 m vegetation clearing area."* This Mitigation for the use of "Existing Roads" has been vetted into many mitigation measures, leading to net effects assessments throughout the EA. For example – mitigation measures on page 6.5-99 will include *"Limit the Project footprint to the extent possible by using existing access roads."* The potential impacts of roads (including increased access, timber harvest, significant wildlife habitat destruction, etc.) have been underestimated within the EA. As such, there is concern that currently there is not sufficient information to fully understand the potential impacts of this project. In addition, there is insufficient information in the EA related to the evaluation of impacts from recreational Off-Road Vehicle (ORV) use of the existing HONI ROW where adjacent and proposed use in the new corridor. Impacts to the natural environment (especially to water courses and wetlands) associated with recreational ORV use of transmission line corridors are not fully considered in the EA.	MNRF strongly recommends the Final EA access plan to be ground truthed through site visits and knowledge exchange with SFL holders. The mitigation measures and potential project impacts and net effects assessment need to be updated to reflect actual disturbance of the landscape. Please include an assessment of impacts associated with ORVs in the Final EA.	The "Existing Access Roads – Potential Improvement" category of access roads includes locations where a previous linear disturbance was visible either through aerial imagery or through field reconnaissance. The condition of these locations could vary from an overgrown trail to existing roads where minimal improvements are required. For the EA, these roads were generally considered equal to new access roads in the assessment. For example, the Project footprint assessed as part of the vegetation assessment included both improved existing roads and new roads (Table 6.4-3). These roads were considered equally in the vegetation assessment when determining ecosite loss from the Project footprint. As such, potential effects were not underestimated in the EA. Additional details on ecosite loss specific to access roads were included in the Final EA. Additional details were added to the Final EA related to ORV use. Additional ground truthing field reconnaissance was completed in 2023 to verify and refine access plans. These refinements are included in the Final EA.

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				SFL holders have been engaged to collaborate and identify opportunities for joint access strategies. Refinements to the access plan to account for SFL existing and future road development plans will be included in the Final EA access requirements.
36	Section 6.6 Fish and Fish Habitat	Statements seen within the EA, such as Section 6.6.8.5 Net changes due to Public Access to Fish Habitats "*potential changes due to increased access and fishing pressure will largely continue to be managed and monitored by MNRF and DFO, the government resource agencies mandated to manage fisheries resources.*"	Please clarify that access restrictions are not appropriate for all roads (i.e., there is no PLA signage for the protection of Natural Lake Trout Lakes) and would be very site specific. This approach should not be a "key" consideration for mitigation strategies applied in the EA to address increased public access.	The Final EA Report has been updated as follows, "Potential changes in angler pressure and fish harvest will continue to be managed by MNRF and DFO, the government resource agencies mandated to manage fisheries resources (**i.e., fish management zones, fish restricted access timing windows and fish catch allotments, sport fish license, commercial/bait fish harvest licence)**." No access restrictions were implemented as potential mitigation measures within Section 6.6. It should be noted that minimizing disturbance and access restrictions on hunting and trapping areas was considered a mitigation measure (i.e., to them leave accessible for future use).
37	Project Description 3.3.4 Access Roads Page 3.3-9/10	The preliminary access plan accounts for primary and alternate access roads. It also outlines four categories of access roads, New Access Road – Preferred, New Access Road – Alternate, Existing Access Road – Potential Improvements, and Existing Access Road – No Improvements. "To minimize adverse effects, Hydro One commits to progressively restoring temporary construction access roads located on previously undisturbed lands as described in Section 3.4.1.11. To minimize future potential access development impacts, some access roads may be left permanently to support long-term inspection and maintenance activities and for multiple use/integration with other existing industrial operations (e.g., forestry operations within forest management areas)." "Access roads will use in-situ and/or other locally sourced material (e.g., gravel pits) where appropriate to create a stable surface for travel (e.g., cleared wood, logs and swamp mats may be used as a base for travel across wetlands, bogs, and/or low-lying areas)." The Draft EA does not contain sufficient information to fully understand the potential impact of the proposed wetland crossings, and how they will be avoided managed or mitigated. The use of in-situ and locally	Please elaborate on how temporary access roads, especially existing – potential improvement roads will be rehabilitated/handled upon construction completion. Will gravel and logs be left in place or is the intention to remove all or some of the material? If this information is available in a subsequent section, please provide a reference. Confirm that merchantable timber will not be used in establishing road access.	Prior to reclamation activities, a reclamation plan will be developed and submitted to the MNRF. The plan will consist of a map depicting the level of reclamation for each segment of road and a corresponding description of the reclamation activities to be undertaken for each level of reclamation. Unless directed otherwise by the MNRF, new access roads will be recontoured and stored topsoil and organic material will be spread across the disturbed road width. Natural drainage will be restored. Existing access roads may be stabilized and left in place depending on feedback from appropriate stakeholders (e.g., MNRF, MTO, municipalities and road users).. In wetlands, gravel and corduroy (logs used to support the subgrade) will be removed to the extent practicable and/or as directed by the MNRF. In upland areas, road prism materials will be recontoured and covered with stored soil and organic material. Organic material may include brush, tree stems and logs to control erosion and create microsites to facilitate regrowth and provide

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		sourced material are of interest to the MNRF, including timber and aggregate.		habitat for small mammals. Tree stems may also be used to create barriers to travel and facilitate local wildlife objectives depending on the feedback from agencies and stakeholders. Section 3.4.1.1.11 of the Final EA Report has been updated to reflect this information. There are currently some requests in place from SFL holders to keep some existing and new roads in place where these correspond to the SFL holder's future plans. It is the intention to utilize merchantable trees where practicable across the Project. However, there will likely be a need to use some merchantable timber in the construction of the roads. This is not expected to be widespread but would be in areas where extra subgrade support may be required (i.e., wet areas) and in areas where extra fill may be required such is in rocky areas. This reduces the amount of rock blasting and aggregate required and therefore reduces the overall environmental impact of the Project. Any merchantable timber used in the subgrade will be accounted for under a scaling agreement with the MNRF. Section 3.4.1.2 of the Final EA Report has been updated to reflect this information.
38	Project Description 3.3.4 Access Roads Page 3.3-9	MNRF notes there is a potential for increased access to fish sanctuaries on the landscape.	The EA should consider the impact of increased access to fish sanctuaries as part of their net effects evaluation.	The number of fish sanctuaries has been included within Section 6.6.5.2.1 as background information and the effects and mitigation were considered under the potential for increased public access to fish habitats is reported on in detail in Section 6.6.7.6. Fish sanctuaries are regulated though the fisheries management zones and Ontario fishing regulations under which it is illegal to fish within these systems and is the responsibility of the angler to use the appropriate resources to understand where and when they can legally fish.
39	Section 3.0 – Project Description & Section 6.2 Surface Water & Section 6.6 – Fish and Fish Habitat	Section 3.3.5 Water Crossings *"Hydro One will incorporate the best management practices within the MNRF Environmental Guidelines for Access Roads and Water Crossings (MNR 1990) MNRF and DFO protocol for the review and approval of forestry water crossings (MNRF and DFO 2021), DFO's Measures to Protect Fish and Fish Habitat (DFO 2022a) and applicable Codes of Practice (DFO 2022b), Forest Management Guide for Conserving Biodiversity at the Stand and Site Scales (MNR 2010a), for access road construction and temporary waterbody crossing during construction to the extent practicable If there*	Please clarify the intent of the sentence "If there is any circumstance under this cannot be met, DFO and MNRF will be contacted to discuss any permits and approvals required". The MNRF guidance documents referenced are great resources when planning access roads and crossings, however all the specified direction is specifically designed for forest management operations. The activities described within these guidance materials on or for Crown resources still require permitting through the MNRF	Section 6.6.7.1.2.1 includes the following text with regards to channel realignment permitting requirements: "Channel realignments/infilling will be avoided through Project planning and design to the extent practicable. Channel realignments/infilling will only be undertaken in locations where specific conditions are met and/or where required for safety/security purposes. If

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		is any circumstance under this cannot be met, DFO and MNRF will be contacted to discuss any permits and approvals required." In addition, it should be more apparent in the EA that MNRF Permits Water Crossings, but DFO grants Approval (All crossing types). Example - Page 6.6-91 *"If new waterbodies are identified, an Aquatics Specialist will be engaged to determine the appropriate crossing methods, proposed restricted activity timing window, and DFO will be contacted regarding approvals or permits required."* - MNRF is permitting / DFO approval In addition, Mitigation Measures described in multiple sections. Example – Section 6.2.7.11 Changes to Surface Water Quantity and Surface Water Quality due to Changes in Channel Hydraulics at Water Crossings. References channel realignments *"Any minor channel realignment at a water crossing will maintain the channel width, depths, slopes and substrate;".* It should be referenced that a realignment would avoid the use of a DFO code of practice and would require approval by DFO, with the plan and mitigations requiring reviewed by MNRF through permitting the water crossing.	prior to construction, regardless of whether the requirements can be met or not (e.g., waterbody crossings, timber harvest, access road development, land clearing, aggregate pit development). Additionally, please ensure that the permitting and approval differences between MNRF and DFO are adequately differentiated within the Final EA.	required, then DFO/MNRF permitting, and consultation will be undertaken." The Final EA Report will be updated with additional detail regarding MNRF and DFO designation. All relevant permitting/approvals will be secured for project works.
40	Project Description 3.3.5 Waterbody Crossings Page 3.3-10	"The waterbody crossings will involve temporary bridges (i.e., clear span bridges, rig mats), ice bridges/snow fills (for winter construction); and may potentially include culverts. When installing waterbody crossings, ford crossings of waterbodies will be required for clearing and access building equipment. […] As appropriate, some waterbody crossings may use a very short-term rig mat to facilitate clearing and access equipment, before being immediately replaced with a temporary bridge." Crown Land Bridge Guidelines consider a structure a bridge when the distance between the bearing points is 3m or greater. The project lists rig mats as a bridge used to span distances less than 2m bank-full width. "Where new waterbody crossing structures are proposed, the primary preferred structures to be used are clear-span bridges, ice bridges/snow fills (for winter constructions), culverts, and rig mats." And finally, will rig mats be used in wetland crossing applications? The Project Description specifies that "for clear-span bridges and rig mats, it is expected that no new temporary or permanent fil would be placed below the high-water mark" in waterbody crossing applications. Subsequent text reaffirms this statement.	Rig mats do not meet the Crown's definition of a bridge; therefore, MNRF suggests more clearly articulating the differences in design standards and approval requirements between a clear-span bridge and the use of a rig mat. MNRF recommends an easy way to help accomplish this would be by describing rig mats as their own temporary structure, rather than labelling them as a temporary bridge option (e.g., "The waterbody crossings will involve temporary bridges (i.e., clear span bridges), rig mats, […]"). MNRF wishes to clarify if the preference on water crossing structures will be in the order specified in the above text with clear-span bridges being most preferred and rig mats the least preferred option. If rig mats are to be used in wetland crossing scenarios where they might be at or below the high-water level, then MNRF recommends the text be expanded to address that discrepancy.	Hydro One recognizes that there are several layers of legislation for consideration within the EA. For the purposes of the Project Description, a rig mat is considered to bridge small watercourses and was considered to facilitate a span that would avoid interference with watercourse beds and banks as defined by DFO's code of Practice for Clear Span bridges. The revision requested has been applied throughout the EA to classify rig mats separately from clear span bridges. The preference of crossing structures is noted. The Final EA Report has been updated to clarify that a rig mat crossing, though technically a clear span, is not a bridge as classified by the MNRF due to the definition in the Crown Land Bridge Management Guidelines. To clarify, rig mats will only be used for crossings where the span is no greater than three metres. Generally, bridges are preferred over rig mats as a crossing method; however, there are specific situations where rig mats serve better and have a lower environmental impact. Such situations are for smaller creek crossings where clearances are

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				not an issue and there is no need to excavate and install large abutments. Other situations might be short duration crossings in the fall where the rig mat will only be in place for a short period of time before being replaced by a snowfill. For wetlands, the issue for a short term, temporary road is the soft banks. Rather than build bridges which have a high profile and require heavier abutments the goal is to have a lesser impact by using a low-profile rig mat with swamp mats as abutments. This disperses the load and requires less road fill to ramp up on the approaches. There is also less impact during reclamation as there is less material to remove
41	Section 3.0 – Project Description & Section 6.6 – Fish and Fish Habitat	The EA does not provide sufficient detail regarding **decommissioning** of temporary project infrastructure, new and upgraded roads, water crossings, site reclamation, clean-up and proposed remediation that is to occur post- construction. Example: Page 6.6-100 *"A Road Management Strategy will be prepared and implemented for the Project within the EPP that describes decommissioning of Roads and water crossings will be decommissioned in a manner that protects fish habitat."* Further information regarding the native cover crop species to be used to more fully understand how the remediation of disturbed sites is to occur. Delaying the rehabilitation plan until the design phase does not allow MNRF to fully assess whether project impacts are being adequately identified and mitigated and what residual effects may be expected. In numerous instances, reclamation has been identified as "natural regeneration". Example – Section 3.4.1.11 Decommissioning of Temporary Construction Infrastructure "*Areas with low risk of erosion will be left to naturally revegetate following grading and stabilizing activities. Any areas that demonstrate or pose high risk to erosion will require additional mitigative measures, including soil stabilization and seeding as appropriate."* Example – Section 3.4.1.11 Clean-up and Rehabilitation "*Unless prompt revegetation is required for erosion control, most areas will be left to naturally revegetate following grading and stabilizing activities. However, rehabilitation will also include site-specific measures to promote the natural revegetation of disturbed areas, as appropriate."*	A rehabilitation plan should be included in the Final EA. It should include • Timing • Monitoring • Description of work • Type of seed used Site specific plans for roads near sensitive features	Additional details on reclamation have been added to Section 3.4.1.11 of the Final EA Report. Prior to reclamation activities, a reclamation plan reflecting the details presented in the Final EA Report will be developed and submitted to the MNRF. The plan will consist of mapping depicting the level of reclamation and a corresponding description of the reclamation activities to be undertaken for each level of reclamation.

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		In some instance natural regeneration may not be appropriate. The focus should be to ensure the disturbed areas are returned to the productive land base. In some instances, conifer species may be the preferred option. Further discussion is needed and monitoring efforts for successful regeneration to conifer (spruce / pine) should be included in monitoring plans. Example – Section 6.6.8.5 net Changes due to Public Access to Fish Habitats "*Renaturalization through natural recovery of temporary access trails and riparian areas, camp/laydown areas, etc. and removal of temporary crossings to limit accessibility by the public, post construction."* This could provide access for years (vehicle leading to UTV) after project completion without a level of decommissioning/planting. This is of particular concern when dealing with roads near sensitive features (i.e., Lake Trout Lakes etc.).		
42	Section 3.0 – Project Description & Section 6.2 – Surface Water & Section 3.4 – Vegetation and Wetlands Project Description 3.3.5 Waterbody Crossings Page 3.3- 11/12	The EA references in multiple sections that water crossings have been sized to handle "peak flow" Example: Section 3.3.5 Water Crossings *"Culvert selection will consider site- specific conditions such as the width of the waterbody crossing, fish habitat characteristics, substrate type, and hydrologic characteristics of the waterbody. Culverts will be sized to handle peak flow and aligned parallel to the waterbody channel on a straight section of uniform gradient."* Example – Section 6.2.7.11 Changes to Surface Water Quantity and Surface Water Quality due to Changes in Channel Hydraulics at Water Crossings *"Designing the infrastructure at water crossings to pass peak flows and maintain sufficient flow conveyance in such a way that no discernible effects on stream hydraulics occur;"* The EA does not provide any detail regarding how water crossing type is determined. What is the methodology/tools HONI is using to calculate crossing size? It is unknown/unclear what standard is being used/followed. Reference – Section 3.4.1.11 Decommissioning of Temporary Construction Infrastructure *"Approximately 30% of access roads and trails outside of the ROW will remain in place to provide access for operation and maintenance activities."* Crossings need to be sized appropriately for long term use.	MNRF requires additional information on the methodology for selecting water crossing locations, calculating water crossing sizes and the ability for those structures to withstand Q10, Q25 and Q100 flows. Please also clarify if temporary crossing materials will be removed immediately following completion of construction activities and elaborate on what "if needed" and "as necessary" mean.	Culvert selection is based on a desktop and field exercise and should not be adjusted in real time. Culvert selection is primarily based on design flow calculations that consider the expected rainfall in the geographic area, the catchment basin area, the slope and composition of the channel, etc. Culvert design criteria dictate the function of the culvert including the minimum and maximum water levels in the culvert for fish passage, erosion control and the proper hydraulic function of the culvert. Each culvert is selected based on hydrology analysis, with the ultimate size of the culvert being selected to ensure that the normal water level rises no higher than half the diameter of the pipe, and no higher than the top of the pipe at the designed flood flow. All selections and installations are done according to the Ministry of Natural Resources and Forestry and Fisheries and Oceans Canada Protocol for the Review and Approval of Forestry Water Crossings (MNRF and DFO 2021). Each waterbody crossing will be visited ahead of construction to ensure that the crossing location is conducive to a culvert install. If site-specific

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		"Temporary crossing materials, if used, will be removed immediately following the completion of construction activities." "Upon removal of the crossing materials, the waterbody banks will be returned to their original profile if needed, and disturbed areas will be stabilized, as necessary, to prevent soil erosion.		features, such as a bedrock bottom, prevent the installation of a culvert then a different crossing method will be chosen. All installations will follow the sediment control procedures to minimize any impacts to the stream and surrounding environment. In-water work timing windows for the local area will be followed for all installations. Culvert installation will be overseen by the contractor's qualified environmental personnel and inspected both by Hydro One and the MNRF at their discretion. Disturbing waterbody banks is kept to a minimum including during and after construction activities. As such, recontouring of banks might not exactly reflect the original profile, but rather ensure that the site will have a similar hydrologic function as its pre-construction condition thereby minimizing the overall disruption to the crossing location. Stabilization of the site, may require more or less effort depending on the amount of disturbance and site characteristics and will be completed as necessary (e.g., a snow fill may require minimal bank stabilization whereas culvert removal may require recontouring, seeding, erosion control, etc.). The statement of "removal as needed" in Section 6.2.7.10 specifically refers to the removal of a temporary crossing structure following the completion of the relevant work. The Final EA Report has been updated to clarify this distinction.
43	S. 3.3, p. 16	It is unclear as to what is meant by an "existing inactive" status for the potential Aggregate Pits	Please provide clarity in the text for the term "existing inactive" status for the potential Aggregate Pits.	Per the Ontario GeoHub system, these pits are labelled "Surrendered". Based on aerial imagery and online information status, these pits were labelled as 'existing inactive' since there may be some material left in them that could facilitate some construction activities, subject to field verification.

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44	S. 3.4, p. 24, S.3.4, p. 25 & S 6.2, p 60-61	An application for an aggregate site will be required to be developed in accordance with the Aggregates Resources for Ontario Standards and regulations to operate a pit or quarry. The Aggregate Resources Site Plan standards requires a rehabilitation plan at the time of application as a part of the site plan.	Review the requirements for an aggregate application and ensure they are reflected in the text. Please refer to the cover letter for links to the requirements.	The Final EA Report has been updated to identify that aggregate pit applications will follow the MNRF process outlined at https://www.ontario.ca/page/aggregate-resources#section-7. Rehabilitation plans will be included at the time of application for all proposed aggregate sites.
45	Environmental Assessment Approach 5.2 Table 5.2-1 Page 5.2-10 Also applicable to: Table 6.4-2 Page 6.4-8	Vegetation and Wetland Ecosystems (Section 6.4) Indicators – Ecosystem quantity "[…] change to area (ha) of vegetation communities in the Project footprint, by type as appropriate (e.g., bog, fen, swamp wetlands)." The example list only lists 3 of the 4 wetland categories typically used to describe wetlands at a broader level. Marsh wetlands have been omitted.	MNRF recommends marsh be added to the ecosystem quantity indicator. Please apply to all applicable tables and text (e.g., Table 5.2-1 and Table 6.4-2). Measurement of Potential Effects Descriptions are included for determining ecosystem availability and distribution. Availability is assumed to equate to the ecosystem quantity indicator. Describe how will the ecosystem condition indicator be measured?	Marshes were considered under the wetland category in the Draft EA Report. Table 6.4-2 of the Final EA Report has been updated to include 'Marsh' as one of the example wetlands considered.
46	Environmental Assessment Approach 5.2 Table 5.2-1 Page 5.2-10	Vegetation and Wetland – Plant Species (Section 6.4) – Criterion Includes: Plant Species at Risk (SAR), Plant Species of Conservation Concern (SOCC)(a), and Plants of Traditional Use.	MNRF supports the list of criteria provided; however, MNRF notes that SAR and SOCC may be quite limited along the Project footprint. Please provide rationale for why a small selection of more common species (perhaps species that are sensitive to disturbance) are not also included for consideration, given the ability to better infer Project impacts with a greater species abundance and distribution on which to infer net Project effects.	The approved Amended TOR suggested criteria for the EA. Indigenous and agency review comments resulted in the addition of criteria but there was no suggestion of common plant species. It is suggested that rare plant species are more threatened by human-made disturbance and thus special consideration is made. The broader ecosystem criteria would include the common plant species within those ecosites and Section 6.4 of the Final EA Report has been updated to clarify this..
47	Environmental Assessment Approach 5.2 Table 5.2-1 Page 5.2-10	Osprey nests are known to be longstanding features on the landscape and can be impacted by increased human activity and disturbance. Western Painted Turtles have smaller home ranges; thus, there could be an impact on this species if its habitat or migration routes are overlapped by the Project footprint.	Please provide rationale for why Western Painted Turtle (Herpetofauna) and Osprey (Raptor) are not species considered under the current Wildlife and Wildlife Habitat criteria list.	Snapping turtle was selected to represent potential impacts to other herpetofauna such as western painted turtle. It is often typical practice in EA to use a species to represent other species in the same guild who use similar habitat. Similarly, bald eagle is a criterion that is used as a surrogate for osprey.
48	Environmental Assessment Approach 5.2 Table 5.2-1 Page 5.2-15	Land and Resource Use / Economy Forestry is an important value to the economy in the Northwest Region and is an important land and resource use that is not reflected in the net effects assessment criteria and indicators.	Please include a new criteria or expand an existing one to reflect the impacts to the forest activities/industry, including area, access, and investment.	Hydro One has added an additional criterion to Section 7.1 (Land and Resource Use) to take into consideration forestry resource use within the Project study areas.
49	Environmental Assessment Approach 5.6.5 Table 5.6-2 Page 5.6-29	Environmental, Cultural or Social Component Criteria titles differ slightly from Table 5.2-1 to Table 5.6-2 in relation to Component Titles.	Please ensure consistent titles are being used from one table to another for improved comprehension and readability (e.g., Vegetation and Wetland – Plant Species (Section 6.4) versus Vegetation and Wetlands (Section 6.4) and Vegetation and Wetlands – Species at Risk (Section 6.4).	The Final EA Report has been updated accordingly.

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50	Environmental Assessment Approach 5.6.5 Table 5.6-2 Page 5.6-29	Definitions of Significant Net Effects for Each Criterion Criteria Are Definitions of Significance more fulsomely quantified or qualified in Sections 6.0 and 7.0? For example, net effect would be considered significant if it is assessed as high magnitude for soil productivity and quality. How will high magnitude be assigned in this case? Similar questions arise for duration, geographic extend and management concern for many of the remaining definitions in the table.	Descriptions of magnitude, such as seen in the Vegetation and Wetlands component, are helpful in better understanding the triggers for determining significance of an effect. MNRF recommends adding in the additional text that is included in the following two rows to better expand the definition: “Loss of ecological effectiveness (i.e., function) occurs when a population can no longer perform its ecological role, such that it might trigger ecological changes that result in degraded or simplified ecosystems. “ Similarly, Vegetation and Wetlands – Species at Risk, Wildlife and Wildlife Habitat, and Wildlife and Wildlife Habitat – Species at Risk rows should be expanded to include the following text provided in Vegetation and Wetlands: “Ecologically effective communities are those that can support the range of native species and ecological and evolutionary processes normally provided by the ecosystem.”	Table 5.6-1 in the Final EA report provides a definition and description for the significance factures used to characterize net effects. As described in the table, magnitude is defined by each criteria specific assessment and included in their respective sections in Sections 6.0 and 7.0. The additional text recommended has been added to Table 6.4-21 and Table 5.6-2.
51	Environmental Assessment Approach 5.6.5 Table 5.6-2 Page 5.6-30	Land and Resource Use (Section 7.1) • Mining Resource Use • Aggregate Resources • Hunting, Trapping and Fishing • Recreation and Commercial Tourism • Navigation	MNRF recommends this component also consider a “forest resource use” criterion to address the potential effects on Crown Forest resources, SFL holders and other forestry industry applications. In addition, the Definition of Significance states: “The significant effect would cause the capacity of a land and resource use system to be exceeded on an ongoing and consistent basis, with the land and resource use system (and its users and operations, at the community level) being unlikely to be able to respond in a timely manner.” It is unclear how this definition applies to the described components. Please elaborate on how you would define and evaluate capacity and what types of responses and timelines the Project would fall within scope of this assessment.	Please refer to the response to Comment #48.
52	Environmental Assessment Approach 5.8 Page 5.8-35	“Hydro One has committed to undertaking a biodiversity initiative specific to this project to offset habitat loss or transition (long-term change) that may occur as a result of the Project.”	MNRF recommends considering Ontario’s Biodiversity Strategy 2023-2030 when undertaking planning for their biodiversity initiative. The document contains a wealth of information including recommended targets and actions towards improving biodiversity. It may be a useful tool for discussion during engagement.	Hydro One will consider Ontario’s Biodiversity Strategy 2023-2030 when undertaking planning for the biodiversity initiative.

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53	Section 6.2 – Surface Water	Section 6.2.7.8 Changes to Surface Water Quality from the Wash-off of Organic Debris from Work Sites to Nearby Waterbodies, and/or Increased Rates of Erosion in Disturbed and Exposed Areas with Sediment Transport and Delivery to Adjacent Waterbodies *"Small trees and branches will be burned or chipped on-site; the chips may be spread over the ROW."* Clarification should be added that no chips will be placed near watercourses as they are very susceptible to washing into the watercourse. In addition, *"Controls may include seeding, surface roughening (scarification), lockdown netting, straw bales, straw and/or wood fibre logs, rock check dams, silt fences, sediment traps/basins, diversion swales/dykes and collection ditching."* Loose straw is inadequate erosion control method (especially with steep slopes and especially near water crossings). Much like wood chips, straw is also very susceptible to washing into the watercourse.	If some type of wooded material to mat those areas is required, MNRF recommends slash (brush matting) as a better alternative. In addition, please provide clarification on lockdown netting – is this referring to coco matting (an acceptable product) or mesh netting/straw (an unacceptable product) as an erosion control method? Most forms of mesh netting would not be supported/recommended erosion control due to the high risk of wildlife getting caught/entangled in the mesh. Furthermore, much more effective products for erosion control, such as rip rap (rocks / cobble sized 3 stones) should be referenced in this section.	Erosion will be controlled by using low-ground pressure equipment for clearing operations near waterbodies outside the 10 m buffer and retaining compatible vegetation to the extent practicable. Trees within the 10 m buffer would be hand felled and removed if the risk of soil erosion is low. Otherwise, trees will be limbed and topped in place and cut to lay low to the ground for added soil protection. Chips will not be placed near waterbodies for erosion control or any other purpose. Road construction will avoid long, sustained grades and steep grades down to watercourses; there will be no through cutting, if possible, to control runoff. Roads will be built with swales to divert surface water onto stable ground thereby minimizing high volume or high-water velocity. Check dams may be used in ditches, and ditch water may be periodically diverted onto stable ground. When cutting ditches and slopes, especially near waterbodies, the soil will be cut to a stable angle. Supplementary erosion control techniques could include spreading slash, seeding, straw bales, sediment traps and silt fencing.
54	Section 6.4 p. 173	MNRF is seeking further information regarding the timeframe that will be used when seeding the upland ecosystems in relation to final clean up. Mitigation measures in the Vegetation and Wetlands section, indicate seeding as close as possible to final clean up. Greater clarification will further explain potential effects to allow a complete review of the potential impacts and assist with developing the required Environmental Protection Plans and Vegetation Management Plan	The timeframe between seeding and final clean up needs to be further defined to develop appropriate mitigation measures. The EA should consider providing further information in the Renewal Plan on what stage final clean up will occur and the state of the location after final clean up has been completed.	Rough clean-up and interim reclamation activities will take place throughout the construction of the Project. These activities will include, but not be limited to, removing refuse, grading disturbed areas, contouring disturbed slopes to a stable profile, and re-establishing natural drainage patterns. A post-construction assessment process will be established to enable ROW construction and workspace turnover following completion of construction. Final reclamation activities will be completed outside of frozen conditions as soon as weather and soil conditions permit. Reclamation efforts will commence within and near wetlands as soon as reasonably possible to reduce the potential impact and to take advantage of access. Re-vegetation efforts will be timed to take advantage of favourable moisture and temperature conditions.

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				Mitigation measures will be outlined in the Environmental Protection Plan to address items such as re-grading, subsoil compaction, subsoil and topsoil replacement, seeding and revegetation, and temporary watercourse structure removal as it pertains to final reclamation.
55	Vegetation and Wetlands 6.4.2 Page 6.4-4	Information Sources “Some of these sources were also used to identify the locations of natural heritage features such as: • Provincially significant wetlands (PSW) (MNRF 2022); and • Areas of Natural and Scientific Interest (ANSI; including candidate ANSIs).”	Please clarify if Significant Wildlife Habitat was also considered under the lens of natural heritage. In relation to the information sources listed in this section, was the MNRF Significant Wildlife Habitat Technical Guide also considered in association with the Natural Heritage Reference Manual?	The Natural Heritage Reference Manual was not considered as it is a municipal planning tool to support the Provincial Policy Statement, which is not applicable to infrastructure development under a provincial EA. The Significant Wildlife Habitat Technical Guide was used in describing the existing candidate Significant Wildlife Habitat features in the Project Study area.
56	Vegetation and Wetlands 6.4.3 Table 6.4-2	Provincially Significant Wetlands are identified as a value, however, the specific PSWs that are located within or adjacent to the Project are not listed (e.g., McVicar’s Creek, Neebing River, Kivikoski, Little Falls, Basin A, Sawmill Bay, etc.)	MNRF recommends including in the Final EA any potential impacts on PSWs within or adjacent to the Project Footprint along with the applicable mitigation measures to be applied.	Specific references were added to the Final EA Report.
57	Vegetation and Wetlands 6.4.3 Page 6.4-6	SOCC Criteria Definition	MNRF recommends the Project include SH in their “provincially listed as rare (i.e., subnational rank of S1, S2 or S3)” definition. SH refers to Possibly Extirpated – Known from only historical records but still some hope of rediscovery. There is evidence that the species or ecosystem may no longer be present in the jurisdiction, but not enough to state this with certainty. Examples of such evidence include (1) that a species has not been documented in approximately 20-40 years in human-dominated landscapes despite some searching and/or some evidence of significant habitat loss or degradation; (2) that a species or ecosystem has been searched for unsuccessfully, but not thoroughly enough to presume that it is no longer present in the jurisdiction.	Definitions for the noted S-ranks have been added to the Final EA Report.
58	Vegetation and Wetlands 6.4.3 Page 6.4-7	Ecosystem Distribution	Please elaborate on how “linear feature density (e.g., roads)” was used to help inform changes in ecosystem distribution and connectivity. How did linear feature density inform changes and why were these features used?	Linear and non-linear infrastructure, including roads, utility lines, airports, and buildings, that are a result of human alteration contributed to creation of a single ‘disturbance’ layer. This layer was used to better understand areas within each of the Project footprint, LSA and RSA that do not contribute to the available ecosystem.

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<tr><th>#</th><th>Document, Section and Page Number</th><th>MNRF Comment</th><th>Request/Recommendation</th><th>Hydro One Response</th></tr>
<tr><td>59</td><td>Vegetation and Wetlands
6.4.3 Page 6.4-6/7</td><td>Indicators</td><td>Ecosystem availability, distribution and composition can also be impacted by fire and flooding, MNRF recommends these natural hazards also be looked at under one or more of these lenses in case these scenarios are encountered on the landscape.</td><td>Fire disturbances are only reported in the RSA. A reference to this has been added to Section 6.4.5.2.1 of the Final EA Report.</td></tr>
<tr><td>60</td><td>Vegetation and Wetlands 6.4.4.2
Table 6.4-3 Page 6.4-9/10</td><td>Project Footprint

“Widened ROW for the separation of circuits F25A and D26A for 1 km.”</td><td>Please provide the width of the proposed “widened ROW”. This will assist MNRF with understanding the spatial impact.</td><td>The ROW will be widened approximately 30 m. Section 3.3.3 has been updated accordingly.</td></tr>
<tr><td>61</td><td>Vegetation and Wetlands
6.4.5.1.1
Page 6.4-15</td><td>Previous and Existing Disturbances</td><td>Please confirm whether fire disturbance was considered as a part of this exercise. MNRF recommends considering wildfire disturbance when determining total disturbance area and percentage for the existing environment.</td><td>Please refer to the response to Comment #59.</td></tr>
<tr><td>62</td><td>Vegetation and Wetlands
6.4.5.1.2
Page 6.4-16</td><td>Ecosystem Mapping / Wetland Ecosystem Mapping

Wetland ecosystem mapping should also take into consideration Provincially Significant Wetlands (PSWs) in addition to the four general habitat types.</td><td>PSWs undergo a scored wetland evaluation to be designated as provincially significant. While PSWs may still be added into potential effects change calculations under the four wetland types, MNRF requests they also be assessed and addressed separately for their own merit given their significance to the province.

Development and site alteration should not be permitted within significant wetlands and their adjacent lands unless it has been demonstrated that there will be no negative impacts on the natural features or their ecological functions. MNRF recommends a 120 m buffer be applied to PSWs as adjacent lands.</td><td>The PSW spatial mapping was incorporated into the final wetland mapping used to assess impacts to wetland ecosystem criteria.

The effects assessment in the EA serves to demonstrate that the Project will not result in significant effects to wetlands. The 120 m buffer is a trigger for further assessment of effects to PSWs and not a protective buffer width. PSW-specific assessment data has been incorporated into the Final EA Report.</td></tr>
<tr><td>63</td><td>Vegetation and Wetlands
6.4.5.1.2
Page 6.4-17 & Section 6.6 – Fish and Fish Habitat</td><td>“[…] a 30 m buffer from the edge of waterbodies was considered for lakes and ponds. Riparian areas of watercourses were considered within a 30 m buffer of the edges for streams of stream order 1, 2, 3, and 4. For stream orders 5 and 6, riparian buffers of 80 m were applied to account for the placement of the buffer from the centreline of the watercourse.”</td><td>MNRF recommends use of a slope-dependent buffer model when determining the width of a riparian areas and when planning water crossing. For example, forest industry uses the following guidelines:

<table><tr><th>Slope (%)</th><th>Slope (degrees)</th><th>Width of AOC</th></tr><tr><td>0 –15</td><td>0 – 8.5</td><td>30 m</td></tr><tr><td>>15 – 30</td><td>8.6 –16.7</td><td>50 m</td></tr><tr><td>>30 – 45</td><td>16.8 – 24.2</td><td>70 m</td></tr><tr><td>>45</td><td>>24.2</td><td>90 m</td></tr></table>
This technique can be very useful in steep terrains, like conditions the Project may encounter, by reducing the likelihood of bank instability, erosion, and sedimentation. In addition, please update the following. Page 6.6-96 “The Forest Management Guide for Conserving Biodiversity at the</td><td>Conservative values were used to establish riparian habitat while considering guidance provided by the province (MNR, 2010b) and existing literature.

A slope-based approach is possible; however, not reasonable for the scale of this Project. This approach is very time consuming and given the level of error to be factored into contour and DEM data interpretation, may not provide additional value.

Reference:
MNR. 2010b. Forest Management Guide for Conserving Biodiversity at the Stand and Site Scales. Toronto: Queen’s Printer for Ontario. 211pp</td></tr>
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			Stand and Site Scales (MNRF 2010a recommends a riparian buffer of at least 30 m from waterbodies. This is measured from the edge of the vegetation communities capable of providing an effective barrier to the movement of sediment (MNR 2010a).”. The SSG provides direction following a slope dependent AOC.	For the purposes of delineating the availability and distribution of riparian ecosystems across the study areas, the Vegetation and Wetland assessment used a general approach which related the width of the riparian ecosystem to the size of the watercourse. This approach was meant to facilitate the Vegetation assessment and not to plan watercourse crossings, thus a general approach was anticipated to satisfy the assessment needs. No change was made to the methods to delineate riparian ecosystems.
64	Vegetation and Wetlands 6.4.5.2.1 Table 6.4-4 Page 6.4-19	"(a) Total area/percentage of available upland habitat type. This does not include anthropogenic/disturbed (e.g., commercial, residential, unvegetated areas such as waterbodies) areas.”	Please clarify if this area also includes forestry cut blocks as a part of anthropogenic/disturbed areas.	Additional text added to reference forestry cut blocks has been added to Section 6.4 of the Final EA Report.
65	Vegetation and Wetlands 6.4.5.2.1 Page 6.4-27	“The draft SWH Criteria Schedule for Ecoregion 3W (MNRF 2017) was used as the criteria to evaluate the habitat of vegetation SWH as part of the baseline characterization.” Given the location of the Project, additional rare vegetation communities and specialized habitat may be available given the influence of the Great Lakes-St. Lawrence Forest type and more southern range inland from Lake Superior than Ecoregion 3W.	Please clarify if the geographical difference was considered when compiling a list of Significant Wildlife Habitat. MNRF recommends taking this into account and considering additional SWH communities that may not be covered within the SWH Ecoregional Criteria Schedule for Ecoregion 3W. The SWH Technical Guide may be referenced when considering other communities that may be applicable to the Project area (e.g., yellow birch, red oak, bur oak, seeps and springs, mast producing areas). There may also be habitat types included within the Criteria Schedule for Ecoregion 3W that are not applicable to the Ecoregion(s) in which the Project lies. MNRF recommends including rationale for the inclusion of any SWH types addressed within the EA.	Criteria Schedule for Ecoregion 3W was used as it was the only criteria schedule available that covered the study area for the Project. The Waasigan Transmission Line Field Work Plan – Terrestrial (Hydro One 2022) outlines the SWH categories used in the assessment.
66	Vegetation and Wetlands 6.4	Please provide rationale for why the tables in this section do not report percentage and hectares for the Project footprint, in addition to the LSA and RSA values.	MNRF recommends including these percentages and areas for the Project footprint to improve understanding of direct impacts to the environment along with being able to compare to the larger local and regional distributions, availability, and composition.	Tables within Section 6.4.8 provides hectare and percentage loss of the ecosystem components as it relates to the Project footprint with respect to each of the LSA and RSA. The ‘[LSA/RSA] Net Effect’ indicates the size (ha) of loss, while the ‘[LSA/RSA] Percent Change’ identifies the associated percentage. A footnote has been included with all these tables in Section 6.4 to note that, “the net effects in the LSA and RSA are a result of the Project footprint (i.e., direct impact to upland ecosites).”

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67	Vegetation and Wetlands 6.4.5.2.3 Page 6.4-35	Ecosystem Availability “Overall, 77.1% of habitat adjacent to watercourses and waterbodies in the LSA is naturally vegetated in the baseline characterization, which is above the resource management criterion of 75.0% naturally vegetated stream length recommended by Environment Canada (2013) to prevent degradation of these ecosystems. Within the RSA, 71.0% of the area adjacent to watercourses and waterbodies is naturally vegetated.”	MNRF suggests considering restoration of riparian habitat within the RSA as one potential regional option or activity for the Project’s biodiversity initiative to boost the percentage to within the recommended resource management criterion.	Comment noted. Hydro One will consider this as part of the Project’s biodiversity initiative.
68	Vegetation and Wetlands 6.4.5.2.5 Page 6.4-39	“The habitat associated with special concern and provincially rare species with a subnational rank (Srank) of S1 to S3 are classified as SWH.”	MNRF recommends subnational rank (Srank) species classified as SWH consist of S1 to S3 and SH. MNRF recommends subnational rank plant communities also be considered in this section if they are present within the study areas. In addition, please clarify what the percentage of diverse and sensitive orchid communities comprises the RSA. The hectares are included, but the percentage is missing. Please note, this SWH is unique to Ecoregion 3W and may not be considered significant within the Ecoregions where the project is located. Additional rationale for the inclusion of this SWH type is recommended.	Additional text has been added to Section 6.4 of the Final EA Report.
69	Vegetation and Wetlands 6.4.5.2.3 Page 6.4- 33/36	Riparian Ecosystems Bogs are ombrotrophic, i.e., dependent on atmospheric moisture (rain and snow rather than streams and springs) for its nutrients, and thus may not be closely associated with riparian habitat.	Please ensure this consideration is addressed in the Project’s evaluation of impacts to riparian ecosystems within wetland ecosites.	Standard offsets of 30 m and 80 m were used to establish the limit of the riparian ecosystem. This method is meant to provide a general understanding of composition and quantity, as required for the EA. Riparian zones are described as regional wildlife movement corridors (MNR 2010a), in which case the proximity to a water feature is most applicable. This includes upland and wetland ecosite types. Although it is understood that bogs are ombrotrophic, it remains possible they may also serve as a wildlife movement corridor through the LSA and RSA. Per FRI data, Bog type does not occur within the riparian ecosystem that extends into the Project footprint.

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70	Vegetation and Wetlands 6.4.5.2	MNRF notes that not all subsections within the Vegetation and Wetland Section 6.4.5.2 provide conclusions at to whether the baseline characterization is predicted to be within the resilience and adaptability limits of the criterion.	MNRF recommends all subsections include a discussion of their result findings.	Resiliency relates to the capacity of an 'ecosystem' to cope with disturbances. Section 6.4.5.2.1 through Section 6.4.5.2.3, relating to the three ecosystem types considered by this EA (upland, wetland and riparian) include a statement related to resiliency and adaptability among the respective closing statement for the section.
71	Vegetation and Wetlands 6.4.6 Table 6.4-13 Page 6.4-53	Project-Environment Interactions for Vegetation and Wetlands and Plant Species Introduction and Spread of Noxious and Invasive Plant Species	Please elaborate on why there is no plausible interaction during the Operation Phase with the introduction and spread of noxious and invasive species, given there will be vegetation, infrastructure, and equipment maintenance efforts in the foreseeable future. MNRF recommends including rationale for why such activities do not pose a risk of being vectors for introduction and dispersal, given human activity and access were listed as being a vector of dispersal in subsequent sections.	Table 6.4-13 of the Final EA Report has been updated to address this comment.
72	Vegetation and Wetlands 6.4.7.1.1 Page 6.4- 55/56	All Vegetation and Wetland Criteria Reduced Soil Quantity and Quality / Mitigation Measures "Temporary access roads and waterbody crossings, temporary laydown areas, staging areas and temporary construction camps will be decommissioned and reclaimed throughout and after completion of the construction stage." "Erodible soils will be stabilized as soon as practicable by seeding, spreading mulch or installing erosion control blankets."	Please elaborate on or reference where additional information can be found regarding the decommissioning and reclamation process. Are these details also included within the mitigation measures (Table 6.4-20)? Please provide more information about how mulch may be utilized. MNRF is interested in the depths of material proposed and what the composition of the material will be. MNRF has available research and guidance chipper debris depths and considerations when mitigating forestry operations that may be useful to consider within this EA. This can be provided upon request. Material depth affects vegetation uptake and the type of material used can impact its effectiveness as an erosion prevention technique.	Mulch will be generated in areas that have minimal salvageable timber. In these locations, generated mulch will be spread across the ROW to avoid accumulation of flammable material and comply with the *Forest Fires Prevention Act*. Mulch chips will not exceed a depth of 18 cm. Generally, mulch depths in wetland areas are minimal since there is insufficient fibre to generate large mulch depths. In-situ mulch may also be used to help stabilize soils prone to erosion in combination with other erosion control measures. Additional details have been added to Section 3.4.1.11 and 6.4.8.1.1 of the Final EA Report to reflect the information above.
73	Vegetation and Wetlands 6.4.7.2 to 6.4.7.7	Upland Ecosystems / Ecosystem Loss or Alteration / Ecosystem Availability	Please provide percentages and acres for the Project Footprint boundaries in addition to the LSA and RSA information, so that MNRF can more easily understand volume, distribution and composition of habitat change within the footprint.	In Table 6.4-14, the columns "LSA Change in Area (ha)" and " Change in Area (ha)" as well as the subsequent "% Changes" columns are based on the Project footprint. A footnote has been added to the table in the Final EA Report to clarify.

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74	Vegetation and Wetlands 6.4.7.2.1 Table 6.4-14 Page 6.4-59	Upland Ecosystems / Ecosystem Loss or Alteration / Ecosystem Availability	MNRF is interested in the 13.2% (LSA) and 10.8% (RSA) loss of Meadow habitat, which is noticeably higher than in other general habitat types. MNRF recommend recognizing this loss and discussing the significance of this impact.	Meadow represents the majority of areas previously cleared (for anthropogenic development) and due to the new transmission line paralleling the existing transmission line for the majority of its length, the meadow habitat in the ROW will be disturbed by the Project footprint. A discussion has been added to Section 6.4.8.2.1 of the Final EA Report.
75	Vegetation and Wetlands 6.4.7.2.1 Page 6.4-64	Upland Ecosystems / Ecosystem Loss or Alteration / Ecosystem Composition “Herbicides may be used as an efficient measure for controlling noxious weeds within the ROW. Integrated pest management standards must be employed with any herbicide use.”	MNRF would like to see an Herbicide/Pesticide Management Plan framework and outline provided as part of the EA along with a brief discussion of the current ongoing review and its scope.	Through engagement during the draft EA process, Hydro One heard feedback from Indigenous communities and stakeholders regarding concerns with the use of herbicides to remove and manage vegetation on the Project. After extensive consideration of this feedback, herbicides will not be used during construction of the Project or for future maintenance of this transmission line. The Final EA Report has been updated to reflect this.
76	Vegetation and Wetlands 6.4.7.2.1 Page 6.4-65	Upland Ecosystems / Ecosystem Loss or Alteration / Ecosystem Composition “Upland SWH is established based on specific criteria related to one or more indicator species.”	Identification of SWH should consider the ecosystem as a whole and not be restricted to criteria only associated with one or more indicator species identified in this Project, given the restricted nature of this list. Please elaborate on how SWH was determined for this project and how criteria reflect the ecoregional location of the Project and the habitat interactions representative of this area. SWH Ecoregional Criteria Schedule for Ecoregion 3W can be used to guide the Project’s determination of SWH; however, please note that not all features identified for Ecoregion 3W may be applicable for the Project area and additional features may exist in the area that are of significance that are not present in Ecoregion 3W. In addition, the species or ecosite lists may also differ for the Project area compared to Ecoregion 3W characteristics. SWH identification should look to the SWH Technical Guide as the primary guidance source.	Comment noted. Please refer to the response to Comment #65.

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77	Vegetation and Wetlands 6.4.7.2.2 Page 6.4-66	Upland Ecosystems / Dust and Air Emissions, and Subsequent Deposition / Potential Effects Please provide information on the content and framework for the following plans mentioned in this section: • Blasting and Communications Management Plan	MNRF would like to see an outline and framework for this plan to determine how they address our mandated interest.	The Blasting and Communication Management Plan includes measures to address the following items: • Stakeholder notification • Storage, Transportation and Use • Security • Environmentally Sensitive Areas • Waterbodies These details have been added to Section 10.2.2 of the Final EA Report
78	Vegetation and Wetlands 6.4.7.3.1 Page 6.4-71	Wetland Ecosystems / Ecosystem Loss or Alteration / Potential Effect / Ecosystem Availability “The Project footprint is not expected to disturb the least common and available general wetland habitat type in the study areas (i.e., Bog habitat).”	Project footprint Predicted Changes (acres & percentages) are not listed in Table 6.4-17. Please include amount and percent changes for the Project footprint, in addition to the LSA and RSA values already provided. This will assist the MNRF in more clearly gauging the impact of the Project on natural heritage values.	In Table 6.4.17, the columns “LSA Change in Area (ha)” and “RSA Change in Area (ha)" as well as the subsequent “% Changes” columns are based on the Project footprint. A footnote has been added to the table in the Final EA Report to clarify.
79	Vegetation and Wetlands 6.4.7.3.1 Page 6.4-71	Wetland Ecosystems / Ecosystem Loss or Alteration / Potential Effect / Ecosystem Composition “Wetland habitat in close proximity to construction activities and permanent development features are predicted to provide lower quality habitat for wildlife due to changes in the composition of vegetation communities.”	Please elaborate on the impact to non-compatible vegetation communities (e.g., treed swamps). Will these areas be cleared? How will impacts be mitigated? Are there net effects given the greatest loss within the LSA and RSA is posed to this general wetland ecosite habitat type? This additional information will assist the MNRF in more clearly gauging the impact of the Project on natural heritage values.	Non-compatible vegetation will be removed from the ROW. Tree wetland habitats (i.e., treed swamp and treed fen) comprise 334 ha of the Project footprint. A total of 98.1% and 99.4% of treed wetland ecosites within the LSA and RSA, respectively, will be preserved. Vegetation management practices, such as establishing a wire zone - border zone where vegetation closer to the ROW edge is permitted to grow taller and may include tree species, can be used along the ROW to increase treed species within the transmission line ROW. All metrics contained within the EA do not account for a wire zone – border zone, and therefore represents the worst-case-scenario. Mitigation measures are discussed within the EA and will be further detailed in the EPP. Section 6.4.8.3.1 of the Final EA Report has been updated to include discussion.

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80	Vegetation and Wetlands 6.4.7.3.1 Page 6.4-72	Wetland Ecosystems / Ecosystem Loss or Alteration / Potential Effect / Ecosystem Distribution “However, some wetland connectivity reduced by the Project may be restored where mineral soil wetlands are located under temporary access roads that will be reclaimed when no longer in use.”	Please elaborate on how wetland connectivity will be restored with temporary access road reclamation. MNRF is interested in what techniques will be employed to construct and reclaim such roads to achieve this goal to better gauge the feasibility of the proposed actions.	By removing the subgrade of the road and the geotextile (as noted below in response to Comment #81), the hydrological function would be restored. Once this is complete, the wetland area previously occupied by the road can begin to recover naturally. If corduroy will interfere with the functioning of the wetland, then it will be removed as well.
81	Vegetation and Wetlands 6.4.7.3.1 Page 6.4-73	Wetland Ecosystems / Ecosystem Loss or Alteration / Mitigation Measures “Compatible vegetation, coarse woody debris and plants, and other sensitive plants (e.g., SAR, SOCC, SWH communities) identified during clearing activities will be retained where feasible as practicable and will be considered for further mitigation action as appropriate.” The EA contains inconsistent messaging regarding the retainment of coarse woody debris. MNRF supports retaining coarse woody debris where safe to do so to facilitate wildlife movement and maintain microhabitats on the ROW.	Please ensure consistent commitments in relation to the removal or retainment of coarse woody debris between EA documents. In addition, please elaborate on the methods and construction practices to be used for developing access roads into sites where wetland areas cannot be avoided. This will assist MNRF in its review of Project impacts to wetland features.	When constructing roads in wetlands, the objective is to protect the natural root mat and strengthen the ground surface as necessary to support the road. To achieve that objective, road construction in wetlands may involve the placement of geotextile underneath the road subgrade. Where additional surface strengthening is required, corduroy will be laid beneath the geotextile. Where surface and subsurface drainage could be impeded by the placement of the road then cross culverts or log fills will be used to facilitate cross water flow and equalize water levels on both sides of the access road. During reclamation, the imported fill and geotextile will be removed from the wetland. If deemed to be an impediment to surface flow or wetland recovery, the corduroy will be removed as well. In some cases, access across wetlands may be accomplished using swamp or access mats. These will also be removed during reclamation
82	Vegetation and Wetlands 6.4.7.3.3 Page 6.4-74	Wetland Ecosystems / Introduction and Spread of Noxious and Invasive Plant Species / Potential Effects	Please elaborate on the potential spread of European Common Reed (Phragmites) or Purple Loosestrife, which can both be found in many locations throughout Northwestern Ontario. While these species may not be in the current existing environment, there is a strong possibility they could be transported on site. MNRF recommends considering the risk of introduction associated with these species, or any other common invasive species (e.g., rusty crayfish or spiny water flea) well-known to the region and how such risk may be mitigated. Similarly, please consider invasive species known to the region and their risk in relation to Riparian Ecosystems (Section 6.4.7.4.3) and Plant Species at Risk (Section 6.4.7.5.3), Plants Species of Conservation Concern (Section	Standard mitigation measures, as outlined in Table 6.4-20, states that machinery will undergo cleaning and inspection prior to arriving to site and prior to moving between sites, and designating areas for such cleaning/inspection activities. The EPP will include an Invasive Species and Biosecurity Management Plan, designed to control spread of identified and other invasive species.

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			6.4.7.6.3) and Plants of Traditional Use (Section 7.7.8.4 & Section 7.8.8.4).	
83	Vegetation and Wetlands 6.4 Table 6.4-14 Page 6.4-59 Table 6.4-18 Page 6.4-76	Predicted Changes to Upland Ecosystem Availability at the LSA and RSA Predicted Changes to Riparian Ecosystem Availability in the LSA and RSA The percent change calculations for the Meadow General Habitat Type are high for both Upland and Riparian Ecosites.	Please clarify if the conversion of the ROW to field meadow is incorporated into these calculations (i.e., added into the net effects hectares which is then subtracted from the baseline characterization).	The Project footprint is comprised of four (4) meadow ecosite types, as follows: • B008 – 0.5 ha • B030 – 2.0 ha • **B045 – 288.5 ha** • B094 – 1.2 ha Table 6.4-4 includes a footnote which indicates that the ROW conversion to meadow (B045) was considered as part of the baseline characterization that was carried through the EA. As observed above, B045 and reclassified ROW comprises 98.7% of all meadow habitat within the Project footprint.
84	Vegetation and Wetlands 6.4.7.4.1 Page 6.4-77	Riparian Ecosystems / Ecosystem Loss or Alteration / Ecosystem Distribution “Riparian habitat within the Project footprint overlaps with 19 ha (<0.1% in the LSA) of anthropogenic ecosites within the LSA. “	Please reference where the anthropogenic ecosite overlap areas and percentages are coming from in this section and other applicable sections, so that the corresponding table can be found.	Additional text has been added to the Final EA Report to better explain anthropogenic or ‘disturbed’ ecosites.
85	Vegetation and Wetlands 6.4.7.4.1 Page 6.4-77	Riparian Ecosystems / Ecosystem Loss or Alteration / Ecosystem Composition	Impacts to wildlife inhabitants, moisture regimes, water quality and drainage patterns are discussed. Please elaborate on the loss and alteration of the vegetation composition, especially with the removal of non-compatible vegetation, and what that means for riparian vegetation community.	Retention of compatible vegetation will result in removal of trees from within the ROW that have the potential to affect the safe operation of the transmission line. While considering treed upland and wetland ecosites that occur within the riparian ecosystem of the Project: • 81.1 ha of coniferous, deciduous, and mixed forest • 14.4 ha of treed fen and treed swamp wetland While considering the available treed riparian ecosystem within the LSA and RSA: • 98.9% (7,092 ha less 81.1 ha) and 99.7% (23,430 ha less 81.1 ha) of treed upland habitat will remain in the LSA and RSA, respectively. • 99.1% (1,598 ha less 14.4 ha) and 99.7% (4,652 ha less 14.4 ha) of treed wetland habitat will remain in the LSA and RSA, respectively.

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				With respect to each of the LSA and RSA, more than 98.9% of treed upland and wetland habitat will be retained. Vegetation management practices, such as establishing a wire zone - border zone where vegetation closer to the ROW edge is permitted to grow taller and may include tree species, can be used along the ROW to increase treed species within the transmission line ROW. All metrics contained within the EA do not account for a wire zone – border zone, and therefore represents the worst-case-scenario. It is expected additional upland and wetland treed habitats can be retained/restored.
86	Vegetation and Wetlands 6.4.7.4.1 Page 6.4-77	Riparian Ecosystems / Ecosystem Loss or Alteration / Mitigation Measures	Please elaborate, if applicable, on how riparian ecosystem mitigation measures might differ from the upland and wetland ecosystems. MNRF recognizes that there may be great similarities with mitigation measures applied in upland and wetland sites, but are there actions that would be strictly considered for riparian areas given their proximity to streams, rivers, lakes, and ponds?	Mitigation measures applicable to upland and wetland ecosystems will also be applicable to upland and wetland ecosites also occurring within the riparian ecosystem. Mitigation measures have been developed to address potential impacts when working in or near streams, rivers, lakes, and ponds. Please refer to Section 6.6 - Fish and Fish habitat.
87	Vegetation and Wetlands 6.4.7.6.1 Page 6.4-83	Plant SOCC / Plant Loss or Alteration / Habitat Quantity	Please elaborate on the impact to the larger subnational population for species listed as S1-S3 and SH. This is important to understand the larger scale impact of the Project on these population given the limited number of occurrences or populations within the province. For example, in Ontario: S1 – Extremely rare (often 5 or fewer occurrences, or very few remaining hectares) S2 – Very rare (usually between 5 and 20 occurrences, or few remaining hectares) S3 – Rare to uncommon (usually between 20 and 100 occurrences, but with some extensive examples remaining) In addition, MNRF recommends making a clearer distinction between SOCC and their associated SWH considerations, and other SWH (i.e., regionally rare orchid species). Typically, SOCC SWH consists strictly of an occurrence of a SOCC species (S1-S3, SH) or Special Concern Species at Risk. However, the majority of SWH cannot be categorized as SOCC. The differentiation of the two in the EA is a bit	Of the fourteen species containing an SRank of S1-S3 and SH within the RSA, only two species are recorded within the Project footprint: • Scabrous Black Sedge (31.0 ha) • Vasey's Rush (8.0 ha) Based on the above metrics, 97.8 % and 98.5% of available habitat for the SOCC will be retained in the LSA and RSA, respectively. SOCC is defined in the baseline report (Appendix 6.4-A) as any species listed under Schedule a of SARA as Special Concern, any species designated as THR, END, EXT by COSEWIC, and species listed under the ESA as SC, and any species the subnational rank of SH and S1-S3. Per SWH criterion 3W, rare vegetation communities constitute SWH in addition to habitat of provincially SC, and S1-S3 and SH ranked species. SOCC criteria is more encompassing

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			confusing, especially when total SOCC habitat loss incorporates non-SOCC species habitat into its calculations. The impact of SOCC loss may be significant at a subnational (provincial) scale, whereas the loss of a regionally rare species may be felt at a regional level but at a provincial scale may be less significant. For example, in Habitat Distribution: “The greatest area of habitat loss for SOCC within the LSA consists of diverse and sensitive orchid community SWH (262 ha; 2.0% loss of the LSA).” Diverse and Sensitive Orchid Community SWH are defined as large, rare, and specialized communities of sensitive orchid species that are sensitive to disturbance. SOCC may occur in these communities, however their presence is not the sole trigger for this SWHs identification. The presence of >9 total orchid species within a	than SWH SC and Rare plant species alone, with the addition of species listed under SARA and COSEWIC. A statement has been added to highlight that SH and S1-S3 ranked plants discussed as SOCC also constitute SWH.
88	Vegetation and Wetlands 6.4.7.6 Page 6.4- 83/86	Plant SOCC / Mitigation	MNRF recommends species-specific approaches be considered for avoidance and mitigation to minimize impacts to these highly adapted and sensitive species.	Please refer to the response to Comment #87. While maintaining over 97.8% of SOCC habitat within each of the LSA and RSA, mitigation measures will be applied to retain available ecosystem within the Project footprint where possible. Both SOCC species (i.e., Scabrous Black Sedge and Vasey’s Rush) fit within the definition of compatible vegetation and will be retained where possible. In areas with disturbance is unavoidable, restoration methods, including natural regeneration, will encourage species and native seedbanks to recolonize.
89	Vegetation and Wetlands 6.4.7.6.1 Page 6.4- 83/84	Plant SOCC / Plant Loss or Alteration / Survival and Reproduction “Project-related changes in survival and reproduction are likely well within the resilience and adaptability limits for this criterion.”	Rare vegetation communities are adapted to specialized habitats, unlike most widespread species within an ecoregion. Given the sensitive and highly adapted nature of SOCC species, MNRF suggests the opposite may be true depending on the direct or indirect nature of the impact. Please elaborate on the rationale behind the statement above, so that we can better understand the perspective being put forward.	Please refer to the responses to Comments #87 and #88, above. The SOCC comprise a small area of the Project and less than 2.2% change when considering the LSA and RSA. Further to natural restoration methods, consideration is given to limit changes to the landscape, particularly drainage. Management of drainage paths to maintain wetlands outside of the footprint from potential changes to catchment is considered. Drainage paths will be maintain/restored, where possible.

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90	Vegetation and Wetlands 6.4.7.7.1 Table 6.4-19 Page 6.4-87	Predicted Changes to Ecosystem Availability for Plant Species of Traditional Use in the LSA and RSA It is challenging to follow and confirm the percentages and hectares provided without having Table 6.4-12 alongside.	MNRF suggests replicating Table 6.4-12 while updating it to include hectares and/or percentages in exchange for the "confirmed" and/or "suitable" categories being used to calculate loss and alteration quantities. Total summaries could be included in the same table for both rows and columns. This would greatly enable MNRF to draw connections between general habitat type and traditional plant species much more easily and clearly, facilitating MNRF's review of their mandated interests.	Areas of both confirmed and suitable habitat types have been added to Table 6.4-12 in the Final EA Report.
91	Vegetation and Wetlands 6.4.7.7.1 Page 6.4-88	Plants of Traditional Use / Project Effect / Habitat Distribution "However, the greatest percent of habitat loss for plant species of traditional use within the LSA consists of meadow (295 ha: 13.2% loss in the LSA). It is noted; however, that the Project footprint will be allowed to naturally recover with compatible species, resulting in creation of 2,867 ha of meadow habitat."	MNRF suggests this discussion also acknowledge the possibility of these areas being managed for incompatible vegetation through herbicide application, which may be in contradiction with Traditional Use practices.	Through engagement during the draft EA process, Hydro One heard feedback from Indigenous communities and stakeholders regarding concerns with the use of herbicides to remove and manage vegetation on the Project. After extensive consideration of this feedback, herbicides will not be used during construction of the Project or for future maintenance of this transmission line. The Final EA Report has been updated to reflect this.
92	Vegetation and Wetlands 6.4-92	Table 6.4-20 Potential Effects, Mitigation Measures, and Predicted Net Effects.	MNRF has two edits to the first row in the table on potential effects, mitigation measures and predicted net effects: 1) Change the wording of "avoid burning slash piles when a fire hazard is present" to "avoid burning slash piles in peat-rich areas where residual fires could smoulder after April 1st" 2) Change the wording of "Avoid locating slash burn piles in peat-rich areas where residual forest could persist after construction" to "Avoid creating slash burn piles in peat-rich areas where residual fires could smoulder after April 1st."	The Final EA Report has been updated accordingly.
93	Vegetation and Wetlands 6.4.12 Page 6.4-173	Monitoring "In the event that a sensitive feature is identified, appropriate vegetation management procedures will be implemented."	Will a Vegetation Management Plan be included within the EA that outlines these described procedures and implementation considerations? Inclusion of this material within the EA allows MNRF to determine if the proposed procedures and implementation guidance addresses our natural heritage interests and legislated requirements. MNRF will want to see plans or protocols be provided for invasive species management, erosion and sediment control management, and progressive reclamation.	The EPP will include a Rare Plant Management Plan that addresses mitigation measures and a contingency plan for rare plant species or community discovered through the course of construction, and can be provided to the MNRF in advance of construction. Mitigation measures included in Section 6.4 of the Final EA report will be included in this plan, which will address: • Avoidance Flagging • Protection of known rare plant features • Protection of undiscovered rare plant features

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				The EPP will also include an Invasive Species and Biosecurity Management Plan, Erosion and Sediment Control Plan, and Final Reclamation mitigation measures. Additional details on the scope of these plans has been added to Section 10.2.2 of the Final EA Report.
94	Vegetation and Wetlands 6.4.11 Page 6.4-171	Prediction Confidence in the Assessment “Wetlands in the study area were mapped as either bogs, fens, marshes, or swamps. It is understood that mineral wetlands are infrequently captured and classified as wetland through spatial analysis programs (e.g., digital surface mode) and, as such, existing data may underestimate wetlands within the LSA and RSA. As it relates to observations made during baseline characterization field assessments, only 53% of the ecosites visited aligned with the existing FRI mapping. It is noted that FRI mapping was approximately 15 years old during the field assessment, so, inevitably, the landscape has undergone some alteration from development and natural processes; however, this value seems to suggest a high level of error.”	MNRF encourages conversations with SFL holders, as well as MNRF, regarding FRI classification.	It is understood from a discussion with the MNRF that the FRI is not designed to provide detailed information on ecosite classification and it is a tool for forestry. The Final EA Report has been updated to acknowledge these limitations when using it for land cover mapping and ecosite classification.
95	Vegetation and Wetlands 6.4.8.1.1 Page 6.4- 107/108	Net Effects Characterization / Upland Ecosystems / Ecosystem Loss or Alteration “Construction of the Project is predicted to remove upland habitats and the direct and indirect effects of the changes are predicted to be confined to the footprint and extend into the LSA, respectively. For the purposes of this assessment, changes to all three indicators that extend into the operations and maintenance stage are assumed to be medium term/reversible for uplands disturbed by permanent access roads and towers. Effects to treed upland general habitat type in the corridor ROW would also be permanent due to maintaining compatible vegetation to meet safety requirements during operations.”	Please elaborate on how permanent access roads and towers are assumed to be medium term and reversible, while compatible vegetation management is considered permanent. Given the indefinite lifespan of the Project. It would seem that permanent access roads and towers should be considered permanent (long-term and irreversible) as well? Regular vegetation management efforts will be required to keep non-compatible vegetation from encroaching on the ROW.	To clarify, “permanent” access roads are referenced to differentiate them from temporary access roads during construction. The use of “permanent” is not a reflection of the net effects characterization definition of permanent which is defined as “irreversible”. Access roads used during operation can be removed if they are no longer required for ongoing operation and maintenance of the Project, or if the Project is retired and effects would be reversible. The net effects characterization has been updated to indicate that the net effects for ecosystem loss or alteration are medium term for temporary Project components and long-term for Project components that will be in place for the life of the Project (e.g., towers and permanent access roads). These effects continue to be considered reversible. Towers are captured by the ROW. Direct impact to vegetation from towers are generally related to their footings and not the entire footprint of the structure. Compatible vegetation will continue to grow around and under the tower structures.

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96	Vegetation and Wetlands 6.4.8.1.1 Table 6.4-22 Page 6.4-109	Characterization of Predicted Net Effects to the Upland Ecosystem	Please include predicted loss of Project footprint in addition to the LSA's baseline characterization. This assists MNRF in reviewing and understanding the direct and indirect impacts to our mandated interests. Please add Project footprint to the other characterization tables as well (e.g., Table 6.4-23 to Table 6.4-26).	Tables 6.4-23 through 6.4-27 are not meant to assess the general habitat changes among the respective ecosystem, but rather as a whole ecosystem. The predicted loss for the ecosystem is identified in the 'Magnitude' column. Tables 6.4-14, 6.4-15, 6.4-16, 6.4-17, 6.4-18, and 6.4-19 identify the loss associated with the Project footprint (Net Effect) and associated percent change with respect to each of the LSA and RSA.
97	Vegetation and Wetlands 6.4.8.2.1 Page 6.4-110	Net Effects Characterization / Wetland Ecosystems / Ecosystem Loss or Alteration "For the Project footprint, negative effects to the availability and distribution of wetland ecosystems are predicted to be small, probable, continuous, and local in scale. Construction of the Project is predicted to remove 1.8% of wetland ecosystem within the LSA, confined to the Project footprint. For the purposes of this assessment, changes to all three indicators that extend into the operations and maintenance stage are assumed to be medium term/reversible."	Please elaborate on how the negative effects to wetland ecosystems are assumed to be medium term and reversible, when effects are predicted to be continuous and probable.	Medium-term and reversibility are part of the Duration/Reversibility net effects criteria. Continuous and probable are part of the Frequency and Likelihood of Occurrence net effects criteria. Additional details on how these criteria are defined are provided in Table 5.6-1. Based upon these definitions, impacts are considered medium-term, where, "the effect occurs during construction and/or operation and maintenance, and persists after the activity is complete, but is reversible". Impacts to wetlands will be limited to the period of construction through to operation. At the end of the Project and following decommissioning, the impacts are predicted to be reversible given that the area can recover to pre-disturbance condition. While considering the above, the actual impacts are predicted to be probable – the effect is likely to occur and not certain (i.e., the effect will occur).
98	Vegetation and Wetlands 6.4.8	Please elaborate on how duration, reversibility and frequency characterizations are assigned. Additional rationale and explanation are needed for MNRF to understand how these conclusions are being made, as predicted losses or alterations often are of a different impact nature than the assigned characterization.	Additional clarification will assist the MNRF in understanding the thinking behind the characterizations and how they relate to our natural heritage interests.	Table 5.6-1 provides definitions for the net effects characterization, which includes duration/reversibility and frequency.

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99	Wildlife and Wildlife Habitat Section 6.5 p. 53	MNRF is concerned with the lack of a fulsome species list in their description of the confirmation criteria for Amphibian Breeding Habitat including the exclusion of indicator species, Spring Peeper. Salamanders also should be considered when determining Amphibian Breeding Habitat, and the provided criteria in this section should be updated to reflect their consideration as well.	MNRF recommends including the following list of amphibian species known to occur in Ecoregion 4W to support the identification of "four or more of the listed frog or toad species", including: Eastern Newt, Spotted Salamander, Blue-spotted Salamander, American Toad, Gray Treefrog, Boreal Chorus Frog, Wood Frog, Spring Peeper, Northern Leopard, Green Frog, Mink Frog, and Mudpuppy. Updating the EA to reflect the above considerations will allow the EA to assess and mitigate the impacts to herpetofauna more accurately. In addition, a fulsome list of species under the breeding habitat criteria will meet the Project requirements to identify assess and manage potentially significant environmental risks and integrate environmental considerations into decisions.	Spring Peeper was selected as an indicator species for amphibian breeding habitat as they breed in a wide-range of aquatic habitats (i.e., lakes, pods, streams, bogs, marshes, etc.); however, Spring Peeper also spend the majority of their lifecycle more terrestrially. Therefore, the habitat modelling for Spring Peeper captures a variety of aquatic habitat conditions which may support additional amphibian species within the LSA and RSA. This approach was specifically taken to capture habitat impacts for all amphibian species which rely on aquatic habitats to reproduce. Therefore, the addition of other amphibian indicator species that is more common and widespread is not necessary, as this will not change the results of the effects assessment for amphibians.
100	Wildlife and Wildlife Habitat 6.5	The Trumpeter Swan has been selected as the indicator species for Marsh birds in the draft EA assessment. The Trumpeter Swan has recently begun to re-establish in the area and is not a widespread species in the Project area. In addition, the Trumpeter Swan has very habitat specific nesting (large nests) and general habitat (large wetland to allow take off) requirements. A wider-spread and more generalist wetland species, may provide a more accurate assessment for a larger diversity of species and a wider range of wetland habitat types to inform mitigation measures and the net effect for this EA.	An additional wetland species (e.g., Green-winged Teal, Ring-necked Duck, Hooded Merganser), that is common and a generalist, should be considered and added to the Draft EA. This additional species can be used to assess the impact to larger range wetland species and habitats. In addition, a clear explanation of how the trumpeter swan assesses the widespread and overall impacts to wetland and wetland species should be provided.	Trumpeter Swan was selected as an indicator species for marsh birds as they thrive in high quality habitats. Although these large swans require long runways of at least 100 m for take-off, they are known to use waterbodies of variable size for nesting, including small features (Mitchell et al. 2020). Therefore, the habitat modelling for Trumpeter Swan included all wetland ecosites (other than treed swamps) and beaver ponds within the LSA and RSA, plus a buffer around those features of 100 to 1000 m (into adjacent terrestrial and aquatic habitat, respectively); no minimum size criteria was applied as a threshold for suitable Trumpeter Swan habitat. This approach was specifically taken to capture habitat impacts for all marsh bird and wetland species. Therefore, the addition of another wetland indicator species that is more common and widespread is not necessary, as this will not change the results of the effects assessment for marsh birds.

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101	Wildlife and Wildlife Habitat Section 6.5 Table 6.5-20: Potential Project-Environment Interactions for Wildlife p. 86	A potential project interaction due to the attraction of wildlife to the Project at the Operation and Maintenance stage is not indicated. In addition, consider the impact of increased public access and wildlife interactions. The proposed changes will allow the EA to accurately assess and therefore mitigate the impacts to wildlife and will meet the ToR requirement to accurately identify, asses, and manage potentially significant environmental risks and integrate environmental considerations into decisions.	The EA should consider additional impacts at the Operation and Maintenance stage for wildlife attractants and increased public access at the retirement stage. Please ensure project-environment interactions for wildlife consider all potential impacts at various stages to assess the net effects.	Table 6.5-22 was updated to include effects from wildlife attractant in the operations and maintenance phase and increase in public access in the retirement phase.
102	Wildlife and Wildlife Habitat Section 6.5	Future MNRF permitting/approval requirements are not noted if an individual encounters and wishes to possess a found dead wild animal. The proposed changes will make workers aware of MNRF permitting requirements under the Fish and Wildlife Conservation Act if an individual was to encounter dead wildlife during the various stages of the Project.	The EA should indicate that MNRF permitting is required (Notice of Possession) if an individual will possess a dead animal. Keep a dead wild animal | ontario.ca	Comment acknowledged. MNRF will be contacted to discuss permitting requirements if an individual will possess a dead animal.
103	Wildlife and Wildlife Habitat Section 6.5 p.128 & Fish and Fish Habitat Section 6.6 p. 105	Future MNRF permitting/approval requirements regarding nuisance beavers have not been clarified in the EA. The MNRF has permitting requirements regarding the removal of the beavers, in addition to beaver dams. The proposed changes will ensure that the EA follows all licensing under the Fish and Wildlife Conservation Act as per commitment #75 of the ToR. Additionally, MNRF noted an inconsistency regarding potential beaver blockages in culverts. An "Authorization to Interfere With/Destroy a Black Bear or Furbearing Mammal Den, Beaver Dam, Black Bear Den" as per the Fish and Wildlife Conservation Act, 1997 is an important permit to be noted for culvert maintenance to ensure all permits are obtained as per commitment #75 of the ToR.	The EA should indicate that MNRF permitting is required for the removal of the beavers themselves. This permit is in addition to the beaver dam removal authorization. The permit required is the Term Agent Authorization, Individual Authorization or for the EA to identify the need to have the assistance of the head trapper to trap the nuisance beaver. In the event of a dam blocking a culvert, MNRF approval will be required before the beaver dam can be removed. A permit is required unless the individual is the head trapper for the trapline. This requirement should be reflected in any report text regarding culvert maintenance.	Where beaver removal is required, the head trapper for the impacted trapline will be contacted and/or the required MNRF permits will be acquired as necessary. Section 6.6.7.1.2.2 notes that a permit is required for beaver dam removals. Additional wording has been added to Section 6.5.7.6.4 of the Final EA Report about beaver removal and the utilization for head trappers on traplines to assist with the work
104	Section 6.5 – Wildlife and Wildlife Habitat	Mitigation Measures Bald Eagle page 6.5-143 *"Managing tree clearing activities to the extent possible so that removal will occur outside of the bald eagle nesting period (March 15 to August 15)."* This nesting period is not consistent with the Forest Management Guide for Conserving Biodiversity at the Stand and Site Guide (SSG). The geography for the project footprint recognizes "March 1 to August 31" as the critical breeding period in the SSG At what distance will tree clearing be managed? The EA does not speak to any additional mitigations that will be put in place from HONI assessing potential impact at the site level. Can HONI provide additional information within this section describing how this will be evaluated and mitigated?	Please ensure tree clearing activities are consistent with the Stand and Site Guide and recognize the critical breeding period of bald eagle and that impacts to other raptor species and their critical breeding periods are captured in the Final EA. Example: Using "Bald Eagle" from the SSG: 400m radius area of concern (AOC) around known active primary eagle nests. Ranking assessment (pg., 192) in the SSG (see below), to help assess the potential impact of activities on nesting birds. Ranking may be adjusted to meet specific site conditions and a concurrent combination of operations may elevate the potential impact. Generally, no operations would be permitted within 200m of the nest and any high and moderate ranked operations would	As described in Section 6.5.3 of the EA, bald eagle has been selected as a surrogate of all raptor species. Bald eagle mitigation measures in section 6.5.7.9.1 have been updated to be consistent with the SSG guidelines and wording has been updated to apply to all active raptor nests. Updated measures include avoidance of moderate to high impact operations (including vegetation clearing, helicopter flights, drilling, blasting, and implosion slicing) to the extent practicable within 400m of an active bald eagle (or other raptor) nest during the critical breeding period (March 1 to August 31). If raptor nest removals are required, or

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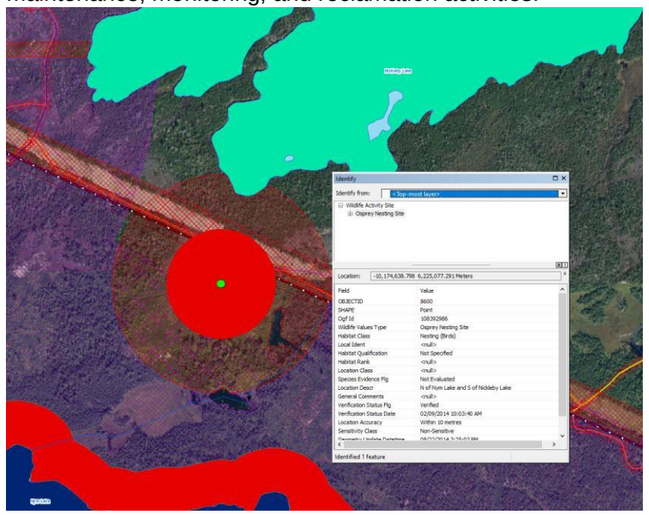
			be avoided within 201-400 m of the nest during the critical breeding period (March 1 to August 31). In addition, the EA does not speak to other raptor species that maybe impacted by the project footprint. For example, Osprey with a critical breeding period from April 15 to August 31. Below is an example of an Osprey nest that falls just outside of HONI's proposed ROW, however, the distance is close enough to consider mitigations related to low, medium, and high potential impact activities during the critical breeding period. Not addressing/planning for site specific mitigations could lead to abandonment of the nest during construction, maintenance, monitoring, and reclamation activities.  	if works are required within the protective nest buffers, Hydro One will engage with the MNRF to acquire all appropriate permits for this work. Bald Eagle nest locations (including a 400m buffer) have been mapped and included in the EA (Appendix 6.5-B). All other raptor nest locations have been mapped and included in the Baseline Report (Appendix 6.4-A). The raptor nesting locations and mitigation measures identified in the EA will be carried forward to the EPP. Mapping will be used to determine potential overlap of raptor nests with moderate to high impact operations (including vegetation clearing, helicopter flights, drilling, blasting, and implosion slicing) so that potential impacts to raptor nests can be avoided during the critical breeding period (March 1 to August 31).
105	Section 6.5 – Wildlife and Wildlife Habitat	Section 6.5.7.9.3 Electrocution and Collisions with the Transmission Line under Mitigation Measures *"Management of nests during the non-breeding season (such as moving nests to alternate structures, and removing unoccupied nests), can minimize the risk of avian mortality from electrocution (APLIC 2006)."* More information is required on the methods to "move nests to alternate structures", and information on MNRF permitting/approval requirements for destruction of bald eagle nests needs to be included to ensure that the EA follows the regulations under the Fish and Wildlife Conservation Act.	The Final EA should indicate that MNRF permitting is required for the removal of bald eagle nests, as a species that is not covered under the Migratory Birds Convention Act (MBCA), it is covered under the Fish and Wildlife Conservation Act (FWCA). The Final EA should consider including additional wording to indicate that authorization is also required for any other bird species nest that is not covered under the MBCA. These nests require MNRF authorization before destruction, taking or possession of nests or its eggs. This is an Authorization to Destroy/Take/Possess Nests or Eggs (FW2013).	Updated wording in Section 6.5.7.9.3 and 6.5.7.9.6 to indicate an FWCA Authorization is required to remove a bird nest not protected under the MBCA and that MNRF consultation is required to determine removal methods.

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106	Section 6.5 – Wildlife and Wildlife Habitat Pg.29	"Aerial surveys conducted by the Ontario Government between 1975 and 2022 indicate moose populations in the Project study area are declining…"	Updated estimates for WMU-specific moose populations relative to their WMU-specific population objective range (POR) can be viewed at the following webpage (Moose population management | ontario.ca). Going into winter 2023, all WMU-specific moose populations within the LSA/RSA (i.e., moose populations in CEZ C1) were below their POR. After winter 2023 MAI surveys, moose within WMU 12A were estimated to be at the lower limit of their POR, while the moose population in WMU 12B remains below its POR.	Section 6.5.5.2 had been updated with 2023 estimates
107	Section 6.5 – Wildlife and Wildlife Habitat Pg.29	The information referenced around moose pregnancy and twinning rates (i.e., Boer 1992 and Murray et al. 2012) although correctly refers to what those authors observed, differ what has been observed more recently and in closer proximity to the LSA/ RSA.	MNRF recommends augmenting this section with context around the relative survivability of calf moose (in proximity to the LSA/RSA) through to their first year would also add further context to the EA report readers around the relative health of the moose population associated with the LSA/RSA.	Information provided by MNRF was incorporated into the text in Section 6.5.5.2.
108	Section 6.5-Wildlife and Wildlife Habitat Pg.29	The MNR references (i.e., MNR, 2013 a, b, c, d, e, f, g) to moose home range sizes in WMUs 5,8, 9A, 12A and 12B do not appear to be correct.	Please confirm accuracy of references within the document.	Comment noted. These references have been checked
109	Section 6.5 – Wildlife and Wildlife Habitat Pg.30	White-tailed deer are indicated as the primary host of moose winter tick.	MNRF suggests decreasing the importance of white-tailed deer as a host for this tick species and thus the impact of deer populations on moose relative to deer being a host of moose winter tick.	All existing factors that could be affecting wildlife populations at existing conditions are discussed. Recent and relevant literature to support these statements were used. Hydro One is not in a position to decrease or increase the importance of these statements without appropriate studies and evidence.
110	Section 6.5 – Wildlife and Wildlife Habitat Pg.30	The estimated abundance of white-tailed deer across the LSA/RSA has been well below levels observed 10-15 years ago.	MNRF suggests that the report not overstate the relative import of white-tailed deer on the moose population in the LSA/RSA 'existing environment'.	Please refer to the response to Comment #109.
111	Fish and Fish Habitat Table 6.6-23: Potential Effects, Mitigation Measures, and Predicted Net Effects for Fish and Fish Habitat, p. 126 and 125.	Incomplete data/information on the timeframe for the restoration of disturbed areas. Mitigation measures in the Fish and Fish Habitat section, indicate restoration of disturbed areas as soon as reasonably possible. To allow MNRF to understand the potential impacts and net effects assessment for Fish and Fish Habitat, more detailed is required to further define the timeframe indicated within the text. Further clarification will explain potential effects to allow a complete review of the potential impacts and assist with developing associated environmental protection plans (Erosion and Sediment Control Plan)	Please further define the timeframe that will be used when restoring disturbed areas as soon as reasonably possible.	Restoration must be completed in consideration of time of year, weather/ground conditions, and access relative to when construction of facilities in a given area are completed. Final reclamation is to be completed outside of frozen conditions as soon as weather and soil conditions permit. Reclamation efforts within and near wetlands are to commence as soon as reasonably possible to reduce the potential impact and to take advantage of access. Timing of re-vegetation is to take advantage of favourable moisture and temperature conditions. Temporary watercourse crossing structures and all materials will be removed upon project completion

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				in accordance with approvals from MNRF, DFO and Conservation Authorities as warranted. Snowfill and ice bridge removals will comply with DFO's Interim code of practice: temporary stream crossings. All permit requirements and applicable measures from DFO's Measures to Avoid Causing Harm to Fish and Fish Habitat including Aquatic Species at Risk will be followed. No construction activities are to be completed below the high-water mark to remove crossing structures. No logs or woody debris are to be left within the water body or on the banks or shoreline where they can wash into the water body.
112	Fish and Fish Habitat – Table 6.6-23: Potential Effects, Mitigation Measures, and Predicted Net Effects for Fish and Fish Habitat, p. 120. Section 6.6 p. 109	Further clarification regarding vegetation buffer clearing up to 10m and placement of material from watercourses will explain potential effects to allow a complete review of the potential impacts and assist with developing associated plans (Erosion and Sediment Control Plan) The EA indicates mechanical harvesters and bulldozers will be used to remove vegetation for laydowns at the construction stage. Further clarification is required to confirm if the EA will use a different method of removal within a potential riparian zone. Additionally, there is inconsistency with the intended clearing buffer, as a 30m buffer is noted in a different section of the EA.	Please ensure practices adjacent to watercourses follow MNRF Environmental Guidelines for Access Roads and Water Crossings as indicated in the Draft EA. The EA could consider defining where the potentially erodible material will be placed in relation to the high-water mark. A clear description of the riparian buffer, and the are that will remain vegetated, is required.	Removal of incompatible vegetation (i.e., trees) that may interfere with the safe operation of the transmission line will be removed. Compatible vegetation (i.e., shrubs, trees unlikely to interfere with clearance requirements) will be retained within riparian areas and within 10 m of watercourses. Natural revegetation will be used as the preferred method of reclamation. Seeding and planting will be limited to erosion-prone areas (e.g., steep slopes), or where required by landowner commitments, or regulatory authorization. Wetland work areas will be restored to pre-construction drainage patterns and seeded/planted with native vegetation (wetland seed mix and shrub stock appropriate for the site conditions and surrounding vegetation community).
113	Fish and Fish Habitat Section 6.6 p. 96	Further information on erosion and sediment control measures regarding bank stabilization and removal is required. Further clarification will describe potential effects to allow a complete review of the potential impacts and assist with developing associated plans (Erosion and Sediment Control Plan) as per commitment #30 of the ToR.	The EA should explain how it will ensure that erosion and sediment control measures (for example sediment fencing) are removed from the Project area once the bank stabilizes. In addition, the EA could consider providing additional information on what indicators will be used to define the bank as stable.	Disturbed areas will be stabilized and restored to prevent erosion. Site-specific designs and bank treatments will be implemented to address erosion risks and will be available for review during detailed design. Erosion and sediment control measures will be kept in place until all work is completed and/or all disturbed ground has been stabilized and/ or re-vegetated as required. Biodegradable sediment fencing will be used throughout the project.

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				Erosion and sediment control measures and procedures are included in the Final EA Report and will be detailed in the EPP which can be provided to MNRF.
114	Fish and Fish Habitat Section 6.6 p. 93	Incomplete information on the EA's definition of "reinstated" waterbody banks regarding the re vegetation of the Project area.	The EA should define what the word "reinstate" means in the context of revegetation of the site. There should be a clear description of how the EA will "reinstate and stabilize banks of waterbodies".	Please refer to the responses to Comments #112 and #113. Temporary watercourse crossing structures and all materials will be removed upon project completion in accordance with approvals from MNRF, DFO and Conservation Authorities as warranted. Banks may be recontoured, as needed. Disturbed areas will be stabilized and restored to prevent erosion, Erosion and sediment control measures will be kept in place until all disturbed ground has been stabilized.
115	Fish and Fish Habitat Section 6.6 p. 91	The EA does not currently state the MNRF will be identified if new waterbodies are identified.	During construction, if new waterbodies are encountered, MNRF will need to be notified.	MNRF will be notified of all new watercourses identified requiring crossings.
116	Fish and Fish Habitat Section 6.6 p. 91	More information is required regarding the definition of temporary and permanent infrastructure. Including, what infrastructure will be developed > 30 m from waterbodies. Further clarification will explain potential effects to allow a complete review of the potential impacts and assist with developing the required Environmental Protection Plans.	Further clarification is required on what infrastructure is considered temporary and permanent. In addition, the EA should indicate what infrastructure will be developed > 30 m from waterbodies.	At this stage in the project, it is unknown which access roads will be left in place to support operations and maintenance of the transmission line. Engagement with Indigenous communities and appropriate stakeholders, including the MNRF, will occur prior to determining which roads will not be removed and any necessary permits/approvals will be obtained.
117	S. 6.6, p. 94, p. 110, p. 120, Table 6.6-23	An application for a new licence or permit will have to be developed in accordance with the new application requirements. The text currently references "categories" in which are past application requirements.	Remove the reference to "category" from the text and replace it with proper current terminology.	The Final EA Report was updated to remove reference to "Category 9".
118	Section 6.6 – Fish and Fish Habitat	Water course field survey measurements and site characteristic (at all the crossing sites) are not currently available to inform the EA. Stream channel measurements and site characteristic are required to properly design/determine the most appropriate structure (for each specific water crossing) and are required for MNRF permitting. Potential impacts from installing water crossing structures are highly dependent on the type of crossing structure that will be installed., The EA should acknowledge this requirement and the EPP should capture permit requirements for water crossing within a SOP (i.e., details and	Provide rationale for type of water crossing selected. MNRF understands that site specific information will be provided during permitting. To avoid delays, post EA-approval, please specify actions that will be used to identify type of crossing needed. MNRF suggests a water crossing protocol to allow for some flexibility while in the field. Provide a definition of "log fill" in the EA. Please elaborate on the considerations given for downstream effects during the freshet. In addition, please explain how these will be	Prior to installation of a water crossing structure, a qualified professional will ground truth/field assess the stream characteristics to confirm the correct structure has been selected. Notification to MNRF will be provided where any changes to proposed crossing structures are required and/or when new water crossings are identified. Log fills will only be prescribed in wet areas where there are no defined channels and are intended

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		measurements required for review) to ensure a more streamlined process. There is concern that the use of culverts as temporary crossing structures may not be appropriate to the extent proposed within the EA. Installation and removal of a culvert (as temporary structure), results in the disturbance of the stream channel (once when the culvert is installed and then again when the culvert is removed). Thus, necessitating much more rehabilitation, compared to the use of clear span structures or winter water crossings. There is a high volume of temporary culverts proposed in the overall footprint of the Project. Culvert use will require more fisheries assessment work (including on-site assessment of local fisheries values, substrate, stream beds and banks), more restrictive work timing windows and additional rehabilitation work in the permitting process compared to temporary bridges. In addition, no contingency or mitigation plan appears to be in place for warm winters when ice bridges and snow fills are compromised. It should be noted that small flowing streams are not suitable for ice bridges or snow fills within the EA, as it is not feasible to maintain flow over the bottom. In addition, there are concerns about the lack of mitigation measures for fording of watercourses during construction. The EA indicates that fording is not planned as a primary method but states that it will occur one time (there and back) for installation of the water crossing structures and will occur for construction under approval from regulatory agencies following DFO code of practice. Structure type “Log fill/Snow fill”. It is unclear if this is an "option between the two" or if logs will be used to support a snowpack crossing. Please confirm. It should be noted that the use of logs in frost free conditions within a watercourse is not a standard practice with MNRF In addition, the use of logs (other then support on approaches) with a snowpack crossing is not consistent with the DFO code of practice or Ministry of Natural Resources and Forestry and Oceans Canada Protocol for the Review and Approval of Forestry Water Crossings (MNRF/DFO Water Crossing Protocol). Page 6.6-91 “Log fill crossings will be used only in areas with no defined channel, areas that are dry at the time of crossing and in seepage areas where no fish habitat has been identified. They will be	decommissioned. This information is necessary to help determine overall impacts of the project in relation to MNRF mandates, legislative requirements and/or interests.	only to maintain natural drainage patterns. There will be no log fills installed in any actual waterbody or in any defined channel, whether it is wet or dry. In effect, log fills will only be used where there is clearly no impact to fish or fish habitat. Log fills will be characterized by a layer of logs covered with geotextile and fill material as required. Upon decommissioning, the fill material will be pulled back and the geotextile removed and disposed. Logs will be removed and redistributed/disposed as appropriate to ensure natural drainage is maintained. The anticipated maximum time frame for temporary structures to be in place is approximately <2 years. Fording will be used to facilitate access to locations where water crossing installments are required. Fording will follow the mitigation measures outlined within the DFO Code of Practice and will include the following: • No SAR are present at the crossing; • Will be conducted in shallow watercourses with stable beds, low sloping banks and approaches in wet conditions and or under dry crossing conditions; • Does not include realignment of the watercourse or construction activities, infrastructure installments to ford; • Mitigation measures identified in the EA to protect fish and fish habitat are implemented; and • Notification will be submitted for locations planned to be forded. Log fill/snowfill crossings are presented as an option of using either method to cross the waterbody. Further refinements to the crossing methods have been presented in the Final EA Report.

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		used only during the appropriate timing windows, and under agency permitted conditions." The EA does not have sufficient information on how these impacts are going to be rehabilitated. The EA and the EPP must present more information on reclamation and clean-up of temporary waterbody crossing structures. Statements such as - Section 3.3.5 Water Crossings "Temporary crossing materials, if used, will be removed immediately following the completion of construction activities." Are vague. Additional discussion about how restoration of disturbed banks is to occur for all crossing types will also provide a more thorough understanding on how the potential impacts are to be managed and mitigated.		Additional details on the post-construction reclamation condition of water crossings will be provided within the EPP and detailed within permitting applications to applicable regulatory agencies.
119	S. 6.9, p. 8, P. 18, p.34, Table 6.9-21, p. 37, p. 46	For an application to operate a pit or quarry the Technical Reports and Information Standards 2020 requires a Blast Design Report. Please review the requirements for this report.	Please ensure these requirements are reflected in the EA as a requirement for an aggregate application. Please refer to the cover letter for links to information about requirements. Once a licence or permit is issued the operation is confined to the limits of the site. Please remove reference to "expected to be more stationary" and replace it with "it will be stationary within the permitted/licenced area" in page 37.	The Final EA Report has been updated to identify that aggregate pit applications will follow the MNRF process outlined at https://www.ontario.ca/page/aggregate-resources#section-7.
120	Section 7.0 *7.1.6-1-3*	Bear Management Areas and labels do not appear to be on maps	MNRF recommends adding the bear management areas to the map of hunting, trapping, and fishing in the regional study area.	The figure has been updated in the Final EA Report to include Bear Management Areas.
121	Section 7.0	The EA did not consider new or planned upgraded roads within Crown Land Use Policy Atlas (CLUPA), Lake Trout Lakes Area of Concern. CLUPA is higher level direction resulting from broad landscape level crown land use planning exercises, vetted through extensive public consultation. CLUPA management direction applies the following local policies to the management of Natural Lake Trout Lakes (LTL) in the Atikokan area. • Lakes shall have a 120m Area of Concern (AOC) • Timber Harvesting will not be permitted within 120 m The intent of the AOC is to protect water quality on Lake Trout Lakes. In the FMP planning process, road building for primary and branch roads has been recognized to have a greater impact to water quality through sediment disturbance and transport, therefore road infrastructure is not permitted within 120m of these designated lakes [does not permit higher impact activity (road construction), where a lower impact activity (timber harvesting) is explicitly prohibited]. In further support, the original wording in the DLUGS was "no cut". An example of the Atikokan area CLUPA LTL:	MNRF will not be permitting or authorizing any actions or activities that are not consistent with Crown Land Use Policy reports in CLUPA.	Additional information on Crown Land Use Policy, the CLUPA and policy areas that overlap with the ROW and Project footprint have been added to Section 7.1.7.2.2.6 (Crown Land Use Policy). Additional information regarding Lake Trout Lakes has also been added to the Final EA Report. Hydro One met with MNRF on August 18, 2023, to discuss Comment #121 and Comment #123. It was noted that there are a number of designated Lake Trout Lakes within the Project LSA and RSA. Refinements to the Project footprint to avoid these areas have the potential to require a longer ROW and would lead to more habitat fragmentation as the ROW would no longer parallel the existing infrastructure. This option may not be favorable from an overall environmental effects perspective. Hydro One has minimized roads in the area(s) overlapping designated Lake Trout Lakes. Hydro One also acknowledges that a CLUPA

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		https://www.lioapplications.lrc.gov.on.ca/services/CLUPA/xmlReader.asp x?xsl=web-primary.xsl&type=primary&POLICY_IDENT=G2569 Some examples of these designated lakes that have been identified to add new or upgrade existing roads (please see comments 35 and 41 in relation to concerns on existing roads) are: • Little Eva Lake • Cole Lake • Nym Lake • Forsberg Lake • Crowrock Lake – Additional note: the road and line crossing location within a Fish Sanctuary • Sandford Lake		amendment may be required if Project construction activities are required to take place within the 120 m Area of Concern. Section 6.6 (Fish and Fish Habitat) of the EA provides additional information on lake trout. The proposed species restricted activity timing window is between September 1 to May 31. Lake Trout are cold-water species and typically spawn during the fall. Lake trout habitat typically consists of Large boulder/ cobble substrates in various water depths (often <40 m, observed as shallow as 0.3 m) and is often associated with groundwater upwellings. Approximately 92 waterbody crossings along the ROW are estimated to support lake trout habitat, while 71 waterbody crossings along access roads are estimated to support lake trout habitat. Hydro One will adhere to the restricted activity timing period noted above for lake trout to the extent practicable and the mitigation measures outlined in Section 6.6.7.2.1 (Mitigation Measures) in order to minimize adverse impacts to lake trout habitat.
122	Section 7.0	There are other CLUPA General Use Area policies within the project footprint that are not referenced, including: G2624, G2699, for Crown Land Disposition and Road Development and Maintenance.	All Crown Land Use Policies for the proposed route should be listed and considered to determine the permitted uses within the project footprint and the study area with regards to utility development, and road development and maintenance. MNRF will not be permitting or authorizing any actions or activities that are not consistent with CLUPA/ For example., G2699 Shebandown Lake: Land and Resource Management Activities. Crown Land Disposition may be a permitted activity. MNR will not consider the future development of Crown land through sale, lease, or other form of land disposition. Shoreline reserves may not be sold if there is a risk of impact to the cold-water ecosystem. There are significant restrictions on land disposition on designated lake trout lakes. See specific direction in Crown land disposition policy PL 4.02.01, Appendix A.	Please refer to the response to Comment #121.
123	7.0 *7.1.7.4.4*	Lake trout lakes are acknowledged within the project footprint, LSA, RSA but there is no reference to policy PL 4.02.01 Crown Land Disposition and Lake Trout Lakes. The principle of this policy is that the Ministry will not dispose of vacant, undeveloped Crown land, where the disposition of Crown land could subsequently lead to impacts to habitat or lakeshore carrying capacity for lake trout. The Ministry may, however, dispose of Crown land on	Please refer to policy PL 4.02.01 Crown Land Disposition and Lake Trout Lakes to verify and consider impacts to lake trout habitat or lakeshore carrying capacity in the Final EA. Lakes designated for lake trout management can be found here: Inland lakes designated for lake trout management | Ontario.ca	Please refer to the response to Comment #121.

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		lake trout lakes through consideration of other Land Management policy directives in the following situations. • Where there is adequate lakeshore development capacity on put-grow- take lakes • The disposition relates to an existing occupation of Crown land with occupational authority (e.g., land use permit, lease, licence of occupation) as referred to in Section A.3.2 of the appendix; or, • The disposition is recognized as not having a significant impact upon lake trout habitat (e.g., shore road allowances) as referred to in Section • A.3.2 of the Appendix.		
124	7.1, Table 7.1-5, page 49	"Swamp River ANSI -*No management planning document available (MMAH 2020: Ontario Parks, 2020)"* MNRF has background information available regarding the significance and value of the Swamp River ANSI (available upon request).	Delineated on March 1, 1979, the Earth Science Inventory Checklist recommends that "the Swamp River pillows must be preserved to serve the scientific community and the public alike." The Provincial Policy Statement (2020) states that development and site alteration shall not be permitted in significant areas of natural and scientific interest unless it has been demonstrated that there will be no negative impacts on the natural features or their ecological function. MNRF strongly recommends preservation of the feature for its geological, scientific, and public importance. Allowance of Utility Infrastructure is discouraged, and avoidance is preferred.	MNRF provided Hydro One with additional information to provide a description of the Swamp River ANSI and better understand the geographic extent of feature, as well as recommended protections. The Swamp River ANSI is a bedrock outcrop consisting of a pillow lava structure located north of Highway 11, directly east of the Swamp River, 1 km west of the turn-off to Shebandowan. The Project is not expected to result in negative impacts to the bedrock outcrop within the Swamp River ANSI as the Project ROW will not overlap the identified bedrock outcrop. In addition, no transmission structures, access roads or other Project components (e.g., helicopter pads, laydown areas) are proposed within the Swamp River ANSI. In addition, no blasting is proposed in this area.
125	7.1*Section 7.1.9.5.1. page 7.1 -172* 7.1*Section 7.1.7.4.3 page 7.1-121*	The text indicates that project construction activities may temporarily reduce or restrict access to lands used for trapping. Please note that there are multiple trap cabins that may be impacted by the proximity of both access roads and the ROW, acknowledging that trap cabin locations may not have been provided to the proponent because of privacy issues. Specifically, traplines IG50 and AT46.	The Final EA should identify the location and proximity of trap cabins to the ROW and access roads and acknowledge that the use of some planned access roads may also impact some trapper's abilities to access their trapline and/or utilize their trap cabins. The Final EA should also acknowledge that the impact of construction on existing trapping lands will result in a permanent alteration of the habitat currently present. Traplines will be impacted during construction by the permanent removal of forested lands from each trapline that the ROW crosses, and that this removal of habitat will persist through the operation and maintenance stages, as forested lands are incompatible with the presence of the ROW. There does not seem to be any indication in the text that there will	Hydro One has included details in Section 7.1.7.6.3 (Trapping Activities in the Study Areas) to highlight the total number and area (ha) of trapline license areas; number of (and type) of trapping licenses registered to trapline license areas; and number of structures identified by MNRF located within trapline license areas overlapped by the Project footprint. Specific information regarding exact proximity of traplines and trap cabins to the Project footprint and ROW have been excluded from the EA for privacy purposes.

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			be a permanent change to the area available for some trappers in trapping specific furbearers who rely on mature forested habitat, and therefore a possible impact to the productivity of the trapline, cumulative to the impacts of forest harvesting where that has also impacted specific traplines.	The language in Section 7.1.10.2.7 (Net Changes to the Area and Access to Hunting, Trapping, Fishing, and Associated Activities) has been updated to acknowledge the long-term effects to traps lines associated with the loss of mature forested habitat utilized by furbearers. A long-term net effect is defined as an effect that occurs during construction and/or operation and maintenance, and persists for the life of the Project, but is reversible. If the Project were decommissioned at some point in time, the ROW and operational access roads would be allowed to regenerate and the net effect to trap lines would be reversible.
126	7.1*Section 7.1.9.2.1 page 7.1-165*	Reference is made to a Permits and Approvals Plan. Will this be provided in the final EA document?	Please confirm the intent of the Permits and Approvals Plan. Is this regarding a Crown Land Use Policy amendment?	Section 1.7 of the Final EA Report discusses regulatory approvals and authorizations potentially required for the Project. A detailed Permits and Approvals Plan outlining specific permits to support construction of the new transmission line will not be included in the Final EA Report but can be provided to the MNRF. Updates to the existing Hydro One Crown Land Use Permit will be required to account for the new permanent infrastructure and Hydro One will work with the MNRF on these required updates.
127	7.1*Section 7.1.9.6.1 page 7.1 -175*	The text states that "*there are a range of recreation and commercial tourism features in the LSA which may provide users with alternative recreational services in the event that recreation and commercial tourism features crossed by the project footprint are inaccessible*" which implies that the impact is low with respect to recreation and tourism due to the options available to recreationalists.	Can the Final EA confirm that recreational and commercial tourism will still be able to operate during construction	Hydro One does not anticipate requiring closure of any public roads during construction operations. Traffic control may be required from time-to-time which may cause short duration interruptions/delays to road users; however, long-term access to public roads by local businesses, tourism operators, and land users are not anticipated. Additionally, a minimum 48-hour notification in advance of major activities commencing will be provided to Indigenous Communities, directly affected landowners, or as otherwise required by permits/approvals. Notification will typically be completed via email or phone call. Signage will be posted identifying active construction areas along public roadways to better communicate hazards to local road users. Details of construction activities/schedule will be made available via Hydro One's project website.

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				Section 7.1.9.7.1 has been updated to the following text to reflect that recreational and commercial tourism will still be able to operate during Project construction: "There are a range of recreation and commercial tourism features in the LSA, which may provide users with alternative recreational services in the event that recreation and commercial tourism features crossed by the Project footprint are ***temporarily*** inaccessible. ***Additional traffic controls may be required from time-to-time, causing short duration interruptions/delays to road users; however, long-term access to public roads by local businesses, tourism operators, and land users are not anticipated.***"
128	7.1*Table 7.1-35 page 7.1-182*	There is a duplication of the text in the bullet points in this section.	Administrative recommendation.	The duplicated text has been removed.
129	*Page 7.1-188*	The text states that during the construction stage, routes will be designed to avoid key access roads and new lanes required for maintenance will be gated, fenced, ditched or bermed to prevent recreational access during operation and maintenance stage. This requires tenure approval by MNRF for structures on Crown land and in accordance with Crown land use planning policies for the area.	Text should be added to clarify that any gates or fencing outside of the ROW will have to be reviewed by MNRF as tenure will be required for structures on Crown land, and placement of gates and access restrictions will have to be in accordance with MNRF land use policies.	Hydro One has revised the mitigation measures listed in Table 7.1-48 related to structures on Crown Land and access restrictions. The following text has been added where appropriate: "*Gates or fencing outside of the ROW will be reviewed by MNRF as tenure will be required for structures on Crown land, and placement of gates and/or access restrictions will be in accordance with MNRF land use policies*."
130	*Page 7.1-190*	The text states that mutually beneficial agreements that may be developed with affected tenure holders such as outfitters, trappers, BMA and BHA holders, and access restrictions will be implemented. MNRF will need to be involved in any discussion or agreement where access restrictions are being proposed, as MNRF may need to provide tenure for gates, and access restrictions will have to be in accordance with MNRF land use policies.	Please indicate where there will be proposed access restrictions developed with affected tenure holders. MNRF will need to review the proposed access restrictions and whether they follow MNRF land use planning policies.	Hydro One and their contractor do not anticipate requiring closure of any public roads during construction. Traffic control may be required from time-to-time which may cause short duration interruptions/delays to road users; however, long-term access to public roads by local businesses, tourism operators, and land users are not anticipated. Hydro One will engage with MNRF to discuss where access restrictions are being proposed with tenure holders.

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131	S. 7.1, p. 1, p.3 S. 7.2, p. 11, p.13, Table 7.2-4, p. 81	An application for an aggregate licence or permit will require additional studies and public consultation outside of this EA. This is outlined in the Aggregate Resources Application Standards and regulation 244/97.	Please ensure these requirements are reflected in the EA as a requirement for an aggregate application. Refer to the cover letter for links to information on requirements.	Hydro One has added the following text within Section 7.1.7.5.1 (Regulatory Context and Overview). "*Applications for an aggregate license or permit will follow the process outlined in the Aggregate Resources Application Standards and Regulation (O.Reg. 244/97). Additionally, the requirements for aggregate applications are outlined within the Aggregate Resources of Ontario: Technical Reports and Information Standards (2020).*"
132	S. 7.1, p. 101	Ontario Aggregate Resources Corporation should be "The Ontario Aggregate Resources Corporation"	Please replace with "The Ontario Aggregate Resources Cooperation"	Hydro One has revised the suggested text to "The Ontario Aggregate Resources Cooperation."
133	S. 7.1, p. 170-171	Some of the identified sites mentioned in this section have already been permitted or allocated to other users. MNRF encourages Hydro to contact the licensees and permittees of existing sites to discuss how they may be impacted. If discussions result in alterations to the site, the licensee or permittee must apply to the ministry for a site plan amendment to accommodate the project footprint.	MNR recommends engagement with aggregate stakeholders to determine if sites can be used and/or to determine the impacts/mitigation for sites that may be impacted by the line location.	Hydro One acknowledges that permitted or allocated uses may already be in place for some of the sites identified within this section. Hydro One continues to engage with the licensees and permittees for existing aggregate pits regarding use of these sites for the Project. The Project footprint includes a conservative number and area of proposed aggregate sites so that the final sites can be selected following detailed design and further engagement with the existing licensees and permittees. Mitigation measures are included in the Final EA to limit adverse effects on aggregate resources.
134	S. 7.1, p. 187-188, Table 7.1-35	An application for a pit or quarry is required to be developed in accordance with the Standards and regulation 244/97. The Aggregate Resources Site Plan Standards requires a rehabilitation plan at the time of application as part of the site plan.	Please correct the text to acknowledge that site will be rehabilitated as per the approved site plan for an aggregate site. Please refer to the cover letter for links to site plan standards.	Hydro One has added the following text within Section 7.1.9.9 (Summary of Potential Effects, Impacts, and Predicted Net Effects (Aggregate Resources): "Applications for pits or quarries will be developed in accordance with the Aggregate Resources Application Standards and Regulation (O.Reg. 244/97). A rehabilitation plan will be required at the time of application as part of the pit or quarry site plan."
135	S. 7.1, p. 195, Table 7.1-37	The ministry requires Hydro One to contact any aggregate licensees or permittees that will be impacted by the project footprint.	HONI will be required to work with MNRF to determine the operators of sites that are directly impacted and receive instructions on contacting them and addressing impacts.	Hydro One acknowledges the requirement and will work with MNRF to determine the operators of sites that are directly impacted and receive instructions on contacting them and addressing impacts.

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136	S. 7.1, p. 198-199	This section requires a further explanation to how the conclusion of the project effects on aggregate resources being both negative and positive was determined.	Provided further context on the determination of project effects having both a negative and positive impact.	Updates have been made to Section 7.1.10.2.7 (Net Changes to the Area and Access of Aggregate Resources). This section has been updated to reflect a net negative impact on aggregate resources upon further review.
137	S. 7.1, p. 190, Table 7.1-35	Extraction of aggregate resources on private land in designated areas will require a licence and a permit on Crown land. Please file an application in accordance with the required Aggregate Resources of Ontario Application Standards and regulation 244/97.	Please correct text that states in-situ materials will be extracted for road construction. The extraction may require approvals under the Aggregate Resources Act.	As part of road construction, recontouring of the existing topography is required to achieve a safe and serviceable horizontal and vertical alignment, level the road base, create proper drainage and ditches, create safe sight lines, ensure that inside and outside ditch slopes are stable, and create turnouts and landings. While completing these activities, excess in-situ materials will be generated. This material will be incorporated into the road subgrade to reduce waste. Aggregate required for the construction of the road will be sourced from existing or approved pits under the *Aggregate Resources Act*.
138	S. 7.2, p. 78	An application for an aggregate site is required under the Aggregate Resources of Ontario: Technical Reports and Information Standards too be followed. For Noise requirements please see 2.6. Noise Assessment Report.	Please ensure these requirements for an aggregate application are reflected in the EA. Refer to the cover letter for links to information on requirements.	An overview of the regulatory context related to mining and aggregate resources is discussed within Section 7.1.7.3 (Mining and Aggregate Resources), within Section 7.1 (Land and Resource Use). Section 7.1 of the EA considers that aggregate resources in the Province of Ontario are regulated under the *Aggregate Resources Act* and that the MNRF manages aggregate resources in collaboration with The Ontario Aggregate Resources Cooperation. Hydro One acknowledges that aggregate extraction on Crown land requires an Aggregate Permit, and aggregate extraction on private land requires an Aggregate Licence if the private land is within an Aggregate Designated Area. Applications for an aggregate license or permits may require additional studies and consultation outside of the EA process and are outlined in the Aggregate Resources Application Standards and Regulation (O.Reg. 244/97). Additionally, the requirements for aggregate applications are outlined within the Aggregate Resources of

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				Ontario: Technical Reports and Information Standards (2020).
139	S. 7.5, p. 5-6, p. 12 Table 7.5-3	An Archaeological assessment for aggregate applications must be within accordance Aggregate Resources of Ontario: Technical Reports and Information Standards August 2020 - 2.3 Cultural Heritage Report.	Please ensure these requirements for an aggregate application are reflected in the EA. Please see the cover letter for links to more information on technical reports and information standards.	Comment noted. Please refer to the responses to Comments #44 and 138.
140	S. 7.6, p. 6-7, Table 7.6-3	Built Heritage Assessments for aggregate sites must be within accordance of the Aggregate Resources of Ontario: Technical Reports and Information Standards and Regulation 244/97. This will be a requirement of studies for an application for a pit or quarry.	Review the requirements for an aggregate application and ensure they are reflected in the text. Please refer to the cover letter for links to information on requirements.	Comment noted. Please refer to the responses to Comments #44 and 138. Hydro One included several of the recommended references from the Aggregate Resources of Ontario: Technical Reports and Information Standards August 2020 in the Cultural Heritage Existing Conditions and Preliminary Heritage Impact Assessment (Appendix 7.6-A). The recommended references used in the text include the: *Planning Act*, Provincial Policy Statement, *Ontario Heritage Act*, Thunder Bay Official Plan, and the Official Plan of the City of Dryden.
141	S. 8.0, p. 3, p. 18, Table 8.0-1	Impact evaluations and monitoring commitments must be in accordance with the Aggregate Resources of Ontario: Technical Reports and Information Standards and regulation 244/97. This will be a requirement of studies for an application for a pit and quarry.	Relocating aggregate sites may compromise EA coverage for the application. Please select primary aggregates sites for aggregate extraction to ensure EA coverage. Ensure that monitoring requirements in the EA meet the requirements of an aggregate application to ensure EA coverage. Review the requirements for an aggregate application and ensure they are reflected in the text. These can be found in the cover letter.	The Final EA Report will be updated to identify that aggregate pit applications will follow the MNRF process outlined at https://www.ontario.ca/page/aggregate-resources#section-7.
142	N/A	The EA refers to plans that have not been submitted to the Government Review Team. For example, the Environmental Protection Plan has been indicated as a living document to be modified after the EA is approved. The ability to review all required plans at the EA stage will allow complete review of the proposed EA to prevent delays and issues at the permitting stage and ensure that all potential mitigation measure have been reviewed and considered as per commitment #30 and #32 of the ToR.	Please provide all plans required as a part of the final EA for MNRF review. This should include, the Vegetation Reclamation Plan, Vegetation Management Plan, Erosion and Sediment Control Plan, Post Construction Monitoring Plan, Spill Prevention Emergency Response Plan, Environmental Protection Plan, Timber Salvage Plan, Natural Environment and Landscape Management Plan, Soil Management Plan, Noise Management Plan and Dust Control/Air Quality Plan.	Mitigation measures to be implemented for the Project are detailed in the Draft EA Report and Final EA Report for Government Review Team review and comment. The plans referred to by MNRF will include the mitigation and measures identified in the Final EA Report and will be developed after EA finalization. These plans are described in Section 10.2.2. Further, these plans can be provided to agencies for review and input at least 90 days in advance of construction. Hydro One and their contractor will provide all necessary information to support agency review of permit and approval applications.

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143	Monitoring and commitments Section 10.2 EPP	The EA speaks to how the EPP will be a living document and developed and updated as needed, but the EA has limited information about what the EPPS will contain. It is not clear how the EPPs will avoid or mitigate adverse effects of the project. In addition to this, the EPPs do not appear to include the restoration of roads and laydown areas and other temporary developments after construction. This is linked to commitment numbers 19-25 of the TOR where there has been a commitment made for restoration of all temporary construction components/areas.	The Final EA should include an Environmental Protection Plan that MNRF can review as part of the EA review as it relates to mitigation of net effects of the project. Deferring developing EPPs and incorporating the results and recommendations of the EA to the permitting stages may cause delays in permitting. While it is acknowledged that the results of the EA should be incorporated, it is highly recommended that these plans be developed to the greatest extent possible and included in the Final EA in a single location with the acknowledgement that they may be subject to additions pending the results of the EA (i.e. topic headers, specifying minimum requirements for each criteria such as timing windows, encountering unmapped values, setbacks on sensitive areas, erosion and sedimentation control measures etc. as a conceptual example of what an EPP would look like). Currently, mitigation measures are discussed, in a general manner, throughout the EA. This format makes it difficult for MNRF to fully evaluate the mitigation measures. This would provide MNRF with an opportunity to provide meaningful input into these plans that may streamline the permitting stage. Examples • It is unclear specifically how and at what point the pathways of effect are broken by the proposed mitigation measures. • The section describing the EPP does not appear to commit the proponent to implement mitigation measures described in the EA. Furthermore, the EA mitigation uses ambiguous wording “such as where feasible, when applicable or when appropriate” • The EA and the section describing the EPP lists numerous Contingency Plans, Management Plans, and Construction Execution Plans that are to subsequently be developed in design phase and therefore not presented in the EA, which is not suitable (at the very least, draft / conceptual plans or template should be presented in the EA). • Insufficient information to fully understand how potential impacts will be avoided, managed, or mitigated for unmapped / unknown values discovered during the construction and operation of the project or at the permitting phase, as well as potential impacts to these values. Lack of detailed direction and planning available in the EPP for these unmapped values.	The EPP that can be provided to agencies for review and input at least 90 days in advance of construction. Hydro One and their contractor will provide all necessary information to support agency review of permit and approval applications.

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			The EPP would benefit with additional information being summarized from the EA, such as summarizing EA mitigations and information on timing windows and setbacks to be used to protect wildlife, fisheries, and natural heritage features. It is recognized that activity-specific environmental mitigation measures and BMPs will be developed as part of the EPP and will consider all stages of construction from planning to post-construction in addition, the EPP should provide anticipated standard operating procedures (i.e., water crossings), approaches (i.e., wetland crossings) and additional survey and mitigation protocols (i.e., Amphibian/Reptile pre-construction Assessment).	
144	Monitoring and Commitments Section 10.0 p.12	More information is required regarding the Fish and Fish Habitat monitoring and Erosion and Sediment Control Measures section. The timeline for the monitoring program to be discontinued is not clear, with no definition of how pre-construction conditions will be defined. The proposed changes will allow the EA to mitigate the impacts to fish and fish habitat and will meet the ToR requirement to accurately identify, assess, and manage potentially significant environmental risks and integrate environmental considerations into decisions.	Further clarification is required to define pre-construction conditions, timelines and outline the steps on how the monitoring program will be discontinued.	The Planning Phase of the Project includes activities carried out prior to construction. This includes regulatory approval, pre-construction reconnaissance (i.e., constructability surveys), environmental field surveys, preliminary geotechnical investigations and structure and ancillary workspace planning. Prior to any field-based planning and construction activities, all necessary permits, approvals and agreements will be obtained. The following mitigation measures specific to watercourse crossings are included in the Final EA Report and will be incorporated into the construction plan: • Access plan will limit watercourse crossings and access through wetlands (e.g., PSWs) to the extent practicable. • Optimize construction to develop winter access in areas with extensive wetlands. • Avoid access development and tower placement within PSWs to the extent practicable. • Use existing watercourse crossing structures where available and suitable for construction access to the extent practicable. • Identify proposed and alternate crossing methods and use the Ontario Flow Assessment Tool (OFAT), where necessary, to select the appropriate sizing and design for watercourse crossing structures.

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				• Incorporate sediment control measures prior to construction activities or immediately after disturbance on site-specific cases throughout the Project to avoid introduction of sediment to the environment, to stabilize drifting soils or loss of topsoil, as practicable. Sediment control measures may include silt fences, filter bags, straw bale fences, berms, ponds and gravel or vegetative filters, check dams, erosion control blankets, etc. • Monitor sediment and erosion control features in place to ensure they are functional and well maintained. Sediment and erosion control measures will be replaced, repaired and/or supplemented as required. • Sediment control methods should remain on-site until all work is completed and/or the site has been stabilized or re-vegetated as required.
145	Section 10.0 – Monitoring and Commitments	Tree removal on crown land (and/or private where trees are reserved) will require MNRF approval.	If tree clearing is to occur on private land, please verify that trees are not reserved to the Crown.	Trees harvested on private land will be made available for use by the landowner. Where landowners do not want timber for personal use, material will be disposed of by chipping, burning, or delivery to a manufacturing facility or otherwise amenable receiver.
146	Section 10.0 – Monitoring and Commitments	More information on harvest planning is required, such as specific Forest Management Unit product specifications, harvesting methods, slash management selection, plans to work with the Forest companies, harvest locations, layout, harvesting of SAR, Fire Plan, compliance, Unidentified values, Area of Concern Prescriptions, and Conditions on Regular Operations	MNRF strongly recommends a Harvest Plan, in consultation with the SFL holder, be submitted with the Final EA for review and approval, prior to any permitting. Some suggestions on what to include in the Harvest Plan are as follows: 1) An individualized harvest plan for each Forest is recommended due to the different product specifications (full tree, cut-to-length (8ft, 9ft, 16ft), Biofibre, chipping), harvesting methods (processor, feller-buncher, chipper, grinder etc.) and slash management selection (grinding for biofibre, pile and burn). All merchantable timber removed from the project areas will be processed and delivered to meet the specifications of each receiving mill on associated Forests, regardless of quantity. These areas include helicopter pads, construction camps, laydown area, construction offices, and access roads, etc. See examples of harvest plans for each Forest below.	As part of the process to obtain an Overlapping Licence Agreement with each SFL-holder, Hydro One and/or their contractor will be meeting with each SFL holder to discuss, among other things: • Harvest and utilization plans for merchantable and non-merchantable trees; • Disposal plans for non-marketable trees and non-merchantable portions of trees; • Available markets, product specifications and pricing for harvested timber; • Wood supply commitments in accordance with SFL conditions; • Use and maintenance of forest access roads; • Potential synergies, or conflicts, in timing of operations with the SFL holder (e.g., road use and maintenance, timber harvest, wood haul); • Disruption of recently renewed/established post-harvest areas; and

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			Harvest Plan for the Wabigoon Forest: 1) All merchantable timber will be cut-to-length or full tree logging, depending on the species and mill destination: 1. All unmerchantable, merchantable, dead trees, conifer (Spruce, Pine, Fir) will be chipped and sent to the Domtar mill in Dryden. 2. All merchantable Poplar & Birch will go to Weyerhaeuser in Kenora. 3. All Cedar must be sent to a local sawmill. 2) The following tree species and products can be left in the slash piles and must be piled and burned or used for biofibre before the harvesting contractor leaves the site: Cedar (depending on current market conditions and quality), Larch, Red Maple, trees under 14cm in diameter for Poplar and Birch, branches, plugs left from cut to length harvest, etc. 3) An agreement will need to be in place with receiving mills before applying to MNRF for a Forest Resource License. 4) The following harvest blocks can be harvested at the same time to reduce the Transmission Line harvesting. Also, most of these areas can be used as new laydown, helipads, construction camp areas etc.: BLK-RA246, BLK-RA256, BLK- RA257, BLK-RA275, BLK-RA262, BLK-BO182C, Block by Patent Road. The SFL Holder may help to identify recent harvest areas that are not regenerated. An example of this is the Balmoral Lake Area-Potential not to go through regen area because of a fresh clear-cut adjacent to this area. 5) Extra area will need to be added to incorporate chipping pad location. These areas will be identified on the License request maps. **Harvesting Plan for the Boundary Waters Forest:** 1) All merchantable timber will be cut-to-length or full tree logging, depending on the species and mill destination: Resolute FP Canada Inc. Sapawe Sawmill (16 ft Spruce, Pine, Fir,),Resolute FP Canada Inc. Ignace Sawmill-(9 ft Spruce, Pine, Fir), BioPower Pellets- Full tree Poplar and Birch, Norbord Oriented Strand Board (8 ft Poplar and Birch), Manitou and Nickle Lake Lumber Sawmill (16 ft Red Pine and White Pine), All Cedar must be sent to local sawmill and mulch bagging facility.	• Rehabilitation and regeneration of disturbed sites. Meetings will also occur with non-SFL related wood facilities to discuss opportunities for harvested open market wood fibre, product specifications and pricing. A wood marketing plan for each forest management unit will then be developed. Where operationally practical, harvested merchantable timber will be processed and marketed. There are numerous variables that impact the operational practicality in the utilization of merchantable timber, including: • Type of product and market demand. • Distance to market. • Timing / season of harvest/processing/hauling. • Road accessibility and water crossing structure types (e.g., temporary winter vs. all-season). • Topography / terrain operability for heavy equipment, including road building; harvesting, skidding, processing and hauling. • Skidding distance. • Volume of merchantable timber by species, as defined by the Ontario Scaling Manual. • Concentration of merchantable volume by species. • Available roadside (distance) usable for operations, and limitations on area for down piling logs, processing, debris accumulation and product merchandizing within the transmission line footprint. • Availability of trucking, including self-loaders. • Available wood measurement options: mass/central scale vs. bush scale; availability of certified bush scalers; FRI volume estimate.

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			2) The following tree species and products can be left in the slash piles and must be piled and burned or used for Biofibre: Larch, Red Maple, dead trees, trees under 10 cm in diameter for Spruce, Pine Fir, trees under 14cm in diameter for Poplar and Birch, trees under 16cm in diameter for Red and White Pine in diameter, branches, plugs left from cut to length harvest, etc. 3) An agreement will need to be in place with receiving mills before applying to MNRF for a Forest Resource License. 4) The following harvest blocks can be harvested at the same time with the SFL Holder to reduce the harvesting on the Transmission Line: 1607, 1601, 1602, 1605, 5) 1510, 1511, 1512, 1518, 1509, 1388, 1397, 1342, 1346, 1345, 1334, 1333, 1308, 6) 1314(cut), 1318(cut), 1326(cut), 1327(cut), 1328. Also, most of these areas can be used as new laydown, helipads, construction camp areas. There are 4 sites that are newly harvested and will not be regenerated. The SFL Holder can help to 7) identify recent harvest areas that are not regenerated. **Harvesting plan for the Dog Matawin** 1) The majority of conifer roundwood (spruce, jack pine, balsam fir logs) is supplied to the Resolute Growth Canada Inc. (RGC) sawmill in Thunder Bay for lumber manufacture (full tree); the Resolute Forest Products Canada Inc. (RFP) pulp mill; the Resolute FP Canada Inc. operations in Atikokan (16ft) and Ignace (9ft). Most of the Poplar and Birch is sent to Norbord Inc. oriented strand board mill (8ft) and Garden Lake Timber. All merchantable timber will be full tree logging, biofibre or cut-to-length depending on the species and mill destination. 2) The following harvest blocks are located on the Dog Matawin Forest and can be harvested at the same time with the SFL Holder to reduce the harvesting on the Transmission Line: 1012, 1020, 1021, 1022, 1025, 376, 379, 399, 400, 402, and 3) Bedrock Branch Road Corridor. Also, most of these areas can be used as new laydown, helipads, construction camp areas. There are also harvest blocks that may be suitable for a camp and are close to water, however the blocks are not adjacent to the	

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			line: 1010, 1011, 1013, 1014, 1023, 1024, 445. The SFL Holder can help to identify recent harvest areas that are not regenerated. **Harvesting Plan for the Lakehead Forest** 1) The majority of conifer roundwood (spruce, jack pine, balsam fir logs) is supplied to the Resolute Growth Canada Inc. (RGC) sawmill in Thunder Bay for lumber manufacture (full tree); the Resolute Forest Products Canada Inc. (RFP) pulp mill; and the AV Terrace Bay Inc. (AVTB) pulp mill. Most of the hardwood roundwood (poplar and white birch logs) is supplied to Resolute Forest Products Canada Inc. pulp mill in Thunder Bay, Norbord Inc. - composite, Weyerhaeuser Company Limited - composite, and RTKWP2 Canada (Rentech) pellets. Wood products from the hardwood hog fuel grinder flows to RFP pulp mill and the AVTB pulp mill. Hardwood hog fuel birch wood chips also flows to the RFP pulp mill and the AVTB pulp mill. 2) The following harvest blocks are located on the Lakehead Forest and can be harvested at the same time with the SFL Holder to reduce the harvesting on the Transmission Line: 3134, 3135, 3136. The SFL Holder can help to identify recent harvest areas that are not regenerated. 2) 2.A notification of start-up will be sent to MNRF. 3) A start-up meeting will be held between Hydro One Supervisor/Forester or an identified agent and harvesting contractor to go over all approved harvesting maps with the operator and to outline the values that need to be protected during operations 4) All contractors will be trained in Environmental Management Systems. All contractors working on the Forest will need to be trained under each specific EMS system for that Forest. Local contractors will already be trained. 5) All approved harvest areas will be flagged in pink ribbon. All values to be protected will be flagged. **6)** All areas will be flagged by a reputable layout contractor. 7) All slash will be removed for biofibre or piled and engineered into a beehive. The pile will be mixed with	

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			both conifer and hardwood if available on site before harvesting is complete and the contractor leaves the site. 8) Include a section for Forest Compliance-When harvesting and piling is complete an MNRF inspector will be notified of completion and a compliance inspection will be conducted. The harvest inspection will follow the Forest Operation Inspection Program and the following categories will be inspected:1. Have all merchantable timber of any length been utilized, 2. Has all wood chip fibre been utilized, 3. Has Crown timber been scaled, 4. Have conditions applicable to wood measurement and movement been followed, 5. Is all slash piled, 6. Is an approved License on file, 7. Is all garbage removed from the site, 8. Have operations been within approved boundary, 9. Has cutting proceeded with authority, 10. Have all values been protected, 11. Have timing restrictions been met, 12., Has site disturbance occurred etc. 9) Include a section regarding the harvesting of a SAR species -Black Ash: The contractor cannot profit from a listed SAR, so it cannot be taken to a mill, do not cut black ash unless necessary, leave as residual forest, wildlife trees, part of AOCs etc., only cut black ash for road ROW, aggregate pit location or other operational challenge, avoid using black ash as corduroy. However, if black ash is used as corduroy, appropriate stumpage must be paid. Only use black ash removed from the road ROW. 10) A Fire Plan will be submitted to MNRF Aviation Forest Fires and Emergency Services Branch. 11) Add a section on Unidentified Values- If a value is identified during operations and is not on the approved harvesting map, operations will stop immediately and an MNRF representative will be contacted to determine protection measures. 12) Add the Area of Concern Prescriptions (AOC) (nest, water, MEA, Forestry Plot, etc.) and Condition on Regular Operations CROS(CRO-5 Rutting and Compaction, CRO-6 Erosion, CRO-10A Hydrological Impacts, CRO-10B Unmapped Hydrological Linkages, CRO-15A-Wetlands, CRO-16 Woodland Pools, CRO-17 & CRO-18 Dens, CRO-19-CRO-25 Nests, CRO-26-Patent Land, CRO-34 Species at Risk, CRO-35 Nuisance Beaver) to the Harvest Plan and for	

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			Environmental training for all forestry staff. The benefit of hiring a local contractor is that they will be trained under each FMP and will already know the Area of Concern Prescription and Conditions on Regular Operations. 13) Include in the Safety Plan to follow Forest Industry protocols for forestry access roads. i.e., Use appropriate haul channels for different forestry roads. 14) Any merchantable timber left on site will be scaled at the cost of the Hydro One and submitted to the Crown for Stumpage payment. 15) All harvesting operations will follow the Forest Scaling Manual and Forest Management Plans. 16) All merchantable species will be subject to Ontario Crown Timber Charges (i.e., Stumpage; Forestry Futures Trust charge; and Forest Renewal Trust charges). Please ensure all harvest areas are included in the Final EA. This includes the Laydown Areas, Construction Camps, helipad etc.	
147	Section 10.0 – Monitoring and Commitments	More information on renewal planning is required. Reference is made to restoring laydown areas and reclaiming roads when they are no longer required, however it is not clear how restoration and reclaiming will occur.	MNRF strongly recommends a Renewal Plan, in consultation and agreement with the SFL holder, be submitted with the Final EA that includes information on renewal locations, description of renewal areas, species to be planted, types of renewal, operations, compliance and monitoring. Some suggestions on what to include in the Renewal Plan are as follows: 1) All areas where merchantable timber is removed and are not associated with a block from the current FMP will be planted with the same species removed. These areas include helicopter pads, construction camps, laydown areas, construction offices, and decommissioned access roads, etc. 2) All areas where merchantable timber is removed and are associated with a block from the current FMP will be planted with species outlined in the Silviculture Ground Rule from each associated FMP and confirmed by the Forest Management Silviculture Forester from each Forest. These areas include helicopter pads, construction camps, laydown areas, construction offices, and decommissioned access roads, etc. 3) All areas within already harvested allocations where regeneration activities are not complete will be planted	Hydro One does not believe that a blanket prescription is appropriate at the time of the EA especially for areas that are not part of the current FMP. These are better left to be assessed at the time of reclamation and the appropriate revegetation method and planting species will depend on the condition of the site after reclamation. Some areas will be better left to naturally revegetate through seeding or suckering which can occur quite quickly following reclamation, especially for small areas. Clearing required for the Project footprint is not a forest management activity and should not be categorized as such. The goal of reclamation should be to stabilize disturbed areas and return them to a functioning condition as soon as possible following reclamation. This may or may not coincide with the SFL holder's harvesting plan for the FMA. While it is recognized that the desire may be to ultimately return areas to a functioning climax forest, treating every disturbed area as a cutblock may actually conflict with the goal of minimizing

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			with species outlined in the Silviculture Ground Rule from each associated FMP and confirmed by the Forest Management Silviculture Forester from each Forest. These areas include helicopter pads, construction camps, laydown areas, construction offices, and decommissioned access roads, etc. All areas within already harvested allocations where regeneration activities are complete will be planted with the same species removed. These areas include helicopter pads, construction camps, laydown areas, construction offices, and decommissioned access roads, etc. 4) All areas where regeneration investments have been completed (site preparation, planting, vegetative management) and are planned for removal will have to be assessed with the SFL holder for compensation to the Forest Renewal Trust Fund. 5) All areas will be assessed by MNRF for site preparation requirements before planting. Site preparation may include the following silviculture activities: disc trenching, barrels and chains, and vegetative management. Depending on the stage of decommissioning for the project, all sites will be assessed for the need for vegetative management (Ground spray with backpacks or ground spray with skidders and back blading etc.) before planting occurs. 6) All Slash Piles will be piled and burned. The company will submit a Low Complexity Burn Plan to the MNRF for review and to receive a Burning Permit. 7) All planted areas will be assessed at year 2 or 3 for additional silvicultural treatments, which may include vegetative management such as: manual tending, ground spray with backpacks, ground spray with skidders etc. The assessment may include the following: Aerial Imagery, Aerial Survey, Ground survey (SFL and MNRF can provide a survey methodology). 8) All planted areas will be assessed at year 5 or 8 to ensure the plantation is Free To Grow (FTG) or free of competition. The assessment may include the following: Aerial Imagery, Aerial Survey, Ground survey (SFL and MNRF can provide a survey methodology). A completed Regeneration Assessment (RAP-Regeneration Assessment Program) must be	the temporal environmental impact. For example, a helicopter pad may re-seed and sucker quite quickly following the cessation of operations. However, if that area is planted and subjected to stand treatments, the immediate objectives of reconstitution may be impacted. Rather than blanket prescriptions at the time of the EA, it is recommended that each site be assessed by a professional forester and/or qualified environmental professional following disturbance to determine the most appropriate revegetation strategy.

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			completed by MNRF before the block can be declared FTG or released to the Sustainable Forest License holder of each Forest Management Unit. 9) All seeds and seedlings will be sourced from the approved seed zones (ex. Boundary waters forest is seed zone 12) and seed banks from each Forest Management Unit. The SFL holder will provide the appropriate seeds to the nursery and will add on additional seedling inventory needed for the Waasigan Transmission Line Project planting operation. The SFL holder may incorporate the Transmission Line planting into the yearly planting schedule for each Forest. This will ensure a reputable planting company is completing the planting operation and are trained appropriately. If Hydro One hires their own planting contractor, the MNRF and the SFL holder will supply a list of specifications to include in the planting contract. For example, here are a few specifications that may be included in a planting contract: different spacing requirements for each species (Jack Pine must be planted 2m x 2m and Red Pine 2.5 m x 2.5m), seedlings must be kept in a refrigerated unit, seedling must be handled with care, seedlings are not be left out in full sunlight and covered with a tarp at roadside at all times, seedling plugs must be covered completely in mineral soil, no planting in duff or shallow soil or the seedling will dry out and die, planters must be trained in appropriate micro site selection for planting, planters must screen the duff layer to expose the mineral soil before planting. 10) During the planting operation a supervisor will be completing planting quality assessments at all times. 11) The Renewal Plan submission will be completed in several stages as the project progresses: • Stage 1- Areas mentioned above will be mapped with species identified for planting and submitted to MNRF for review. • Stage 2- Planting Operational Plan will be submitted to MNRF for review. This may include contractor, schedule (each year), tree plant camp locations, coordinating with SFL holder, etc. • Stage 3- Assessment at year 2 or 3 results will be mapped and submitted to MNRF for compliance and assessment.	

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			• Stage 4- Final areas will be assessed and mapped by the company at year 5 or 8 and sent to the MNRF for final Regeneration Assessment.	
148	Section 10.0- Monitoring and Commitments	More information on slash management planning is required, such as types of slash management depending on the Forest Unit and location, best management practices, compliance, and operations.	MNRF strongly recommends a Slash Management Plan, in consultation with the SFL holder, to be submitted with the Final EA. Some suggestions on what to include in the plan are as follows: **Biofibre Harvest** Depending on which Forest the contractor is working on there are three possible sources of biofibre; 1) slash from roadside produced from processing timber, 2) harvesting of unmerchantable trees, and/or 3) harvesting of unused merchantable trees (not marketable). Roadside Biofibre (Slash): Roadside biofibre processing will be permitted in areas which have been approved for harvesting and renewal. Roadside debris normally generated from harvesting and processing trees can be processed as biofibre from within 50 metres of the road centerline (including winter roads). Where biofibre material is located beyond 50 metres of the road centerline, MNRF may approve its retrieval from within the harvested area on a case-by-case basis. Harvesting Unmerchantable Trees: Standing unmerchantable trees may be harvested and processed as biofibre when a Forest Resource License is in place. Harvesting of Unused Merchantable Trees: All merchantable species processed for bioproduct will be subject to Ontario Crown Timber Charges (i.e., Stumpage; Forestry Futures Trust charge; and Forest Renewal Trust charges). Merchantable trees that have no current market may be harvested and processed for bioproduct when a Forest Resource License is in place. Discussion with the local MNRF District will occur prior to commencing processing operations (i.e., grinding) to ensure that a stumpage rate is in place for the processing of unused merchantable trees. When these species must be harvested for road construction, landings, etc., they may be used for biofibre. **Management of Roadside Logging Debris and Associated Landing Area (Laydown areas, construction camps, helipads etc.)** 1) Debris management will continue to occur on areas where there is little chance that the roadside debris	Any clearing plans will be finalized in consultation with the SFL holders who will advise on the forest products that can be received by the mills. These will be agreed and included in the overlapping licence agreement that is a prerequisite to the Crown Forest Licence that must be obtained prior to the cutting of trees. Wood and debris/fibre that has no destination will be disposed of on site by burning, chipping or mulching. There will be no significant amount of slash remaining on the right-of-way for the reasons stated by the MNRF (vegetation growth, fire hazard, etc.) and also because it could interfere with the maintenance of the transmission line and the transmission line right-of-way. These will be contractual requirements between Hydro One and/or their contractor and with the SFL holders through the overlapping licence agreement. A slash management plan may be developed if required by the SFL holder.

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			(slash and chipper debris) will be used as a source of forest biofibre, as described earlier. This does not include downed woody debris that will be left on site during harvest operations. The primary goals of managing roadside logging debris are to: a) Limit the loss of productive land. b) Successfully and effectively regenerate any productive land (in accordance with the appropriate silvicultural ground rules). c) Minimize the potential social considerations by reducing visual impacts associated with logging debris. d) Manage associated fire risk. In areas where the impacts of roadside logging debris are minimal, and the objectives of successful regeneration can be achieved, no additional debris management activities may be required, based on the judgement of the Silvicultural Forester for each Forest and MNRF. A site-specific debris management prescription will be developed for harvest areas, identifying whether the slash and chipper debris will be used as forest biofibre, or managed as logging debris. Forest BioFibre is slash and chipper debris that will likely be used as biofuel feedstock. This material may or may not be piled or manipulated, depending on the site conditions and planned type of recovery operations. Forest biofibre not utilized within a three-year window will be re-evaluated, and a decision will be made on whether the other goals of debris management are being negatively affected. If this material no longer considered usable as biofibre, it will be reclassified as Logging Debris. After roadside debris is processed as forest biofibre, the site conditions will be evaluated and appropriate prescriptions will be applied to minimize the loss of productive land, and to successfully regenerate any productive land. Logging Debris is slash and chipper piles that will not be used as forest biofibre, due to market-related factors (as described above). Logging Debris will be managed, normally within two-years, using one or more of the best management practices outlined below and complete renewal within three-years. **Chipper and Roundwood Debris Best Management Practices:** Chipper Debris a) Mechanical site preparation through chipper piles.	

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			b) Mechanical rowing or aligning of chipper piles. c) Redistributing chipper debris across the cutover, including block roads. Minimize the area of thicker (>20 cm) debris d) Chipper debris that remains on the pad should be left in piles not more than three metres high. Piles should also be located away from the road or standing timber. e) Use chipper debris as fill for tertiary road construction, landscape material for aggregate site rehabilitation, and road bank stabilization as appropriate. f) Suitable chipping pads and landings will be selected prior to the commencement of operations. g) Productive land will be renewed using the most applicable SGR. h) Minimize the area of thicker (>20 cm) debris on productive land through carry back, locating pads on unproductive areas, or piling/spreading the debris in a manner that reduces the pile footprint or makes it more amenable to further planned treatments. i) Remediate remaining debris by piling followed by burning or spreading it thin enough (<20 cm) for standard silvicultural treatments to be applied. Roundwood Slash a) Piling or pushing for burning upon the completion of harvest operations unless otherwise prescribed in the debris management prescription. b) Piling of roundwood slash during the haul is encouraged, and the use of a loader or excavator with a thumb is preferred. c) Roundwood piles should be kept free of soil, rocks, and foreign materials. d) Roundwood slash piles should be in a location suitable for fall burning. Avoid piling or pushing roundwood slash within 3 metres of regeneration, standing timber and wet areas. e) Roundwood slash piles will not be established within 3 metres of any known wetlands, permanent streams, intermittent streams, ephemeral streams, springs, seeps, and other areas of groundwater discharges. f) Roundwood slash may be redistributed in the harvest block if this will not impede the prescribed renewal treatment for the block.	

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			g) Roundwood slash should not be placed on or near chipper pads. h) Use roundwood slash for brush mats, to prevent rutting and compaction. i) Incorporate slash into operational road sub-grades during construction where possible. j) Use slash to create access restrictions, consistent with road use management strategies. k) Mechanical site preparation through slash piles. l) Mechanical rowing or aligning of slash piles. m) Carry out prescribed burn plan. n) Productive land will be renewed using the most applicable SGR. o) After roadside debris is processed, the site conditions will be evaluated and appropriate silviculture treatment prescription (SGRs) will be applied, normally within three-years, to regenerate the area to minimize any loss of productive land. p) Add a section on Slash Management Compliance to the plan. When Slash Management is complete an MNRF inspector will be notified of completion and a compliance inspection will be conducted. The inspection will be completed before the contractor leaves the site.	
149	Section 10.0-Monitoring and Commitments	More information on compliance planning is required, such as forest compliance objectives for minimizing compliance issues to ensure legislative requirements are met during the project and descriptions of the supporting strategies.	MNRF strongly recommends a Compliance Plan that includes objectives, strategies, and actions for minimizing compliance issues, in consultation with the SFL holder, to be submitted with the Final EA. Some suggestions on what to include in the plan are as follows: Forest Compliance Objectives The following outlines the objectives for minimizing compliance issues, to ensure legislative requirements are met and describes the supporting strategies. A. Resource Protection Objectives a) To ensure that the sustainability of the forest resources is maintained, and all forest values are protected during forest operations. b) To assist the MNRF in the protection of the forest against fire. B. Communications Objective, Strategies and Action a) To ensure that all Staff, Contractors, and Overlapping Licensees are fully aware of the legislation, regulations	Please refer to the responses to Comments #147 and 148 regarding working with SFL holders.

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			and guidelines, environmental and operation standards they are required to comply with. C. Increasing Compliance with Legislation, Plans and Policies Objective a) To conduct all forest activities in a manner that meets or exceeds the legal requirements in the province of Ontario. D. Continuous Improvement Objective a) To track progress in forest compliance and take actions to continually improve upon past performance. Strategies and Actions Some of the strategies and actions, described below, relate to more than one objective. Strategy 1: Ensure that Area of Concern planning is current, communicated and successfully implemented. Actions: a) MNRF's Land and Information Office (LIO) data will be compared annually to the values on the Transmission Line and incorporated accordingly. b) SAR information will be updated annually, or as required, and the appropriate AOC applied, or a new AOC will be developed in conjunction with the MNRF. c) AOC prescriptions will be communicated to all Contractors and Overlapping Licensees before operations commence. d) Contractors and Overlapping Licensees will be trained to identify/locate existing or previously unidentified values to ensure AOC prescriptions are implemented correctly. e) AOC prescriptions will be located and marked in field by trained staff or contractors. f) Newly identified values, or existing values which have changed, will be incorporated as they are identified. Strategy 2: All new operations will receive thorough training to ensure conformance with the approved harvesting areas on the Transmission Line prior to beginning work on the line. Actions:	

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			a) Copies of this forest compliance plan will be distributed to all Contractors and Overlapping Licensees. b) The Company and Overlapping Licensee Field Representative(s) will promote environmental awareness and compliance to environmental and operating standards throughout operations. c) The Company Field Representative coaches operations staff in the interpretation and application of environmental and operating standards. d) For emergency washout repairs the MNRF, will be contacted immediately to complete a culvert calculation and provide review and approval. Strategy 3: To conduct all forest activities in a manner that meets or exceeds the legal requirements in the province of Ontario. To monitor all activities to measure adherence to the legal requirements in the province of Ontario. Actions: a) OFRL agreements will contain clauses requiring adherence to the CFSA and associated manuals, regulations, and guidelines. It will also require conformance with the approved Transmission Line harvest area, including the requirement to self-monitor and report directly to the MNRF, as well as notify The Company representatives. b) AOC prescription information will be shown on all Transmission Line maps. c) SAP imagery or other means will be used each year to check cutover boundaries as to the tolerance due to projection shift. d) Forest Operations Information Reports (FOIP) will be completed in the specified timelines required to ensure timely monitoring of operations. These timelines vary according to activity and compliance status. e) The Company Field Representatives or OFRL supervisors will coach front line supervisors in the completion of FOIP reports. f) The Company will review the compliance record annually. g) OFRL's and Contractors will be monitored regularly.	

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			Strategy 4: Take all reasonable action to protect the forest against fire Actions: a) Fully assist the MNRF in the protection and prevention of forest fires. b) Adhere to all applicable legislation regarding the prevention of forest fires. Strategy 5: Develop and/or maintain methods of open and productive communication. Actions: a) Use each Forest Environmental Management System (EMS) as the basis for providing information and instruction. b) Continue Company and MNRF monthly operations meetings. c) Encourage joint inspection opportunities between inspectors from the Company, Contractors, Overlapping Licensees and MNRF staff. Strategy 6: Track progress in forest compliance and take actions to continually improve upon past performance. Actions: a) Monitor all operations regularly for compliance. b) Analyze the root cause of all non-compliance incidents identified in forest operations to ensure that similar situations can be avoided. c) Fully investigate all non-compliance incidents by all contractors and Overlapping Licensees to determine causes and prescribe effective preventative measures. Summarize, evaluate, and report in, the annual forest compliance performance of contractors, overlapping licensees and actions takes to identify and address issues.	
150	Section 10.0 – Monitoring and Commitments	More information on access planning is required, such as incorporating the most up to date road and harvest information, Road Use Management Strategies, road standards, compliance, and decommissioning.	MNRF strongly recommends updating the Access Plan. The following updates should be considered for including in the plan and will reduce the harvesting during the development of the roads to access the Transmission Line: **1)** Review the most recent depletions, operational, primary and branch roads and renewal areas. The following data can reduce the disturbance footprint: Recent Road building can be reviewed in Annual Reports (AR) Arcmap Layer Files- For example, depending on how old the imagery is, the AR's can help Hydro One to determine the most recent access,	Access planning is ongoing and the access plan will continue to be updated up to Project execution in an effort to reduce the overall impact as much as possible by incorporating the most current information available and feedback received through ongoing engagement with Indigenous communities and stakeholders. In particular, Hydro One and its contractor will continue collaborating with SFL holders throughout the permitting process.

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			harvest, and renewal areas for better selection of laydown areas, helipads, and construction camps. Here is a list of AR's based on the age of the imagery- 2022, 2021, 2020, 2019, 2018, 2017. 2) Include updated branch road corridor construction plans for the Windigoostigwan Lake Road and Potts Road with the General Manager of the Boundary Waters Forest. These roads were identified as part of the access plan for the Transmission Line and will need to be constructed to a Branch Road standard as per the FMP (i.e., The road width for a Branch Road Right of Way is 30m) 3) Some of the roads identified and classified as "Potential Need for Improvements" should be classified as "New Access" e.g., Crowrock and Camp 111 areas. 4) Add a section on Road Use Management Strategies. As an example, the Ann Bay Road should be decommissioned based on the Road Use Management Strategy in the Boundary Waters Forest Management Plan. Currently, the water crossings are removed, and the road is decommissioned (ditched) to prevent access. An access restriction was applied to the protect the remoteness for the area (Crown Land Use Policy Atlas (CLUPA), Lands for Life, Remote Tourism Outfitter, White Otter Provincial Park, Enhanced Management Area). Also, 2000 trees were planted where the portage meets the Ann Bay Road for visual protection of the road. Ensure already mapped Visual Aesthetics AOCs in the FMPs are left in place to protect Remote Tourism. A pit is identified near this portage area between White Otter and Sandford. There is also a new cut block near the aggregate pit. 5) Follow access and timing restrictions outlined in the FMP to protect Remote Tourism near Mabel Lake. Or request consent from the Tourism Outfitter to access the area. 6) Pit locations will need to be updated with MNRF and SFL holder values. For example, most aggregate pits are in MTO, forestry pits, FMP Aggregate Extraction Areas or already permitted Cat-9's. Also, a construction camp is proposed in FMP aggregate extraction areas 231. Permission will need to be obtained from Forest Company to use these pits. Pits	While some synergies between the FMPs and the Project access plan have been identified, not all can be realized this early in the process. For example, while certain activities are planned to coincide with Boundary Waters development plans, they have advised that they cannot state with certainty which areas of their plan will be accessed and cleared in either of the first two years of the plan. That is due to the fact that discretion to develop any particular area in the two-year plan is left to the clearing contractor. While all reasonable efforts will be made to align efforts, some of these opportunities will only be realized closer to execution of the Project. The ultimate reclamation plans for each of the roads will be confirmed through engagement toward the end of Project execution prior to a reclamation permit being issued by the MNRF. Consultation with the SFL holders will be an important part of this process. Aggregate pit locations belonging to MTO were identified in the early stages of the project; however, MTO will not permit the removal of aggregate from their pits. The location of some other proposed pits overlap forestry pits and these have all been supplied to the SFL holders as part of the Project footprint. Some SFL holders have indicated that they are reviewing these locations against their own aggregate needs and will identify any conflicting issues.

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			will need to be rehabilitated before it can be closed and used by Hydro One. Forest companies may not need the AEA, so a conversation with the SFL holder first before an application for a CAT 9 is submitted to MNRF would expedite the process. 7) Some of the more recent blocks are getting ready to be planted or seeded so its very important that Hydro One contacts the company. 8) Add a Road Standards section with measurable standards for the following categories: Road Width, Right of Way Width, ditching, erosion control, signage, sub grade, grading, capping, blading and gravel specifications, cobble specifications for compliance purposes. 9) Add a section on Access Compliance to the plan. When road building is complete an MNRF inspector will be notified of completion and a compliance inspection will be conducted. The access inspection will follow the Forest Operation Inspection Program and the following categories will be inspected: a) Have AOC and values been protected, b) Is the road with the approved location, c) Is the road properly drained, d) Is the road clearing in accordance with the CFSA requirements, e) Is the Road Use Management Strategy in accordance with the FMP, f) Has the operator followed water crossing details, g) Are erosion protection measures in place at the crossing, h) Have applicable timing restrictions been met, i) Are the road approaches stable and erosion mitigated, j) Is fish passage addressed, k) Is traffic safety addressed, l) Had debris been left in a water body or watercourse, m) Has the road use strategy been implemented. n) Add a section on road decommissioning. This section should indicate the roads and all Transmission Line Area that will be decommissioned. Also, the plans, timelines, and compliance plan.	

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151	Section 11.0 - Conclusions S, 10.2.2/pg. 7	"*The following project components can be moved up to 50 m within the terrestrial study area assessed as part of this EA…"*	MNRF requires clarification if the Limits of Work proposal would be 50 m from the centreline of the 46 m ROW or 50 m from the edge of the 46 m ROW.	The 50 m movement of these Project components is from the edge of each Project component listed and not the centerline. This has been clarified in Section 10.3.1.2 of the Final EA Report.
152	Proposed Limits of Work Section 11.3.1.2	In general, having a degree of operational flexibility during implementation of the project is beneficial, however the EA does not provide adequate information to fully assess the impacts of applying the limits of work provisions. It is unclear in the EA which project components are proposed to be under the limits of work that could lead to location refinement within the terrestrial study area (i.e., the project footprint plus a 1km buffer). Is this referring to all project components (i.e., camp locations, aggregate pit locations, etc.) that are not included in the provisions that allow for only a 50m location refinement from the location depicted in the EA (i.e., ROW and temporary pull sites, access roads and water crossings)? The extent of work provisions should not replace proper planning during the EA. To the greatest extent possible, planning for the preferred locations of major project components should occur during the EA stage to prevent numerous changes to the project design come construction phase.	Contingency areas (i.e., limits of work) should be subject to review and consultation during the EA. It is recommended that the components proposed to be moved up to 50 m from their original location as shown in the EA (ROW, temp pull sites, access roads and water crossings), have a buffer shown around them that clearly depicts the limits of work to facilitate a transparent review of the potential location of the component.	The limits of work approach includes multiple steps and limitations that must be considered when deciding if it would apply. A generic 50 m buffer on a map would not be reflective of the site-specific considerations that will take place and could cause confusion. For example, the limits of work includes limitations when Project components are near bat hibernacula. Also, changes on private land will be made through negotiated agreements with private landowners prior to proceeding. As such, this was not added to the Project mapping in the Final EA. Hydro One can provide this mapping to the MNRF if needed.
153	Conclusions Section 11.3 p.7	Incomplete list of stakeholders to be identified, particularly the MNRF-managed stakeholders, such as trapline, bear management, tourism, and baitfish operators regarding the potential proposed limits of work. This includes the potential movement of helicopter pads, laydown areas, construction camps, etc.	The Project should consult with all relevant parties to changes in the proposed Project, including MNRF managed stakeholders. A clear description of who was consulted, when and for who, and any responses. A general description of concerns raised and how they were addressed, etc. A list of stakeholders who were consulted should be presented (e.g., tourism operators, trapline #s, etc.).	Hydro One has completed comprehensive engagement throughout the Terms of Reference and EA phase and no significant concerns related to MNRF managed stakeholders have been identified. Hydro One will continue to engage with MNRF managed stakeholders as appropriate throughout the EA and construction. For example, Hydro One continues to engage with the Ontario Fur Managers Association to discuss the Project. Additional text has been added to Section 11.3.1.3 of the Final EA Report to note that Hydro One will notify other applicable stakeholders of changes that occur on a land parcel where they hold an interest (e.g., trapline holders).
154	S. 11.3, p. 7	Aggregate licence and permit applications are required to be developed in accordance with the Standards and Regulation 244/97. The application will require studies in which the location of the site will prompt for different surveys and evaluations based on natural features in the area. There will be additional requirements for consultation outside of this EA.	Review the requirements for an aggregate application and ensure they are reflected in the text. Please refer to the cover letter for links to information on requirements.	The final EA will be updated to identify that aggregate pit applications will follow the MNRF process outlined at https://www.ontario.ca/page/aggregate-resources#section-7.

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155	Appendix 3.0-B – Project Footprint	The transmission line routes through E2414a White Otter Enhanced Management Area (EMA). Aggregate site 10 is located within the EMA. Aggregate sites may be a permitted use within the Enhanced Management Area for the construction of forest access roads only.	Aggregate sites should be relocated outside of the EMA.	Aggregate site 10 is located outside the EMA. Aggregate site 17 is located within the EMA and Hydro One will engage with MNRF further on this location. Alternative aggregate sites are included in the Final EA Report and aggregate site 17 can be removed through a commitment in the EA approval if MNRF continues to have concerns.
156	Appendix 3.0 -B Project Footprint Figures	Figures should be updated to recognize the land use designations (i.e. White Otter Enhanced Management Area) within the LSA, RSA, and Project Footprint.	MNRF recommends including land use designations on maps.	The White Otter Enhanced Management Area has been added to the figures in Appendix 3.0-B.
157	Appendix 3.0- B; Data Reviewer Access Roads	Access Road illustrated include: • Existing access roads – no improvements required • Existing access road – potential improvements • Access Road – Preferred • Access Road – Alternate MNRF understands that all access roads, new preferred and alternate access roads, were included in the footprint to assess for project and net effects as indicated in Section 3.3.4. Progressively restoring temporary construction access roads, approximately 30% located outside of the right-of-way (Section 3.4.1.11) is a beneficial commitment to reduce the duration of project effects on applicable project indicators. It is uncertain what the degree of anticipated improvements will be required for existing roads, and it is not indicated which new access roads will be decommissioned and remediated progressively or after construction. With the absence of this access road specific information, it is difficult to infer how these features were captured in the assessment of project and net effects for applicable indicators. In addition to supporting MNRF's review of the Environment Assessment for the Project, access road specific information will also assist with future work permitting requirements and land use authorizations. Work permits may be required for improvement to existing Crown land roads. MNRF understands that improvements will vary and be road specific. Ontario Regulation 239/13 indicates that the following activities are exempt:	Please provide details in the Access Plan (commitment #19 from Final Terms of Reference) relating to the location, timing, size, upgrades, ownership, and decommissioning.	Commitment 19 of the ToR requires that a preliminary access plan be included in the EA including identifying where changes to existing access are planned and potential impacts (natural environment/social/economic). Additional details have been added to the Final EA Report regarding access road and waterbody construction and general reclamation. Overall, it is Hydro One's opinion that the access plan included in the Final EA Report meets the requirements of commitment 19, is of sufficient detail for the EA and allows for the identification or potential effects and recommended mitigation measures. Existing access requiring potential improvements will be decommissioned to a similar pre-construction state (i.e., crossings removed, cross drains installed, etc.). Potential improvements include brushing out shoulders of roads, patching road surface to create a drivable surface, installing watercourse crossings as appropriate, upgrading approaches onto other roads, etc. All necessary permits with MNRF and/or agreement with road holders will be obtained prior to initiating upgrades.

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		1) Water crossing cleaning for the purpose of maintaining the flow of water. 2) Grading of existing trails or roads. 3) Clearing of existing ditches. 4) Gravelling of existing trails or roads. 5) Clearing or brushing of existing road or trail surface. 6) Snow plowing. 7) Sanding or dust control. 8) Repair or replacement of posted signage. O. Reg. 239/13, s. 4 (2); O. Reg. 160/17, s. 3. Further, trails, water crossings or roads authorized under a forest management plan under the or constructed as part of a forest operation do not apply to the Public Land Act. However, improvement to these structures must abide by conditions and prohibitions as defined by the Crown Forest Sustainability Act, 1994. <u>General Comments relating to Access Roads:</u> To reduce new linear disturbances across the landscape, utilizing access via construction right-of-way or existing right-of-way is encouraged and should be maximized to the extent feasible. New small access roads from existing road to specific towers should be minimized and used only when justifiable due to topography and water crossing considerations. Ex. Thunder Lake Road, Turgeon Road, Melgund Road 3, Raleigh Cutoff Road, Little Raleigh Road Utilizing proposed footprints for multiple activities should be implemented to reduce disturbance (e.g. proposed Alternate Access Road R_2066 to Tower ID 4-143 should utilize the proposed temporary laydown area pull site rather than increasing linear disturbances via new access). MNRF recognizes that environmental variables, such as water courses, bedrock, and topography, will be influential to access road planning. Where new access roads are proposed, a rationale may be requested.		
158	Online mapping products - Road access plan	It is noted that many of the roads described as “existing access road potential improvements” and “existing access road no improvements required” in the online mapper are in varying conditions and will require varying degrees of upgrade. For example, the Ann Bay Road has access controls in place (ditch and berm). It is also noted that several access roads are shown to get to a single area. In some cases, the number of roads seems an excessive number of new access roads is required for construction of the project. It is unclear if existing roads are alternatives being shown, or if HONI intends to use these roads in addition to the roads that are being	It is recommended that a stand-alone access plan is developed that accompanies/supplements/supports appendix 3.0-B that identifies road standards that will be followed (i.e. standards for permanent and temporary can be described), mitigation measures that will be employed (access restrictions, decommissioning), decommissioning strategies that will be employed, etc. as this will be required in certain areas (i.e. within 120m of trout lakes in DRY-FF-ATK district, within EMA and other sensitive areas that are identified in applicable CLUPs). While it is recognised that some site-specific planning cannot be identified in the EA, overarching	The impact of road development will be reduced by keeping road widths and length to the minimum required, minimizing imported gravel, installing proper drainage, and ensuring erosion is controlled during construction. Aggregate or access matting will be used in work areas to support specific construction activities where heavy equipment is utilized (e.g., crane pads for foundation excavation/drilling, concrete pouring, structure erection, etc.).

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		proposed to be constructed. Efforts to reduce the amount of proposed access roads and trails should be made and documented. Aside from the location information and broad categorization available on the online mapper, the proposed permanent and temporary access roads, as well as water crossings have not been fully described, planned, assessed, or mitigated in the EA. Considering the proposed limits of work that apply to road location refinement in the EA, it is difficult for MNRF to constructively comment on road locations in the draft EA.	road construction standards and identifying areas where decommissioning will be required can be done in the EA.	Sediment and erosion control methods, such as silt fencing, check dams, straw bales, etc., will be used to prevent sediment from entering water bodies, and will be utilized when necessary, during water crossing installations. Installation methods for sediment control measures will be outlined in in an Erosion and Sediment Control Plan which will be abided by during construction. All new and upgraded all-season access roads will typically be built to the following standards: • 6 m driving surface with widening up to 8 m on corners, within a 20 m clearing; • Roads less than 15% grade; • Trails less than 18% grade (tracked equipment access); • Grade breaks less than 9%; • Minimum 15 m radius on horizontal curves; • Turnouts every 500 m and incorporated into tower access approaches; and • Ditches 0.3 m to 1 m wide and 0.25 m to 0.5 m deep. Winter access will be maintained for the Project duration as required by construction or weather conditions. The contractor will monitor weather and schedule activities so that shutdown of operations leaves adequate time to stabilize or reclaim roads and break up snow fills / ice bridges at the end of the winter season. Reclamation requirements for the Project will vary depending on the location (e.g., structure, span, land location) and construction activity, as well as specific requirements (e.g., agency/regulatory requirements, EA commitments, landowner agreements, etc.). The Project Reclamation Plan will identify location specific reclamation requirements and provide a mechanism for tracking deficiencies and signoff following inspection and monitoring by Hydro One and their contractor. Post-Construction worksite clean-up and reclamation can begin once construction is complete in an area (e.g., following

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				completion of stringing and commissioning) and includes the following tasks, as appropriate: • Temporary structure dismantling and removal (e.g., temporary approaches, crossing structures, rider poles, etc.); • Clean-up and removal of all construction materials (including temporary culverts, mats, geotextile materials, etc.), equipment, and equipment cleaning stations (if applicable); • Workspace and travel lane restoration, where not required for future access, including tilling or ripping of compacted soil as required, re-contouring areas where necessary to restore micro drainage patterns and applying erosion control measures (e.g., mulching, check dams, straw crimping) where required; • Seed mixes may be applied following engagement with the appropriate Indigenous communities, municipal representative and/or landowners; • Restoration of fences, gates, and other small infrastructure; • Repair of roads damaged by construction activities to pre-construction condition; • Installation or removal of temporary erosion control measures and re-vegetation, where required; • Re-applying seed mixes as warranted and conducting a noxious weed control program during the growing season following the last work completed on each property to control any weeds resulting from construction activities; and • Other general reclamation measures as outlined in the EPP.

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159	Mapping Products and Main Report "Other Environmental Data Reviewer Section 3.0 – Project Description S 3.3.4 & S. 3.3.6"	Access roads are currently mapped as either existing or planned, and which roads require improvement. Additionally, the Draft EA suggests that some access roads (new or upgraded) Example: Section 3.3.4 Access Roads "*To minimize future potential access development impacts, some access roads may be left permanently to support long-term inspection and maintenance activities and for multiple use/integration with other existing industrial operations (e.g., forestry operations within forest management areas).*" In addition to other infrastructure – Section 3.3.6 Equipment/Material Laydown Areas *"To minimize adverse effects, Hydro One commits to progressively restoring areas to be used on a temporary basis during construction, such as laydown areas, pull sites, and helipads, located on previously undisturbed lands. Some of these areas may be required on a permanent basis depending on the future operational needs assessed after the route is determined."*	The Final Access Plan and associated mapping products, should include details on which roads will be used temporarily or permanently, and should be included in the Final EA.	Approximately 30% of access roads and trails outside of the ROW will remain in place to provide access for operation and maintenance activities. All others will be decommissioned and rehabilitated using applicable and appropriate methods and standards. At this stage in the Project, it is unknown which access roads will be left in place to support operations and maintenance of the transmission line. Engagement with Indigenous communities and appropriate stakeholders, including the MNRF, will occur prior to determining which roads will not be removed and any necessary permits/approvals will be obtained.
160	Appendix 6.3B Appendix 6.3C Appendix 6.4A Appendix 6.5A Appendix 6.6B & 6.6C Appendix 6.4A Figures 3, 5, 7, 12, 13, 15-17, 19, 23, 24, 28, 29 Figures 3, 5 Figures 3, 5 S. 2.4, p. 63-64, p. 65 S.3.1, p. 80 S. 3.2, p. 102, p. 125, p.149, p. 203, S. 3.2-7-1 -	Please ensure that the information for well surveys meets the requirements for an aggregate's application. The requirements are laid in the Standards and Regulation 244/97. Any required Source Water Protection information may be required as a part of an application for an aggregate permit. Please ensure that information in this EA is reflective of requirements for an application of an aggregate licence or permit. Please ensure that the information in the surveys meets the requirements for an aggregate application for a pit or quarry. Please ensure that information in this EA is reflective of requirements for an application of an aggregate licence or permit. Please ensure mitigation buffers outlined in this document are mirrored in the application for an aggregate license or permit and meet the application requirements laid out in the Standards and Regulation 244/97. Ensure that timing windows stated in this EA are referenced in the Natural Environment Reports for aggregate applications. Applications under the ARA will be required to follow the Standards and Regulation 244/97.	Review the requirements for an aggregate application and ensure they are reflected in the text. Please refer to the cover letter for information on requirements.	The Final EA Report has been updated to identify that aggregate pit applications will follow the MNRF process outlined at https://www.ontario.ca/page/aggregate-resources#section-7.

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	3.2-7-39 S. 2, p. 5, p. 6, p. 12, Figures 3, 5, 7, 12, 13, 15-17, 19, 23, 24, 28, 29 p. 2, Table 6.6- C-1A, p. 1-2, Table 6.6-C-2A p. 1-3, Table 6.6-C-2B			
161	Mapping Products “Other Environmental Data Reviewer”	WC-3322 is not a “Unmapped” is a known mapped watercourse in OHN, classification is permanent.	Please update WC-3322 to mapped and permanent classification.	This classification has been revised in the Final EA Report, in Appendix 6.6 B Table 1.
162	Mapping Products “Other Environmental Data Reviewer”	Please be aware that where tenure is existing in the form of an LUP, MNRF is unable to provide further tenure or approval on top of those locations for access roads. As a result, planned access roads may have to be relocated, as for example ***Preferred Access Road R-1390*** which, as currently mapped, crosses an existing land use permit for a commercial outpost camp.	MNRF recommends that access road planning is reviewed, and existing land tenure values are considered. If there are any existing land tenure conflicts with proposed access road planning, please ensure that MNRF or the land tenure holder is contacted.	Comment noted. All landowners and permit holders where there is proposed new access or the proposed use of existing access will be contacted with the goal of negotiating an agreement for same.
163	Mapping Products	During review it was noted that there are multiple water crossing identifiers with no mapped stream:	Please provide a protocol or methodology that will be used if an unmapped stream is encountered and identified prior to construction activities.	In situations where unmapped streams are encountered and a water crossing is required, an appropriate crossing structure will be installed based on the types of equipment crossing, the overall width of the crossing, the season of use, and the duration of the crossing. Crossing structures will typically consist of snow fills, culverts, or steel rig mats founded on wooden access mats for suitable crossing locations which have a span of 3 m or less. For crossings greater than 3 m, a temporary ice bridge or clear span bridge will be installed. A qualified professional will assess each crossing location to ensure the appropriate crossing structure is selected and installed in accordance with all regulatory requirements.

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164	Mapping Products Proposed Route and Water Crossings	Locations exist (ex, Finlayson Lake) on mapped route with an existing road and water crossing; however, the EA proposes installation of a new water crossing along the same stream. Additionally, there are ice crossing locations identified, specifically a proposed crossing below Finlayson Lake, where the feasibility of creating an ice road crossing would not be feasible.	Ground truthing of the proposed activities in the Access Plan is required to ensure no duplication of water crossing installations and that ice crossings are feasible at identified locations.	The existing crossing at Finlayson Lake is not suitable for construction traffic. At the time of the desktop plan, an ice bridge was proposed adjacent to it. However, subsequent field assessments have determined that an ice bridge is not feasible at this location. In the updated access plan, this crossing will be removed. The structures on the north side of the waterbody will be accessed by roads coming from the north and similarly, the structure south of the waterbody will be accessed by roads coming in from the south. These roads are already identified as “Alternate” in the current plan. Field verification of the remaining waterbody crossings will be completed in advance of construction.
165	Mapping Products Proposed Helicopter Pads	Seeking further information regarding helicopter pads and mitigation measures. Helicopter pads are currently mapped adjacent to watercourses and waterbodies, with missing information on how the EA will mitigate environmental risks. The proposed changes will allow the EA to mitigate the impacts to fish and fish habitat and water quality and will meet the ToR requirement to accurately identify, assess, and manage potentially significant environmental risks and integrate environmental considerations into decisions.	Further information of the type of risk to watercourses/fish and fish habitat and how they will be mitigated is required to assess the potential impact of the helicopter pad locations.	This has been addressed in the Final EA Report, through updating the effects and mitigations measures within the text as well as the mapping. A 30 m buffer has been added to all helicopter pads that interact with waterbodies. The details have been summarized in Appendix 6.6C, Table 1.
166	Mapping Products Proposed Route and Waterbodies	The proposed access route on topographic maps, with elevation shown, indicate that some of the access roads are planned to go through waterbodies. The elevation (steep cliffs) indicate that the current proposed access road is not viable in some locations as mapped. To allow passage around the area an access road may need to be realigned, impacting known values.	The proposed access route, with elevation mapped, should be reviewed and ground-truthed to ensure that the proposed access route will remain on land. The EA should consider adjusting the proposed route, as required, to account for steep banks alongside waterbodies.	Additional ground truthing was completed to support the access plan included in the Final EA Report and further work will be completed in advance of access finalization. The nature of the limits of approach and alternative access identified are intended to facilitate changes to appropriately navigate around obstacles.

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167	Mapping Products Laydown Areas	When selecting laydown areas, it is strongly advised to ensure that sites selected do not conflict with existing values that have been provided by MNRF, as well as, existing land uses and resource extraction activities, such as those that have been approved as part of an existing FMP and existing licences and permits, etc.	MNRF encourages engagement with resource users and stakeholders to ensure feasibility of areas selected for laydown. It is noted that the Draft EA only identifies 4 laydown areas. MNRF strongly recommends that the EA describes the amount of required laydown areas and clarifies if laydown area location is subject to the limits of work provisions. Additionally, site selection criteria should be clearly outlined in the EPP along rehabilitation standards and notification requirement to potentially impacted stakeholders. This may streamline permitting as currently the limits of work lack details on site refinement procedures (i.e., incorporating existing data).	Primary laydown areas will be located with camps which will use previously disturbed sites (i.e., previously cleared including in cutblocks) to the extent reasonably possible in consideration of proximity to the project. Camp/laydown locations have been adjusted and will be included in the Final EA Report. Further these sites have applications for LUPs submitted with MNRF. Rehabilitation standards will be included in the EPP and notification to potentially impacted stakeholders will be competed as necessary.

Table 10: Lakehead Region Conservation Authority – Michelle Sixsmith, Development Regulations Officer – July 4, 2023

#	Document, Section and Page Number	Comment	Request/Recommendation	Hydro One Response
1	n/a	The project study is within the Municipality of Shuniah, which is a member municipality of the Authority. As watershed advisors to our member municipalities, the ability of structures to pass flood flows and potential erosion/sedimentation and impacts are components of our input. There are various water crossings and wetlands (i.e. North Star Creek, Savigny Creek, North Current River and various Unevaluated Wetlands etc.) as shown on the attached map, which may be subject to the Authority's Development, Interference with Wetlands and Alterations to Shorelines and Watercourses Regulations, O. Reg. 180/06. In general, any development (i.e. temporary or permanent water crossings) within or adjacent to the shore-zone and/or watercourse or wetland may require a permit under the Authority's Regulations, within the Area of Jurisdiction of the Lakehead Region Conservation Authority (LRCA). Based on the information provided in the draft Environmental Assessment Report, a portion of the proposed development falls within the LRCA's Regulated Area and may require a permit from the LRCA (per 2021 Memorandum of Understanding between Conservation Ontario and Hydro One Networks Inc). Once the proposed development is finalized, please contact the LRCA to determine if a permit is required from the LRCA.	n/a	Comment acknowledged. Hydro One will engage LRCA regarding permit requirements.

Table 11: Ministry of Citizenship and Multiculturalism, Joseph Harvey, Heritage Planner – July 10, 2023

#	Document, Section and Page Number	Comment	Request/Recommendation	Hydro One Response
1	Terminology throughout document	Cultural heritage resources include archaeological resources, built heritage resources and cultural heritage landscapes (BHR/CHL). The Cultural Heritage Report only addresses BHR/CHL, therefore, please replace the term 'cultural heritage resources' with BHR/CHL as appropriate.	n/a	The term "cultural heritage resources" has been replaced with BHR or CHL as appropriate throughout Section 7.6 (Built Heritage Resources and Cultural Heritage Landscapes) and Appendix 7.6-A (Cultural Heritage Existing Conditions and Preliminary Heritage Impact Assessment) of the Final EA Report.
2	2.0 (Provincial Heritage Policies) p. 9	*Original Text* Section title "Provincial Heritage Policies"	The title of this section should be revised to "Provincial Legislative Framework".	Appendix 7.6-A (Cultural Heritage Existing Conditions and Preliminary Heritage Impact Assessment) of the Final EA Report has been updated with the proposed text.
3	2.3.1 (Environmental Assessment Act and Ontario Energy Board Act)	*Original Text* The *Environmental Assessment Act* (EAA) was legislated to ensure that Ontario's environment is protected, conserved, and wisely managed. Under the EAA, "environment" includes not only natural elements such as air, land, water and plant and animal life, but also the "social, economic and cultural conditions that influence the life of humans or a community", and "any building, structure, machine or other device or thing made by humans". To determine the potential environmental effects of a new development, the Environmental Assessment (EA) process was created to standardize decision-making.	We recommend the following revision: See underlined text edits below. The *Environmental Assessment Act* (EAA) was legislated to ensure that Ontario's environment is protected, conserved, and wisely managed. Under the EAA, "environment" includes not only natural elements such as air, land, water and plant and animal life, but also the "social, economic and cultural conditions that influence the life of humans or a community", and "any building, structure, machine or other device or thing made by humans". Cultural heritage resources including archaeological resources, built heritage resources and cultural heritage landscapes are included in the cultural component of the environment. To determine the potential environmental effects of a new development, the Environmental Assessment (EA) process was created to standardize decision- making.	Appendix 7.6-A (Cultural Heritage Existing Conditions and Preliminary Heritage Impact Assessment) of the Final EA Report has been updated with the proposed revised text.
4	2.3.3 (Ontario Heritage Act and Ontario Regulation 9/06) p. 11	*Original Text* The Ontario Heritage Act (OHA) enables the Province and municipalities to conserve significant individual properties and areas. For provincially owned, administered, or occupied heritage properties, compliance with the MTCS S&Gs is mandatory under Part III of the OHA and holds the same authority for ministries and prescribed public bodies as a Management Board or Cabinet directive. For municipalities, Part IV and Part V of the OHA enables council to "designate" individual properties (Part IV), or properties within a heritage conservation district (HCD) (Part V), as being of "cultural heritage value or interest" (CHVI).	The title of this section should be revised to "Ontario Heritage Act and Standards and Guidelines for Conservation of Provincial Heritage Properties". Ideally this subsection should be the first and before the EAA, OEB Act and Planning Act. We recommend revising this section to reflect the current terminology, Hydro One's responsibilities under the *Ontario Heritage Act* (OHA) and recent changes to the Act that were made under the *More Homes Built Faster Act, w*hich came into effect on January 1, 2023. Sections 2.3.3 and 2.3.1 should be merged. For example, *O. Reg. 9/06* has been amended so that there are nine criteria for determining cultural heritage	Appendix 7.6-A (Cultural Heritage Existing Conditions and Preliminary Heritage Impact Assessment) of the Final EA Report has been updated as follows: • The title of this section was updated to "*Ontario Heritage Act* and Standards and Guidelines for Conservation of Provincial Heritage Properties". The section was updated to be first before the *Environmental Assessment Act, Ontario Energy Board Act and Planning Act*. • The section was updated to reflect current terminology and merge Sections 2.3.3 and 2.3.1. • References to O. Reg. 9/06 section were updated to reflect current information about O. Reg. 9/06.

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		Evaluation for CHVI under the OHA (or significance under PPS 2020) is guided by Ontario Regulation 9/06 (O. Reg. 9/06), which prescribes the criteria for determining cultural heritage value or interest. O. Reg. 9/06 has three categories of absolute or non-ranked criteria, each with three sub-criteria.	value or interest. A property must now meet two out of the nine criteria to be of cultural heritage value or interest. This section should be replaced with the following: The Ontario Heritage Act (OHA) provides the primary statutory framework for the conservation of cultural heritage resources (which includes their identification, protection, and wise management) in Ontario). The conservation of cultural heritage resources is also a matter of provincial interest as reflected in provincial legislation such as the *Planning Act* and the *Environmental Assessment Act,* among others. Under the OHA, all Ontario government ministries and public bodies prescribed under Ontario Regulation 157/10, including Hydro One Inc., are required to follow the Standards and Guidelines for Conservation of Provincial Heritage Properties (S&Gs), prepared under section 25.2 of the Ontario Heritage Act, when making any decisions affecting cultural heritage resources on lands under their control. Consistent with the OHA S&Gs, and with Hydro One's Identification and Evaluation (I&E) Process (as approved by the Deputy Minister of MCM), HONI hires qualified person(s) to undertake technical heritage studies, e.g., to determine whether a property (or properties) under its ownership or control has cultural heritage value or interest based on the criteria under Ontario Regulations 9/06 and 10/06. [Please revise the information for Ontario Regulation 9/06.] HONI's I&E Process has further information, should a property meet Ontario Regulation 9/06 and/or 10/06 and be identified (not designated) as a provincial heritage property. Please do not include reference to the Ontario Heritage Toolkit as it is not relevant to HONI's activities.	• Reference to the Ontario Heritage Toolkit was removed.

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5	3.1 (Cultural Heritage Existing Conditions (CHEC)) Table 3-1 p. 18	We recommend including a new section, based on table 3-1, which expands upon what, when and how community input was undertaken as part of the research methodology for this Report. It should also outline the process used to determine the outcomes of the community input exercise(s) and describe the results. A more detailed overview of community engagement can be attached as an appendix. See also Hydro One's I&E Process. Please confirm whether the draft Cultural Heritage Report was sent to Indigenous communities with a potential interest, and to heritage stakeholders, such as the City Thunder Bay Heritage Advisory Committee, for review and comment. Other heritage stakeholders may have an interest in reviewing this draft report and it is not clear if they have been identified.	n/a	A new section (Section 3.2) in Appendix 7.6-A (Cultural Heritage Existing Conditions and Preliminary Heritage Impact Assessment) has been created based on Table 3-1 which expands upon what, when and how community input was undertaken as part of the research methodology for this report. The Cultural Heritage Report was distributed to potentially affected Indigenous communities for review prior to finalizing. The public open houses occurred in Spring 2023 and included the results of the cultural heritage assessment from the EA.
6	5.0 (Results) p. 40	*Original Text* An additional three properties were found to have buildings or structures 40 years or more years old but were evaluated at a preliminary level not to have potential CHVI.	It is not clear how it was determined that these properties are not of CHVI. The Ministry's *Criteria for Evaluating Potential for Built Heritage Resources and Cultural Heritage Landscapes* should be completed for each of the three properties identified as being of potential CHVI. The completed checklists, clear photographs of the buildings and structures and a rationale should be included the report documentation. The information included in Appendix B needs to be expanded upon. Please see Hydro One's I&E Process. See also comments 10 and 11 below.	Following the Hydro One Cultural Heritage Identification and Evaluation Process, the study area was screened for built heritage resources and cultural heritage landscapes using the MCM Checklist. See Section 3.1 for the list of tasks carried out to complete the checklist. During the field review, potential heritage resources were identified by employing a high-level and cursory evaluation based on an understanding of the criteria identified in the MCM's Criteria for Evaluating Potential for Built Heritage Resources and Cultural Heritage Landscapes and the criteria identified in Hydro One's Cultural Heritage Identification and Evaluation Process. As a result of this review, one Federally recognized Cultural Heritage Landscape (the Dawson Trail) was identified, and three properties were screened out. Appendix B of the Cultural Heritage Existing Conditions and Preliminary Heritage Impact Assessment (Appendix 7.6-A) contains photographs and rationales for the three properties that were found to have buildings or structures 40 years or more: 621 McGogy Road, Dryden; 71 Kivilahti Road, Thunder Bay; and 342 Silver Falls Road, Thunder Bay. The rationale has been expanded upon to include that each property was evaluated using a high-level evaluation against criteria from MCM and Hydro One, and were screened out of the Cultural Heritage Existing Conditions and Preliminary Heritage Impact Assessment.

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				Appendix C of the Cultural Heritage Existing Conditions and Preliminary Heritage Impact Assessment (Appendix 7.6-A) contains the completed MCM Checklist for the study area. The use of the 40-year threshold is accepted as a preliminary screening measure and does not imply that all structures constructed 40 years ago are inherently of heritage value, nor does it exclude buildings constructed within the past 40 years from retaining heritage value.
7	6.3 (Impact Assessment) p. 44	*Original Text* When determining the effects a development or site alteration may have on known or identified built heritage resources or cultural heritage landscapes, the MTCS *Heritage Resources in the Land Use Planning Process* advises that the following "negative impacts" be considered: …	Please do not include reference to the Ontario Heritage Toolkit as it is not relevant to HONI's activities. See also comment 4 above. As Hydro One is a public body prescribed under Ontario Regulation 157/10, it should refer to the MCM's Information Bulletin 3 – Heritage Impact Assessment for Provincial Heritage Properties – attached. This section should be revised to align with the advice on that Bulletin.	The reference to the Ontario Heritage Toolkit has been removed and the reference to the MCM's Information Bulletin 3 – Heritage Impact Assessment for Provincial Heritage Properties has been added to Appendix 7.6-A (Cultural Heritage Existing Conditions and Preliminary Heritage Impact Assessment) of the Final EA Report.
8	6.4 (Results and Recommendations) Table 6-1 p. 46	*Original Text* See table Column 5 (Recommendations) for all Alternatives: A Cultural Heritage Evaluation Report is recommended for this Cultural Heritage Landscape.	We recommend the following revision to table Column 5 (Recommendations): See underlined text edits below. A Cultural Heritage Evaluation Report is recommended for this Cultural Heritage Landscape to confirm its cultural heritage value or interest as part of preliminary design and prior to the issuance of the notice of completion. If the cultural heritage landscape is found to be of cultural heritage value or interest of *provincial* significance (i.e., meets Ontario Regulation 10/06 and therefore a potential provincial heritage property of provincial significance) a Heritage Impact Assessment will be undertaken before the issuance of the notice of completion. MCM should be contacted to advise on whether MCM Minister's Consent is required. If the property only meets the criteria of Ontario Regulation 9/06 then the HIA will be undertaken as early as possible during detailed design and prior to any ground disturbing activities. The HIA will follow MCM's Information Bulletin 3 and be sent for review and comment to MCM, municipalities, Indigenous communities, and other interested parties, as appropriate.	The proposed revisions have been made to Appendix 7.6-A (Cultural Heritage Existing Conditions and Preliminary Heritage Impact Assessment) of the Final EA Report.
9	7.6.7 (Alteration of a Cultural Heritage	*Original Text* Potential Effects:	We recommend the following revisions to align with our suggested revisions to the Cultural Heritage Report	The proposed revisions have been made to Section 7.6.7 of the Final EA Report for "Potential Effects".

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	Resource from Destruction or Alteration – Built Heritage Resources) p. 7.6-10	As discussed in Section 7.6.5.3, the results of the CHEC/PIA (Appendix 7.6-A) indicated that one landscape (CHL-1), the Dawson Trail, was assessed to have known CHVI as a cultural heritage landscape (Appendix 7.6-B). Dawson Trail is recognized by the Historic Sites and Monuments Act (R.S.C., 1985, c. H- 4) as a National Historic Event (Parks Canada, n.d.). As currently proposed, this trail could be crossed by the Project footprint as shown on the figures in Appendix 7.6-B. Alteration of the resource during construction of the Project could result in damage or destruction to portions of the Dawson Trail, a federally recognized cultural heritage landscape, resulting in the loss of valuable contextual information, or may result in the complete destruction of cultural heritage resources. Potential effects on this cultural heritage resource are most likely to occur during Project construction, through blasting, clearing, and grubbing of vegetation along the 46 m wide transmission line ROW, access roads, and other construction areas. No known or potential built heritage resources (e.g., buildings) were identified in the LSA; therefore, construction activities are not predicted to have potential to impact built heritage resources.	(See table 1 comments above), with best practice and current terminology: See underlined text edits below. Potential Effects • Displacement of built heritage resources and/or cultural heritage landscapes by removal and/or demolition and/or disruption • Effects on cultural heritage landscape features • Disruption of resources by introduction of physical, visual, audible, or atmospheric elements that are not in keeping with the character and setting of the cultural heritage resource ~~As discussed in Section 7.6.5.3, the results of the CHEC/PIA (Appendix 7.6-A) indicated that one landscape (CHL-1), the Dawson Trail, was assessed to have known CHVI as a cultural heritage landscape (Appendix 7.6-B). Dawson Trail is recognized by the Historic Sites and Monuments Act (R.S.C., 1985, c. H-4) as a National Historic Event (Parks Canada, n.d.). As currently proposed, this trail could be crossed by the Project footprint as shown on the figures in Appendix 7.6-B.~~ ~~Alteration of the resource during construction of the Project could result in damage or destruction to portions of the Dawson Trail, a federally recognized cultural heritage landscape, resulting in the loss of valuable contextual information, or may result in the complete destruction of cultural heritage resources. Potential effects on this cultural heritage resource are most likely to occur during Project construction, through blasting, clearing, and grubbing of vegetation along the 46 m wide transmission line ROW, access roads, and other construction areas.~~ ~~No known or potential built heritage resources (e.g., buildings) were identified in the LSA; therefore, construction activities are not predicted to have potential to impact built heritage resources.~~ Mitigation Measures	In terms of “Mitigation Measures”, the recommendations from the Cultural Heritage Report have been inputted in the existing text (to carry out a CHER for the Dawson Trail). A CHER will be completed for the Dawson Trail in order to determine if an HIA is necessary. If an HIA is necessary, the HIA will assess the effects and impacts of the Project on the Dawson Trail’s identified heritage attributes and will provide detailed mitigation recommendations.

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		Mitigation Measures: Construction activities with the potential to cause changes in the landscape may affect the cultural heritage resource unless appropriate steps are taken in advance to identify and mitigate impacts to cultural heritage resources. Direct and indirect negative effects can be avoided by identifying and avoiding the Dawson Trail cultural heritage resource prior to construction, and by increasing the awareness of Project personnel about the cultural heritage resource that crosses the Project footprint.	[The mitigation measures should be replaced with the recommendations of the Cultural Heritage Report – Copy and paste do not summarize] Some examples of typical mitigation measures include: • Identify, evaluate, and manage built heritage resources and cultural heritage landscapes as per the OHA S&Gs • Avoidance, through alternative route selection • Prevent built heritage resources from undergoing demolition by neglect • Carry out impact assessment and appropriate public engagement, given removal and demolition of cultural heritage resources is considered to be a last resort • Consider alternative alignment to retain and maintain the visual settings and physical relationships of heritage features • Avoid and preserve BHR/CHL features in-situ and consider adaptive reuse alternatives • Relocate heritage building(s) or structures, and consider adaptive reuse alternatives • Document and salvage features from heritage buildings and/or structures prior to demolition • Decrease harmful environmental condition changes such as vibration, altered water table etc.to cultural heritage resources • Utilize landscape planting plan to provide mitigation, screening, and enhancement. MCM may have additional advice pending the submission of the revised Cultural Heritage Report.	
10	7.6.7 (Alteration of a Cultural Heritage Resource from Destruction or Alteration – Built Heritage Resources) Table 7.6-5	*Original Text* Project Component or Activity • Clearing and grubbing of vegetation along the 46-m-wide transmission line ROW, access roads and other construction areas; • Foundation and conductor installation; and • Reclamation of decommissioned access roads, temporary laydown areas, and temporary construction camps.	We recommend the following revisions to align with recommended revisions above (See comment 9). See underlined text edits below. Project Component or Activity • Clearing and grubbing of vegetation along the 46-m-wide transmission line ROW, access roads and other construction areas; • Foundation and conductor installation; and • Reclamation of decommissioned access roads,	The proposed revisions for “Potential Effects” and “Net Effect” have been made to Section 7.6.7 of the Final EA Report. In terms of “recommendations”, the recommendations from the Cultural Heritage Report have been inputted in existing text (to carry out a CHER for the Dawson Trail). A CHER will be completed for the Dawson Trail in order to determine if an HIA is necessary.

#	Document, Section and Page Number	Comment	Request/Recommendation	Hydro One Response
		Potential Effects • Alteration of a cultural heritage resource through destruction or alteration Recommendations • A CHER will be conducted to evaluate the cultural heritage landscape in the Project LSA. • If any potential resources are evaluated in the CHER as being of CHVI, an HIA will be completed and include mitigation measures. The HIA may also recommend that an HCP be undertaken to guide protection and conservation of the specific cultural heritage resource. The CHER, HIA, and/or HCP will be submitted for MCM and Indigenous communities for review and comment. • If required, a compliance letter for the Project under the OHA will be obtained from the MCM prior to construction, and the mitigation measures specified in the letter will be adhered to. • The Project footprint will be surveyed prior to construction to limit activities to the designated areas of the Project. • Project personnel will be made aware when working near known or potential cultural heritage resources and avoid areas that are flagged or fenced, and abide by restrictions on in/out privileges. Net Effect • No net effect	temporary laydown areas, and temporary construction camps. Potential Effects • ~~Alteration of a cultural heritage Landscape resource through destruction or alteration~~ • Displacement of built heritage resources and/or cultural heritage landscapes by removal and/or demolition and/or disruption • Effects on cultural heritage landscape features • Disruption of resources by introduction of physical, visual, audible or atmospheric elements that are not in keeping with the character and setting of the cultural heritage resource Recommendations [The recommendations should be replaced with the recommendations of the CHEC/PIA - Copy and paste do not summarize (See also Table 1 comments above)] Net Effect No net effect. [Please clarify why there would be no net effect.]	If an HIA is necessary, the HIA will assess the impacts of the Project on the Dawson Trail's identified heritage attributes and will provide detailed mitigation recommendations.
11	10.6 (Adaptive Management – Monitoring and Commitments) Table 10.6-1 p. 10.6-15	*Original Text* Criteria - Archaeology Resources Objective - To monitor effectiveness of mitigation measures implemented to protect archaeological resources Method • Hydro One will monitor the Project footprint during construction for incidental sensitive features (e.g., water bodies, rare plants, rare vegetation communities, wildlife species of concern, archaeological resources) that have	*Comment* We recommend the following revisions to align with our revisions to Report sections 7.6 and 7.7 above. See underlined text edits below. Criteria • Archaeological Resources Objective • To monitor effectiveness of mitigation measures implemented to conserve archaeological resources [We recommend HONI expand on how this will be achieved – will a monitoring plan be developed	The archaeology text has been updated as proposed. For the proposed cultural heritage revision, the text has been updated to: • "Heritage attributes as they relate to the identified heritage resources will be identified and evaluated under Ontario Regulation 9/06 in a Cultural Heritage Evaluation Report (CHER). Project effects to built heritage resources and cultural heritage landscapes resources will be assessed mitigated by adhering to the recommendations of the CHEC/PIA through the completion of this CHER and a Heritage Impact Assessment (HIA) if necessary.

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		not been previously identified in the Project footprint. • Hydro One will employ the services of qualified Environmental Inspector(s) and Indigenous monitors to guide implementation, monitor and report on the effectiveness of the construction procedures, and mitigation measures for minimizing potential impacts. • Monitoring programs may be required if archaeological resources are identified during the Stage 2 Archaeological Assessment and mitigation measures by avoidance and protection are undertaken.	based on the archaeological assessments? See also comment 2 above] Method • ~~Hydro One will monitor the Project footprint during construction for incidental sensitive features (e.g., water bodies, rare plants, rare vegetation communities, wildlife species of concern, archaeological resources) that have not been previously identified in the Project footprint.~~ • ~~Hydro One will employ the services of qualified Environmental Inspector(s) and Indigenous monitors to guide implementation, monitor and report on the effectiveness of the construction procedures, and mitigation measures for minimizing potential impacts.~~ • ~~Monitoring programs may be required if archaeological resources are identified during the Stage 2 Archaeological Assessment and mitigation measures by avoidance and protection are undertaken.~~ • The recommendations of the Stage 1 archaeological assessment (AA) and any subsequent recommended AA (e.g., Stage 3-4) will be followed. • Should previously undocumented archaeological resources be discovered, they may be a new archaeological site and therefore subject to Section 48(1) of the *Ontario Heritage Act*. Hydro one or the person discovering the archaeological resources must cease alteration of the site immediately and engage a licensed consultant archaeologist to carry out an archaeological assessment, in compliance with Section 48(1) of the *Ontario Heritage Act*. • The *Funeral, Burial and Cremation Services Act*, 2002, S.O. • 2002, c.33 requires that any person discovering human remains must cease all activities immediately and notify the police or coroner. If the coroner does not suspect foul play in the disposition of the remains, in accordance with Ontario Regulation 30/11 the coroner shall notify the Registrar, Ontario Ministry of Public and Business Service Delivery, which administers provisions of that *Act* related to	• Effects are assessed as not significant and so no monitoring programs are proposed for Cultural Heritage." As noted above in Comment 10, a CHER must be completed for the Dawson Trail in order to determine if an HIA is necessary. If an HIA is necessary, the HIA will assess the impacts of the Project on the Dawson Trail's identified heritage attributes and will provide detailed mitigation recommendations.

#	Document, Section and Page Number	Comment	Request/Recommendation	Hydro One Response
		Timing Duration Ongoing during Construction Criteria • Built Heritage Resources and Cultural Heritage Landscapes Objective • n/a Method • Heritage attributes as they relate to the identified heritage resources will be identified and evaluated under Ontario Regulation 9/06 in a Cultural Heritage Evaluation Report (CHER). Project effects to cultural heritage resources will be assessed through the completion of a Heritage Impact Assessment. Effects are assessed as not significant and so no monitoring programs are proposed for Cultural Heritage. Timing duration • n/a	burial sites. In situations where human remains are associated with archaeological resources, the Ministry of Citizenship and Multiculturalism should also be notified (at archaeology@ontario.ca) to ensure that the archaeological site is not subject to unlicensed alterations which would be a contravention of the Ontario Heritage Act. Timing Duration • Ongoing during Construction Criteria • Built Heritage Resources and Cultural Heritage Landscapes Objective • n/a Method • Heritage attributes as they relate to the identified heritage resources will be identified and evaluated under Ontario Regulation 9/06 in a Cultural Heritage Evaluation Report (CHER). Project effects to built heritage resources and cultural heritage landscapes resources will be assessed mitigated by adhering to the recommendations of the CHEC/PIA through the completion of a Heritage Impact Assessment. Effects are assessed as not significant and so no monitoring programs are proposed for Cultural Heritage. Timing duration - n/a	

Table 12: Ministry of Environment, Conservation and Parks - Kristen Braun and Rachel Hepburn - Environmental Officers, Thunder Bay District – July 6 2023

#	Document, Section and Page Number	Comment	Request/Recommendation	Hydro One Response
1	Section 6.1.7.1 6.1-15	Dewatering of an area (including groundwater and storm water) for construction purposes is subject to eligibility criteria included in the water taking Environmental Activity and Sector Registry (EASR) regulation. The prescribed activity also covers the treatment and discharge of water that is taken. No Permit to Take Water or Environmental Compliance Approval (ECA) is required for these activities. There are limits and reporting requirements outlined within the EASR.	n/a	Comment noted. Regulatory requirements for dewatering are noted in Sections 6.3.7.2 and 6.3.7.8 of the Final EA and will be included in the mitigation measures of the Groundwater Dewatering and Discharge Plan.
2	Section 6.1.7.2 6.1-16	Blasting and Communication Management Plan was discussed. Reference should be made to Ministry of the Environment, Conservation and Parks (MECP) Publications NPC-115 and NPC-118 for source-based noise limits and to NPC-119 and NPC-207 for receptor-based limits due to impulsive vibration from construction activities such as blasting and pile driving. The District is requesting a copy of the Plan be submitted for review.	n/a	A reference to NPC-118 will be added to the noise section of the EA. Based on discussion with the MECP on July 20th, the vibration assessment would continue to consider those presented in the EA, provided rationale was included in the EA. The EA has been updated to include additional information why these were appropriate. The Blasting and Communication Management Plan that will be prepared prior to construction will follow the applicable criteria.
3	Section 6.7.7.1 6.7-14	Slash pile burning may be required during the construction phase. Notification to the local fire department is recommended prior to burning.	n/a	Comment acknowledged. Notification will be provided to local fire department in advance of burning activities.
4	Section 6.7.7.1 6.7-22	The use of two diesel generators were mentioned. An ECA or an EASR (under Ontario Regulation 245/11) may be required.	n/a	Hydro One or their contractor will obtain required approvals and/or registrations for onsite diesel generators for the project work camps.
5	Section 6.1.7.3 6.1-16	Sediment erosion control would be required during vegetation clearing, at water crossings, and/or when working near water. Refer to comments provided by the surface water technical staff.	n/a	The Final EA Report includes erosion and sediment controls as mitigation measures for disturbance of productive soil areas during construction (Section 6.1.7.3), changes to soil productivity due to soil mixing, erosion and/or compaction (Section 6.1.7.5) and clearing and working near waterbodies (Section 6.2.7 and Section 6.6.7). The EPP will also include an Erosion and Sediment Control Plan which will contain these mitigation measures along with specific measure to use when clearing vegetation or working near waterbodies.
6	Section 6.1.7.3 6.1-16	Construction camps were noted within this section. There was no mention of how sewage or domestic garbage was to be handled. Sewage generated over 10,000 L/day will require an ECA under Section 53 of the Ontario Water Resources Act.	n/a	The Waste Management and Disposal Plan will be included in the EPP. The Waste Management and Disposal Plan will outline waste management procedures to be implemented for the Project during construction. This plan will include management of hazardous wastes and non-hazardous wastes and will be based on industry standard best practices, and past project experience. The Waste Management and

#	Document, Section and Page Number	Comment	Request/Recommendation	Hydro One Response
		Section 6.3.7.7 refers to the containment and treatment of sewage prior to on-site discharge via an approved system. The Waste Management Plan discussed in Section 6.1.7.6 should include a section on how construction and domestic waste shall be handled. A description of waste generated, timing of removal, and destination of final waste needs to be discussed. The District is requesting a copy of the Waste Management Plan be submitted for review.		Disposal Plan will incorporate any additional Project or regulatory requirements as appropriate. The final EA includes multiple potential camp locations. Only three locations are expected to be required during construction. Once the camp locations are finalized and the land use permits are issued from MNRF, Hydro One will apply for any required ECAs. Further, a Qualified Professional will design each septic field.
7	Section 6.1.7.4 6.1-17	Spill and Emergency Preparedness and Response Plan was discussed. This should also include how the contractor will manage, store and handle fuel, with a description of how and where wastes from spills will be disposed of. The District is requesting copies of these plans be submitted for review and awareness. Ontario Regulation 675/98 speaks to spill exemptions. The Spills and Emergency Preparedness Plan should discuss what classifies as a reportable spill. Note, that although spills less than 100 L in restricted areas from public access, and spills less than 25 L in areas with public access are not required to be reported, this does not exempt the spiller from clean up of the spill forthwith and file a record of the cleanup. If there is confusion on what to report to Spills Action Centre, best management practice would be to report all spills.	n/a	The suggested information will be included in the Spill and Emergency Preparedness Plan as part of the EPP which will be provided to the District for review.
8	Section 6.1.7.6 6.1-18	Waste Management and Disposal Plan was discussed. The District is requesting that specific receiving disposal sites be described in the Plan and a copy of the Plan be submitted to the District for review.	n/a	The Waste Management and Disposal Plan will include the specific receiving disposal sites. This plan will also be provided to the District for review.
9	Section 6.1.7.6 6.1-18	Soil Management Plan was discussed. The Excess Soil Regulation (Ontario Regulation 406/19) may apply if the contractor is planning on removing greater than 100 m3 of soil from a project area and transporting off-site. The Soil Management Plan must discuss whether areas of the project fall under the Excess Soil Regulation.	n/a	The Soils Management Plan in the EPP will note that if excess soil is produced, materials will be managed in accordance with O. Reg 406/19 as required. Based on current plans, excess soil production is not anticipated.

#	Document, Section and Page Number	Comment	Request/Recommendation	Hydro One Response
10	Section 6.1.7.6 6.1-18	Should species at risk be identified within or near the proposed site during the construction, the proponent is directed to complete an Information Gathering Form and Avoidance Alternatives Form. This may require the proponent to also obtain an Overall Benefit Permit (OBP) under clause 17(2)(c) of the Endangered Species Act. Construction within an area of identified Species at Risk may also be limited due to Species' timing windows. These restraints will be outlined within the OBP.	n/a	Comment acknowledged. Potential effects, mitigation measures, including potential permitting requirements are described in Section 6.5. In addition, wildlife encounters will be addressed in the Wildlife Management Plan of the EPP.
11	Section 6.3.7.5 6.3-17	Area of influence from construction sites is estimated to be approximately 300 m from the project boundary. Blasting events have the capacity to temporarily increase the sediment levels in wells within the area of influence. Best management practice may include completion of pre- and post-construction well sampling, specifically for total suspended solids.	n/a	Comment acknowledged. Hydro One will work with private landowners to identify nearby wells with the potential to be affected by the Project, including shallow dug wells, and ways in which construction activities and locations can be modified to reduce those effects, including avoiding excavation and blasting near private wells. In the event of well interference as a result of the Project, Hydro One will work with the landowner to provide alternative water supply.
12	Section 6.7.7.1 6.7-14	Notification to the local fire department and Ministry of Natural Resources office will be required before slash pile burning can proceed.	n/a	Comment acknowledged. Notification will be provided to local fire department in advance of burning activities.
13	Section 6.7.7.1 6.7-22	ECA or EASR approvals (under Ontario Regulation 245/11) may apply for the use of onsite diesel generators.	n/a	Hydro One or their contractor will obtain required approvals and/or registrations for onsite diesel generators for the project work camps.

Table 13: Ministry of Environment, Conservation and Parks - Andrew Williams, Senior Environmental Officer, Kenora Area Office – July 5, 2023

#	Document, Section and Page Number	Comment	Request/Recommendation	Hydro One Response
1	6.4 49	Potential Soil Quantity and Quality changes -What is the expectation for excess soils management (O. Reg 406/19)? It is unclear if stockpiled soil will be removed from site, reused, or if soils need to be taken off site (especially along highways corridors).	n/a	Stockpiled soil will be stored on site and respread across the site as part of reclamation activities. Hydro One and its contractor will comply with all requirements of O. Reg. 406/19, including the on-site management and reuse/disposal of soil. It is anticipated that stockpiled soil from the ROW construction will be stored on site and respread across the site as part of reclamation activities. A Soil Management Plan will detail management of excess soils in accordance with regulations (O.Reg 406/19) and specify criteria to be met in order to re-use soils on the Project site, including the ROW and transformer stations. The Soil Management Plan will also detail requirements for management and reuse/disposal of soils which need to be removed from the Project site in accordance with O. Reg. 406/19.
2	2.2-21	Consult with the MECP's Species at Risk Branch. Cutting windows for vegetation will be an important factor moving forward in the project**. Note that short-eared owl is now a threatened species in Ontario (as of this year).**	n/a	Section 6.5.7 of the EA has been updated to include permitting requirements where vegetation removal within SAR habitat cannot be avoided during the appropriate timing windows. Section 6.5.3 of the EA has been updated to provide rationale for why short-eared owl was not included as a criteria to be carried forward in the assessment.
3	6.4-65	Mitigation Measures: existing trails will be used as much as possible. This does not seem to be the case within the digitized product. There are many new and preferred routes nearby existing trails which would have a similar travel time. New routes need to be justified in order to minimize environmental impact.	n/a	Access has been developed to use existing roads and trails to the extent practicable. Many trails that are visually discerned in the digitized product are not developed for construction use. Trails that do not form part of the access plan are traversable only by tracked equipment (nodwells) and quads, which will not support construction traffic. There is no roadbed in place and an entirely new subgrade would need to be constructed. In addition to there not being an existing roadbed to support construction equipment and vehicles, the trails are not horizontally and vertically designed for construction use; the grades and grade breaks are too steep and the curves will not accommodate heavy hauls. In the construction of a transmission line, construction equipment requires high-grade road access to every tower. Therefore, constructing along the new right-of-way also results in the shortest overall road length. The access plan has used as much of the existing infrastructure practicable while keeping the new road optimally at its shortest length.

#	Document, Section and Page Number	Comment	Request/Recommendation	Hydro One Response
4	6.4 65	Use of herbicides and pesticides under review. With whom? These pose a potential for adverse impact and need to be reviewed by our technical specialists. This is critical, especially where construction zones are close to waterbodies (e.g., Herb lake).	n/a	Through engagement during the Draft EA Report review process, Hydro One heard feedback from Indigenous communities and stakeholders regarding concerns with the use of herbicides to remove and manage vegetation on the Project. After extensive consideration of this feedback, herbicides will not be used during construction of the Project or for future maintenance of this transmission line. The Final EA Report has been updated to reflect this.
5	6.3 77	Regarding construction camps. What are your plans for sewage? Typically, camp sites will have shallow buried trench systems or similar to provide basic treatment of sewage from the camp. Please clarify whether these camps will be overnight.	n/a	Once camp locations are finalized and land use permits are issued from MNRF, Hydro One or their contractor will apply for an Environmental Compliance Approval for each septic field required. A Qualified Professional will design each septic field. The construction camp will support overnight accommodation for workers; each camp will be designed to house, at peak construction periods, up to 350 people.

Table 14: Ministry of Environment, Conservation and Parks - Katie Zwick, Project Manager, Climate Change Policy Branch, Climate Change and Resiliency Division – July 4, 2023

#	Document, Section and Page Number	Comment	Request/Recommendation	Hydro One Response
1	Section 6.8 Greenhouse Gas Assessment, May 2023, Page 6.8-2 Section 6.8.2, Page 6.8-3	Reference should be made to *Considering climate change in the environmental assessment process*, https://www.ontario.ca/page/considering-climate-change-environmental-assessment-process (hereinafter "Ontario guide") and https://ero.ontario.ca/notice/012-5806	n/a	Reference to the Ontario guide has been added to Section 6.8 on page 6.8-2. For Section 6.8.2: Information Sources, reference to the Ontario guide was not added because this section is referring solely to baseline GHG information that was pulled from the National Inventory Report and does not relate to the methods used to consider climate change in EAs.
2	Section 6.8 Greenhouse Gas Assessment May 2023 Appendix 6.8A Greenhouse Gas Calculation Methodology	Scope of MECP staff review of GHG assessment: Staff were not able to reproduce/ review calculations as full data and calculations were not provided. Consider noting where / how detailed data, calculations and assumptions can be obtained/ reviewed.	n/a	This information, including all inputs and sample calculations, was provided in Appendix 6.8-A of the draft EA and will remain in the final EA.
3	Section 6.8 Greenhouse Gas Assessment May 2023 Table 6.8-9, page 6.8-13 Table 6.8-10, page 6.8-14	Unclear why the Electricity Consumption row contains "-" for construction stage emissions but then includes values in the Total column for that row. Please clarify in the document.	n/a	The emission factor for electricity consumption is directly for CO_2 equivalent emissions; therefore, CO_2, CH_4, and N_2O emissions are not calculated separately. A note has been added to the bottom of Tables 6.8-9 and 6.8-10 in the final EA to clarify this.
4	Appendix 6.8A Greenhouse Gas Calculation Methodology Appendix_3.0-C_Climate_Analysis.pdf (hydroone.com) Table 1.8-2, page 1.8-2, Applicable Guidelines for Estimation of Greenhouse Gas Emissions	Reference should be made to the Ontario Guide (see above).	n/a	Reference to the Ontario Guide has been added to Table 1.8-2 of Appendix 6.8-A (Greenhouse Gas Calculation Methodology) in the final EA. Appendix 3.0-C (Climate Change Analysis) references the Ontario Guide in Section 1.1.

#	Document, Section and Page Number	Comment	Request/Recommendation	Hydro One Response
5	Appendix 6.8A Greenhouse Gas Calculation Methodology Table 1.8-3: Emission Source Categories Included in the Greenhouse Gas Reporting Program, Intergovernmental Panel on Climate Change, The Greenhouse Gas Protocol, and Assessed in the Application	A column should be included for the Ontario Guide (see above), which does include land use change as an emission source category. See s. 3 of the Ontario Guide.	n/a	A column has been added to Table 1.8-3 in Appendix 6.8A (Greenhouse Gas Calculation Methodology) to include the Ontario Guide requirements in the final EA.
6	Section 5.0 Environmental Assessment Approach Page 5.1-1	Please include reference to the Ontario Guide (see above).	n/a	Reference to the Ontario Guide has been added to Section 5.0 (Page 5.1-1) of the final EA.

Table 15: Ministry of Environment, Conservation and Parks - Heather Hawthorne, Senior Policy Advisor, Adaptation and Resilience Branch, Climate Change and Resiliency Division – July 6, 2023

#	Document, Section and Page Number	Comment	Request/Recommendation	Hydro One Response
1	Executive Summary Page 1	In the general description of what the EA covers, there is no mention of consideration of the effect of climate change on the project. Overall comment on the summary: There's no mention of evaluation of the potential effects of climate change on the project, either in construction or ongoing implementation.	n/a	A sentence has been added to the Executive Summary (Page 1) to explain that the EA considers both the effect of the Project on climate change (i.e., greenhouse gas emissions), as well as the impact of climate change on the project (i.e., the resilience of the project to a changing climate).
2	Draft EA, section 1, introduction 1.1.1	No mention of consideration of the effects of climate change on the project.	n/a	A sentence has been added to the Section 1 (Page 1.1-1) to explain that the EA considers both the effect of the Project on climate change (i.e., greenhouse gas emissions), as well as the impact of climate change on the project (i.e., the resilience of the project to a changing climate).
3	Section 1.8-25	Description of the EA does not refer to consideration of the impact of the project on climate change or the impact of climate change on the project.	n/a	Sentences have been added to Section 1.0, and 1.8 to indicate that the EA considers and assessed the impacts of the Project on climate change, as well as the impacts of climate change on the Project.
4	Section 2.2-21	Description of GoldSET alternative route analysis process, multi-criteria analysis. Talks of 34 criteria and 103 indicators including categories for natural environment. <u>Comment:</u> There is no mention or consideration in this analysis for the potential impact of climate change on the project. Was this considered as part of impact to the natural environment when evaluating alternatives?	n/a	The criteria and indicators included in the alternative route evaluation were provided and approved as part of the Amended ToR. In addition, no feedback was received during engagement on the criteria and indicators throughout the EA stage regarding the inclusion of a climate change criterion. As such, a separate criterion was not included in the EA. Please refer to the response to Comment #3 on how climate change was considered in the EA.
5	Section 3, project description 3.3-11	Section on waterbody crossings during construction. "Sediment and erosion control measures will be installed prior to commenting construction activities". After construction waterbody banks will be returned to their original profile and disturbed areas will be stabilized to prevent soil erosion. <u>Comment:</u> Do sediment and erosion control measures during construction include planning for the possibility of extreme rain as a result of climate change? That is, can the proposed erosion controls handle an extreme rainfall event?	n/a	Section 1.1.10 of Appendix 3.0-C of the Final EA notes that the Soil Management Plan will consider impacts from extreme rainfall, flooding and high winds. Erosion and sediment control measures also include avoidance measures (e.g., avoiding or minimizing work during weather events (Section 6.6.7.7.2).

#	Document, Section and Page Number	Comment	Request/Recommendation	Hydro One Response
6	Section 3.7.3	Fire safety and prevention. All work will adhere to the Forest Fires Prevention Act (1990) which provides direction for the prevention and suppression of wildland fires in forested area within the fire region during fire season, normally April 1 – Oct. 31. Comment: Are additional safety precautions and planning measures anticipated or needed as a result of current potential increased risk of drought and forest fires caused by climate change?	n/a	As part of the EPP, a Fire Prevention Plan will be prepared which will include mitigation measures such as: • implementing appropriate protection measures (e.g., use of fire-resistant mats or wetting down the area prior to work commencing, etc.), if the fire hazard is high, • maintaining an adequate supply of fire-fighting equipment on hand as regulated by provincial regulations and government agencies, • ensuring each vehicle is carrying fire-fighting equipment (e.g., fully charged fire extinguisher, shovel) required by the Fire Protection and Prevention Act, • maintaining a fire watch and/or reduced hours of work as appropriate during high fire hazard situations, and, • .following all Fire Orders as implemented by MNRF The comprehensive Fire Prevention and Preparedness Plan will be in place for the Project to address fire prevention, preparedness and emergency response procedures.
7	Section 3.7.5	Climate change considerations. Provides a short description of possible impacts of climate change on the long-term operation and maintenance of the transmission line. Hydro One will mitigate the effects of climate change on the project through applying safety factors into the design process; conducting routine inspections of the line; implementing its existing emergency response plans. Comment: Consider building into contingency planning for soil and sediment erosion during construction as well as spill prevention in order to respond to them quickly if they happen.	n/a	An Environmental Protection Plan will be prepared prior to construction. It will include a Soil Management Plan that will include soil erosion mitigation measures and a Spill and Emergency Preparedness and Response Plan to mitigate accidental spills.
8	Section 5.1-1	Section provides a short description of how the EA was developed to satisfy regulatory requirements and is based on the Code of Practice: Preparing and Reviewing EAs in Ontario. Comment: Consider expanding on this to include reference to the MECP's guide on considering climate change in the environmental assessment process, 2017, a companion the ministry's codes of practice.	n/a	Reference to the Ontario Guide has been added to Section 5.0 (Page 5.1-1)

#	Document, Section and Page Number	Comment	Request/Recommendation	Hydro One Response
9	Section 10.0 Monitoring and Commitments	This section reviews commitment to developing mitigation measures, monitoring programs and management plans to ensure minimal impact to the environment through all phases of the project including construction, operation, and retirement of the project. Contingency plans will include soil management, spill and emergency preparedness and response plan, and erosion and sediment control plans. Comment: there is opportunity to acknowledge the potential impact of climate change on construction activities that might have implications for the management and preparedness plans listed above. For example, extreme rain and flood events should be considered for erosion control plans. Drought and wildfires should be considered in emergency preparedness plans.	n/a	A sentence has been added to Section 10.2.2 to indicate that the plans listed will consider the impacts of climate change to provide procedures that will remain effective in a changing climate. An example was provided that indicated the consideration for precipitation and drought events in the erosion and sediment control plan.
10	Appendix 3.0-C Climate Analysis Report	Note for reference. The project ToR simply states that climate change adaptation will be considered as part of the assessment (potential effect of climate change on the project). Comment: the report does not appear to address how the project will or will not affect the environment's ability to adapt to climate change. Even if there is overall minimum impact anticipated, there is opportunity to make the statement more explicit.	n/a	A new section (Section 1.1.11) has been added to Appendix 3.0-C (Climate Analysis Report) to address the impact of the Project on the environment's ability to cope with climate change.
11	Section 1.1-1	Description of the climate analysis report includes reference to the MECP's "considering climate change in the EA process" guidance and cites 2021 as the year of that guidance. The guidance document was published in 2017. Section describes Hydro One's overall commitment to developing its own climate adaptation plan corporately. Assessment uses projection data used in Hydro One's corporate adaptation plan.	n/a	Reference to the date that the MECP's climate change guide was published was changed to 2017, both in text and in the references list.

#	Document, Section and Page Number	Comment	Request/Recommendation	Hydro One Response
		Comment: Good acknowledgement and description of the possibility of future climate change impact hazards and characterization of which hazards were used to conduct and exposure analysis. Focus is on the ongoing and long-term operation and maintenance of the transmission line. Good documentation of the process used to project future climate conditions. Good description of potential impact of future climate change risks on operations and maintenance of equipment.		
12	Section 1.1-13	Good documentation about Hydro One's plans to prepare for possible future climate change impacts through engineering and design standards; and through operational process to manage climate risks and grid resiliency. Plans include emergency management. Comment: This chapter provides a thorough review, assessment, consideration of potential impacts of climate change on the long-term operation and maintenance of the transmission line. However, the chapter does not anticipate or discuss the possible impact of extreme weather events on the construction phase of the project. Are contingency plans in place?	n/a	When assessing the resilience to climate change, construction is not considered to the same extent as operations due to the short-term nature of construction. However, there will be contingency and management plans outlined in the Environmental Protection Plan (EPP) that will be prepared prior to construction. This EPP will mitigate impacts to the environment from extreme weather events. For example, the Soil Management Plan, to be included in the EPP, will consider impacts from extreme rainfall, flooding, and high winds. The EPP will also include snow management measures that will mitigate not only potential safety hazards associated with snow, but also impacts to soil, vegetation and wildlife from snow clearing. An Emergency Response Plan will be developed for construction that will incorporate the potential impacts of extreme events.

Table 16: Ministry of Environment, Conservation and Parks, Environmental Assessment Branch, Stephen Deneault, Project Officer

#	Document, Section and Page Number	Comment	Request/Recommendation	Hydro One Response
1	General	**Glossary of Terms and Acronyms** The main EA report should include a glossary of technical terminology, and a list of all acronyms and abbreviations used throughout the document.	Include a glossary of terms and list of acronyms and abbreviations in the final EA.	An acronyms list was included with the Table of Contents in the Draft EA report and is included in the Final EA report. A glossary of technical terminology is also included in the Final EA report.
2	Section 3.3 Project Components	**Description of the Undertaking** The draft EA includes a description of the project components, including illustrations of tower structures and temporary construction camps/lay-down areas. Example illustrations, approximate locations, and detailed descriptions of all project components (i.e. construction office facilities, aggregate pits, helicopter pads, etc.) should be included to better understand their size and impact in the proposed project. Differentiations between permanent and temporary project components should be clear. Where project components are listed as temporary, descriptions of decommissioning activities should be as detailed as possible.	Update descriptions of project components to include more detail on ancillary project components and clarify temporary vs. permanent infrastructure.	Comment acknowledged. Additional details have been included in the Final EA.
3	Section 2.2.2 Separation of Circuits F25A and D26A	**Description of alternative method** Where alternative method "*Separation of circuits F25A and D26A*" is described, the section refers the reader to Section 3.3.3; Project Description in the EA Report, which indicates that the type and extent of work associated with expansion, installation, and removal, of these works "*will be determined and confirmed during detailed planning*". There should be a full evaluation of the alternative methods (including potential effects, impact management, net effects, advantages/disadvantages) and this needs to be considered and documented in the EA. It is also not appropriate to defer some of the explanation in section 2.2.2 on an alternative method to another section of the EA report (section 3.3.3).	Revise the description of alternative method 2.2.2 to include more detail on the extent of work, potential effects, impact management, net effects, advantages/disadvantages etc.	Comment acknowledged. Additional details have been included in the Final EA.

#	Document, Section and Page Number	Comment	Request/Recommendation	Hydro One Response
4	General	List of Studies The studies that were done in connection with the undertaking are mentioned throughout the main EA report, however, there should be a consolidated list of all studies in the EA. In accordance with Regulation 334 of the *Environmental Assessment Act* (EAA), and section 4.3.2 of the EA Code of Practice, the EA must contain: • A list of studies and reports, which are under the control of the proponent and were done in connection with the undertaking or matters related to the undertaking; and, • A list of studies and reports done in connection with the undertaking or matters related to the undertaking of which the proponent is aware and that are not under the control of the proponent.	Please summarize the list of studies and reports undertaken in connection with the undertaking and include in the final EA. These lists can be included in an appendix.	Comment acknowledged. A list of studies has been included in the Final EA in Appendix 5.0-A.
5	Sections 7.7 First Nations Rights and 7.8 Métis Rights	**Indigenous Consultation** There are instances that Hydro One has indicated that IK wasn't available at the time of the circulation of the draft EA. Because of this, a full review will be required once Hydro One has considered all IK submissions. It would also be prudent for Hydro One to consider all applicable permitting/approvals during the EA and a consultation plan to address upcoming consultation opportunities for Indigenous communities and groups.	Please provide IK and comments from Indigenous groups on the draft EA as they become available to Hydro One for ministry awareness and review.	Comments from Indigenous communities and Hydro One's responses are included in Appendix 4.0-A in the Final EA Report. Given the sensitive and confidential nature of IK, the IK reports are not planned to be shared with the Ministry. Information from these reports have been included throughout the Final EA Report based on engagement with the respective Indigenous communities.
6	Section 1.7.1.1 Environmental Assessment Requirements	**Terminology** Where it reads "*This draft EA report was prepared in accordance with the approved amended ToR*." Be cautious with this language in the EA report. It is the ministry that assesses whether the EA has been prepared in accordance with the approved amended ToR and the EAA and publishes a Ministry Review of the EA before a decision.	Please remove/revise this statement and others like it throughout the EA report.	Comment acknowledged. The wording in this section has been updated to, "*This Final EA Report was prepared based on direction from the approved amended ToR*."
7	Section 3.4.3 Retirement	**Project Life-cycle**	The EA report should be revised to contain detailed information on life-cycle planning, including what	The following additional information on maintenance activities that are covered under the Project have been included in the Final EA report.

#	Document, Section and Page Number	Comment	Request/Recommendation	Hydro One Response
	And; Section 5.3.2 Temporal Boundaries And; Section 1.7.1.2 Provincial Class Environmental Assessments	Where it reads in section 3.4.3 that: "*The Project will be operated for an indeterminate period and retirement, or decommissioning, is not anticipated. The new transmission line and related facilities would undergo regular maintenance in adherence with Hydro One's maintenance standards and regulatory requirements to maintain a safe and reliable electricity transmission system. The timing of retirement, or decommissioning, is not known at this time as it is anticipated that upgrades to reinforce or rebuild portions of the Project may occur over its lifetime to maintain its longevity*." And; Where it reads in section 5.3.2: "*The Project will be operated for an indeterminate period. The new transmission line and related facilities would undergo regular maintenance in adherence with Hydro One's maintenance standards and regulatory requirements to maintain a safe and reliable electricity transmission system. It is anticipated that upgrades to reinforce or rebuild portions or all of the Project may occur over its lifetime to maintain its longevity, and these projects would be subject to their own environmental regulatory requirements. Therefore, the timing of retirement, or decommissioning, is not known at this time."* The information provided in these sections does not provide enough detail as to what Hydro One's regular maintenance standards and requirements are, or what maintenance/longevity activities would be subject to environmental regulatory requirements, and what those requirements could be. The EA for the proposed project must provide sufficient information on the entire life-cycle of the undertaking (i.e. construction, operation, and retirement/decommissioning). Refer to EA Code of Practice sections 3.3 and 4.2.5 for what needs to be included as a part of the EA approval.	processes and regulations would apply during long-term operational maintenance of the project and its potential retirement.	Maintenance of transmission lines is required to ensure acceptable performance of the line components over time and to repair damage due to accidents or unusual climatic conditions. This involves periodic patrols and/or inspections. Specific maintenance programs have been developed and are carried out on a regular basis. Routine maintenance involves planned repairs of a localized nature, which usually take over one-half to one day to complete, are carried out to avert potential problems. These repairs may require trucks to be moved to the repair site. The frequency of such repairs is approximately once each year for every 160 km of line. There are also larger maintenance activities such as conductor, shieldwire, pole, insulator replacement, etc. These items are usually of such a nature as to permit long-range planning, and they can usually be scheduled to minimize inconvenience to property owners. Emergency repairs are needed when assets are out of service or in response to an imminent risk of failure (but are not yet out of service) presenting the potential risk of a power disruption or safety or environmental hazards. Emergency repairs, which may include replacement of structures, must be carried out as quickly as possible. It may take several days to replace damaged structures. Heavy equipment and materials are usually required to replace structures during emergency situations, and mitigating measures will be taken as soon as possible to repair any damage. Right-of-way management practices reflect provincial legislative requirements and are designed to ensure the long-term safety and reliability of the line and protection of the environment. Management practices are carried out in accordance with general and site-specific management specifications, which identify the best treatment methods (see Section 3.4.2.3). In most cases, transformer stations, including those related to the Project, are unattended and are operated remotely from a district/provincial control centre. Maintenance personnel make periodic inspections and can be dispatched to the station in the case of an emergency. In stations where attendance is required, working facilities are provided within the control, meter and relay area. The Project will be operated for an indeterminate period and retirement, or decommissioning, is not anticipated. The new transmission line and related facilities would undergo regular maintenance in adherence with Hydro One's maintenance standards and regulatory requirements to maintain a safe and reliable electricity transmission system. The timing

#	Document, Section and Page Number	Comment	Request/Recommendation	Hydro One Response
		It is not clear in section 1.7.1.2 of the main EA report if any Minor Transmission Facilities (MTF) Class EA requirements apply to the project with regard to refurbishment and retirement. The EA report should also detail what process would be followed by Hydro One in the event of an emergency during operation (E.g. emergency repairs of the transmission line).		of retirement, or decommissioning, is not known at this time as it is anticipated that upgrades to reinforce or rebuild portions of the Project may occur over its lifetime to maintain its longevity. Should a decision be made to decommission the Project in the future, a detailed review of the potential effects and mitigation measures will be completed. These activities will be planned and conducted in accordance with the relevant standards and regulatory requirements in effect at that time. The potential effects and mitigation measures to be identified during the EA for the construction of the Project will likely equally apply to the potential removal of the Project at a future point in time, should it ever be required. As such, the Class EA for Minor Transmission Facilities would not apply to the retirement of this Project as the EA requirements would be covered by the current EA for the Project. The refurbishment as defined by the Class EA for Minor Transmission Facilities (Hydro One 2022) or rebuild of the Project is not covered as part of this EA and the Class EA for Minor Transmission Facilities would be applied if this were to be required in the future.
8	Executive Summary, page ES-14 And; Section 4.6 Ongoing Engagement	**Ongoing Engagement** Where it reads: "*A Communications Plan will be implemented that will set out standards regarding communications on Project updates and community relations, such as providing advance notice of construction activities*." The communication plan is not mentioned again in section 4.6 of the EA Report which speaks to ongoing engagement with the project. Detailed information of the communication plan should be provided. As per section 4.3.7 of the EA Code of Practice, if appropriate, an EA may also include a plan for ongoing consultation during construction, operation and/or decommissioning/closure, should approval to proceed with the undertaking be given. While information on certain communications may not be none at this time, the EA should contain basic information as to how interested stakeholders are to be notified, and when	Include details on the any future/ongoing consultation plans in the EA report, including the timing of notification about construction activities, and the means of communication (website, newspaper, mail-out notification, etc.).	Comment acknowledged. Additional details have been included in the Final EA.
9	Section 3.5 Project Schedule	**Project Schedule and Construction Windows** Where it reads: "*Construction activities are expected to occur throughout the year with staging to avoid or minimize potential effects on environmentally sensitive areas or wildlife*	Please clarify and include recommended timing windows for construction in the EA report. If exact construction windows cannot be determined at this time, there should be an explanation of when this will	The construction schedule for a long linear project is complex and dynamic. Generally, construction does not occur consistently throughout the entire construction period at any one location and different activities start and stop at different periods across the Project footprint. Additional details are included in the Final EA Report to

#	Document, Section and Page Number	Comment	Request/Recommendation	Hydro One Response
		breeding cycles (e.g., breeding bird period, fisheries windows, etc.), where possible. Specific timing, sequencing and staging will be determined during the detailed planning phase." Construction timing windows have not been described or estimated in the EA report with enough detail or certainty to demonstrate environmental protection/mitigation of net effects, or for community awareness. The EA should provide an appropriate level of detail as per section 3.2.6 of the EA Code of Practice.	be determined and communicated (i.e., is it a part of the communications plan mentioned above?).	outline this staging process and high-level scheduling. In addition, the sensitive timing windows applicable to the Project are described in the appropriate EA sections (e.g., terrestrial wildlife windows are described in Section 6.5 Wildlife and Wildlife Habitat).
10	Section 10.2 Environmental Protection Planning	**Mitigation Measures** Site-specific mitigation measures are described generally throughout the draft EA report in a format that makes it difficult to track and evaluate all mitigation measures committed in the EA. Section 10 of the draft EA report is about Monitoring and Commitments, and section 10.2 explains that an Environmental Protection Planning (EPP) living document will be prepared to: "*Identify and document environmental concerns and appropriate mitigation measures for each Project activity*". It is not clear what information or mitigation measures the EPP will contain, and how implementation of the EPP will avoid or mitigate adverse effects of the project. It is also not clear that Hydro One must commit to implementing the EPP. The impact management measures that will be used to reduce the negative environmental effects must be provided in the EA to ensure all effects of the project have been considered and mitigation measures have been committed to. Please refer to section 4.2.4 of the EA Code of Practice. Section 10.2.2 of the EA report lists multiple contingency plans, management plans, and construction execution plans that are not presented elsewhere in the EA. At a minimum, draft or conceptual plans should be described at an appropriate level of detail.	All mitigation measures for the project need to be presented in the EA report. The EPP should be circulated with the final EA report so the ministry can better understand project mitigation to ensure appropriate compliance and monitoring.	Mitigation measures presented in the Final EA report will reflect those that will be included in the EPP and are considered a fulsome list of measures to avoid or limit adverse effects on the environment. The mitigation measures included in the Final EA report will form part of the EA approval for the Project and will be required to be implemented. Section 10.2 will also be updated as follows "An EPP will be developed **and implemented** for the Project…" The EPP and associated contingency/construction plans discussed in the Final EA can be provided to agencies for review and input at least 90 days in advance of construction and Hydro One commits to providing the necessary information to support agency review of permit applications, when they are submitted. Additional high-level details are included in Section 10.2.2 of the Final EA Report to outline the scope of each of the plans listed.

#	Document, Section and Page Number	Comment	Request/Recommendation	Hydro One Response
11	Section 10.3 Environmental Commitments	**List of Commitments** The list of commitments made during the planning of the EA, referred to as *Appendix 10.0-A*, was not included. It is also not clear how the commitments from the approved ToR have been met. As per section 4.3.3 of the EA Code of Practice, proponents are required to present in the EA a tabular summary of the requirements of the approved ToR and where in the EA they are discussed.	Include a list of commitments made during the EA, and a tabular summary of the ToR commitments and how/where they were met in the EA report. Please ensure all applicable appendices and referenced information is included in the Final EA.	Comment acknowledged. A list of commitments made during the EA as well as a table summary of how ToR commitments were met will be included in the Final EA.
12	Section 11.3 EA Amendment Procedure	**Limits of Work and Change Management** The draft EA contains an amendments procedure in section 11.3, and Hydro One lists the steps to follow for proposed changes within a defined "limits of work", and a procedure for proposed changes outside of the defined limits of work. The proposed limits of work are listed in section 11.3.1.2. For changes to the project within the limits of work, Hydro One has proposed applying all mitigation measures and monitoring requirements outlined in the EA. Section 11.3.1.3 explains that Hydro One will notify Indigenous communities and landowners when changes within the described limits of work are required and will mitigate concerns as reasonably as possible as they are raised. This section is unclear as to what notification would entail (i.e. consultation vs. notification, and by whom), and what mitigation measures would be committed to in this regard. For changes proposed outside of the limits of work, Hydro One has proposed in section 11.3.2 the steps Hydro One plans to follow for amending the EA; including; • Notifying the Director of EAB with a brief description of the change for MECP to confirm whether the change can proceed as an amendment.	The ministry requests a revised section 11.3 and a meeting with Hydro One to better understand the proposed roles for MECP in this amendment procedure, and the full details of what Hydro One is seeking in their EA approval before a final EA is submitted.	***This section is unclear as to what notification would entail (i.e. consultation vs. notification, and by whom), and what mitigation measures would be committed to in this regard.*** The intent of the limits of work is to be a notification and not formal consultation. However, any concerns will be taken seriously and Hydro One will work with the concerned parties to address their concerns to the extent practicable. Additional details can be added to describe the notification process. For Indigenous communities, Hydro One will be working collaboratively with Indigenous communities to develop a communication plan that will include notification requirements in more detail. For mitigation measures, these will be tied to the specific concerns received during the notification to Indigenous communities and landowners. The EA covers a broad range of mitigation measures to limit adverse effects for all environmental components and many could be applied to address concerns. However, Hydro One will consider additional site-specific mitigation measures through engagement with the concerned Indigenous communities and landowners. ***The above section provides no information on what were to happen if MECP determines that the change would not be considered an amendment and instead would trigger new EAA requirements.*** At that stage Hydro One would identify the applicable EAA requirements based on the change proposed and engage with MECP to confirm appropriate next steps. ***There is uncertainty around the nature and magnitude of changes outside of the proposed limits of work. Can Hydro One provide examples of what work would trigger an amendment to the EA?***

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		• If an amendment is determined, Hydro One will assess effects, identify mitigation measures, identify net effects and monitoring as necessary, and document the process as an EA amendment before circulating the amended EA for a 30-day comment period. Hydro One would then submit final documentation and the results of consultation to the EAB Director for review. MECP would then confirm whether or not the change can proceed as an amendment to the EA. The above section provides no information on what were to happen if MECP determines that the change would not be considered an amendment and instead would trigger new EAA requirements. There is uncertainty around the nature and magnitude of changes outside of the proposed limits of work. Can Hydro One provide examples of what work would trigger an amendment to the EA? It is also not clear what is meant by “refinements” in section 11.3. Are these minor or major changes to the undertaking?		Hydro One understands that if major changes to the EA were required that could change the conclusions of the EA then the amendment procedure would not be appropriate. In general, the amendment procedure is meant to cover minor changes where the conclusions of the EA are not expected to change but the changes are beyond the parameters set out in the limits of work. As an example, Hydro One continues to work with private landowners on concerns. There could be smaller, site-specific design refinements to resolve their concerns such as moving the transmission line to avoid a residence. The Project footprint to be included in the Final EA will already include many of those changes based on engagement work completed by Hydro One with the affected landowners to date. However, there are some cases where a decision on refinements have not yet been confirmed. As another example, the limits of work allows for the movement of the ROW, waterbody crossings and access roads but the other project components (e.g., camps and laydowns) are not afforded this flexibility. Conservatism has been included in the EA for these features, such as including a slightly larger footprint than necessary to accommodate shifts in the identified area as part of detailed design and also by identifying more sites than may be required. If a different camp or laydown areas is required outside of the already identified locations, then the amendment procedure would be applicable. Mitigation measures are already included for these features in the EA and, therefore, it is not expected that the conclusions of the EA would change and that these minor changes are appropriate to be covered under the limits of work. ***It is also not clear what is meant by “refinements” in section 11.3. Are these minor or major changes to the undertaking?*** Refinements for both the limits of work and amendment procedure are considered minor and would not be expected to change the conclusions of the EA. However, there may be interest from stakeholders in these changes which is why the notification requirements for the limits of work are included and the mandatory 30-day review period for changes outside the limit of work

Table 17: Ministry of Environment, Conservation and Parks, SARB, Michael Allan, Management Biologist – July 28 2023

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1	6.5 Wildlife and Wildlife Habitat Table 6.5-2 page 6.5 - 11	For your awareness, Barn Swallow, included in this document as a threatened species, has been down listed to species of Special Concern under the ESA (2007) O.Reg. 230/08 Species at Risk in Ontario List, as such, the species and its habitat are no longer protected under the ESA.	n/a	Thank you for this input. The EA document has been revised accordingly.
2	6.5.5.3 Gray Fox Page 5.3 - 32	*"Dens can be found in modified burrows of other animals, hollow trees, hollow logs, woodpiles, rocky outcrops, cavities under rocks, piles of brush, slab, wood or sawdust, and abandoned buildings (MECP 2019)."* MECP SARB recommends the proponent avoid tree clearing and heavy equipment disturbance within 100 meters where an active gray fox den has been identified during the denning period (February 15-July 15). If the proponent cannot operate outside of the recommended timing window, then an authorization under the ESA may be required.	n/a	There are no active gray fox dens currently identified within the Project study areas or Project footprint. It is understood that the ESA prohibits damaging or destroying den sites. MECP SARB does not have a standardized protocol for surveying for gray fox and identification of den sites. This discussion will resume during the permitting phase of the Project.
3	6.5.5.7 Little Brown and Northern Myotis 5.7 pages 46 - 51	Maternity roost habitat – MECP SARB recommends the proponent conduct tree and vegetation removal outside of the active season (May 1 – August 31). If the proponent chooses not to or cannot avoid clearing outside of the active season for SAR bats, then an authorization under the ESA may be required.	n/a	Comment is acknowledged and timing restriction is incorporated into the EA document (Section 6.5.7.7; Section 6.5.8 and Section 6.5.9)
4	6.5.5.12 Bank Swallow 5.12 - 70	*"Field surveys in 2022 documented 15 individuals at one nesting colony within the LSA."* Where is this in relation to the planned ROW? Was the nesting colony observed in an existing aggregate pit? If this habitat is to be removed, it will require an authorization under the ESA. If the pit is active, excavation is allowed outside of the nesting season providing the remaining face is suitable for nesting. In areas outside of an active nesting site, MECP SARB recommends aggregate slopes and stock-piles of soft materials suitable for bank swallow nesting be maintained at an angle <70 degrees to prevent nesting by the species. Where nesting colonies occur or when stock piling materials, MECP SARB recommends the proponent should	n/a	The nesting colony is near Ignace in the existing K&M Construction Aggregate Pit 15813. Approximately 7 ha of Category 3 habitat will be removed for construction of a laydown/camp area on the opposite side of the highway. An additional 3 laydown/camp areas are proposed within 1000 m of Category 3 habitat. The bullet point in Section 6.5.5.12 discussing the 2022 field survey results was updated to include the location. Updated mitigation measures under Section 6.5.7.12.1 and 6.5.7.12.6 to include BMPs, vegetation clearing timing windows, 500 m buffer and permit requirements (where timing windows are not adhered to). Bank Swallow candidate habitat locations are available in Attachment 6.5-B-13 of Appendix 6.5-B.

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		follow BMP for the protection and creation of bank swallow habitat		
5	6.5.5.13 Chimney Swift 5.13 - 70	Any candidate trees found within the LSA should be maintained where possible. If a candidate tree or occupied tree is required to be removed, then mitigation to avoid section 9 concerns is recommended by removing the tree outside of the active breeding bird season (April 15 – August 31). Should a nest tree require removal then an authorization under s.10 of the ESA may be required.	n/a	Vegetation clearing during the breeding bird timing window will be minimized to the extent practicable. If vegetation clearing is required during the breeding bird timing window then the necessary permitting will be completed. Section 6.5.7.13.1 has been updated to reflect the potential need for permitting where timing windows for vegetation clearing cannot be adhered to.
6	6.5.5.14 Bobolink 5.14 - 74	MECP SARB recommends that clearing any vegetation and grubbing occur outside of the active breeding bird season (April 15 – August 31).	n/a	Vegetation clearing during the breeding bird timing window will be minimized to the extent practicable. If vegetation clearing is required during the breeding bird timing window then the necessary permitting will be completed. Section 6.5.7.14.1 has been updated to reflect the potential need for permitting where timing windows for vegetation clearing cannot be adhered to. No vegetation removal is proposed within bobolink candidate habitat. Bobolink candidate habitat locations are available on Attachment 6.5-B-16 in Appendix 6.5-B.
7	6.5.5.15 Eastern Whip poor will 5.15-78	As in comment # 6.	n/a	Vegetation clearing during the breeding bird timing window will be minimized to the extent practicable. If vegetation clearing is required during the breeding bird timing window then the necessary permitting will be completed. Section 6.5.7.15.1 has been updated to reflect the potential need for permitting where timing windows for vegetation clearing cannot be adhered to. There will be some impacts from vegetation removal to Whip-poor-will candidate habitat at Station EWPW-24. Whip-poor-will candidate habitat locations are available in Attachment 6.5-B-17 in Appendix 6.5-B.
8	Table 6.5 – 20 Little Brown Myotis and Northern Myotis 6.5 - 87	*Little Brown and Northern Myotis – incidental take* – any adverse impacts to SAR bats or SAR bat habitat during hibernation (September 1 – April 30) or maternity season (May 1 – August 31) should be avoided. If these sensitive time periods cannot be avoided then an authorization under the ESA may be required.	n/a	Adverse impacts to SAR bat and bat habitat during the hibernation (August 1 – May 31) or maternity season (May 1 – August 31) will be minimized to the extent practicable. If there are potential adverse impacts to SAR bats and bat habitat during these windows then the necessary permitting will be completed. Table 6.5-40 has been updated to reflect the potential need for permitting where timing windows cannot be adhered to.
9	Table 6.5 – 20 Wildlife and Wildlife Habitat – All Bird Criteria	*Incidental take – Site preparation, construction and maintenance may result in the destruction of nests, eggs, and individuals of migratory birds (incidental take).*	n/a	Vegetation clearing during the breeding bird timing window will be minimized to the extent practicable. If vegetation clearing is required during the breeding bird timing window then the necessary permitting will be completed. Section 6.5.7 has been updated to

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	6.5 - 87	MECP SARB recommends the proponent conduct site preparation (tree and vegetation removal and grubbing) outside of the active breeding bird season (April 15 – August 31). If the proponent chooses not to or cannot avoid site preparation during this time period, then an authorization under the ESA may be required.		reflect the potential need for permitting where timing windows for vegetation clearing cannot be adhered to.
10	Table 6.5 – 20 Furbearers (American marten, beaver, gray wolf) and Gray Fox 6.5 - 87	***Incidental take*** *– Site preparation, construction and maintenance may result in the destruction of furbearer den sites and denning individuals (incidental take).* MECP SARB recommends site preparation, construction and maintenance occur outside of the denning period for Gray Fox (February 15 – July 15). If the proponent cannot avoid site preparation, construction and maintenance during this time period then an authorization under the ESA may be required.	n/a	Construction activities that could impact a gray fox den (or take place within 100 m of a den) will occur outside of the denning period. Clarification has been added to Section 6.5.7.3.5.
11	6.5.7.1.6 Fly Rock from Blasting *Potential Effects* Survival and Reproduction 6.5 - 94	Although Fly Rock is not considered to be much of a threat to SAR in the area, vibrations and noise from blasting may impact bat hibernacula. Disturbing bats during hibernation may lead to mortality as the disturbance may cause them to use up their fat stores too early. MECP SARB recommends that blasting, drilling or heavy equipment use should not occur within 500 meters of any bat hibernacula and no tree or vegetation removal or grubbing may occur within 200 meters of a bat hibernacula. If the proponent chooses not to or cannot commit to working outside of the recommended timing windows or buffer distances from hibernacula, then an authorization under the ESA may be required.	n/a	Comment noted. The assessment addresses these potential impacts and states in Section 6.5.7.7.1: *No tree removal or other construction activities will be completed within 200 m of hibernacula. Furthermore, no construction activities that produce loud noises and vibrations (e.g., drilling, blasting, and implosion splicing) to the extent practicable will be completed within 500 m of a hibernacula during the hibernation period (September 1 to May 30). These restrictions on activities are expected to limit effects on hibernating bats because the Project is not predicted to result in the removal or alteration of potential hibernation habitat. The main concern during the construction stage is the effect that sensory disturbance (e.g., noise and vibration) may have on hibernating bats.*
12	6.5.7.3 Gray Fox 6.5 - 110	*Mitigation measures will likely include:* *• Environmental training for workers, including information on den identification and procedures to follow if a den is identified.* *• Surveys to identify den sites within home ranges of known gray fox occurrence records.* *If an active den is identified during active construction, including during vegetation removal, work will stop and local MECP SARB offices will be contacted immediately. The den will be clearly*	n/a	Section 6.5.7.3.5 and Table 6.5-40 have been updated to specify how dens encountered during construction will be marked and buffered. MECP SARB will be contacted should a den be found during construction.

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		marked, a 100 m buffer surrounding the den will be established and no vegetation removal will proceed within that buffer until MNRF is engaged. MECP SARB acknowledges the mitigation measures identified in this section, however, has concerns about how a den will be marked if encountered during the active denning season (e.g. flagged or GPS point?). MECP advises minimizing any human presence at the den site as this may cause the female to abandon her pups. Should an active den be encountered in the Thunder Bay to Atikokan region where Gray Fox have been identified to occur,(attachment 6.5-B-1 maps 1,2,3 8 and 9), SARB acknowledges the stop work procedure and to contact MECP for next steps.		
13	6.5.7.7.1 Little Brown Myotis and Northern Myotis Habitat Loss 6.5-129	*Vegetation removal will occur between 200 m and 500 m **of three likely or possible hibernaculum**. This activity will not negatively impact hibernation habitat availability. Any Project activities that could cause loud noise and vibrations will not be conducted within 500 m of a hibernaculum during the hibernation period. Project activities causing loud noises and vibrations will not negatively impact hibernation habitat availability. **No Project activities are planned within 200 m of a hibernaculum** (Table 6.5-25).* Noise caused by heavy equipment and vibrations from drilling and blasting do not seem to impact hibernating bats when conducted at distances greater than 500 m from a hibernaculum. Maintaining a buffer of trees and vegetation within 200 m of a hibernaculum provide shelter and microclimate conditions for the hibernaculum. MECP SARB acknowledges Hydro One's commitment to avoid removing trees and vegetation within 200 m of a bat hibernaculum and avoid loud noises associated with drilling, blasting and implosion splicing within 500 m of a hibernaculum. Any tree or vegetation removal occurring between 200 meters and 500 meters of a bat hibernaculum	n/a	Section 6.5.7.7.1 has been updated to clarify.

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		is recommended to occur outside of the maternity season for bats (May 1 – August 31). If the proponent chooses not to or cannot meet these avoidance recommendations than an authorization under the ESA may be required. For your awareness, the paragraph repeats itself in the document (recommend removing duplicate paragraph).		
14	6.5.7.7.1 Little Brown Myotis and Northern Myotis 6.5 - 131	*No construction activities that produce loud noises and vibrations (e.g., drilling, blasting, and implosion splicing) will be completed within 500 m of a hibernacula during the hibernation period (September 1 to May 30).* MECP SARB acknowledges Hydro One's commitment to avoid construction activities that produce loud noises and vibrations such as drilling, blasting or implosion splicing within 500 m of a bat hibernaculum, however, recommends these activities should be avoided between August 1 – May 31 to include the most sensitive time periods around a hibernaculum including swarming and hibernation.	n/a	Section 6.5.7.7.1 has been updated with the timing window of August 1 - May 31.
15	6.5.7.7.1 Little Brown Myotis and Northern Myotis Survival and Reproduction 6.5 - 132	*Site clearing for the Project Footprint will result in removal of vegetation between 200 m and 500 m of three likely or possible hibernaculum* It is unclear when will tree removal occur in the zone between 200 m and 500 m of a hibernaculum. If clearing trees near a hibernaculum is required, MECP SARB recommends the proponent conduct tree and vegetation clearing within 200 m of a hibernaculum outside of the maternity season for bats (May 1 – August 31) providing noise and vibration created at the site is restricted to that associated with logging (e.g. chain saw, skidder, or mechanical harvesting equipment). If the proponent cannot adhere to avoiding the sensitive timing period for bats, or if tree and vegetation removal is required less than 200 m	n/a	Clearing will be conducted within the 200 – 500 m distance from some hibernacula. Clearing is not required within 200 m of a hibernaculum. Clearing will be conducted within the 200 - 500 m distance from hibernation habitat outside of the maternity season for bats (May 1 – August 31) providing noise and vibration created at the site is restricted to that associated with logging (e.g., chain saw, skidder, or mechanical harvesting equipment).

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		from a bat hibernaculum then an authorization under the ESA may be required.		
16	6.5.7.7.1 Little Brown Myotis and Northern Myotis Survival and Reproduction 6.5 - 134	*No Project-related disturbance will occur within 200 m of a bat hibernaculum without engagement and approval of regulatory agencies.* *• Project activities causing loud noise or vibrations (e.g., drilling, blasting, implosion splicing) will not be undertaken within 500 m of a bat hibernaculum during the hibernation period (September 1 to May 30).* MECP SARB recommends no clearing of trees and vegetation within 200 m of a bat hibernaculum. If the proponent chooses not to or cannot avoid operating outside of this buffer than an authorization may be required. MECP SARB acknowledges Hydro One's commitment to avoid construction activities that produce loud noises and vibrations such as drilling, blasting or implosion splicing within 500 m of a bat hibernaculum, however, recommends these activities should be avoided between August 1 – May 31 to include the most sensitive time periods around a hibernaculum including swarming and hibernation.	n/a	Section 6.5.7.7.1 has been updated accordingly.
17	6.5.7.7.1 Little Brown Myotis and Northern Myotis Mitigation Measures 6.5 - 134	*If potential maternity roost habitat is to be removed during the roosting period, it will be subject to ESA permitting and site-specific mitigation measures to be developed in consultation with the MECP.* As previously indicated, if the proponent cannot adhere to avoiding and clearing of trees or vegetation during the recommended timing window for SAR bats of May 1 – August 31 then an authorization under the ESA may be required.	n/a	Comment acknowledged.
18	6.5.7.7.3 Incidental Take Mitigation Measures 6.5-135	*Clearing maternity roost habitat during the maternal roosting period (May 1 to August 31) will be avoided. Should this timing not be able to be maintained as identified, MECP SARB will be engaged.* If the proponent intends on clearing maternity roost habitat during the SAR bat sensitive timing window	n/a	Construction activities are planned within the 200 - 500 m area, but no work is planned within 200 m distance from a potential or confirmed hibernacula.

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		of May 1 – August 31 then an authorization under the ESA may be required. *In areas within 500 m of a known or suspected hibernacula, construction activities causing sensory disturbance (e.g., drilling, blasting, implosion splicing) will be completed outside the hibernation period (September 1 to May 30).* As noted in comment # 14 above, MECP SARB acknowledges Hydro One's commitment to avoid construction activities that produce loud noises and vibrations such as drilling, blasting or implosion splicing within 500 m of a bat hibernaculum, however, recommends these activities should be avoided between August 1 – May 31 to include the most sensitive time periods around a hibernaculum including swarming and hibernation. *Construction activities causing sensory disturbance and tree clearing will not be completed* ***within 200 m of potential hibernacula*** MECP SARB acknowledges this commitment and based on the Attachment 6.5-B-5 Candidate and Confirmed SAR Bat Hibernacula, shows the Andowan, Steep Rock, Spillway and Lakeshore hibernacula (Figures 1, 3 and 4 respectively) as being impacted by construction activities in the LSA. MECP SARB recommends the proponent follow comments pertaining to sensitive timing periods and buffers noted above. Please clarify if other tree and vegetation clearing activities are planned at the other confirmed or potential hibernacula.		
19	6.5.7.12 Bank Swallow 6.5-165	*The Project is predicted to remove 155 ha (3.3% of the LSA and 1.1% of the terrestrial RSA) of moderate to high suitability bank swallow habitat (Table 6.5-31), including 6.0 ha of Category 3 of protected habitat.*	n/a	The nesting colony is near Ignace in the existing K&M Construction Aggregate Pit 15813. Bank Swallow candidate habitat locations are available in Attachment 6.5-B-13 of Appendix 6.5-B.

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		It is unclear as to what type of suitable habitat is being removed (e.g. feeding) The proponent refers to 6.0 ha of category 3 habitat impacted by the project. There is no reference to the GHD mapping or to which map in attachment 6.5-B-13 this occurs. Please provide the GHD mapping for known Bank Swallow nesting colonies (active or inactive) and identify where the colony occurs in the attachment. Please specify if the nesting location used to create the GHD mapping is in an existing aggregate pit, proposed aggregate pit or natural location (I.e. river bank). Will this location be utilized for aggregate material during the project?		Approximately 7 ha of Category 3 habitat will be removed for construction of a laydown/camp area on the opposite side of the highway. According to the ESA GHD for Bank Swallow, Category 3 habitat is identified as suitable foraging habitat within 500 m of a colony. Section 6.5.7.12.1 was updated to provide a definition for what is considered Category 3 habitat.
20	6.5.7.12 Bank Swallow 6.5-167	*If an active/inactive bank swallow nesting colony is identified during pre-construction or during active construction, including during vegetation removal, work will stop and MECP and other appropriate agencies will be contacted immediately to discuss mitigation measures. Nest monitoring will be implemented to document nest use and potential abandonment.* MECP SARB recommends the proponent conduct tree and vegetation clearing and grubbing outside of the active breeding bird season (April 15 – August 31). If a Bank Swallow nesting colony is located within the LSA or found at any of the aggregate pit locations used to support the project, then MECP SARB recommends the proponent avoid work within 50 m of the active colony until nesting season has been completed. If the proponent cannot avoid the nesting season or the habitat, then an authorization under the ESA may be required. In the event the proponent requires stockpiling of soft materials such as aggregate (e.g. sand, A-gravel etc.)where Bank Swallow are present, MECP SARB recommends the proponent follow section 4.2.1 of the Best Management Practices for the Protection, Creation and Maintenance of Bank Swallow Habitat in Ontario https://www.google.com/url?sa=t&rct=j&q=&esrc=s	n/a	The nesting colony is near Ignace in the existing K&M Construction Aggregate Pit 15813. Bank Swallow candidate habitat locations are available in Attachment 6.5-B-13 of Appendix 6.5-B. Approximately 7 ha of Category 3 habitat will be removed for construction of a laydown/camp area on the opposite side of the highway. Updated mitigation measures under Section 6.5.7.12.1 and 6.5.7.12.6 to include BMPs, vegetation clearing timing windows, 500 m buffer and permit requirements (where timing windows cannot be adhered to).

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		&source=web&cd=&cad=rja&uact=8&ved=2ahUKEwiGvOb51fX_AhUEEFkFHaPBAuQQFnoECA0QAQ&url=https://files.ontario.ca/bansbmpenpdffinalv.1.117mar17.pdf&usg=AOvVaw0zIiWgbBeYxNAL-46msstj&opi=89978449 to avoid creating unintentional nesting habitat for the species that may result in delays to construction. For your awareness, Bank Swallow breeding colonies and congregation of burrows can be mapped using the General habitat Description.		
21	6.5.7.13 Chimney Swift 6.5 - 70	*Structures with barn swallow and chimney swift nests can be removed outside of the breeding season, following appropriate legislative requirements.* MECP SARB recommends the proponent conduct tree and vegetation clearing outside of the breeding bird window (April 15 – August 31). It is the proponent's responsibility to conduct breeding bird surveys and identify nesting sites for Chimney Swift that may be impacted by the proposed project. Any such structures observed with active roosting or nesting Chimney Swift would be considered Chimney Swift habitat. Any damage or destruction of SAR habitat is considered a contravention to the ESA and an authorization under the ESA may be required. MECP SARB recommends the proponent identify any of these locations up front with MECP SARB to determine if an authorization is required. For your awareness, Barn Swallow has been down-listed to a species of special concern and the species and its habitat are no longer protected under the ESA.	n/a	Mitigation measures were updated under Section 6.5.7.13.1 and 6.5.7.13.6 to clarify surveys at structures will be conducted for nesting and roosting individuals and to include vegetation/structure removal timing windows and registration/permitting requirements for removal of chimney swift nesting/roosting habitat. All bird statuses under the ESA, COSEWIC and SARA have been reviewed and updated in Table 6.5-2.
22	6.5.7.13 Chimney Swift Mitigation Measures 6.5 -178 - 179	*Surveys at identified active nest sites of known barn swallow and chimney swift colony occurrence records.* What kind of surveys were/are going to be completed? MECP SARB recommends the proponent follow the Breeding Bird Atlas link for Chimney Swift surveys.	n/a	Mitigation measures were updated in Section 6.5.7.13.1 to clarify surveys at identified chimney swift active nest sites will be conducted for nesting and roosting individuals in accordance with the Birds Canada SwiftWatch Protocol.

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23	6.5.7.14 Bobolink Habitat Availability 6.5 - 180	*The Project is predicted to remove 7 ha (1.6% of the LSA and 0.4% of the terrestrial RSA) of moderate to high suitability bobolink habitat* MECP SARB could not locate a map in Appendix 6.5 – A or any reference to Bobolink habitat mapping in the Wildlife Figures. Please provide a figure with the General Habitat Description mapping for Bobolink and provide the number of hectares impacted by the project. For your awareness, a link has been provided to the General Habitat Description for Bobolink.	n/a	Bobolink habitat availability in the study area is shown in Appendix 6.5-B, Attachment 6.5-B-16. Section 6.5.7.14.1 was updated to fix incorrect reference to the figures. The GHD mapping has been based on the two NHIC Element Occurrences near Dryden. There will be no impacts to protected Bobolink Category 1/2/3 habitat. No Bobolink habitat was confirmed during surveys.
24	6.5.7.14 Bobolink Habitat Availability 6.5 - 180	*Managing vegetation removal activities so that removal does not occur within the migratory bird nesting period (April 15 to August 31)* ***to the extent possible.*** *• If vegetation removal cannot be avoided during the migratory bird nesting period (i.e., April 15 to August 31),* ***pre-clearing nest searches will be completed.*** **“The Migratory Birds Convention Act, 1994 (**Government of Canada 1994**) prohibits the disturbance or destruction of migratory bird nests (**e.g., passerines and waterfowl**) during the breeding season.”** MECP SARB supports the above statement and does not recommend nest searching during the active nesting period and recommends vegetation clearing and grubbing outside of the breeding bird active season (April 15 – August 31). If vegetation clearing and grubbing cannot be completed outside of the active breeding bird period, an authorization under the ESA may be required.	n/a	Section 6.5.7.14.1 was updated to include permit requirements (where timing windows cannot be adhered to). No Bobolink habitat was confirmed during surveys. There will be no impacts to protected Bobolink Category 1/2/3 habitat (identified based on NHIC EO records).
25	6.5.7.14 Bobolink Mitigation Measures 6.5 - 182	*If an active bobolink nest is identified during pre-construction surveys or during active construction and/or vegetation removal, work will stop and MECP and other appropriate* *agencies will be contacted immediately to discuss mitigation measures. Nest monitoring will be implemented to document nest use and potential abandonment*	n/a	Section 6.5.7.14.6 was updated to include permit requirements (where timing windows cannot be adhered to). No Bobolink habitat was confirmed during surveys. There will be no impacts to protected Bobolink Category 1/2/3 habitat (identified based on NHIC EO records).

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		"The Migratory Birds Convention Act, 1994 (Government of Canada 1994) prohibits the disturbance or destruction of migratory bird nests (e.g., passerines and waterfowl) during the breeding season." MECP SARB supports the above statement and does not recommend nest searches during the active breeding bird season and recommends the proponent avoid contravening the ESA by conducting any vegetation removal and grubbing outside of the active bird season (April 15 – August 31). If the proponent cannot adhere to working outside of the recommended timing window, then an authorization under the ESA may be required.		
26	6.5.7.14 Bobolink Mitigation Measures 6.5 - 186	*If vegetation removal cannot be avoided during the migratory bird nesting period (i.e., April 15 to August 31), pre-clearing nest searches will be completed.* As above in comment # 25.	n/a	Sections 6.5.7.14.1 and 6.5.7.14.6 were updated to include permit requirements (where timing windows cannot be adhered to). No Bobolink habitat was confirmed during surveys. There will be no impacts to protected Bobolink Category 1/2/3 habitat (identified based on NHIC EO records).
27	6.5.7.15 Eastern Whip-poor-will Habitat Loss 6.5 - 187	*The Project is predicted to remove 1,814 ha (3.0% of the LSA and 0.7% of the terrestrial RSA) of moderate to high suitability eastern whip-poor-will habitat (Table 6.5-35), including 1 ha of Category 2 habitat and 4 ha of Category 3 habitat* MECP SARB notes in Attachment 6.5-B-17 Eastern Whip-Poor-Will, Figures 10, 19 and 30 have confirmed breeding habitat in the ROW. Please provide the General Habitat Description mapping for each of the identified locations identified in your baseline data collection (following the guidance as found in the MNRF 2014 Survey Protocol for Eastern Whip poor will in Ontario) and for portions of the LSA, please map the GHD for all potential suitable nesting habitat to arrive at an estimation of habitat impacts requiring authorization.	n/a	Hydro One requested that MECP SARB provide guidance on mapping candidate EWPW habitat. For the purposes of the Final EA, only confirmed whip-poor-will habitat is being considered under the commitment to obtain an ESA authorization for damage/destruction of habitat.

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28	6.5.7.15 Eastern Whip-poor-will Mitigation Measures 6.5 - 190	*If vegetation removal cannot be avoided during the migratory bird nesting period (i.e., April 15 to August 31), pre-clearing nest searches will be completed and will be valid for a period up to 72 hrs. Pre-clearance searches will involve nest sweeps.* As per comment # 25.	n/a	Section 6.5.7.15.1 was updated to include permit requirements (where timing windows cannot be adhered to).
29	6.5.7.15 Eastern Whip-poor-will Mitigation Measures 6.5 - 190	*Surveys at known eastern whip-poor-will occurrence records* MECP SARB recommends the proponent conduct surveys at known occurrence and candidate locations following the MNRF Draft Survey Protocol for Eastern Whip Poor Will in Ontario (2014) and provide GHD mapping for these occurrences and for all potential suitable nesting habitat to arrive at an estimation of habitat impacts requiring authorization. How is proponent going to effectively survey all impacted regions of the ROW?	n/a	Eastern Whip-poor-will candidate habitat locations are available on Attachment 6.5-B-17 in Appendix 6.5-B. Section 6.5.7.15.6 was updated to include permit requirements (where timing windows cannot be adhered to). Hydro One requested that MECP SARB provide guidance on mapping candidate EWPW habitat. For the purposes of the Final EA, only confirmed whip-poor-will habitat is being considered under the commitment to obtain an ESA authorization for damage/destruction of habitat.
30	6.5.7.15 Eastern Whip-poor-will Mitigation Measures 6.5 - 190	*If an active eastern whip-poor-will nest is identified during pre-construction surveys or during active construction, including during vegetation removal, work will stop and MECP and other appropriate agencies will be contacted immediately to discuss mitigation measures. Nest monitoring will be implemented to document nest use and potential abandonment* As stated in comment # 29. In the event that an EWPW is found nesting in a recently cleared area or during construction, MECP SARB recommends the proponent stop work immediately and contact SARB regarding next steps.	n/a	The wording throughout Section 6.5.7 for all bird species was updated accordingly.

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31	6.5.7.15 Eastern Whip-poor-will Mitigation Measures 6.5 - 190	*Environmental training for workers, including information on active nest identification and procedures to follow if an active nest is identified.* Please include what the recommended procedure is for following up on an active nest if identified. MECP SARB recommends the proponent stop work, leave the area and contact MECP SARB for next steps.	n/a	The wording throughout Section 6.5.7 for all bird species was updated accordingly.
32	6.5.7.15 Eastern Whip-poor-will Incidental take - Mitigation Measures 6.5 - 193	*Eastern whip-poor-will nests, eggs, and/or individuals could be disturbed or destroyed during construction of access roads and the ROW, and maintenance of the ROW during operations.* SARB recommends the proponent conduct these activities outside of the active breeding bird season during any construction of the project including access roads, work camps, pole and line installation etc. If the proponent chooses not to or cannot operate outside of the breeding bird season, then an authorization under the ESA may be required.	n/a	Section 6.5.7.15.6 was updated to include permit requirements (where timing windows cannot be adhered to).
33	Table 6.5 – 37 Summary of Net Effects and Mitigation Measures to Wildlife	*Avoid vegetation removal and all construction activities that cause sensory disturbance within 100 m of gray fox den from February 15-July 15 of each year to avoid disturbing denning gray fox.* *• If a gray fox den is identified during construction or operations, and should this timing not be able to be maintained within the buffer widths identified, local MECP SARB offices will be contacted to develop a den management plan and appropriate Indigenous communities will be notified, where requested(b).* In the event that a Gray Fox den is encountered, If the proponent chooses not to or cannot avoid the sensitive timing period for Gray Fox denning (February 15 – July 15) then an authorization under the ESA may be required. A den management plan may be included as part of the mitigation, however, would not be considered sufficient as an overall benefit to the species.	n/a	Comment acknowledged. Any impacts within 100 m of a gray fox den during the timing window will require and ESA authorization.

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34		*If vegetation removal must be completed during the migratory bird nesting period, implement nest sweeps. Similar measures will be taken for vegetation removal during routine ROW maintenance* See MECP SARB's comment # 25.	n/a	Table 6.5-40 was updated to include timing window for migratory bird nesting period (April 15 to August 31) and additional mitigation measures for threatened and endangered SAR.
35	Table 6.5 – 37 Wildlife and Wildlife Habitat All bird Criteria Construction, Operation and Maintenance stages 6.5-210	MECP SARB recommends the proponent include Eastern Whip-poor-will, Chimney Swift, Bank Swallow, Bobolink, Eastern Meadowlark and the appropriate mitigation for these species. Mitigation is listed above but is lacking in this table.	n/a	Table 6.5-40 was updated to include buffers and permit requirements for Bank Swallow, Bald Eagle, Bobolink, Chimney Swift and Eastern Whip-poor-will (where timing windows cannot be adhered to). Timing window has been updated to March 1 to August 31 for Bald Eagle, April to October for Chimney Swift, and April 15 to August 31 for Bank Swallow, Bobolink and Eastern Whip-poor-will. No mitigation has been added for Eastern Meadowlark as this species has not been included in the EA due to lack of breeding records in the region. Furthermore, Bobolink mitigation will also protect Eastern Meadowlark (as they use similar habitats). Updated Section 6.5.3 to include rationale for exclusion of Eastern Meadowlark from the list of bird criteria to be carried forward in the assessment.
36	Table 6.5 – 37 Wildlife and Wildlife Habitat Project Component or Activity 6.5 - 209	*Construction stage:* *• Clearing, grading, earth moving, grubbing of vegetation, and stockpiling of materials along the ROW and other access and construction areas, and construction of infrastructure (e.g., access roads, bridges, temporary laydown areas, turnaround areas and temporary construction camps);* This paragraph should appear in the project component or activity section of the table as per comment # 35. Please add these activities under the project and component or activity section and address mitigation for these activities for each species as per direction in comment #35	n/a	The mitigation measures in Table 6.5-40 were updated to include criteria specific mitigations.

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37	Table 6.5 – 37 Little Brown Myotis and Northern Myotis Project Component or Activity 6.5 - 211	*Construction stage:* *• Clearing, grading, earth moving, grubbing of vegetation, and stockpiling of materials along the ROW and other access and construction areas, and construction of infrastructure (e.g., access roads, bridges, temporary laydown areas, turnaround areas and temporary construction camps)* MECP SARB recommends adding the above paragraph to the project component and activity section and including mitigative actions for SAR bats during these activities.	n/a	The mitigation measures in Table 6.5-40 were updated to include SAR bat specific mitigations.
38	Table 6.5 – 37 Little Brown Myotis and Northern Myotis Potential Effect	Incidental Take For your awareness, any site preparation involving drilling or blasting resulting in destruction of roosting or hibernating bats and their habitat would be in contravention to the ESA. If the proponent chooses not to or cannot follow the recommendations outlined in comment # 13, then an authorization under the ESA may be required.	n/a	Adverse impacts to SAR bat and bat habitat during the hibernation (August 1 – May 31) or maternity season (May 1 – August 31) will be minimized to the extent practicable. If there are potential adverse impacts to SAR bats and bat habitat during these windows then the necessary permitting will be completed. Table 6.5-40 has been updated to reflect the potential need for permitting where timing windows cannot be adhered to.
39	Table 6.5 – 37 Little Brown Myotis and Northern Myotis Potential Effect	*Avoid clearing maternity roost habitat from May 1 to August 31. Should this timing not be able to be maintained as identified, MECP SARB will be contacted for further discussion and appropriate Indigenous communities notified, where requested.* If the proponent chooses not to or cannot avoid the sensitive timing period for SAR bats, then an authorization under the ESA may be required.	n/a	Adverse impacts to SAR bat and bat habitat during the hibernation (August 1 – May 31) or maternity season (May 1 – August 31) will be minimized to the extent practicable. If there are potential adverse impacts to SAR bats and bat habitat during these windows then the necessary permitting will be completed. Table 6.5-40 has been updated to reflect the potential need for permitting where timing windows cannot be adhered to.
40	Table 6.5 – 37 Little Brown Myotis and Northern Myotis Potential Effect	*Within 500 m a bat hibernaculum, avoid any construction activities that may cause sensory disturbance to hibernating bats during the hibernation period (September 1 to May 30).* As stated in comment # 14.	n/a	Adverse impacts to SAR bat and bat habitat during the hibernation (August 1 – May 31) or maternity season (May 1 – August 31) will be minimized to the extent practicable. If there are potential adverse impacts to SAR bats and bat habitat during these windows then the necessary permitting will be completed. Table 6.5-40 has been updated to reflect the potential need for permitting where timing windows cannot be adhered to.

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41	6.5.8.7.3 Net Effects on Little Brown and Northern Myotis 6.5 - 235	*If tree clearing activities were to take place in suitable little brown myotis and northern myotis maternity roosting habitat during the maternity roosting period (May 1 to August 31), then some incidental take may occur but the effect is considered unlikely after mitigation. Incidental take of roosting little brown myotis and northern myotis will be restricted to the Project footprint and is considered to be infrequent because the mitigation is expected to be effective* If the proponent cannot commit to avoiding the active season for SAR bats, then an authorization under the ESA may be required.	n/a	Adverse impacts to SAR bat and bat habitat during the hibernation (August 1 – May 31) or maternity season (May 1 – August 31) will be minimized to the extent practicable. If there are potential adverse impacts to SAR bats and bat habitat during these windows then the necessary permitting will be completed. Table 6.5-40 has been updated to reflect the potential need for permitting where timing windows cannot be adhered to.
42	6.6.7.1.2.2 Mitigation below the High Water Mark Lake Sturgeon 6.6-91	The proponent has identified that mitigation measures and avoidance of in water works below the high-water mark should have no adverse impacts on SAR fish (e.g. Lake Sturgeon). The proponent has identified the restricted activity period for Lake Sturgeon as April 1 – June 30. MECP SARB acknowledges this time frame and recommends the proponent avoid any in water work during this period. Should any in-water work in Lake Sturgeon habitat be required, then an authorization under the ESA may be required.	n/a	This has been addressed in the Final EA Report. All sites with potential for Lake Sturgeon (i.e., desktop hydrological connections to Lake Sturgeon bearing waters or those that were identified in the desktop assessment and/or field to provide Lake Sturgeon habitat) had the Lake Sturgeon timing window applied. A statement was added regarding the need for an authorization under the ESA in Section 6.6.7.1.2.4 Reduce the Fish Mortality Risk Through Restricted Activity Timing Windows and Fish Rescues/Relocations.
43	6.4.7.5 Plant Species at Risk Black Ash Potential Effect, Habitat Quantity 6.4-80	*A total loss of 4 ha representing 10.8% habitat loss within the LSA, and 2.3% habitat loss within the RSA* Black Ash was added to the SARO list on January 26, 2022 and will receive protection for both the species and its habitat under the ESA (2007) as identified in O.Reg 23/22 s4. Currently, Black Ash is under a temporary suspension from the ESA which will be revoked as per O.Reg. 23/22 s4. Any Black Ash tree removal or habitat disturbance following the revoke date may require an authorization under the ESA. Please provide a map indicating where the Black Ash are located and the number of individuals that may be impacted by the project.	n/a	Candidate habitat for Black ash was completed for the effects assessment. It is understood that authorization under the ESA may be required for this species after the revoke date of the suspension. MECP SARB to provide further direction on the identification of all black ash trees within the Project footprint to contribute to the potential permitting process under the ESA.

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44	ATTACHMENT 6.4-A-1 Terrestrial Baseline Figures Steeprock Bat Hibernacula Survey Locations Figure 2.4 -2-4	Hydro One is proposing a new road within the 500 m buffer and the proposed hydro line passes through the 500 m buffer of the WCA 81 hibernacula for the Steep Rock site and a laydown area within the 500 m buffer of WCA 72 site. Additional concerns include implosion splicing within 500 meters of the hibernaculum, noise and vibration from drilling and blasting associated with construction and helicopter noise. MECP SARB recommends no sensory disturbance (implosion splicing, blasting or heavy vibration) within 500 meters of a bat hibernaculum from August 1 – May 31. If the proponent chooses not to or cannot operate outside of the recommended timing window, then an authorization under the ESA may be required.	n/a	Adverse impacts to SAR bat and bat habitat during the hibernation (August 1 – May 31) or maternity season (May 1 – August 31) will be minimized to the extent practicable. If there are potential adverse impacts to SAR bats and bat habitat during these windows then the necessary permitting will be completed. Table 6.5-40 has been updated to reflect the potential need for permitting where timing windows cannot be adhered to
45	ATTACHMENT 6.4-A-1 Terrestrial Baseline Figures Bat Hibernacula Survey Locations Figure 2.4-2-5	Hydro One is proposing new roads and the proposed hydro line passes through the 500 m buffer of both hibernacula for the Lakeshore Control site and the Spillway site. Additional concerns include implosion splicing within 500 meters of the hibernaculum, noise and vibration from drilling and blasting associated with construction and helicopter noise. MECP SARB recommends no sensory disturbance (implosion splicing, blasting or heavy vibration) within 500 meters of a bat hibernaculum from August 1 – May 31. If the proponent chooses not to or cannot operate outside of the recommended timing window, then an authorization under the ESA may be required.	n/a	Adverse impacts to SAR bat and bat habitat during the hibernation (August 1 – May 31) or maternity season (May 1 – August 31) will be minimized to the extent practicable. If there are potential adverse impacts to SAR bats and bat habitat during these windows then the necessary permitting will be completed. Table 6.5-40 has been updated to reflect the potential need for permitting where timing windows cannot be adhered to.
46	General Comment SAR species not considered in the Draft EA	The EA needs to address and identify potential impacts to Eastern Meadowlark, Red-headed Woodpecker, Short-eared Owl and Lesser Yellowlegs. Addressing these species now will aid in avoiding delays during the permitting process if required.	n/a	Section 6.5.3 was updated to include rationale for the exclusion of these four additional bird species from the list of bird criteria in the EA assessment. The rationale is consistent with that for exclusion of American White Pelican and Least Bittern.

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		For your awareness, the Short-eared Owl and Lesser Yellowlegs were added to the SARO list in 2023 as Threatened. Although these were listed following approval of the Terms of Reference, these species will need to be addressed and considered in the EA report.		
47	3.3.11 page 16	Any blasting or crushing will need to be a minimum of 500 m from any bat hibernacula or identified breeding bird locations. Will further surveys for breeding birds I.e. EWPW being conducted at these locations? reference to Appendix 3.0 B for locations of 24 aggregate features that may be exploited for materials; are any of these located near bat hibernacula or potential EWPW habitat? do any of these have existing Bank Swallow colonies or congregations of burrows? MECP SARB recommends operating outside of sensitive timing windows for SAR, if this cannot be avoided than an authorization under the ESA may be required. MECP SARB recommends the proponent follow the Best Management Practices for Bank Swallow while conducting aggregate pit work or storing stockpiled aggregate materials at a slope of 70 degrees or less.	n/a	There are no proposed aggregate pits within 500 m of Bank Swallow or Eastern Whip-poor-will confirmed habitat. Bank Swallow and Eastern Whip-poor-will candidate habitat locations are available on Attachment 6.5-B-16 in Appendix 6.5-B (bobolink) Mitigation measures in Section 6.5.7 were updated for birds to include BMPs, timing windows for works, 500 m buffers for moderate to high impact operations in protected habitat and permit requirements (where timing windows cannot be adhered to). Adverse impacts to SAR bat and bat habitat during the hibernation (August 1 – May 31) or maternity season (May 1 – August 31) will be minimized to the extent practicable. If there are potential adverse impacts to SAR bats and bat habitat during these windows then the necessary permitting will be completed.
48	3.3.12 page 17	MECP SARB recommends that helicopter pad areas be cleared outside of SAR sensitive timing periods, and should not be located within 500 m of any bat hibernacula. Are any proposed helicopter pads within 500 m of bat hibernacula? Should the proponent have reasons for not being able to adhere to the SAR sensitive timing windows then please provide literature and rationale to support these reasons. An authorization under the ESA may be required.	n/a	There are no proposed helicopter pads within 500 m of any potential or known hibernacula.

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1	6.5 Wildlife and Wildlife Habitat Table 6.5-2 page 6.5 - 11	For your awareness, Barn Swallow, included in this document as a threatened species, has been down listed to species of Special Concern under the ESA (2007) O.Reg. 230/08 Species at Risk in Ontario List, as such, the species and its habitat are no longer protected under the ESA.	n/a	Thank you for this input. The EA document has been revised accordingly.
2	6.5.5.3 Gray Fox Page 5.3 - 32	*"Dens can be found in modified burrows of other animals, hollow trees, hollow logs, woodpiles, rocky outcrops, cavities under rocks, piles of brush, slab, wood or sawdust, and abandoned buildings (MECP 2019)."* MECP SARB recommends the proponent avoid tree clearing and heavy equipment disturbance within 100 meters where an active gray fox den has been identified during the denning period (February 15-July 15). If the proponent cannot operate outside of the recommended timing window, then an authorization under the ESA may be required.	n/a	There are no active gray fox dens currently identified within the Project study areas or Project footprint. It is understood that the ESA prohibits damaging or destroying den sites. MECP SARB does not have a standardized protocol for surveying for gray fox and identification of den sites. This discussion will resume during the permitting phase of the Project.
3	6.5.5.7 Little Brown and Northern Myotis 5.7 pages 46 - 51	Maternity roost habitat – MECP SARB recommends the proponent conduct tree and vegetation removal outside of the active season (May 1 – August 31). If the proponent chooses not to or cannot avoid clearing outside of the active season for SAR bats, then an authorization under the ESA may be required.	n/a	Comment is acknowledged and timing restriction is incorporated into the EA document (Section 6.5.7.7; Section 6.5.8 and Section 6.5.9)
4	6.5.5.12 Bank Swallow 5.12 - 70	*"Field surveys in 2022 documented 15 individuals at one nesting colony within the LSA."* Where is this in relation to the planned ROW? Was the nesting colony observed in an existing aggregate pit? If this habitat is to be removed, it will require an authorization under the ESA. If the pit is active, excavation is allowed outside of the nesting season providing the remaining face is suitable for nesting. In areas outside of an active nesting site, MECP SARB recommends aggregate slopes and stock-piles of soft materials suitable for bank swallow nesting be maintained at an angle <70 degrees to prevent nesting by the species. Where nesting colonies occur or when stock piling materials, MECP SARB recommends the proponent should follow BMP for the protection and creation of bank swallow habitat	n/a	The nesting colony is near Ignace in the existing K&M Construction Aggregate Pit 15813. Approximately 7 ha of Category 3 habitat will be removed for construction of a laydown/camp area on the opposite side of the highway. An additional 3 laydown/camp areas are proposed within 1000 m of Category 3 habitat. The bullet point in Section 6.5.5.12 discussing the 2022 field survey results was updated to include the location. Updated mitigation measures under Section 6.5.7.12.1 and 6.5.7.12.6 to include BMPs, vegetation clearing timing windows, 500 m buffer and permit requirements (where timing windows are not adhered to). Bank Swallow candidate habitat locations are available in Attachment 6.5-B-13 of Appendix 6.5-B.

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5	6.5.5.13 Chimney Swift 5.13 - 70	Any candidate trees found within the LSA should be maintained where possible. If a candidate tree or occupied tree is required to be removed, then mitigation to avoid section 9 concerns is recommended by removing the tree outside of the active breeding bird season (April 15 – August 31). Should a nest tree require removal then an authorization under s.10 of the ESA may be required.	n/a	Vegetation clearing during the breeding bird timing window will be minimized to the extent practicable. If vegetation clearing is required during the breeding bird timing window then the necessary permitting will be completed. Section 6.5.7.13.1 has been updated to reflect the potential need for permitting where timing windows for vegetation clearing cannot be adhered to.
6	6.5.5.14 Bobolink 5.14 - 74	MECP SARB recommends that clearing any vegetation and grubbing occur outside of the active breeding bird season (April 15 – August 31).	n/a	Vegetation clearing during the breeding bird timing window will be minimized to the extent practicable. If vegetation clearing is required during the breeding bird timing window then the necessary permitting will be completed. Section 6.5.7.14.1 has been updated to reflect the potential need for permitting where timing windows for vegetation clearing cannot be adhered to. No vegetation removal is proposed within bobolink candidate habitat. Bobolink candidate habitat locations are available on Attachment 6.5-B-16 in Appendix 6.5-B.
7	6.5.5.15 Eastern Whip poor will 5.15-78	As in comment # 6.	n/a	Vegetation clearing during the breeding bird timing window will be minimized to the extent practicable. If vegetation clearing is required during the breeding bird timing window then the necessary permitting will be completed. Section 6.5.7.15.1 has been updated to reflect the potential need for permitting where timing windows for vegetation clearing cannot be adhered to. There will be some impacts from vegetation removal to Whip-poor-will candidate habitat at Station EWPW-24. Whip-poor-will candidate habitat locations are available in Attachment 6.5-B-17 in Appendix 6.5-B.
8	Table 6.5 – 20 Little Brown Myotis and Northern Myotis 6.5 - 87	*Little Brown and Northern Myotis – incidental take* – any adverse impacts to SAR bats or SAR bat habitat during hibernation (September 1 – April 30) or maternity season (May 1 – August 31) should be avoided. If these sensitive time periods cannot be avoided then an authorization under the ESA may be required.	n/a	Adverse impacts to SAR bat and bat habitat during the hibernation (August 1 – May 31) or maternity season (May 1 – August 31) will be minimized to the extent practicable. If there are potential adverse impacts to SAR bats and bat habitat during these windows then the necessary permitting will be completed. Table 6.5-40 has been updated to reflect the potential need for permitting where timing windows cannot be adhered to.
9	Table 6.5 – 20 Wildlife and Wildlife Habitat – All Bird Criteria	*Incidental take – Site preparation, construction and maintenance may result in the destruction of nests, eggs, and individuals of migratory birds (incidental take).* MECP SARB recommends the proponent conduct site preparation (tree and vegetation removal and	n/a	Vegetation clearing during the breeding bird timing window will be minimized to the extent practicable. If vegetation clearing is required during the breeding bird timing window then the necessary permitting will be completed. Section 6.5.7 has been updated to reflect the potential need for permitting where timing windows for vegetation clearing cannot be adhered to.

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	6.5 - 87	grubbing) outside of the active breeding bird season (April 15 – August 31). If the proponent chooses not to or cannot avoid site preparation during this time period, then an authorization under the ESA may be required.		
10	Table 6.5 – 20 Furbearers (American marten, beaver, gray wolf) and Gray Fox 6.5 - 87	***Incidental take*** *– Site preparation, construction and maintenance may result in the destruction of furbearer den sites and denning individuals (incidental take).* MECP SARB recommends site preparation, construction and maintenance occur outside of the denning period for Gray Fox (February 15 – July 15). If the proponent cannot avoid site preparation, construction and maintenance during this time period then an authorization under the ESA may be required.	n/a	Construction activities that could impact a gray fox den (or take place within 100 m of a den) will occur outside of the denning period. Clarification has been added to Section 6.5.7.3.5.
11	6.5.7.1.6 Fly Rock from Blasting *Potential Effects* Survival and Reproduction 6.5 - 94	Although Fly Rock is not considered to be much of a threat to SAR in the area, vibrations and noise from blasting may impact bat hibernacula. Disturbing bats during hibernation may lead to mortality as the disturbance may cause them to use up their fat stores too early. MECP SARB recommends that blasting, drilling or heavy equipment use should not occur within 500 meters of any bat hibernacula and no tree or vegetation removal or grubbing may occur within 200 meters of a bat hibernacula. If the proponent chooses not to or cannot commit to working outside of the recommended timing windows or buffer distances from hibernacula, then an authorization under the ESA may be required.	n/a	Comment noted. The assessment addresses these potential impacts and states in Section 6.5.7.7.1: *No tree removal or other construction activities will be completed within 200 m of hibernacula. Furthermore, no construction activities that produce loud noises and vibrations (e.g., drilling, blasting, and implosion splicing) to the extent practicable will be completed within 500 m of a hibernacula during the hibernation period (September 1 to May 30). These restrictions on activities are expected to limit effects on hibernating bats because the Project is not predicted to result in the removal or alteration of potential hibernation habitat. The main concern during the construction stage is the effect that sensory disturbance (e.g., noise and vibration) may have on hibernating bats.*
12	6.5.7.3 Gray Fox 6.5 - 110	*Mitigation measures will likely include:* *• Environmental training for workers, including information on den identification and procedures to follow if a den is identified.* *• Surveys to identify den sites within home ranges of known gray fox occurrence records.* *If an active den is identified during active construction, including during vegetation removal, work will stop and local MECP SARB offices will be contacted immediately. The den will be clearly marked, a 100 m buffer surrounding the den will be established and no vegetation*	n/a	Section 6.5.7.3.5 and Table 6.5-40 have been updated to specify how dens encountered during construction will be marked and buffered. MECP SARB will be contacted should a den be found during construction.

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		removal will proceed within that buffer until MNRF is engaged. MECP SARB acknowledges the mitigation measures identified in this section, however, has concerns about how a den will be marked if encountered during the active denning season (e.g. flagged or GPS point?). MECP advises minimizing any human presence at the den site as this may cause the female to abandon her pups. Should an active den be encountered in the Thunder Bay to Atikokan region where Gray Fox have been identified to occur,(attachment 6.5-B-1 maps 1,2,3 8 and 9), SARB acknowledges the stop work procedure and to contact MECP for next steps.		
13	6.5.7.7.1 Little Brown Myotis and Northern Myotis Habitat Loss 6.5-129	*Vegetation removal will occur between 200 m and 500 m* ***of three likely or possible hibernaculum****. This activity will not negatively impact hibernation habitat availability. Any Project activities that could cause loud noise and vibrations will not be conducted within 500 m of a hibernaculum during the hibernation period. Project activities causing loud noises and vibrations will not negatively impact hibernation habitat availability.* ***No Project activities are planned within 200 m of a hibernaculum*** *(Table 6.5-25).* Noise caused by heavy equipment and vibrations from drilling and blasting do not seem to impact hibernating bats when conducted at distances greater than 500 m from a hibernaculum. Maintaining a buffer of trees and vegetation within 200 m of a hibernaculum provide shelter and microclimate conditions for the hibernaculum. MECP SARB acknowledges Hydro One's commitment to avoid removing trees and vegetation within 200 m of a bat hibernaculum and avoid loud noises associated with drilling, blasting and implosion splicing within 500 m of a hibernaculum. Any tree or vegetation removal occurring between 200 meters and 500 meters of a bat hibernaculum is recommended to occur outside of the maternity season for bats (May 1 – August 31).	n/a	Section 6.5.7.7.1 has been updated to clarify.

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		If the proponent chooses not to or cannot meet these avoidance recommendations than an authorization under the ESA may be required. For your awareness, the paragraph repeats itself in the document (recommend removing duplicate paragraph).		
14	6.5.7.7.1 Little Brown Myotis and Northern Myotis 6.5 - 131	*No construction activities that produce loud noises and vibrations (e.g., drilling, blasting, and implosion splicing) will be completed within 500 m of a hibernacula during the hibernation period (September 1 to May 30).* MECP SARB acknowledges Hydro One's commitment to avoid construction activities that produce loud noises and vibrations such as drilling, blasting or implosion splicing within 500 m of a bat hibernaculum, however, recommends these activities should be avoided between August 1 – May 31 to include the most sensitive time periods around a hibernaculum including swarming and hibernation.	n/a	Section 6.5.7.7.1 has been updated with the timing window of August 1 - May 31.
15	6.5.7.7.1 Little Brown Myotis and Northern Myotis Survival and Reproduction 6.5 - 132	*Site clearing for the Project Footprint will result in removal of vegetation between 200 m and 500 m of three likely or possible hibernaculum* It is unclear when will tree removal occur in the zone between 200 m and 500 m of a hibernaculum. If clearing trees near a hibernaculum is required, MECP SARB recommends the proponent conduct tree and vegetation clearing within 200 m of a hibernaculum outside of the maternity season for bats (May 1 – August 31) providing noise and vibration created at the site is restricted to that associated with logging (e.g. chain saw, skidder, or mechanical harvesting equipment). If the proponent cannot adhere to avoiding the sensitive timing period for bats, or if tree and vegetation removal is required less than 200 m from a bat hibernaculum then an authorization under the ESA may be required.	n/a	Clearing will be conducted within the 200 – 500 m distance from some hibernacula. Clearing is not required within 200 m of a hibernaculum. Clearing will be conducted within the 200 - 500 m distance from hibernation habitat outside of the maternity season for bats (May 1 – August 31) providing noise and vibration created at the site is restricted to that associated with logging (e.g., chain saw, skidder, or mechanical harvesting equipment).

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16	6.5.7.7.1 Little Brown Myotis and Northern Myotis Survival and Reproduction 6.5 - 134	*No Project-related disturbance will occur within 200 m of a bat hibernaculum without engagement and approval of regulatory agencies.* *• Project activities causing loud noise or vibrations (e.g., drilling, blasting, implosion splicing) will not be undertaken within 500 m of a bat hibernaculum during the hibernation period (September 1 to May 30).* MECP SARB recommends no clearing of trees and vegetation within 200 m of a bat hibernaculum. If the proponent chooses not to or cannot avoid operating outside of this buffer than an authorization may be required. MECP SARB acknowledges Hydro One's commitment to avoid construction activities that produce loud noises and vibrations such as drilling, blasting or implosion splicing within 500 m of a bat hibernaculum, however, recommends these activities should be avoided between August 1 – May 31 to include the most sensitive time periods around a hibernaculum including swarming and hibernation.	n/a	Section 6.5.7.7.1 has been updated accordingly.
17	6.5.7.7.1 Little Brown Myotis and Northern Myotis Mitigation Measures 6.5 - 134	*If potential maternity roost habitat is to be removed during the roosting period, it will be subject to ESA permitting and site-specific mitigation measures to be developed in consultation with the MECP.* As previously indicated, if the proponent cannot adhere to avoiding and clearing of trees or vegetation during the recommended timing window for SAR bats of May 1 – August 31 then an authorization under the ESA may be required.	n/a	Comment acknowledged.
18	6.5.7.7.3 Incidental Take Mitigation Measures 6.5-135	*Clearing maternity roost habitat during the maternal roosting period (May 1 to August 31) will be avoided. Should this timing not be able to be maintained as identified, MECP SARB will be engaged.* If the proponent intends on clearing maternity roost habitat during the SAR bat sensitive timing window of May 1 – August 31 then an authorization under the ESA may be required.	n/a	Construction activities are planned within the 200 - 500 m area, but no work is planned within 200 m distance from a potential or confirmed hibernacula.

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		In areas within 500 m of a known or suspected hibernacula, construction activities causing sensory disturbance (e.g., drilling, blasting, implosion splicing) will be completed outside the hibernation period (September 1 to May 30). As noted in comment # 14 above, MECP SARB acknowledges Hydro One's commitment to avoid construction activities that produce loud noises and vibrations such as drilling, blasting or implosion splicing within 500 m of a bat hibernaculum, however, recommends these activities should be avoided between August 1 – May 31 to include the most sensitive time periods around a hibernaculum including swarming and hibernation. *Construction activities causing sensory disturbance and tree clearing will not be completed* ***within 200 m of potential hibernacula*** MECP SARB acknowledges this commitment and based on the Attachment 6.5-B-5 Candidate and Confirmed SAR Bat Hibernacula, shows the Andowan, Steep Rock, Spillway and Lakeshore hibernacula (Figures 1, 3 and 4 respectively) as being impacted by construction activities in the LSA. MECP SARB recommends the proponent follow comments pertaining to sensitive timing periods and buffers noted above. Please clarify if other tree and vegetation clearing activities are planned at the other confirmed or potential hibernacula.		
19	6.5.7.12 Bank Swallow 6.5-165	*The Project is predicted to remove 155 ha (3.3% of the LSA and 1.1% of the terrestrial RSA) of moderate to high suitability bank swallow habitat (Table 6.5-31), including 6.0 ha of Category 3 of protected habitat.* It is unclear as to what type of suitable habitat is being removed (e.g. feeding)	n/a	The nesting colony is near Ignace in the existing K&M Construction Aggregate Pit 15813. Bank Swallow candidate habitat locations are available in Attachment 6.5-B-13 of Appendix 6.5-B. Approximately 7 ha of Category 3 habitat will be removed for construction of a laydown/camp area on the opposite side of the highway.

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		The proponent refers to 6.0 ha of category 3 habitat impacted by the project. There is no reference to the GHD mapping or to which map in attachment 6.5-B-13 this occurs. Please provide the GHD mapping for known Bank Swallow nesting colonies (active or inactive) and identify where the colony occurs in the attachment. Please specify if the nesting location used to create the GHD mapping is in an existing aggregate pit, proposed aggregate pit or natural location (I.e. river bank). Will this location be utilized for aggregate material during the project?		According to the ESA GHD for Bank Swallow, Category 3 habitat is identified as suitable foraging habitat within 500 m of a colony. Section 6.5.7.12.1 was updated to provide a definition for what is considered Category 3 habitat.
20	6.5.7.12 Bank Swallow 6.5-167	*If an active/inactive bank swallow nesting colony is identified during pre-construction or during active construction, including during vegetation removal, work will stop and MECP and other appropriate agencies will be contacted immediately to discuss mitigation measures. Nest monitoring will be implemented to document nest use and potential abandonment.* MECP SARB recommends the proponent conduct tree and vegetation clearing and grubbing outside of the active breeding bird season (April 15 – August 31). If a Bank Swallow nesting colony is located within the LSA or found at any of the aggregate pit locations used to support the project, then MECP SARB recommends the proponent avoid work within 50 m of the active colony until nesting season has been completed. If the proponent cannot avoid the nesting season or the habitat, then an authorization under the ESA may be required. In the event the proponent requires stockpiling of soft materials such as aggregate (e.g. sand, A-gravel etc.)where Bank Swallow are present, MECP SARB recommends the proponent follow section 4.2.1 of the Best Management Practices for the Protection, Creation and Maintenance of Bank Swallow Habitat in Ontario https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&cad=rja&uact=8&ved=2ahUKEwiGvOb51fX_AhUEEFkFHaPBAuQQFnoECA0QAQ	n/a	The nesting colony is near Ignace in the existing K&M Construction Aggregate Pit 15813. Bank Swallow candidate habitat locations are available in Attachment 6.5-B-13 of Appendix 6.5-B. Approximately 7 ha of Category 3 habitat will be removed for construction of a laydown/camp area on the opposite side of the highway. Updated mitigation measures under Section 6.5.7.12.1 and 6.5.7.12.6 to include BMPs, vegetation clearing timing windows, 500 m buffer and permit requirements (where timing windows cannot be adhered to).

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		Q&url=https://files.ontario.ca/bansbmpenpdffinalv.1.117mar17.pdf&usg=AOvVaw0zIiWgbBeYxNAL-46msstj&opi=89978449 to avoid creating unintentional nesting habitat for the species that may result in delays to construction. For your awareness, Bank Swallow breeding colonies and congregation of burrows can be mapped using the General habitat Description.		
21	6.5.7.13 Chimney Swift 6.5 - 70	*Structures with barn swallow and chimney swift nests can be removed outside of the breeding season, following appropriate legislative requirements.* MECP SARB recommends the proponent conduct tree and vegetation clearing outside of the breeding bird window (April 15 – August 31). It is the proponent's responsibility to conduct breeding bird surveys and identify nesting sites for Chimney Swift that may be impacted by the proposed project. Any such structures observed with active roosting or nesting Chimney Swift would be considered Chimney Swift habitat. Any damage or destruction of SAR habitat is considered a contravention to the ESA and an authorization under the ESA may be required. MECP SARB recommends the proponent identify any of these locations up front with MECP SARB to determine if an authorization is required. For your awareness, Barn Swallow has been down-listed to a species of special concern and the species and its habitat are no longer protected under the ESA.	n/a	Mitigation measures were updated under Section 6.5.7.13.1 and 6.5.7.13.6 to clarify surveys at structures will be conducted for nesting and roosting individuals and to include vegetation/structure removal timing windows and registration/permitting requirements for removal of chimney swift nesting/roosting habitat. All bird statuses under the ESA, COSEWIC and SARA have been reviewed and updated in Table 6.5-2.
22	6.5.7.13 Chimney Swift Mitigation Measures 6.5 -178 - 179	*Surveys at identified active nest sites of known barn swallow and chimney swift colony occurrence records.* What kind of surveys were/are going to be completed? MECP SARB recommends the proponent follow the Breeding Bird Atlas link for Chimney Swift surveys.	n/a	Mitigation measures were updated in Section 6.5.7.13.1 to clarify surveys at identified chimney swift active nest sites will be conducted for nesting and roosting individuals in accordance with the Birds Canada SwiftWatch Protocol.
23	6.5.7.14 Bobolink	*The Project is predicted to remove 7 ha (1.6% of the LSA and 0.4% of the terrestrial RSA) of moderate to high suitability bobolink habitat*	n/a	Bobolink habitat availability in the study area is shown in Appendix 6.5-B, Attachment 6.5-B-16. Section 6.5.7.14.1 was updated to fix incorrect reference to the figures.

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	Habitat Availability 6.5 - 180	MECP SARB could not locate a map in Appendix 6.5 – A or any reference to Bobolink habitat mapping in the Wildlife Figures. Please provide a figure with the General Habitat Description mapping for Bobolink and provide the number of hectares impacted by the project. For your awareness, a link has been provided to the General Habitat Description for Bobolink.		The GHD mapping has been based on the two NHIC Element Occurrences near Dryden. There will be no impacts to protected Bobolink Category 1/2/3 habitat. No Bobolink habitat was confirmed during surveys.
24	6.5.7.14 Bobolink Habitat Availability 6.5 - 180	*Managing vegetation removal activities so that removal does not occur within the migratory bird nesting period (April 15 to August 31)* ***to the extent possible.*** • *If vegetation removal cannot be avoided during the migratory bird nesting period (i.e., April 15 to August 31),* ***pre-clearing nest searches will be completed.*** **"The Migratory Birds Convention Act, 1994 (**Government of Canada 1994**) prohibits the disturbance or destruction of migratory bird nests (**e.g., passerines and waterfowl**) during the breeding season."** MECP SARB supports the above statement and does not recommend nest searching during the active nesting period and recommends vegetation clearing and grubbing outside of the breeding bird active season (April 15 – August 31). If vegetation clearing and grubbing cannot be completed outside of the active breeding bird period, an authorization under the ESA may be required.	n/a	Section 6.5.7.14.1 was updated to include permit requirements (where timing windows cannot be adhered to). No Bobolink habitat was confirmed during surveys. There will be no impacts to protected Bobolink Category 1/2/3 habitat (identified based on NHIC EO records).
25	6.5.7.14 Bobolink Mitigation Measures 6.5 - 182	*If an active bobolink nest is identified during pre-construction surveys or during active construction and/or vegetation removal, work will stop and MECP and other appropriate agencies will be contacted immediately to discuss mitigation measures. Nest monitoring will be implemented to document nest use and potential abandonment* *"The Migratory Birds Convention Act, 1994 (Government of Canada 1994) prohibits the disturbance or destruction of migratory bird nests*	n/a	Section 6.5.7.14.6 was updated to include permit requirements (where timing windows cannot be adhered to). No Bobolink habitat was confirmed during surveys. There will be no impacts to protected Bobolink Category 1/2/3 habitat (identified based on NHIC EO records).

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		(e.g., passerines and waterfowl) during the breeding season." MECP SARB supports the above statement and does not recommend nest searches during the active breeding bird season and recommends the proponent avoid contravening the ESA by conducting any vegetation removal and grubbing outside of the active bird season (April 15 – August 31). If the proponent cannot adhere to working outside of the recommended timing window, then an authorization under the ESA may be required.		
26	6.5.7.14 Bobolink Mitigation Measures 6.5 - 186	*If vegetation removal cannot be avoided during the migratory bird nesting period (i.e., April 15 to August 31), pre-clearing nest searches will be completed.* As above in comment # 25.	n/a	Sections 6.5.7.14.1 and 6.5.7.14.6 were updated to include permit requirements (where timing windows cannot be adhered to). No Bobolink habitat was confirmed during surveys. There will be no impacts to protected Bobolink Category 1/2/3 habitat (identified based on NHIC EO records).
27	6.5.7.15 Eastern Whip-poor-will Habitat Loss 6.5 - 187	*The Project is predicted to remove 1,814 ha (3.0% of the LSA and 0.7% of the terrestrial RSA) of moderate to high suitability eastern whip-poor-will habitat (Table 6.5-35), including 1 ha of Category 2 habitat and 4 ha of Category 3 habitat* MECP SARB notes in Attachment 6.5-B-17 Eastern Whip-Poor-Will, Figures 10, 19 and 30 have confirmed breeding habitat in the ROW. Please provide the General Habitat Description mapping for each of the identified locations identified in your baseline data collection (following the guidance as found in the MNRF 2014 Survey Protocol for Eastern Whip poor will in Ontario) and for portions of the LSA, please map the GHD for all potential suitable nesting habitat to arrive at an estimation of habitat impacts requiring authorization.	n/a	Hydro One requested that MECP SARB provide guidance on mapping candidate EWPW habitat. For the purposes of the Final EA, only confirmed whip-poor-will habitat is being considered under the commitment to obtain an ESA authorization for damage/destruction of habitat.

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28	6.5.7.15 Eastern Whip-poor-will Mitigation Measures 6.5 - 190	*If vegetation removal cannot be avoided during the migratory bird nesting period (i.e., April 15 to August 31), pre-clearing nest searches will be completed and will be valid for a period up to 72 hrs. Pre-clearance searches will involve nest sweeps.* As per comment # 25.	n/a	Section 6.5.7.15.1 was updated to include permit requirements (where timing windows cannot be adhered to).
29	6.5.7.15 Eastern Whip-poor-will Mitigation Measures 6.5 - 190	*Surveys at known eastern whip-poor-will occurrence records* MECP SARB recommends the proponent conduct surveys at known occurrence and candidate locations following the MNRF Draft Survey Protocol for Eastern Whip Poor Will in Ontario (2014) and provide GHD mapping for these occurrences and for all potential suitable nesting habitat to arrive at an estimation of habitat impacts requiring authorization. How is proponent going to effectively survey all impacted regions of the ROW?	n/a	Eastern Whip-poor-will candidate habitat locations are available on Attachment 6.5-B-17 in Appendix 6.5-B. Section 6.5.7.15.6 was updated to include permit requirements (where timing windows cannot be adhered to). Hydro One requested that MECP SARB provide guidance on mapping candidate EWPW habitat. For the purposes of the Final EA, only confirmed whip-poor-will habitat is being considered under the commitment to obtain an ESA authorization for damage/destruction of habitat.
30	6.5.7.15 Eastern Whip-poor-will Mitigation Measures 6.5 - 190	*If an active eastern whip-poor-will nest is identified during pre-construction surveys or during active construction, including during vegetation removal, work will stop and MECP and other appropriate agencies will be contacted immediately to discuss mitigation measures. Nest monitoring will be implemented to document nest use and potential abandonment* As stated in comment # 29. In the event that an EWPW is found nesting in a recently cleared area or during construction, MECP SARB recommends the proponent stop work immediately and contact SARB regarding next steps.	n/a	The wording throughout Section 6.5.7 for all bird species was updated accordingly.

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31	6.5.7.15 Eastern Whip-poor-will Mitigation Measures 6.5 - 190	*Environmental training for workers, including information on active nest identification and procedures to follow if an active nest is identified.* Please include what the recommended procedure is for following up on an active nest if identified. MECP SARB recommends the proponent stop work, leave the area and contact MECP SARB for next steps.	n/a	The wording throughout Section 6.5.7 for all bird species was updated accordingly.
32	6.5.7.15 Eastern Whip-poor-will Incidental take - Mitigation Measures 6.5 - 193	*Eastern whip-poor-will nests, eggs, and/or individuals could be disturbed or destroyed during construction of access roads and the ROW, and maintenance of the ROW during operations.* SARB recommends the proponent conduct these activities outside of the active breeding bird season during any construction of the project including access roads, work camps, pole and line installation etc. If the proponent chooses not to or cannot operate outside of the breeding bird season, then an authorization under the ESA may be required.	n/a	Section 6.5.7.15.6 was updated to include permit requirements (where timing windows cannot be adhered to).
33	Table 6.5 – 37 Summary of Net Effects and Mitigation Measures to Wildlife	*Avoid vegetation removal and all construction activities that cause sensory disturbance within 100 m of gray fox den from February 15-July 15 of each year to avoid disturbing denning gray fox.* *• If a gray fox den is identified during construction or operations, and should this timing not be able to be maintained within the buffer widths identified, local MECP SARB offices will be contacted to develop a den management plan and appropriate Indigenous communities will be notified, where requested(b).* In the event that a Gray Fox den is encountered, If the proponent chooses not to or cannot avoid the sensitive timing period for Gray Fox denning (February 15 – July 15) then an authorization under the ESA may be required. A den management plan may be included as part of the mitigation, however, would not be considered sufficient as an overall benefit to the species.	n/a	Comment acknowledged. Any impacts within 100 m of a gray fox den during the timing window will require and ESA authorization.

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34		*If vegetation removal must be completed during the migratory bird nesting period, implement nest sweeps. Similar measures will be taken for vegetation removal during routine ROW maintenance* See MECP SARB's comment # 25.	n/a	Table 6.5-40 was updated to include timing window for migratory bird nesting period (April 15 to August 31) and additional mitigation measures for threatened and endangered SAR.
35	Table 6.5 – 37 Wildlife and Wildlife Habitat All bird Criteria Construction, Operation and Maintenance stages 6.5-210	MECP SARB recommends the proponent include Eastern Whip-poor-will, Chimney Swift, Bank Swallow, Bobolink, Eastern Meadowlark and the appropriate mitigation for these species. Mitigation is listed above but is lacking in this table.	n/a	Table 6.5-40 was updated to include buffers and permit requirements for Bank Swallow, Bald Eagle, Bobolink, Chimney Swift and Eastern Whip-poor-will (where timing windows cannot be adhered to). Timing window has been updated to March 1 to August 31 for Bald Eagle, April to October for Chimney Swift, and April 15 to August 31 for Bank Swallow, Bobolink and Eastern Whip-poor-will. No mitigation has been added for Eastern Meadowlark as this species has not been included in the EA due to lack of breeding records in the region. Furthermore, Bobolink mitigation will also protect Eastern Meadowlark (as they use similar habitats). Updated Section 6.5.3 to include rationale for exclusion of Eastern Meadowlark from the list of bird criteria to be carried forward in the assessment.
36	Table 6.5 – 37 Wildlife and Wildlife Habitat Project Component or Activity 6.5 - 209	*Construction stage:* *• Clearing, grading, earth moving, grubbing of vegetation, and stockpiling of materials along the ROW and other access and construction areas, and construction of infrastructure (e.g., access roads, bridges, temporary laydown areas, turnaround areas and temporary construction camps);* This paragraph should appear in the project component or activity section of the table as per comment # 35. Please add these activities under the project and component or activity section and address mitigation for these activities for each species as per direction in comment #35	n/a	The mitigation measures in Table 6.5-40 were updated to include criteria specific mitigations.

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37	Table 6.5 – 37 Little Brown Myotis and Northern Myotis Project Component or Activity 6.5 - 211	*Construction stage:* *• Clearing, grading, earth moving, grubbing of vegetation, and stockpiling of materials along the ROW and other access and construction areas, and construction of infrastructure (e.g., access roads, bridges, temporary laydown areas, turnaround areas and temporary construction camps)* MECP SARB recommends adding the above paragraph to the project component and activity section and including mitigative actions for SAR bats during these activities.	n/a	The mitigation measures in Table 6.5-40 were updated to include SAR bat specific mitigations.
38	Table 6.5 – 37 Little Brown Myotis and Northern Myotis Potential Effect	Incidental Take For your awareness, any site preparation involving drilling or blasting resulting in destruction of roosting or hibernating bats and their habitat would be in contravention to the ESA. If the proponent chooses not to or cannot follow the recommendations outlined in comment # 13, then an authorization under the ESA may be required.	n/a	Adverse impacts to SAR bat and bat habitat during the hibernation (August 1 – May 31) or maternity season (May 1 – August 31) will be minimized to the extent practicable. If there are potential adverse impacts to SAR bats and bat habitat during these windows then the necessary permitting will be completed. Table 6.5-40 has been updated to reflect the potential need for permitting where timing windows cannot be adhered to.
39	Table 6.5 – 37 Little Brown Myotis and Northern Myotis Potential Effect	*Avoid clearing maternity roost habitat from May 1 to August 31. Should this timing not be able to be maintained as identified, MECP SARB will be contacted for further discussion and appropriate Indigenous communities notified, where requested.* If the proponent chooses not to or cannot avoid the sensitive timing period for SAR bats, then an authorization under the ESA may be required.	n/a	Adverse impacts to SAR bat and bat habitat during the hibernation (August 1 – May 31) or maternity season (May 1 – August 31) will be minimized to the extent practicable. If there are potential adverse impacts to SAR bats and bat habitat during these windows then the necessary permitting will be completed. Table 6.5-40 has been updated to reflect the potential need for permitting where timing windows cannot be adhered to.
40	Table 6.5 – 37 Little Brown Myotis and Northern Myotis Potential Effect	*Within 500 m a bat hibernaculum, avoid any construction activities that may cause sensory disturbance to hibernating bats during the hibernation period (September 1 to May 30).* As stated in comment # 14.	n/a	Adverse impacts to SAR bat and bat habitat during the hibernation (August 1 – May 31) or maternity season (May 1 – August 31) will be minimized to the extent practicable. If there are potential adverse impacts to SAR bats and bat habitat during these windows then the necessary permitting will be completed. Table 6.5-40 has been updated to reflect the potential need for permitting where timing windows cannot be adhered to.

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41	6.5.8.7.3 Net Effects on Little Brown and Northern Myotis 6.5 - 235	*If tree clearing activities were to take place in suitable little brown myotis and northern myotis maternity roosting habitat during the maternity roosting period (May 1 to August 31), then some incidental take may occur but the effect is considered unlikely after mitigation. Incidental take of roosting little brown myotis and northern myotis will be restricted to the Project footprint and is considered to be infrequent because the mitigation is expected to be effective* If the proponent cannot commit to avoiding the active season for SAR bats, then an authorization under the ESA may be required.	n/a	Adverse impacts to SAR bat and bat habitat during the hibernation (August 1 – May 31) or maternity season (May 1 – August 31) will be minimized to the extent practicable. If there are potential adverse impacts to SAR bats and bat habitat during these windows then the necessary permitting will be completed. Table 6.5-40 has been updated to reflect the potential need for permitting where timing windows cannot be adhered to.
42	6.6.7.1.2.2 Mitigation below the High Water Mark Lake Sturgeon 6.6-91	The proponent has identified that mitigation measures and avoidance of in water works below the high-water mark should have no adverse impacts on SAR fish (e.g. Lake Sturgeon). The proponent has identified the restricted activity period for Lake Sturgeon as April 1 – June 30. MECP SARB acknowledges this time frame and recommends the proponent avoid any in water work during this period. Should any in-water work in Lake Sturgeon habitat be required, then an authorization under the ESA may be required.	n/a	This has been addressed in the Final EA Report. All sites with potential for Lake Sturgeon (i.e., desktop hydrological connections to Lake Sturgeon bearing waters or those that were identified in the desktop assessment and/or field to provide Lake Sturgeon habitat) had the Lake Sturgeon timing window applied. A statement was added regarding the need for an authorization under the ESA in Section 6.6.7.1.2.4 Reduce the Fish Mortality Risk Through Restricted Activity Timing Windows and Fish Rescues/Relocations.
43	6.4.7.5 Plant Species at Risk Black Ash Potential Effect, Habitat Quantity 6.4-80	*A total loss of 4 ha representing 10.8% habitat loss within the LSA, and 2.3% habitat loss within the RSA* Black Ash was added to the SARO list on January 26, 2022 and will receive protection for both the species and its habitat under the ESA (2007) as identified in O.Reg 23/22 s4. Currently, Black Ash is under a temporary suspension from the ESA which will be revoked as per O.Reg. 23/22 s4. Any Black Ash tree removal or habitat disturbance following the revoke date may require an authorization under the ESA. Please provide a map indicating where the Black Ash are located and the number of individuals that may be impacted by the project.	n/a	Candidate habitat for Black ash was completed for the effects assessment. It is understood that authorization under the ESA may be required for this species after the revoke date of the suspension. MECP SARB to provide further direction on the identification of all black ash trees within the Project footprint to contribute to the potential permitting process under the ESA.

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44	ATTACHMENT 6.4-A-1 Terrestrial Baseline Figures Steeprock Bat Hibernacula Survey Locations Figure 2.4 -2-4	Hydro One is proposing a new road within the 500 m buffer and the proposed hydro line passes through the 500 m buffer of the WCA 81 hibernacula for the Steep Rock site and a laydown area within the 500 m buffer of WCA 72 site. Additional concerns include implosion splicing within 500 meters of the hibernaculum, noise and vibration from drilling and blasting associated with construction and helicopter noise. MECP SARB recommends no sensory disturbance (implosion splicing, blasting or heavy vibration) within 500 meters of a bat hibernaculum from August 1 – May 31. If the proponent chooses not to or cannot operate outside of the recommended timing window, then an authorization under the ESA may be required.	n/a	Adverse impacts to SAR bat and bat habitat during the hibernation (August 1 – May 31) or maternity season (May 1 – August 31) will be minimized to the extent practicable. If there are potential adverse impacts to SAR bats and bat habitat during these windows then the necessary permitting will be completed. Table 6.5-40 has been updated to reflect the potential need for permitting where timing windows cannot be adhered to
45	ATTACHMENT 6.4-A-1 Terrestrial Baseline Figures Bat Hibernacula Survey Locations Figure 2.4-2-5	Hydro One is proposing new roads and the proposed hydro line passes through the 500 m buffer of both hibernacula for the Lakeshore Control site and the Spillway site. Additional concerns include implosion splicing within 500 meters of the hibernaculum, noise and vibration from drilling and blasting associated with construction and helicopter noise. MECP SARB recommends no sensory disturbance (implosion splicing, blasting or heavy vibration) within 500 meters of a bat hibernaculum from August 1 – May 31. If the proponent chooses not to or cannot operate outside of the recommended timing window, then an authorization under the ESA may be required.	n/a	Adverse impacts to SAR bat and bat habitat during the hibernation (August 1 – May 31) or maternity season (May 1 – August 31) will be minimized to the extent practicable. If there are potential adverse impacts to SAR bats and bat habitat during these windows then the necessary permitting will be completed. Table 6.5-40 has been updated to reflect the potential need for permitting where timing windows cannot be adhered to.
46	General Comment SAR species not considered in the Draft EA	The EA needs to address and identify potential impacts to Eastern Meadowlark, Red-headed Woodpecker, Short-eared Owl and Lesser Yellowlegs. Addressing these species now will aid in avoiding delays during the permitting process if required.	n/a	Section 6.5.3 was updated to include rationale for the exclusion of these four additional bird species from the list of bird criteria in the EA assessment. The rationale is consistent with that for exclusion of American White Pelican and Least Bittern.

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		For your awareness, the Short-eared Owl and Lesser Yellowlegs were added to the SARO list in 2023 as Threatened. Although these were listed following approval of the Terms of Reference, these species will need to be addressed and considered in the EA report.		
47	3.3.11 page 16	Any blasting or crushing will need to be a minimum of 500 m from any bat hibernacula or identified breeding bird locations. Will further surveys for breeding birds I.e. EWPW being conducted at these locations? reference to Appendix 3.0 B for locations of 24 aggregate features that may be exploited for materials; are any of these located near bat hibernacula or potential EWPW habitat? do any of these have existing Bank Swallow colonies or congregations of burrows? MECP SARB recommends operating outside of sensitive timing windows for SAR, if this cannot be avoided than an authorization under the ESA may be required. MECP SARB recommends the proponent follow the Best Management Practices for Bank Swallow while conducting aggregate pit work or storing stockpiled aggregate materials at a slope of 70 degrees or less.	n/a	There are no proposed aggregate pits within 500 m of Bank Swallow or Eastern Whip-poor-will confirmed habitat. Bank Swallow and Eastern Whip-poor-will candidate habitat locations are available on Attachment 6.5-B-16 in Appendix 6.5-B (bobolink) Mitigation measures in Section 6.5.7 were updated for birds to include BMPs, timing windows for works, 500 m buffers for moderate to high impact operations in protected habitat and permit requirements (where timing windows cannot be adhered to). Adverse impacts to SAR bat and bat habitat during the hibernation (August 1 – May 31) or maternity season (May 1 – August 31) will be minimized to the extent practicable. If there are potential adverse impacts to SAR bats and bat habitat during these windows then the necessary permitting will be completed.
48	3.3.12 page 17	MECP SARB recommends that helicopter pad areas be cleared outside of SAR sensitive timing periods, and should not be located within 500 m of any bat hibernacula. Are any proposed helicopter pads within 500 m of bat hibernacula? Should the proponent have reasons for not being able to adhere to the SAR sensitive timing windows then please provide literature and rationale to support these reasons. An authorization under the ESA may be required.	n/a	There are no proposed helicopter pads within 500 m of any potential or known hibernacula.

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1	6.5 Wildlife and Wildlife Habitat Table 6.5-2 page 6.5 - 11	For your awareness, Barn Swallow, included in this document as a threatened species, has been down listed to species of Special Concern under the ESA (2007) O.Reg. 230/08 Species at Risk in Ontario List, as such, the species and its habitat are no longer protected under the ESA.	n/a	Thank you for this input. The EA document has been revised accordingly.
2	6.5.5.3 Gray Fox Page 5.3 - 32	*"Dens can be found in modified burrows of other animals, hollow trees, hollow logs, woodpiles, rocky outcrops, cavities under rocks, piles of brush, slab, wood or sawdust, and abandoned buildings (MECP 2019)."* MECP SARB recommends the proponent avoid tree clearing and heavy equipment disturbance within 100 meters where an active gray fox den has been identified during the denning period (February 15-July 15). If the proponent cannot operate outside of the recommended timing window, then an authorization under the ESA may be required.	n/a	There are no active gray fox dens currently identified within the Project study areas or Project footprint. It is understood that the ESA prohibits damaging or destroying den sites. MECP SARB does not have a standardized protocol for surveying for gray fox and identification of den sites. This discussion will resume during the permitting phase of the Project.
3	6.5.5.7 Little Brown and Northern Myotis 5.7 pages 46 - 51	Maternity roost habitat – MECP SARB recommends the proponent conduct tree and vegetation removal outside of the active season (May 1 – August 31). If the proponent chooses not to or cannot avoid clearing outside of the active season for SAR bats, then an authorization under the ESA may be required.	n/a	Comment is acknowledged and timing restriction is incorporated into the EA document (Section 6.5.7.7; Section 6.5.8 and Section 6.5.9)
4	6.5.5.12 Bank Swallow 5.12 - 70	*"Field surveys in 2022 documented 15 individuals at one nesting colony within the LSA."* Where is this in relation to the planned ROW? Was the nesting colony observed in an existing aggregate pit? If this habitat is to be removed, it will require an authorization under the ESA. If the pit is active, excavation is allowed outside of the nesting season providing the remaining face is suitable for nesting. In areas outside of an active nesting site, MECP SARB recommends aggregate slopes and stock-piles of soft materials suitable for bank swallow nesting be maintained at an angle <70 degrees to prevent nesting by the species. Where nesting colonies occur or when stock piling materials, MECP SARB recommends the proponent should follow BMP for the protection and creation of bank swallow habitat	n/a	The nesting colony is near Ignace in the existing K&M Construction Aggregate Pit 15813. Approximately 7 ha of Category 3 habitat will be removed for construction of a laydown/camp area on the opposite side of the highway. An additional 3 laydown/camp areas are proposed within 1000 m of Category 3 habitat. The bullet point in Section 6.5.5.12 discussing the 2022 field survey results was updated to include the location. Updated mitigation measures under Section 6.5.7.12.1 and 6.5.7.12.6 to include BMPs, vegetation clearing timing windows, 500 m buffer and permit requirements (where timing windows are not adhered to). Bank Swallow candidate habitat locations are available in Attachment 6.5-B-13 of Appendix 6.5-B.

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5	6.5.5.13 Chimney Swift 5.13 - 70	Any candidate trees found within the LSA should be maintained where possible. If a candidate tree or occupied tree is required to be removed, then mitigation to avoid section 9 concerns is recommended by removing the tree outside of the active breeding bird season (April 15 – August 31). Should a nest tree require removal then an authorization under s.10 of the ESA may be required.	n/a	Vegetation clearing during the breeding bird timing window will be minimized to the extent practicable. If vegetation clearing is required during the breeding bird timing window then the necessary permitting will be completed. Section 6.5.7.13.1 has been updated to reflect the potential need for permitting where timing windows for vegetation clearing cannot be adhered to.
6	6.5.5.14 Bobolink 5.14 - 74	MECP SARB recommends that clearing any vegetation and grubbing occur outside of the active breeding bird season (April 15 – August 31).	n/a	Vegetation clearing during the breeding bird timing window will be minimized to the extent practicable. If vegetation clearing is required during the breeding bird timing window then the necessary permitting will be completed. Section 6.5.7.14.1 has been updated to reflect the potential need for permitting where timing windows for vegetation clearing cannot be adhered to. No vegetation removal is proposed within bobolink candidate habitat. Bobolink candidate habitat locations are available on Attachment 6.5-B-16 in Appendix 6.5-B.
7	6.5.5.15 Eastern Whip poor will 5.15-78	As in comment # 6.	n/a	Vegetation clearing during the breeding bird timing window will be minimized to the extent practicable. If vegetation clearing is required during the breeding bird timing window then the necessary permitting will be completed. Section 6.5.7.15.1 has been updated to reflect the potential need for permitting where timing windows for vegetation clearing cannot be adhered to. There will be some impacts from vegetation removal to Whip-poor-will candidate habitat at Station EWPW-24. Whip-poor-will candidate habitat locations are available in Attachment 6.5-B-17 in Appendix 6.5-B.
8	Table 6.5 – 20 Little Brown Myotis and Northern Myotis 6.5 - 87	*Little Brown and Northern Myotis – incidental take* – any adverse impacts to SAR bats or SAR bat habitat during hibernation (September 1 – April 30) or maternity season (May 1 – August 31) should be avoided. If these sensitive time periods cannot be avoided then an authorization under the ESA may be required.	n/a	Adverse impacts to SAR bat and bat habitat during the hibernation (August 1 – May 31) or maternity season (May 1 – August 31) will be minimized to the extent practicable. If there are potential adverse impacts to SAR bats and bat habitat during these windows then the necessary permitting will be completed. Table 6.5-40 has been updated to reflect the potential need for permitting where timing windows cannot be adhered to.
9	Table 6.5 – 20 Wildlife and Wildlife Habitat – All Bird Criteria	*Incidental take – Site preparation, construction and maintenance may result in the destruction of nests, eggs, and individuals of migratory birds (incidental take).* MECP SARB recommends the proponent conduct site preparation (tree and vegetation removal and	n/a	Vegetation clearing during the breeding bird timing window will be minimized to the extent practicable. If vegetation clearing is required during the breeding bird timing window then the necessary permitting will be completed. Section 6.5.7 has been updated to reflect the potential need for permitting where timing windows for vegetation clearing cannot be adhered to.

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	6.5 - 87	grubbing) outside of the active breeding bird season (April 15 – August 31). If the proponent chooses not to or cannot avoid site preparation during this time period, then an authorization under the ESA may be required.		
10	Table 6.5 – 20 Furbearers (American marten, beaver, gray wolf) and Gray Fox 6.5 - 87	***Incidental take*** *– Site preparation, construction and maintenance may result in the destruction of furbearer den sites and denning individuals (incidental take).* MECP SARB recommends site preparation, construction and maintenance occur outside of the denning period for Gray Fox (February 15 – July 15). If the proponent cannot avoid site preparation, construction and maintenance during this time period then an authorization under the ESA may be required.	n/a	Construction activities that could impact a gray fox den (or take place within 100 m of a den) will occur outside of the denning period. Clarification has been added to Section 6.5.7.3.5.
11	6.5.7.1.6 Fly Rock from Blasting *Potential Effects* Survival and Reproduction 6.5 - 94	Although Fly Rock is not considered to be much of a threat to SAR in the area, vibrations and noise from blasting may impact bat hibernacula. Disturbing bats during hibernation may lead to mortality as the disturbance may cause them to use up their fat stores too early. MECP SARB recommends that blasting, drilling or heavy equipment use should not occur within 500 meters of any bat hibernacula and no tree or vegetation removal or grubbing may occur within 200 meters of a bat hibernacula. If the proponent chooses not to or cannot commit to working outside of the recommended timing windows or buffer distances from hibernacula, then an authorization under the ESA may be required.	n/a	Comment noted. The assessment addresses these potential impacts and states in Section 6.5.7.7.1: *No tree removal or other construction activities will be completed within 200 m of hibernacula. Furthermore, no construction activities that produce loud noises and vibrations (e.g., drilling, blasting, and implosion splicing) to the extent practicable will be completed within 500 m of a hibernacula during the hibernation period (September 1 to May 30). These restrictions on activities are expected to limit effects on hibernating bats because the Project is not predicted to result in the removal or alteration of potential hibernation habitat. The main concern during the construction stage is the effect that sensory disturbance (e.g., noise and vibration) may have on hibernating bats.*
12	6.5.7.3 Gray Fox 6.5 - 110	*Mitigation measures will likely include:* *• Environmental training for workers, including information on den identification and procedures to follow if a den is identified.* *• Surveys to identify den sites within home ranges of known gray fox occurrence records.* *If an active den is identified during active construction, including during vegetation removal, work will stop and local MECP SARB offices will be contacted immediately. The den will be clearly marked, a 100 m buffer surrounding the den will be established and no vegetation*	n/a	Section 6.5.7.3.5 and Table 6.5-40 have been updated to specify how dens encountered during construction will be marked and buffered. MECP SARB will be contacted should a den be found during construction.

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		removal will proceed within that buffer until MNRF is engaged. MECP SARB acknowledges the mitigation measures identified in this section, however, has concerns about how a den will be marked if encountered during the active denning season (e.g. flagged or GPS point?). MECP advises minimizing any human presence at the den site as this may cause the female to abandon her pups. Should an active den be encountered in the Thunder Bay to Atikokan region where Gray Fox have been identified to occur,(attachment 6.5-B-1 maps 1,2,3 8 and 9), SARB acknowledges the stop work procedure and to contact MECP for next steps.		
13	6.5.7.7.1 Little Brown Myotis and Northern Myotis Habitat Loss 6.5-129	*Vegetation removal will occur between 200 m and 500 m* ***of three likely or possible hibernaculum****. This activity will not negatively impact hibernation habitat availability. Any Project activities that could cause loud noise and vibrations will not be conducted within 500 m of a hibernaculum during the hibernation period. Project activities causing loud noises and vibrations will not negatively impact hibernation habitat availability.* ***No Project activities are planned within 200 m of a hibernaculum*** *(Table 6.5-25).* Noise caused by heavy equipment and vibrations from drilling and blasting do not seem to impact hibernating bats when conducted at distances greater than 500 m from a hibernaculum. Maintaining a buffer of trees and vegetation within 200 m of a hibernaculum provide shelter and microclimate conditions for the hibernaculum. MECP SARB acknowledges Hydro One's commitment to avoid removing trees and vegetation within 200 m of a bat hibernaculum and avoid loud noises associated with drilling, blasting and implosion splicing within 500 m of a hibernaculum. Any tree or vegetation removal occurring between 200 meters and 500 meters of a bat hibernaculum is recommended to occur outside of the maternity season for bats (May 1 – August 31).	n/a	Section 6.5.7.7.1 has been updated to clarify.

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		If the proponent chooses not to or cannot meet these avoidance recommendations than an authorization under the ESA may be required. For your awareness, the paragraph repeats itself in the document (recommend removing duplicate paragraph).		
14	6.5.7.7.1 Little Brown Myotis and Northern Myotis 6.5 - 131	*No construction activities that produce loud noises and vibrations (e.g., drilling, blasting, and implosion splicing) will be completed within 500 m of a hibernacula during the hibernation period (September 1 to May 30).* MECP SARB acknowledges Hydro One's commitment to avoid construction activities that produce loud noises and vibrations such as drilling, blasting or implosion splicing within 500 m of a bat hibernaculum, however, recommends these activities should be avoided between August 1 – May 31 to include the most sensitive time periods around a hibernaculum including swarming and hibernation.	n/a	Section 6.5.7.7.1 has been updated with the timing window of August 1 - May 31.
15	6.5.7.7.1 Little Brown Myotis and Northern Myotis Survival and Reproduction 6.5 - 132	*Site clearing for the Project Footprint will result in removal of vegetation between 200 m and 500 m of three likely or possible hibernaculum* It is unclear when will tree removal occur in the zone between 200 m and 500 m of a hibernaculum. If clearing trees near a hibernaculum is required, MECP SARB recommends the proponent conduct tree and vegetation clearing within 200 m of a hibernaculum outside of the maternity season for bats (May 1 – August 31) providing noise and vibration created at the site is restricted to that associated with logging (e.g. chain saw, skidder, or mechanical harvesting equipment). If the proponent cannot adhere to avoiding the sensitive timing period for bats, or if tree and vegetation removal is required less than 200 m from a bat hibernaculum then an authorization under the ESA may be required.	n/a	Clearing will be conducted within the 200 – 500 m distance from some hibernacula. Clearing is not required within 200 m of a hibernaculum. Clearing will be conducted within the 200 - 500 m distance from hibernation habitat outside of the maternity season for bats (May 1 – August 31) providing noise and vibration created at the site is restricted to that associated with logging (e.g., chain saw, skidder, or mechanical harvesting equipment).

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16	6.5.7.7.1 Little Brown Myotis and Northern Myotis Survival and Reproduction 6.5 - 134	*No Project-related disturbance will occur within 200 m of a bat hibernaculum without engagement and approval of regulatory agencies.* *• Project activities causing loud noise or vibrations (e.g., drilling, blasting, implosion splicing) will not be undertaken within 500 m of a bat hibernaculum during the hibernation period (September 1 to May 30).* MECP SARB recommends no clearing of trees and vegetation within 200 m of a bat hibernaculum. If the proponent chooses not to or cannot avoid operating outside of this buffer than an authorization may be required. MECP SARB acknowledges Hydro One's commitment to avoid construction activities that produce loud noises and vibrations such as drilling, blasting or implosion splicing within 500 m of a bat hibernaculum, however, recommends these activities should be avoided between August 1 – May 31 to include the most sensitive time periods around a hibernaculum including swarming and hibernation.	n/a	Section 6.5.7.7.1 has been updated accordingly.
17	6.5.7.7.1 Little Brown Myotis and Northern Myotis Mitigation Measures 6.5 - 134	*If potential maternity roost habitat is to be removed during the roosting period, it will be subject to ESA permitting and site-specific mitigation measures to be developed in consultation with the MECP.* As previously indicated, if the proponent cannot adhere to avoiding and clearing of trees or vegetation during the recommended timing window for SAR bats of May 1 – August 31 then an authorization under the ESA may be required.	n/a	Comment acknowledged.
18	6.5.7.7.3 Incidental Take Mitigation Measures 6.5-135	*Clearing maternity roost habitat during the maternal roosting period (May 1 to August 31) will be avoided. Should this timing not be able to be maintained as identified, MECP SARB will be engaged.* If the proponent intends on clearing maternity roost habitat during the SAR bat sensitive timing window of May 1 – August 31 then an authorization under the ESA may be required.	n/a	Construction activities are planned within the 200 - 500 m area, but no work is planned within 200 m distance from a potential or confirmed hibernacula.

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		In areas within 500 m of a known or suspected hibernacula, construction activities causing sensory disturbance (e.g., drilling, blasting, implosion splicing) will be completed outside the hibernation period (September 1 to May 30). As noted in comment # 14 above, MECP SARB acknowledges Hydro One's commitment to avoid construction activities that produce loud noises and vibrations such as drilling, blasting or implosion splicing within 500 m of a bat hibernaculum, however, recommends these activities should be avoided between August 1 – May 31 to include the most sensitive time periods around a hibernaculum including swarming and hibernation. *Construction activities causing sensory disturbance and tree clearing will not be completed* ***within 200 m of potential hibernacula*** MECP SARB acknowledges this commitment and based on the Attachment 6.5-B-5 Candidate and Confirmed SAR Bat Hibernacula, shows the Andowan, Steep Rock, Spillway and Lakeshore hibernacula (Figures 1, 3 and 4 respectively) as being impacted by construction activities in the LSA. MECP SARB recommends the proponent follow comments pertaining to sensitive timing periods and buffers noted above. Please clarify if other tree and vegetation clearing activities are planned at the other confirmed or potential hibernacula.		
19	6.5.7.12 Bank Swallow 6.5-165	*The Project is predicted to remove 155 ha (3.3% of the LSA and 1.1% of the terrestrial RSA) of moderate to high suitability bank swallow habitat (Table 6.5-31), including 6.0 ha of Category 3 of protected habitat.* It is unclear as to what type of suitable habitat is being removed (e.g. feeding)	n/a	The nesting colony is near Ignace in the existing K&M Construction Aggregate Pit 15813. Bank Swallow candidate habitat locations are available in Attachment 6.5-B-13 of Appendix 6.5-B. Approximately 7 ha of Category 3 habitat will be removed for construction of a laydown/camp area on the opposite side of the highway.

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		The proponent refers to 6.0 ha of category 3 habitat impacted by the project. There is no reference to the GHD mapping or to which map in attachment 6.5-B-13 this occurs. Please provide the GHD mapping for known Bank Swallow nesting colonies (active or inactive) and identify where the colony occurs in the attachment. Please specify if the nesting location used to create the GHD mapping is in an existing aggregate pit, proposed aggregate pit or natural location (I.e. river bank). Will this location be utilized for aggregate material during the project?		According to the ESA GHD for Bank Swallow, Category 3 habitat is identified as suitable foraging habitat within 500 m of a colony. Section 6.5.7.12.1 was updated to provide a definition for what is considered Category 3 habitat.
20	6.5.7.12 Bank Swallow 6.5-167	*If an active/inactive bank swallow nesting colony is identified during pre-construction or during active construction, including during vegetation removal, work will stop and MECP and other appropriate agencies will be contacted immediately to discuss mitigation measures. Nest monitoring will be implemented to document nest use and potential abandonment.* MECP SARB recommends the proponent conduct tree and vegetation clearing and grubbing outside of the active breeding bird season (April 15 – August 31). If a Bank Swallow nesting colony is located within the LSA or found at any of the aggregate pit locations used to support the project, then MECP SARB recommends the proponent avoid work within 50 m of the active colony until nesting season has been completed. If the proponent cannot avoid the nesting season or the habitat, then an authorization under the ESA may be required. In the event the proponent requires stockpiling of soft materials such as aggregate (e.g. sand, A-gravel etc.)where Bank Swallow are present, MECP SARB recommends the proponent follow section 4.2.1 of the Best Management Practices for the Protection, Creation and Maintenance of Bank Swallow Habitat in Ontario https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&cad=rja&uact=8&ved=2ahUKEwiGvOb51fX_AhUEEFkFHaPBAuQQFnoECA0QAQ	n/a	The nesting colony is near Ignace in the existing K&M Construction Aggregate Pit 15813. Bank Swallow candidate habitat locations are available in Attachment 6.5-B-13 of Appendix 6.5-B. Approximately 7 ha of Category 3 habitat will be removed for construction of a laydown/camp area on the opposite side of the highway. Updated mitigation measures under Section 6.5.7.12.1 and 6.5.7.12.6 to include BMPs, vegetation clearing timing windows, 500 m buffer and permit requirements (where timing windows cannot be adhered to).

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		Q&url=https://files.ontario.ca/bansbmpenpdffinalv.1.117mar17.pdf&usg=AOvVaw0zIiWgbBeYxNAL-46msstj&opi=89978449 to avoid creating unintentional nesting habitat for the species that may result in delays to construction. For your awareness, Bank Swallow breeding colonies and congregation of burrows can be mapped using the General habitat Description.		
21	6.5.7.13 Chimney Swift 6.5 - 70	*Structures with barn swallow and chimney swift nests can be removed outside of the breeding season, following appropriate legislative requirements.* MECP SARB recommends the proponent conduct tree and vegetation clearing outside of the breeding bird window (April 15 – August 31). It is the proponent's responsibility to conduct breeding bird surveys and identify nesting sites for Chimney Swift that may be impacted by the proposed project. Any such structures observed with active roosting or nesting Chimney Swift would be considered Chimney Swift habitat. Any damage or destruction of SAR habitat is considered a contravention to the ESA and an authorization under the ESA may be required. MECP SARB recommends the proponent identify any of these locations up front with MECP SARB to determine if an authorization is required. For your awareness, Barn Swallow has been down-listed to a species of special concern and the species and its habitat are no longer protected under the ESA.	n/a	Mitigation measures were updated under Section 6.5.7.13.1 and 6.5.7.13.6 to clarify surveys at structures will be conducted for nesting and roosting individuals and to include vegetation/structure removal timing windows and registration/permitting requirements for removal of chimney swift nesting/roosting habitat. All bird statuses under the ESA, COSEWIC and SARA have been reviewed and updated in Table 6.5-2.
22	6.5.7.13 Chimney Swift Mitigation Measures 6.5 -178 - 179	*Surveys at identified active nest sites of known barn swallow and chimney swift colony occurrence records.* What kind of surveys were/are going to be completed? MECP SARB recommends the proponent follow the Breeding Bird Atlas link for Chimney Swift surveys.	n/a	Mitigation measures were updated in Section 6.5.7.13.1 to clarify surveys at identified chimney swift active nest sites will be conducted for nesting and roosting individuals in accordance with the Birds Canada SwiftWatch Protocol.
23	6.5.7.14 Bobolink	*The Project is predicted to remove 7 ha (1.6% of the LSA and 0.4% of the terrestrial RSA) of moderate to high suitability bobolink habitat*	n/a	Bobolink habitat availability in the study area is shown in Appendix 6.5-B, Attachment 6.5-B-16. Section 6.5.7.14.1 was updated to fix incorrect reference to the figures.

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	Habitat Availability 6.5 - 180	MECP SARB could not locate a map in Appendix 6.5 – A or any reference to Bobolink habitat mapping in the Wildlife Figures. Please provide a figure with the General Habitat Description mapping for Bobolink and provide the number of hectares impacted by the project. For your awareness, a link has been provided to the General Habitat Description for Bobolink.		The GHD mapping has been based on the two NHIC Element Occurrences near Dryden. There will be no impacts to protected Bobolink Category 1/2/3 habitat. No Bobolink habitat was confirmed during surveys.
24	6.5.7.14 Bobolink Habitat Availability 6.5 - 180	*Managing vegetation removal activities so that removal does not occur within the migratory bird nesting period (April 15 to August 31)* ***to the extent possible.*** • *If vegetation removal cannot be avoided during the migratory bird nesting period (i.e., April 15 to August 31),* ***pre-clearing nest searches will be completed.*** **"The Migratory Birds Convention Act, 1994 (**Government of Canada 1994**) prohibits the disturbance or destruction of migratory bird nests (**e.g., passerines and waterfowl**) during the breeding season."** MECP SARB supports the above statement and does not recommend nest searching during the active nesting period and recommends vegetation clearing and grubbing outside of the breeding bird active season (April 15 – August 31). If vegetation clearing and grubbing cannot be completed outside of the active breeding bird period, an authorization under the ESA may be required.	n/a	Section 6.5.7.14.1 was updated to include permit requirements (where timing windows cannot be adhered to). No Bobolink habitat was confirmed during surveys. There will be no impacts to protected Bobolink Category 1/2/3 habitat (identified based on NHIC EO records).
25	6.5.7.14 Bobolink Mitigation Measures 6.5 - 182	*If an active bobolink nest is identified during pre-construction surveys or during active construction and/or vegetation removal, work will stop and MECP and other appropriate agencies will be contacted immediately to discuss mitigation measures. Nest monitoring will be implemented to document nest use and potential abandonment* *"The Migratory Birds Convention Act, 1994 (Government of Canada 1994) prohibits the disturbance or destruction of migratory bird nests*	n/a	Section 6.5.7.14.6 was updated to include permit requirements (where timing windows cannot be adhered to). No Bobolink habitat was confirmed during surveys. There will be no impacts to protected Bobolink Category 1/2/3 habitat (identified based on NHIC EO records).

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		(e.g., passerines and waterfowl) during the breeding season." MECP SARB supports the above statement and does not recommend nest searches during the active breeding bird season and recommends the proponent avoid contravening the ESA by conducting any vegetation removal and grubbing outside of the active bird season (April 15 – August 31). If the proponent cannot adhere to working outside of the recommended timing window, then an authorization under the ESA may be required.		
26	6.5.7.14 Bobolink Mitigation Measures 6.5 - 186	*If vegetation removal cannot be avoided during the migratory bird nesting period (i.e., April 15 to August 31), pre-clearing nest searches will be completed.* As above in comment # 25.	n/a	Sections 6.5.7.14.1 and 6.5.7.14.6 were updated to include permit requirements (where timing windows cannot be adhered to). No Bobolink habitat was confirmed during surveys. There will be no impacts to protected Bobolink Category 1/2/3 habitat (identified based on NHIC EO records).
27	6.5.7.15 Eastern Whip-poor-will Habitat Loss 6.5 - 187	*The Project is predicted to remove 1,814 ha (3.0% of the LSA and 0.7% of the terrestrial RSA) of moderate to high suitability eastern whip-poor-will habitat (Table 6.5-35), including 1 ha of Category 2 habitat and 4 ha of Category 3 habitat* MECP SARB notes in Attachment 6.5-B-17 Eastern Whip-Poor-Will, Figures 10, 19 and 30 have confirmed breeding habitat in the ROW. Please provide the General Habitat Description mapping for each of the identified locations identified in your baseline data collection (following the guidance as found in the MNRF 2014 Survey Protocol for Eastern Whip poor will in Ontario) and for portions of the LSA, please map the GHD for all potential suitable nesting habitat to arrive at an estimation of habitat impacts requiring authorization.	n/a	Hydro One requested that MECP SARB provide guidance on mapping candidate EWPW habitat. For the purposes of the Final EA, only confirmed whip-poor-will habitat is being considered under the commitment to obtain an ESA authorization for damage/destruction of habitat.

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28	6.5.7.15 Eastern Whip-poor-will Mitigation Measures 6.5 - 190	*If vegetation removal cannot be avoided during the migratory bird nesting period (i.e., April 15 to August 31), pre-clearing nest searches will be completed and will be valid for a period up to 72 hrs. Pre-clearance searches will involve nest sweeps.* As per comment # 25.	n/a	Section 6.5.7.15.1 was updated to include permit requirements (where timing windows cannot be adhered to).
29	6.5.7.15 Eastern Whip-poor-will Mitigation Measures 6.5 - 190	*Surveys at known eastern whip-poor-will occurrence records* MECP SARB recommends the proponent conduct surveys at known occurrence and candidate locations following the MNRF Draft Survey Protocol for Eastern Whip Poor Will in Ontario (2014) and provide GHD mapping for these occurrences and for all potential suitable nesting habitat to arrive at an estimation of habitat impacts requiring authorization. How is proponent going to effectively survey all impacted regions of the ROW?	n/a	Eastern Whip-poor-will candidate habitat locations are available on Attachment 6.5-B-17 in Appendix 6.5-B. Section 6.5.7.15.6 was updated to include permit requirements (where timing windows cannot be adhered to). Hydro One requested that MECP SARB provide guidance on mapping candidate EWPW habitat. For the purposes of the Final EA, only confirmed whip-poor-will habitat is being considered under the commitment to obtain an ESA authorization for damage/destruction of habitat.
30	6.5.7.15 Eastern Whip-poor-will Mitigation Measures 6.5 - 190	*If an active eastern whip-poor-will nest is identified during pre-construction surveys or during active construction, including during vegetation removal, work will stop and MECP and other appropriate agencies will be contacted immediately to discuss mitigation measures. Nest monitoring will be implemented to document nest use and potential abandonment* As stated in comment # 29. In the event that an EWPW is found nesting in a recently cleared area or during construction, MECP SARB recommends the proponent stop work immediately and contact SARB regarding next steps.	n/a	The wording throughout Section 6.5.7 for all bird species was updated accordingly.

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31	6.5.7.15 Eastern Whip-poor-will Mitigation Measures 6.5 - 190	*Environmental training for workers, including information on active nest identification and procedures to follow if an active nest is identified.* Please include what the recommended procedure is for following up on an active nest if identified. MECP SARB recommends the proponent stop work, leave the area and contact MECP SARB for next steps.	n/a	The wording throughout Section 6.5.7 for all bird species was updated accordingly.
32	6.5.7.15 Eastern Whip-poor-will Incidental take - Mitigation Measures 6.5 - 193	*Eastern whip-poor-will nests, eggs, and/or individuals could be disturbed or destroyed during construction of access roads and the ROW, and maintenance of the ROW during operations.* SARB recommends the proponent conduct these activities outside of the active breeding bird season during any construction of the project including access roads, work camps, pole and line installation etc. If the proponent chooses not to or cannot operate outside of the breeding bird season, then an authorization under the ESA may be required.	n/a	Section 6.5.7.15.6 was updated to include permit requirements (where timing windows cannot be adhered to).
33	Table 6.5 – 37 Summary of Net Effects and Mitigation Measures to Wildlife	*Avoid vegetation removal and all construction activities that cause sensory disturbance within 100 m of gray fox den from February 15-July 15 of each year to avoid disturbing denning gray fox.* *• If a gray fox den is identified during construction or operations, and should this timing not be able to be maintained within the buffer widths identified, local MECP SARB offices will be contacted to develop a den management plan and appropriate Indigenous communities will be notified, where requested(b).* In the event that a Gray Fox den is encountered, If the proponent chooses not to or cannot avoid the sensitive timing period for Gray Fox denning (February 15 – July 15) then an authorization under the ESA may be required. A den management plan may be included as part of the mitigation, however, would not be considered sufficient as an overall benefit to the species.	n/a	Comment acknowledged. Any impacts within 100 m of a gray fox den during the timing window will require and ESA authorization.

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34		*If vegetation removal must be completed during the migratory bird nesting period, implement nest sweeps. Similar measures will be taken for vegetation removal during routine ROW maintenance* See MECP SARB's comment # 25.	n/a	Table 6.5-40 was updated to include timing window for migratory bird nesting period (April 15 to August 31) and additional mitigation measures for threatened and endangered SAR.
35	Table 6.5 – 37 Wildlife and Wildlife Habitat All bird Criteria Construction, Operation and Maintenance stages 6.5-210	MECP SARB recommends the proponent include Eastern Whip-poor-will, Chimney Swift, Bank Swallow, Bobolink, Eastern Meadowlark and the appropriate mitigation for these species. Mitigation is listed above but is lacking in this table.	n/a	Table 6.5-40 was updated to include buffers and permit requirements for Bank Swallow, Bald Eagle, Bobolink, Chimney Swift and Eastern Whip-poor-will (where timing windows cannot be adhered to). Timing window has been updated to March 1 to August 31 for Bald Eagle, April to October for Chimney Swift, and April 15 to August 31 for Bank Swallow, Bobolink and Eastern Whip-poor-will. No mitigation has been added for Eastern Meadowlark as this species has not been included in the EA due to lack of breeding records in the region. Furthermore, Bobolink mitigation will also protect Eastern Meadowlark (as they use similar habitats). Updated Section 6.5.3 to include rationale for exclusion of Eastern Meadowlark from the list of bird criteria to be carried forward in the assessment.
36	Table 6.5 – 37 Wildlife and Wildlife Habitat Project Component or Activity 6.5 - 209	*Construction stage:* *• Clearing, grading, earth moving, grubbing of vegetation, and stockpiling of materials along the ROW and other access and construction areas, and construction of infrastructure (e.g., access roads, bridges, temporary laydown areas, turnaround areas and temporary construction camps);* This paragraph should appear in the project component or activity section of the table as per comment # 35. Please add these activities under the project and component or activity section and address mitigation for these activities for each species as per direction in comment #35	n/a	The mitigation measures in Table 6.5-40 were updated to include criteria specific mitigations.

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37	Table 6.5 – 37 Little Brown Myotis and Northern Myotis Project Component or Activity 6.5 - 211	*Construction stage:* *• Clearing, grading, earth moving, grubbing of vegetation, and stockpiling of materials along the ROW and other access and construction areas, and construction of infrastructure (e.g., access roads, bridges, temporary laydown areas, turnaround areas and temporary construction camps)* MECP SARB recommends adding the above paragraph to the project component and activity section and including mitigative actions for SAR bats during these activities.	n/a	The mitigation measures in Table 6.5-40 were updated to include SAR bat specific mitigations.
38	Table 6.5 – 37 Little Brown Myotis and Northern Myotis Potential Effect	Incidental Take For your awareness, any site preparation involving drilling or blasting resulting in destruction of roosting or hibernating bats and their habitat would be in contravention to the ESA. If the proponent chooses not to or cannot follow the recommendations outlined in comment # 13, then an authorization under the ESA may be required.	n/a	Adverse impacts to SAR bat and bat habitat during the hibernation (August 1 – May 31) or maternity season (May 1 – August 31) will be minimized to the extent practicable. If there are potential adverse impacts to SAR bats and bat habitat during these windows then the necessary permitting will be completed. Table 6.5-40 has been updated to reflect the potential need for permitting where timing windows cannot be adhered to.
39	Table 6.5 – 37 Little Brown Myotis and Northern Myotis Potential Effect	*Avoid clearing maternity roost habitat from May 1 to August 31. Should this timing not be able to be maintained as identified, MECP SARB will be contacted for further discussion and appropriate Indigenous communities notified, where requested.* If the proponent chooses not to or cannot avoid the sensitive timing period for SAR bats, then an authorization under the ESA may be required.	n/a	Adverse impacts to SAR bat and bat habitat during the hibernation (August 1 – May 31) or maternity season (May 1 – August 31) will be minimized to the extent practicable. If there are potential adverse impacts to SAR bats and bat habitat during these windows then the necessary permitting will be completed. Table 6.5-40 has been updated to reflect the potential need for permitting where timing windows cannot be adhered to.
40	Table 6.5 – 37 Little Brown Myotis and Northern Myotis Potential Effect	*Within 500 m a bat hibernaculum, avoid any construction activities that may cause sensory disturbance to hibernating bats during the hibernation period (September 1 to May 30).* As stated in comment # 14.	n/a	Adverse impacts to SAR bat and bat habitat during the hibernation (August 1 – May 31) or maternity season (May 1 – August 31) will be minimized to the extent practicable. If there are potential adverse impacts to SAR bats and bat habitat during these windows then the necessary permitting will be completed. Table 6.5-40 has been updated to reflect the potential need for permitting where timing windows cannot be adhered to.

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41	6.5.8.7.3 Net Effects on Little Brown and Northern Myotis 6.5 - 235	*If tree clearing activities were to take place in suitable little brown myotis and northern myotis maternity roosting habitat during the maternity roosting period (May 1 to August 31), then some incidental take may occur but the effect is considered unlikely after mitigation. Incidental take of roosting little brown myotis and northern myotis will be restricted to the Project footprint and is considered to be infrequent because the mitigation is expected to be effective* If the proponent cannot commit to avoiding the active season for SAR bats, then an authorization under the ESA may be required.	n/a	Adverse impacts to SAR bat and bat habitat during the hibernation (August 1 – May 31) or maternity season (May 1 – August 31) will be minimized to the extent practicable. If there are potential adverse impacts to SAR bats and bat habitat during these windows then the necessary permitting will be completed. Table 6.5-40 has been updated to reflect the potential need for permitting where timing windows cannot be adhered to.
42	6.6.7.1.2.2 Mitigation below the High Water Mark Lake Sturgeon 6.6-91	The proponent has identified that mitigation measures and avoidance of in water works below the high-water mark should have no adverse impacts on SAR fish (e.g. Lake Sturgeon). The proponent has identified the restricted activity period for Lake Sturgeon as April 1 – June 30. MECP SARB acknowledges this time frame and recommends the proponent avoid any in water work during this period. Should any in-water work in Lake Sturgeon habitat be required, then an authorization under the ESA may be required.	n/a	This has been addressed in the Final EA Report. All sites with potential for Lake Sturgeon (i.e., desktop hydrological connections to Lake Sturgeon bearing waters or those that were identified in the desktop assessment and/or field to provide Lake Sturgeon habitat) had the Lake Sturgeon timing window applied. A statement was added regarding the need for an authorization under the ESA in Section 6.6.7.1.2.4 Reduce the Fish Mortality Risk Through Restricted Activity Timing Windows and Fish Rescues/Relocations.
43	6.4.7.5 Plant Species at Risk Black Ash Potential Effect, Habitat Quantity 6.4-80	*A total loss of 4 ha representing 10.8% habitat loss within the LSA, and 2.3% habitat loss within the RSA* Black Ash was added to the SARO list on January 26, 2022 and will receive protection for both the species and its habitat under the ESA (2007) as identified in O.Reg 23/22 s4. Currently, Black Ash is under a temporary suspension from the ESA which will be revoked as per O.Reg. 23/22 s4. Any Black Ash tree removal or habitat disturbance following the revoke date may require an authorization under the ESA. Please provide a map indicating where the Black Ash are located and the number of individuals that may be impacted by the project.	n/a	Candidate habitat for Black ash was completed for the effects assessment. It is understood that authorization under the ESA may be required for this species after the revoke date of the suspension. MECP SARB to provide further direction on the identification of all black ash trees within the Project footprint to contribute to the potential permitting process under the ESA.

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44	ATTACHMENT 6.4-A-1 Terrestrial Baseline Figures Steeprock Bat Hibernacula Survey Locations Figure 2.4 -2-4	Hydro One is proposing a new road within the 500 m buffer and the proposed hydro line passes through the 500 m buffer of the WCA 81 hibernacula for the Steep Rock site and a laydown area within the 500 m buffer of WCA 72 site. Additional concerns include implosion splicing within 500 meters of the hibernaculum, noise and vibration from drilling and blasting associated with construction and helicopter noise. MECP SARB recommends no sensory disturbance (implosion splicing, blasting or heavy vibration) within 500 meters of a bat hibernaculum from August 1 – May 31. If the proponent chooses not to or cannot operate outside of the recommended timing window, then an authorization under the ESA may be required.	n/a	Adverse impacts to SAR bat and bat habitat during the hibernation (August 1 – May 31) or maternity season (May 1 – August 31) will be minimized to the extent practicable. If there are potential adverse impacts to SAR bats and bat habitat during these windows then the necessary permitting will be completed. Table 6.5-40 has been updated to reflect the potential need for permitting where timing windows cannot be adhered to
45	ATTACHMENT 6.4-A-1 Terrestrial Baseline Figures Bat Hibernacula Survey Locations Figure 2.4-2-5	Hydro One is proposing new roads and the proposed hydro line passes through the 500 m buffer of both hibernacula for the Lakeshore Control site and the Spillway site. Additional concerns include implosion splicing within 500 meters of the hibernaculum, noise and vibration from drilling and blasting associated with construction and helicopter noise. MECP SARB recommends no sensory disturbance (implosion splicing, blasting or heavy vibration) within 500 meters of a bat hibernaculum from August 1 – May 31. If the proponent chooses not to or cannot operate outside of the recommended timing window, then an authorization under the ESA may be required.	n/a	Adverse impacts to SAR bat and bat habitat during the hibernation (August 1 – May 31) or maternity season (May 1 – August 31) will be minimized to the extent practicable. If there are potential adverse impacts to SAR bats and bat habitat during these windows then the necessary permitting will be completed. Table 6.5-40 has been updated to reflect the potential need for permitting where timing windows cannot be adhered to.
46	General Comment SAR species not considered in the Draft EA	The EA needs to address and identify potential impacts to Eastern Meadowlark, Red-headed Woodpecker, Short-eared Owl and Lesser Yellowlegs. Addressing these species now will aid in avoiding delays during the permitting process if required.	n/a	Section 6.5.3 was updated to include rationale for the exclusion of these four additional bird species from the list of bird criteria in the EA assessment. The rationale is consistent with that for exclusion of American White Pelican and Least Bittern.

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		For your awareness, the Short-eared Owl and Lesser Yellowlegs were added to the SARO list in 2023 as Threatened. Although these were listed following approval of the Terms of Reference, these species will need to be addressed and considered in the EA report.		
47	3.3.11 page 16	Any blasting or crushing will need to be a minimum of 500 m from any bat hibernacula or identified breeding bird locations. Will further surveys for breeding birds I.e. EWPW being conducted at these locations? reference to Appendix 3.0 B for locations of 24 aggregate features that may be exploited for materials; are any of these located near bat hibernacula or potential EWPW habitat? do any of these have existing Bank Swallow colonies or congregations of burrows? MECP SARB recommends operating outside of sensitive timing windows for SAR, if this cannot be avoided than an authorization under the ESA may be required. MECP SARB recommends the proponent follow the Best Management Practices for Bank Swallow while conducting aggregate pit work or storing stockpiled aggregate materials at a slope of 70 degrees or less.	n/a	There are no proposed aggregate pits within 500 m of Bank Swallow or Eastern Whip-poor-will confirmed habitat. Bank Swallow and Eastern Whip-poor-will candidate habitat locations are available on Attachment 6.5-B-16 in Appendix 6.5-B (bobolink) Mitigation measures in Section 6.5.7 were updated for birds to include BMPs, timing windows for works, 500 m buffers for moderate to high impact operations in protected habitat and permit requirements (where timing windows cannot be adhered to). Adverse impacts to SAR bat and bat habitat during the hibernation (August 1 – May 31) or maternity season (May 1 – August 31) will be minimized to the extent practicable. If there are potential adverse impacts to SAR bats and bat habitat during these windows then the necessary permitting will be completed.
48	3.3.12 page 17	MECP SARB recommends that helicopter pad areas be cleared outside of SAR sensitive timing periods, and should not be located within 500 m of any bat hibernacula. Are any proposed helicopter pads within 500 m of bat hibernacula? Should the proponent have reasons for not being able to adhere to the SAR sensitive timing windows then please provide literature and rationale to support these reasons. An authorization under the ESA may be required.	n/a	There are no proposed helicopter pads within 500 m of any potential or known hibernacula.

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1	6.5 Wildlife and Wildlife Habitat Table 6.5-2 page 6.5 - 11	For your awareness, Barn Swallow, included in this document as a threatened species, has been down listed to species of Special Concern under the ESA (2007) O.Reg. 230/08 Species at Risk in Ontario List, as such, the species and its habitat are no longer protected under the ESA.	n/a	Thank you for this input. The EA document has been revised accordingly.
2	6.5.5.3 Gray Fox Page 5.3 - 32	*"Dens can be found in modified burrows of other animals, hollow trees, hollow logs, woodpiles, rocky outcrops, cavities under rocks, piles of brush, slab, wood or sawdust, and abandoned buildings (MECP 2019)."* MECP SARB recommends the proponent avoid tree clearing and heavy equipment disturbance within 100 meters where an active gray fox den has been identified during the denning period (February 15-July 15). If the proponent cannot operate outside of the recommended timing window, then an authorization under the ESA may be required.	n/a	There are no active gray fox dens currently identified within the Project study areas or Project footprint. It is understood that the ESA prohibits damaging or destroying den sites. MECP SARB does not have a standardized protocol for surveying for gray fox and identification of den sites. This discussion will resume during the permitting phase of the Project.
3	6.5.5.7 Little Brown and Northern Myotis 5.7 pages 46 - 51	Maternity roost habitat – MECP SARB recommends the proponent conduct tree and vegetation removal outside of the active season (May 1 – August 31). If the proponent chooses not to or cannot avoid clearing outside of the active season for SAR bats, then an authorization under the ESA may be required.	n/a	Comment is acknowledged and timing restriction is incorporated into the EA document (Section 6.5.7.7; Section 6.5.8 and Section 6.5.9)
4	6.5.5.12 Bank Swallow 5.12 - 70	*"Field surveys in 2022 documented 15 individuals at one nesting colony within the LSA."* Where is this in relation to the planned ROW? Was the nesting colony observed in an existing aggregate pit? If this habitat is to be removed, it will require an authorization under the ESA. If the pit is active, excavation is allowed outside of the nesting season providing the remaining face is suitable for nesting. In areas outside of an active nesting site, MECP SARB recommends aggregate slopes and stock-piles of soft materials suitable for bank swallow nesting be maintained at an angle <70 degrees to prevent nesting by the species. Where nesting colonies occur or when stock piling materials, MECP SARB recommends the proponent should follow BMP for the protection and creation of bank swallow habitat	n/a	The nesting colony is near Ignace in the existing K&M Construction Aggregate Pit 15813. Approximately 7 ha of Category 3 habitat will be removed for construction of a laydown/camp area on the opposite side of the highway. An additional 3 laydown/camp areas are proposed within 1000 m of Category 3 habitat. The bullet point in Section 6.5.5.12 discussing the 2022 field survey results was updated to include the location. Updated mitigation measures under Section 6.5.7.12.1 and 6.5.7.12.6 to include BMPs, vegetation clearing timing windows, 500 m buffer and permit requirements (where timing windows are not adhered to). Bank Swallow candidate habitat locations are available in Attachment 6.5-B-13 of Appendix 6.5-B.

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5	6.5.5.13 Chimney Swift 5.13 - 70	Any candidate trees found within the LSA should be maintained where possible. If a candidate tree or occupied tree is required to be removed, then mitigation to avoid section 9 concerns is recommended by removing the tree outside of the active breeding bird season (April 15 – August 31). Should a nest tree require removal then an authorization under s.10 of the ESA may be required.	n/a	Vegetation clearing during the breeding bird timing window will be minimized to the extent practicable. If vegetation clearing is required during the breeding bird timing window then the necessary permitting will be completed. Section 6.5.7.13.1 has been updated to reflect the potential need for permitting where timing windows for vegetation clearing cannot be adhered to.
6	6.5.5.14 Bobolink 5.14 - 74	MECP SARB recommends that clearing any vegetation and grubbing occur outside of the active breeding bird season (April 15 – August 31).	n/a	Vegetation clearing during the breeding bird timing window will be minimized to the extent practicable. If vegetation clearing is required during the breeding bird timing window then the necessary permitting will be completed. Section 6.5.7.14.1 has been updated to reflect the potential need for permitting where timing windows for vegetation clearing cannot be adhered to. No vegetation removal is proposed within bobolink candidate habitat. Bobolink candidate habitat locations are available on Attachment 6.5-B-16 in Appendix 6.5-B.
7	6.5.5.15 Eastern Whip poor will 5.15-78	As in comment # 6.	n/a	Vegetation clearing during the breeding bird timing window will be minimized to the extent practicable. If vegetation clearing is required during the breeding bird timing window then the necessary permitting will be completed. Section 6.5.7.15.1 has been updated to reflect the potential need for permitting where timing windows for vegetation clearing cannot be adhered to. There will be some impacts from vegetation removal to Whip-poor-will candidate habitat at Station EWPW-24. Whip-poor-will candidate habitat locations are available in Attachment 6.5-B-17 in Appendix 6.5-B.
8	Table 6.5 – 20 Little Brown Myotis and Northern Myotis 6.5 - 87	*Little Brown and Northern Myotis – incidental take* – any adverse impacts to SAR bats or SAR bat habitat during hibernation (September 1 – April 30) or maternity season (May 1 – August 31) should be avoided. If these sensitive time periods cannot be avoided then an authorization under the ESA may be required.	n/a	Adverse impacts to SAR bat and bat habitat during the hibernation (August 1 – May 31) or maternity season (May 1 – August 31) will be minimized to the extent practicable. If there are potential adverse impacts to SAR bats and bat habitat during these windows then the necessary permitting will be completed. Table 6.5-40 has been updated to reflect the potential need for permitting where timing windows cannot be adhered to.
9	Table 6.5 – 20 Wildlife and Wildlife Habitat – All Bird Criteria	*Incidental take – Site preparation, construction and maintenance may result in the destruction of nests, eggs, and individuals of migratory birds (incidental take).* MECP SARB recommends the proponent conduct site preparation (tree and vegetation removal and	n/a	Vegetation clearing during the breeding bird timing window will be minimized to the extent practicable. If vegetation clearing is required during the breeding bird timing window then the necessary permitting will be completed. Section 6.5.7 has been updated to reflect the potential need for permitting where timing windows for vegetation clearing cannot be adhered to.

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	6.5 - 87	grubbing) outside of the active breeding bird season (April 15 – August 31). If the proponent chooses not to or cannot avoid site preparation during this time period, then an authorization under the ESA may be required.		
10	Table 6.5 – 20 Furbearers (American marten, beaver, gray wolf) and Gray Fox 6.5 - 87	***Incidental take*** *– Site preparation, construction and maintenance may result in the destruction of furbearer den sites and denning individuals (incidental take).* MECP SARB recommends site preparation, construction and maintenance occur outside of the denning period for Gray Fox (February 15 – July 15). If the proponent cannot avoid site preparation, construction and maintenance during this time period then an authorization under the ESA may be required.	n/a	Construction activities that could impact a gray fox den (or take place within 100 m of a den) will occur outside of the denning period. Clarification has been added to Section 6.5.7.3.5.
11	6.5.7.1.6 Fly Rock from Blasting *Potential Effects* Survival and Reproduction 6.5 - 94	Although Fly Rock is not considered to be much of a threat to SAR in the area, vibrations and noise from blasting may impact bat hibernacula. Disturbing bats during hibernation may lead to mortality as the disturbance may cause them to use up their fat stores too early. MECP SARB recommends that blasting, drilling or heavy equipment use should not occur within 500 meters of any bat hibernacula and no tree or vegetation removal or grubbing may occur within 200 meters of a bat hibernacula. If the proponent chooses not to or cannot commit to working outside of the recommended timing windows or buffer distances from hibernacula, then an authorization under the ESA may be required.	n/a	Comment noted. The assessment addresses these potential impacts and states in Section 6.5.7.7.1: *No tree removal or other construction activities will be completed within 200 m of hibernacula. Furthermore, no construction activities that produce loud noises and vibrations (e.g., drilling, blasting, and implosion splicing) to the extent practicable will be completed within 500 m of a hibernacula during the hibernation period (September 1 to May 30). These restrictions on activities are expected to limit effects on hibernating bats because the Project is not predicted to result in the removal or alteration of potential hibernation habitat. The main concern during the construction stage is the effect that sensory disturbance (e.g., noise and vibration) may have on hibernating bats.*
12	6.5.7.3 Gray Fox 6.5 - 110	*Mitigation measures will likely include:* *• Environmental training for workers, including information on den identification and procedures to follow if a den is identified.* *• Surveys to identify den sites within home ranges of known gray fox occurrence records.* *If an active den is identified during active construction, including during vegetation removal, work will stop and local MECP SARB offices will be contacted immediately. The den will be clearly marked, a 100 m buffer surrounding the den will be established and no vegetation*	n/a	Section 6.5.7.3.5 and Table 6.5-40 have been updated to specify how dens encountered during construction will be marked and buffered. MECP SARB will be contacted should a den be found during construction.

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		removal will proceed within that buffer until MNRF is engaged. MECP SARB acknowledges the mitigation measures identified in this section, however, has concerns about how a den will be marked if encountered during the active denning season (e.g. flagged or GPS point?). MECP advises minimizing any human presence at the den site as this may cause the female to abandon her pups. Should an active den be encountered in the Thunder Bay to Atikokan region where Gray Fox have been identified to occur,(attachment 6.5-B-1 maps 1,2,3 8 and 9), SARB acknowledges the stop work procedure and to contact MECP for next steps.		
13	6.5.7.7.1 Little Brown Myotis and Northern Myotis Habitat Loss 6.5-129	*Vegetation removal will occur between 200 m and 500 m* ***of three likely or possible hibernaculum****. This activity will not negatively impact hibernation habitat availability. Any Project activities that could cause loud noise and vibrations will not be conducted within 500 m of a hibernaculum during the hibernation period. Project activities causing loud noises and vibrations will not negatively impact hibernation habitat availability.* ***No Project activities are planned within 200 m of a hibernaculum*** *(Table 6.5-25).* Noise caused by heavy equipment and vibrations from drilling and blasting do not seem to impact hibernating bats when conducted at distances greater than 500 m from a hibernaculum. Maintaining a buffer of trees and vegetation within 200 m of a hibernaculum provide shelter and microclimate conditions for the hibernaculum. MECP SARB acknowledges Hydro One's commitment to avoid removing trees and vegetation within 200 m of a bat hibernaculum and avoid loud noises associated with drilling, blasting and implosion splicing within 500 m of a hibernaculum. Any tree or vegetation removal occurring between 200 meters and 500 meters of a bat hibernaculum is recommended to occur outside of the maternity season for bats (May 1 – August 31).	n/a	Section 6.5.7.7.1 has been updated to clarify.

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		If the proponent chooses not to or cannot meet these avoidance recommendations than an authorization under the ESA may be required. For your awareness, the paragraph repeats itself in the document (recommend removing duplicate paragraph).		
14	6.5.7.7.1 Little Brown Myotis and Northern Myotis 6.5 - 131	*No construction activities that produce loud noises and vibrations (e.g., drilling, blasting, and implosion splicing) will be completed within 500 m of a hibernacula during the hibernation period (September 1 to May 30).* MECP SARB acknowledges Hydro One's commitment to avoid construction activities that produce loud noises and vibrations such as drilling, blasting or implosion splicing within 500 m of a bat hibernaculum, however, recommends these activities should be avoided between August 1 – May 31 to include the most sensitive time periods around a hibernaculum including swarming and hibernation.	n/a	Section 6.5.7.7.1 has been updated with the timing window of August 1 - May 31.
15	6.5.7.7.1 Little Brown Myotis and Northern Myotis Survival and Reproduction 6.5 - 132	*Site clearing for the Project Footprint will result in removal of vegetation between 200 m and 500 m of three likely or possible hibernaculum* It is unclear when will tree removal occur in the zone between 200 m and 500 m of a hibernaculum. If clearing trees near a hibernaculum is required, MECP SARB recommends the proponent conduct tree and vegetation clearing within 200 m of a hibernaculum outside of the maternity season for bats (May 1 – August 31) providing noise and vibration created at the site is restricted to that associated with logging (e.g. chain saw, skidder, or mechanical harvesting equipment). If the proponent cannot adhere to avoiding the sensitive timing period for bats, or if tree and vegetation removal is required less than 200 m from a bat hibernaculum then an authorization under the ESA may be required.	n/a	Clearing will be conducted within the 200 – 500 m distance from some hibernacula. Clearing is not required within 200 m of a hibernaculum. Clearing will be conducted within the 200 - 500 m distance from hibernation habitat outside of the maternity season for bats (May 1 – August 31) providing noise and vibration created at the site is restricted to that associated with logging (e.g., chain saw, skidder, or mechanical harvesting equipment).

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16	6.5.7.7.1 Little Brown Myotis and Northern Myotis Survival and Reproduction 6.5 - 134	*No Project-related disturbance will occur within 200 m of a bat hibernaculum without engagement and approval of regulatory agencies.* *• Project activities causing loud noise or vibrations (e.g., drilling, blasting, implosion splicing) will not be undertaken within 500 m of a bat hibernaculum during the hibernation period (September 1 to May 30).* MECP SARB recommends no clearing of trees and vegetation within 200 m of a bat hibernaculum. If the proponent chooses not to or cannot avoid operating outside of this buffer than an authorization may be required. MECP SARB acknowledges Hydro One's commitment to avoid construction activities that produce loud noises and vibrations such as drilling, blasting or implosion splicing within 500 m of a bat hibernaculum, however, recommends these activities should be avoided between August 1 – May 31 to include the most sensitive time periods around a hibernaculum including swarming and hibernation.	n/a	Section 6.5.7.7.1 has been updated accordingly.
17	6.5.7.7.1 Little Brown Myotis and Northern Myotis Mitigation Measures 6.5 - 134	*If potential maternity roost habitat is to be removed during the roosting period, it will be subject to ESA permitting and site-specific mitigation measures to be developed in consultation with the MECP.* As previously indicated, if the proponent cannot adhere to avoiding and clearing of trees or vegetation during the recommended timing window for SAR bats of May 1 – August 31 then an authorization under the ESA may be required.	n/a	Comment acknowledged.
18	6.5.7.7.3 Incidental Take Mitigation Measures 6.5-135	*Clearing maternity roost habitat during the maternal roosting period (May 1 to August 31) will be avoided. Should this timing not be able to be maintained as identified, MECP SARB will be engaged.* If the proponent intends on clearing maternity roost habitat during the SAR bat sensitive timing window of May 1 – August 31 then an authorization under the ESA may be required.	n/a	Construction activities are planned within the 200 - 500 m area, but no work is planned within 200 m distance from a potential or confirmed hibernacula.

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		In areas within 500 m of a known or suspected hibernacula, construction activities causing sensory disturbance (e.g., drilling, blasting, implosion splicing) will be completed outside the hibernation period (September 1 to May 30). As noted in comment # 14 above, MECP SARB acknowledges Hydro One's commitment to avoid construction activities that produce loud noises and vibrations such as drilling, blasting or implosion splicing within 500 m of a bat hibernaculum, however, recommends these activities should be avoided between August 1 – May 31 to include the most sensitive time periods around a hibernaculum including swarming and hibernation. *Construction activities causing sensory disturbance and tree clearing will not be completed* ***within 200 m of potential hibernacula*** MECP SARB acknowledges this commitment and based on the Attachment 6.5-B-5 Candidate and Confirmed SAR Bat Hibernacula, shows the Andowan, Steep Rock, Spillway and Lakeshore hibernacula (Figures 1, 3 and 4 respectively) as being impacted by construction activities in the LSA. MECP SARB recommends the proponent follow comments pertaining to sensitive timing periods and buffers noted above. Please clarify if other tree and vegetation clearing activities are planned at the other confirmed or potential hibernacula.		
19	6.5.7.12 Bank Swallow 6.5-165	*The Project is predicted to remove 155 ha (3.3% of the LSA and 1.1% of the terrestrial RSA) of moderate to high suitability bank swallow habitat (Table 6.5-31), including 6.0 ha of Category 3 of protected habitat.* It is unclear as to what type of suitable habitat is being removed (e.g. feeding)	n/a	The nesting colony is near Ignace in the existing K&M Construction Aggregate Pit 15813. Bank Swallow candidate habitat locations are available in Attachment 6.5-B-13 of Appendix 6.5-B. Approximately 7 ha of Category 3 habitat will be removed for construction of a laydown/camp area on the opposite side of the highway.

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		The proponent refers to 6.0 ha of category 3 habitat impacted by the project. There is no reference to the GHD mapping or to which map in attachment 6.5-B-13 this occurs. Please provide the GHD mapping for known Bank Swallow nesting colonies (active or inactive) and identify where the colony occurs in the attachment. Please specify if the nesting location used to create the GHD mapping is in an existing aggregate pit, proposed aggregate pit or natural location (I.e. river bank). Will this location be utilized for aggregate material during the project?		According to the ESA GHD for Bank Swallow, Category 3 habitat is identified as suitable foraging habitat within 500 m of a colony. Section 6.5.7.12.1 was updated to provide a definition for what is considered Category 3 habitat.
20	6.5.7.12 Bank Swallow 6.5-167	*If an active/inactive bank swallow nesting colony is identified during pre-construction or during active construction, including during vegetation removal, work will stop and MECP and other appropriate agencies will be contacted immediately to discuss mitigation measures. Nest monitoring will be implemented to document nest use and potential abandonment.* MECP SARB recommends the proponent conduct tree and vegetation clearing and grubbing outside of the active breeding bird season (April 15 – August 31). If a Bank Swallow nesting colony is located within the LSA or found at any of the aggregate pit locations used to support the project, then MECP SARB recommends the proponent avoid work within 50 m of the active colony until nesting season has been completed. If the proponent cannot avoid the nesting season or the habitat, then an authorization under the ESA may be required. In the event the proponent requires stockpiling of soft materials such as aggregate (e.g. sand, A-gravel etc.)where Bank Swallow are present, MECP SARB recommends the proponent follow section 4.2.1 of the Best Management Practices for the Protection, Creation and Maintenance of Bank Swallow Habitat in Ontario https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&cad=rja&uact=8&ved=2ahUKEwiGvOb51fX_AhUEEFkFHaPBAuQQFnoECA0QAQ	n/a	The nesting colony is near Ignace in the existing K&M Construction Aggregate Pit 15813. Bank Swallow candidate habitat locations are available in Attachment 6.5-B-13 of Appendix 6.5-B. Approximately 7 ha of Category 3 habitat will be removed for construction of a laydown/camp area on the opposite side of the highway. Updated mitigation measures under Section 6.5.7.12.1 and 6.5.7.12.6 to include BMPs, vegetation clearing timing windows, 500 m buffer and permit requirements (where timing windows cannot be adhered to).

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		Q&url=https://files.ontario.ca/bansbmpenpdffinalv.1.117mar17.pdf&usg=AOvVaw0zIiWgbBeYxNAL-46msstj&opi=89978449 to avoid creating unintentional nesting habitat for the species that may result in delays to construction. For your awareness, Bank Swallow breeding colonies and congregation of burrows can be mapped using the General habitat Description.		
21	6.5.7.13 Chimney Swift 6.5 - 70	*Structures with barn swallow and chimney swift nests can be removed outside of the breeding season, following appropriate legislative requirements.* MECP SARB recommends the proponent conduct tree and vegetation clearing outside of the breeding bird window (April 15 – August 31). It is the proponent's responsibility to conduct breeding bird surveys and identify nesting sites for Chimney Swift that may be impacted by the proposed project. Any such structures observed with active roosting or nesting Chimney Swift would be considered Chimney Swift habitat. Any damage or destruction of SAR habitat is considered a contravention to the ESA and an authorization under the ESA may be required. MECP SARB recommends the proponent identify any of these locations up front with MECP SARB to determine if an authorization is required. For your awareness, Barn Swallow has been down-listed to a species of special concern and the species and its habitat are no longer protected under the ESA.	n/a	Mitigation measures were updated under Section 6.5.7.13.1 and 6.5.7.13.6 to clarify surveys at structures will be conducted for nesting and roosting individuals and to include vegetation/structure removal timing windows and registration/permitting requirements for removal of chimney swift nesting/roosting habitat. All bird statuses under the ESA, COSEWIC and SARA have been reviewed and updated in Table 6.5-2.
22	6.5.7.13 Chimney Swift Mitigation Measures 6.5 -178 - 179	*Surveys at identified active nest sites of known barn swallow and chimney swift colony occurrence records.* What kind of surveys were/are going to be completed? MECP SARB recommends the proponent follow the Breeding Bird Atlas link for Chimney Swift surveys.	n/a	Mitigation measures were updated in Section 6.5.7.13.1 to clarify surveys at identified chimney swift active nest sites will be conducted for nesting and roosting individuals in accordance with the Birds Canada SwiftWatch Protocol.
23	6.5.7.14 Bobolink	*The Project is predicted to remove 7 ha (1.6% of the LSA and 0.4% of the terrestrial RSA) of moderate to high suitability bobolink habitat*	n/a	Bobolink habitat availability in the study area is shown in Appendix 6.5-B, Attachment 6.5-B-16. Section 6.5.7.14.1 was updated to fix incorrect reference to the figures.

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	Habitat Availability 6.5 - 180	MECP SARB could not locate a map in Appendix 6.5 – A or any reference to Bobolink habitat mapping in the Wildlife Figures. Please provide a figure with the General Habitat Description mapping for Bobolink and provide the number of hectares impacted by the project. For your awareness, a link has been provided to the General Habitat Description for Bobolink.		The GHD mapping has been based on the two NHIC Element Occurrences near Dryden. There will be no impacts to protected Bobolink Category 1/2/3 habitat. No Bobolink habitat was confirmed during surveys.
24	6.5.7.14 Bobolink Habitat Availability 6.5 - 180	*Managing vegetation removal activities so that removal does not occur within the migratory bird nesting period (April 15 to August 31)* ***to the extent possible.*** • *If vegetation removal cannot be avoided during the migratory bird nesting period (i.e., April 15 to August 31),* ***pre-clearing nest searches will be completed.*** **"The Migratory Birds Convention Act, 1994 (**Government of Canada 1994**) prohibits the disturbance or destruction of migratory bird nests (**e.g., passerines and waterfowl**) during the breeding season."** MECP SARB supports the above statement and does not recommend nest searching during the active nesting period and recommends vegetation clearing and grubbing outside of the breeding bird active season (April 15 – August 31). If vegetation clearing and grubbing cannot be completed outside of the active breeding bird period, an authorization under the ESA may be required.	n/a	Section 6.5.7.14.1 was updated to include permit requirements (where timing windows cannot be adhered to). No Bobolink habitat was confirmed during surveys. There will be no impacts to protected Bobolink Category 1/2/3 habitat (identified based on NHIC EO records).
25	6.5.7.14 Bobolink Mitigation Measures 6.5 - 182	*If an active bobolink nest is identified during pre-construction surveys or during active construction and/or vegetation removal, work will stop and MECP and other appropriate agencies will be contacted immediately to discuss mitigation measures. Nest monitoring will be implemented to document nest use and potential abandonment* *"The Migratory Birds Convention Act, 1994 (Government of Canada 1994) prohibits the disturbance or destruction of migratory bird nests*	n/a	Section 6.5.7.14.6 was updated to include permit requirements (where timing windows cannot be adhered to). No Bobolink habitat was confirmed during surveys. There will be no impacts to protected Bobolink Category 1/2/3 habitat (identified based on NHIC EO records).

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		(e.g., passerines and waterfowl) during the breeding season." MECP SARB supports the above statement and does not recommend nest searches during the active breeding bird season and recommends the proponent avoid contravening the ESA by conducting any vegetation removal and grubbing outside of the active bird season (April 15 – August 31). If the proponent cannot adhere to working outside of the recommended timing window, then an authorization under the ESA may be required.		
26	6.5.7.14 Bobolink Mitigation Measures 6.5 - 186	*If vegetation removal cannot be avoided during the migratory bird nesting period (i.e., April 15 to August 31), pre-clearing nest searches will be completed.* As above in comment # 25.	n/a	Sections 6.5.7.14.1 and 6.5.7.14.6 were updated to include permit requirements (where timing windows cannot be adhered to). No Bobolink habitat was confirmed during surveys. There will be no impacts to protected Bobolink Category 1/2/3 habitat (identified based on NHIC EO records).
27	6.5.7.15 Eastern Whip-poor-will Habitat Loss 6.5 - 187	*The Project is predicted to remove 1,814 ha (3.0% of the LSA and 0.7% of the terrestrial RSA) of moderate to high suitability eastern whip-poor-will habitat (Table 6.5-35), including 1 ha of Category 2 habitat and 4 ha of Category 3 habitat* MECP SARB notes in Attachment 6.5-B-17 Eastern Whip-Poor-Will, Figures 10, 19 and 30 have confirmed breeding habitat in the ROW. Please provide the General Habitat Description mapping for each of the identified locations identified in your baseline data collection (following the guidance as found in the MNRF 2014 Survey Protocol for Eastern Whip poor will in Ontario) and for portions of the LSA, please map the GHD for all potential suitable nesting habitat to arrive at an estimation of habitat impacts requiring authorization.	n/a	Hydro One requested that MECP SARB provide guidance on mapping candidate EWPW habitat. For the purposes of the Final EA, only confirmed whip-poor-will habitat is being considered under the commitment to obtain an ESA authorization for damage/destruction of habitat.

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28	6.5.7.15 Eastern Whip-poor-will Mitigation Measures 6.5 - 190	*If vegetation removal cannot be avoided during the migratory bird nesting period (i.e., April 15 to August 31), pre-clearing nest searches will be completed and will be valid for a period up to 72 hrs. Pre-clearance searches will involve nest sweeps.* As per comment # 25.	n/a	Section 6.5.7.15.1 was updated to include permit requirements (where timing windows cannot be adhered to).
29	6.5.7.15 Eastern Whip-poor-will Mitigation Measures 6.5 - 190	*Surveys at known eastern whip-poor-will occurrence records* MECP SARB recommends the proponent conduct surveys at known occurrence and candidate locations following the MNRF Draft Survey Protocol for Eastern Whip Poor Will in Ontario (2014) and provide GHD mapping for these occurrences and for all potential suitable nesting habitat to arrive at an estimation of habitat impacts requiring authorization. How is proponent going to effectively survey all impacted regions of the ROW?	n/a	Eastern Whip-poor-will candidate habitat locations are available on Attachment 6.5-B-17 in Appendix 6.5-B. Section 6.5.7.15.6 was updated to include permit requirements (where timing windows cannot be adhered to). Hydro One requested that MECP SARB provide guidance on mapping candidate EWPW habitat. For the purposes of the Final EA, only confirmed whip-poor-will habitat is being considered under the commitment to obtain an ESA authorization for damage/destruction of habitat.
30	6.5.7.15 Eastern Whip-poor-will Mitigation Measures 6.5 - 190	*If an active eastern whip-poor-will nest is identified during pre-construction surveys or during active construction, including during vegetation removal, work will stop and MECP and other appropriate agencies will be contacted immediately to discuss mitigation measures. Nest monitoring will be implemented to document nest use and potential abandonment* As stated in comment # 29. In the event that an EWPW is found nesting in a recently cleared area or during construction, MECP SARB recommends the proponent stop work immediately and contact SARB regarding next steps.	n/a	The wording throughout Section 6.5.7 for all bird species was updated accordingly.

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31	6.5.7.15 Eastern Whip-poor-will Mitigation Measures 6.5 - 190	*Environmental training for workers, including information on active nest identification and procedures to follow if an active nest is identified.* Please include what the recommended procedure is for following up on an active nest if identified. MECP SARB recommends the proponent stop work, leave the area and contact MECP SARB for next steps.	n/a	The wording throughout Section 6.5.7 for all bird species was updated accordingly.
32	6.5.7.15 Eastern Whip-poor-will Incidental take - Mitigation Measures 6.5 - 193	*Eastern whip-poor-will nests, eggs, and/or individuals could be disturbed or destroyed during construction of access roads and the ROW, and maintenance of the ROW during operations.* SARB recommends the proponent conduct these activities outside of the active breeding bird season during any construction of the project including access roads, work camps, pole and line installation etc. If the proponent chooses not to or cannot operate outside of the breeding bird season, then an authorization under the ESA may be required.	n/a	Section 6.5.7.15.6 was updated to include permit requirements (where timing windows cannot be adhered to).
33	Table 6.5 – 37 Summary of Net Effects and Mitigation Measures to Wildlife	*Avoid vegetation removal and all construction activities that cause sensory disturbance within 100 m of gray fox den from February 15-July 15 of each year to avoid disturbing denning gray fox.* *• If a gray fox den is identified during construction or operations, and should this timing not be able to be maintained within the buffer widths identified, local MECP SARB offices will be contacted to develop a den management plan and appropriate Indigenous communities will be notified, where requested(b).* In the event that a Gray Fox den is encountered, If the proponent chooses not to or cannot avoid the sensitive timing period for Gray Fox denning (February 15 – July 15) then an authorization under the ESA may be required. A den management plan may be included as part of the mitigation, however, would not be considered sufficient as an overall benefit to the species.	n/a	Comment acknowledged. Any impacts within 100 m of a gray fox den during the timing window will require and ESA authorization.

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34		*If vegetation removal must be completed during the migratory bird nesting period, implement nest sweeps. Similar measures will be taken for vegetation removal during routine ROW maintenance* See MECP SARB's comment # 25.	n/a	Table 6.5-40 was updated to include timing window for migratory bird nesting period (April 15 to August 31) and additional mitigation measures for threatened and endangered SAR.
35	Table 6.5 – 37 Wildlife and Wildlife Habitat All bird Criteria Construction, Operation and Maintenance stages 6.5-210	MECP SARB recommends the proponent include Eastern Whip-poor-will, Chimney Swift, Bank Swallow, Bobolink, Eastern Meadowlark and the appropriate mitigation for these species. Mitigation is listed above but is lacking in this table.	n/a	Table 6.5-40 was updated to include buffers and permit requirements for Bank Swallow, Bald Eagle, Bobolink, Chimney Swift and Eastern Whip-poor-will (where timing windows cannot be adhered to). Timing window has been updated to March 1 to August 31 for Bald Eagle, April to October for Chimney Swift, and April 15 to August 31 for Bank Swallow, Bobolink and Eastern Whip-poor-will. No mitigation has been added for Eastern Meadowlark as this species has not been included in the EA due to lack of breeding records in the region. Furthermore, Bobolink mitigation will also protect Eastern Meadowlark (as they use similar habitats). Updated Section 6.5.3 to include rationale for exclusion of Eastern Meadowlark from the list of bird criteria to be carried forward in the assessment.
36	Table 6.5 – 37 Wildlife and Wildlife Habitat Project Component or Activity 6.5 - 209	*Construction stage:* *• Clearing, grading, earth moving, grubbing of vegetation, and stockpiling of materials along the ROW and other access and construction areas, and construction of infrastructure (e.g., access roads, bridges, temporary laydown areas, turnaround areas and temporary construction camps);* This paragraph should appear in the project component or activity section of the table as per comment # 35. Please add these activities under the project and component or activity section and address mitigation for these activities for each species as per direction in comment #35	n/a	The mitigation measures in Table 6.5-40 were updated to include criteria specific mitigations.

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37	Table 6.5 – 37 Little Brown Myotis and Northern Myotis Project Component or Activity 6.5 - 211	*Construction stage:* *• Clearing, grading, earth moving, grubbing of vegetation, and stockpiling of materials along the ROW and other access and construction areas, and construction of infrastructure (e.g., access roads, bridges, temporary laydown areas, turnaround areas and temporary construction camps)* MECP SARB recommends adding the above paragraph to the project component and activity section and including mitigative actions for SAR bats during these activities.	n/a	The mitigation measures in Table 6.5-40 were updated to include SAR bat specific mitigations.
38	Table 6.5 – 37 Little Brown Myotis and Northern Myotis Potential Effect	Incidental Take For your awareness, any site preparation involving drilling or blasting resulting in destruction of roosting or hibernating bats and their habitat would be in contravention to the ESA. If the proponent chooses not to or cannot follow the recommendations outlined in comment # 13, then an authorization under the ESA may be required.	n/a	Adverse impacts to SAR bat and bat habitat during the hibernation (August 1 – May 31) or maternity season (May 1 – August 31) will be minimized to the extent practicable. If there are potential adverse impacts to SAR bats and bat habitat during these windows then the necessary permitting will be completed. Table 6.5-40 has been updated to reflect the potential need for permitting where timing windows cannot be adhered to.
39	Table 6.5 – 37 Little Brown Myotis and Northern Myotis Potential Effect	*Avoid clearing maternity roost habitat from May 1 to August 31. Should this timing not be able to be maintained as identified, MECP SARB will be contacted for further discussion and appropriate Indigenous communities notified, where requested.* If the proponent chooses not to or cannot avoid the sensitive timing period for SAR bats, then an authorization under the ESA may be required.	n/a	Adverse impacts to SAR bat and bat habitat during the hibernation (August 1 – May 31) or maternity season (May 1 – August 31) will be minimized to the extent practicable. If there are potential adverse impacts to SAR bats and bat habitat during these windows then the necessary permitting will be completed. Table 6.5-40 has been updated to reflect the potential need for permitting where timing windows cannot be adhered to.
40	Table 6.5 – 37 Little Brown Myotis and Northern Myotis Potential Effect	*Within 500 m a bat hibernaculum, avoid any construction activities that may cause sensory disturbance to hibernating bats during the hibernation period (September 1 to May 30).* As stated in comment # 14.	n/a	Adverse impacts to SAR bat and bat habitat during the hibernation (August 1 – May 31) or maternity season (May 1 – August 31) will be minimized to the extent practicable. If there are potential adverse impacts to SAR bats and bat habitat during these windows then the necessary permitting will be completed. Table 6.5-40 has been updated to reflect the potential need for permitting where timing windows cannot be adhered to.

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41	6.5.8.7.3 Net Effects on Little Brown and Northern Myotis 6.5 - 235	*If tree clearing activities were to take place in suitable little brown myotis and northern myotis maternity roosting habitat during the maternity roosting period (May 1 to August 31), then some incidental take may occur but the effect is considered unlikely after mitigation. Incidental take of roosting little brown myotis and northern myotis will be restricted to the Project footprint and is considered to be infrequent because the mitigation is expected to be effective* If the proponent cannot commit to avoiding the active season for SAR bats, then an authorization under the ESA may be required.	n/a	Adverse impacts to SAR bat and bat habitat during the hibernation (August 1 – May 31) or maternity season (May 1 – August 31) will be minimized to the extent practicable. If there are potential adverse impacts to SAR bats and bat habitat during these windows then the necessary permitting will be completed. Table 6.5-40 has been updated to reflect the potential need for permitting where timing windows cannot be adhered to.
42	6.6.7.1.2.2 Mitigation below the High Water Mark Lake Sturgeon 6.6-91	The proponent has identified that mitigation measures and avoidance of in water works below the high-water mark should have no adverse impacts on SAR fish (e.g. Lake Sturgeon). The proponent has identified the restricted activity period for Lake Sturgeon as April 1 – June 30. MECP SARB acknowledges this time frame and recommends the proponent avoid any in water work during this period. Should any in-water work in Lake Sturgeon habitat be required, then an authorization under the ESA may be required.	n/a	This has been addressed in the Final EA Report. All sites with potential for Lake Sturgeon (i.e., desktop hydrological connections to Lake Sturgeon bearing waters or those that were identified in the desktop assessment and/or field to provide Lake Sturgeon habitat) had the Lake Sturgeon timing window applied. A statement was added regarding the need for an authorization under the ESA in Section 6.6.7.1.2.4 Reduce the Fish Mortality Risk Through Restricted Activity Timing Windows and Fish Rescues/Relocations.
43	6.4.7.5 Plant Species at Risk Black Ash Potential Effect, Habitat Quantity 6.4-80	*A total loss of 4 ha representing 10.8% habitat loss within the LSA, and 2.3% habitat loss within the RSA* Black Ash was added to the SARO list on January 26, 2022 and will receive protection for both the species and its habitat under the ESA (2007) as identified in O.Reg 23/22 s4. Currently, Black Ash is under a temporary suspension from the ESA which will be revoked as per O.Reg. 23/22 s4. Any Black Ash tree removal or habitat disturbance following the revoke date may require an authorization under the ESA. Please provide a map indicating where the Black Ash are located and the number of individuals that may be impacted by the project.	n/a	Candidate habitat for Black ash was completed for the effects assessment. It is understood that authorization under the ESA may be required for this species after the revoke date of the suspension. MECP SARB to provide further direction on the identification of all black ash trees within the Project footprint to contribute to the potential permitting process under the ESA.

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44	ATTACHMENT 6.4-A-1 Terrestrial Baseline Figures Steeprock Bat Hibernacula Survey Locations Figure 2.4 -2-4	Hydro One is proposing a new road within the 500 m buffer and the proposed hydro line passes through the 500 m buffer of the WCA 81 hibernacula for the Steep Rock site and a laydown area within the 500 m buffer of WCA 72 site. Additional concerns include implosion splicing within 500 meters of the hibernaculum, noise and vibration from drilling and blasting associated with construction and helicopter noise. MECP SARB recommends no sensory disturbance (implosion splicing, blasting or heavy vibration) within 500 meters of a bat hibernaculum from August 1 – May 31. If the proponent chooses not to or cannot operate outside of the recommended timing window, then an authorization under the ESA may be required.	n/a	Adverse impacts to SAR bat and bat habitat during the hibernation (August 1 – May 31) or maternity season (May 1 – August 31) will be minimized to the extent practicable. If there are potential adverse impacts to SAR bats and bat habitat during these windows then the necessary permitting will be completed. Table 6.5-40 has been updated to reflect the potential need for permitting where timing windows cannot be adhered to
45	ATTACHMENT 6.4-A-1 Terrestrial Baseline Figures Bat Hibernacula Survey Locations Figure 2.4-2-5	Hydro One is proposing new roads and the proposed hydro line passes through the 500 m buffer of both hibernacula for the Lakeshore Control site and the Spillway site. Additional concerns include implosion splicing within 500 meters of the hibernaculum, noise and vibration from drilling and blasting associated with construction and helicopter noise. MECP SARB recommends no sensory disturbance (implosion splicing, blasting or heavy vibration) within 500 meters of a bat hibernaculum from August 1 – May 31. If the proponent chooses not to or cannot operate outside of the recommended timing window, then an authorization under the ESA may be required.	n/a	Adverse impacts to SAR bat and bat habitat during the hibernation (August 1 – May 31) or maternity season (May 1 – August 31) will be minimized to the extent practicable. If there are potential adverse impacts to SAR bats and bat habitat during these windows then the necessary permitting will be completed. Table 6.5-40 has been updated to reflect the potential need for permitting where timing windows cannot be adhered to.
46	General Comment SAR species not considered in the Draft EA	The EA needs to address and identify potential impacts to Eastern Meadowlark, Red-headed Woodpecker, Short-eared Owl and Lesser Yellowlegs. Addressing these species now will aid in avoiding delays during the permitting process if required.	n/a	Section 6.5.3 was updated to include rationale for the exclusion of these four additional bird species from the list of bird criteria in the EA assessment. The rationale is consistent with that for exclusion of American White Pelican and Least Bittern.

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		For your awareness, the Short-eared Owl and Lesser Yellowlegs were added to the SARO list in 2023 as Threatened. Although these were listed following approval of the Terms of Reference, these species will need to be addressed and considered in the EA report.		
47	3.3.11 page 16	Any blasting or crushing will need to be a minimum of 500 m from any bat hibernacula or identified breeding bird locations. Will further surveys for breeding birds I.e. EWPW being conducted at these locations? reference to Appendix 3.0 B for locations of 24 aggregate features that may be exploited for materials; are any of these located near bat hibernacula or potential EWPW habitat? do any of these have existing Bank Swallow colonies or congregations of burrows? MECP SARB recommends operating outside of sensitive timing windows for SAR, if this cannot be avoided than an authorization under the ESA may be required. MECP SARB recommends the proponent follow the Best Management Practices for Bank Swallow while conducting aggregate pit work or storing stockpiled aggregate materials at a slope of 70 degrees or less.	n/a	There are no proposed aggregate pits within 500 m of Bank Swallow or Eastern Whip-poor-will confirmed habitat. Bank Swallow and Eastern Whip-poor-will candidate habitat locations are available on Attachment 6.5-B-16 in Appendix 6.5-B (bobolink) Mitigation measures in Section 6.5.7 were updated for birds to include BMPs, timing windows for works, 500 m buffers for moderate to high impact operations in protected habitat and permit requirements (where timing windows cannot be adhered to). Adverse impacts to SAR bat and bat habitat during the hibernation (August 1 – May 31) or maternity season (May 1 – August 31) will be minimized to the extent practicable. If there are potential adverse impacts to SAR bats and bat habitat during these windows then the necessary permitting will be completed.
48	3.3.12 page 17	MECP SARB recommends that helicopter pad areas be cleared outside of SAR sensitive timing periods, and should not be located within 500 m of any bat hibernacula. Are any proposed helicopter pads within 500 m of bat hibernacula? Should the proponent have reasons for not being able to adhere to the SAR sensitive timing windows then please provide literature and rationale to support these reasons. An authorization under the ESA may be required.	n/a	There are no proposed helicopter pads within 500 m of any potential or known hibernacula.

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1	6.5 Wildlife and Wildlife Habitat Table 6.5-2 page 6.5 - 11	For your awareness, Barn Swallow, included in this document as a threatened species, has been down listed to species of Special Concern under the ESA (2007) O.Reg. 230/08 Species at Risk in Ontario List, as such, the species and its habitat are no longer protected under the ESA.	n/a	Thank you for this input. The EA document has been revised accordingly.
2	6.5.5.3 Gray Fox Page 5.3 - 32	*"Dens can be found in modified burrows of other animals, hollow trees, hollow logs, woodpiles, rocky outcrops, cavities under rocks, piles of brush, slab, wood or sawdust, and abandoned buildings (MECP 2019)."* MECP SARB recommends the proponent avoid tree clearing and heavy equipment disturbance within 100 meters where an active gray fox den has been identified during the denning period (February 15-July 15). If the proponent cannot operate outside of the recommended timing window, then an authorization under the ESA may be required.	n/a	There are no active gray fox dens currently identified within the Project study areas or Project footprint. It is understood that the ESA prohibits damaging or destroying den sites. MECP SARB does not have a standardized protocol for surveying for gray fox and identification of den sites. This discussion will resume during the permitting phase of the Project.
3	6.5.5.7 Little Brown and Northern Myotis 5.7 pages 46 - 51	Maternity roost habitat – MECP SARB recommends the proponent conduct tree and vegetation removal outside of the active season (May 1 – August 31). If the proponent chooses not to or cannot avoid clearing outside of the active season for SAR bats, then an authorization under the ESA may be required.	n/a	Comment is acknowledged and timing restriction is incorporated into the EA document (Section 6.5.7.7; Section 6.5.8 and Section 6.5.9)
4	6.5.5.12 Bank Swallow 5.12 - 70	*"Field surveys in 2022 documented 15 individuals at one nesting colony within the LSA."* Where is this in relation to the planned ROW? Was the nesting colony observed in an existing aggregate pit? If this habitat is to be removed, it will require an authorization under the ESA. If the pit is active, excavation is allowed outside of the nesting season providing the remaining face is suitable for nesting. In areas outside of an active nesting site, MECP SARB recommends aggregate slopes and stock-piles of soft materials suitable for bank swallow nesting be maintained at an angle <70 degrees to prevent nesting by the species. Where nesting colonies occur or when stock piling materials, MECP SARB recommends the proponent should follow BMP for the protection and creation of bank swallow habitat	n/a	The nesting colony is near Ignace in the existing K&M Construction Aggregate Pit 15813. Approximately 7 ha of Category 3 habitat will be removed for construction of a laydown/camp area on the opposite side of the highway. An additional 3 laydown/camp areas are proposed within 1000 m of Category 3 habitat. The bullet point in Section 6.5.5.12 discussing the 2022 field survey results was updated to include the location. Updated mitigation measures under Section 6.5.7.12.1 and 6.5.7.12.6 to include BMPs, vegetation clearing timing windows, 500 m buffer and permit requirements (where timing windows are not adhered to). Bank Swallow candidate habitat locations are available in Attachment 6.5-B-13 of Appendix 6.5-B.

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5	6.5.5.13 Chimney Swift 5.13 - 70	Any candidate trees found within the LSA should be maintained where possible. If a candidate tree or occupied tree is required to be removed, then mitigation to avoid section 9 concerns is recommended by removing the tree outside of the active breeding bird season (April 15 – August 31). Should a nest tree require removal then an authorization under s.10 of the ESA may be required.	n/a	Vegetation clearing during the breeding bird timing window will be minimized to the extent practicable. If vegetation clearing is required during the breeding bird timing window then the necessary permitting will be completed. Section 6.5.7.13.1 has been updated to reflect the potential need for permitting where timing windows for vegetation clearing cannot be adhered to.
6	6.5.5.14 Bobolink 5.14 - 74	MECP SARB recommends that clearing any vegetation and grubbing occur outside of the active breeding bird season (April 15 – August 31).	n/a	Vegetation clearing during the breeding bird timing window will be minimized to the extent practicable. If vegetation clearing is required during the breeding bird timing window then the necessary permitting will be completed. Section 6.5.7.14.1 has been updated to reflect the potential need for permitting where timing windows for vegetation clearing cannot be adhered to. No vegetation removal is proposed within bobolink candidate habitat. Bobolink candidate habitat locations are available on Attachment 6.5-B-16 in Appendix 6.5-B.
7	6.5.5.15 Eastern Whip poor will 5.15-78	As in comment # 6.	n/a	Vegetation clearing during the breeding bird timing window will be minimized to the extent practicable. If vegetation clearing is required during the breeding bird timing window then the necessary permitting will be completed. Section 6.5.7.15.1 has been updated to reflect the potential need for permitting where timing windows for vegetation clearing cannot be adhered to. There will be some impacts from vegetation removal to Whip-poor-will candidate habitat at Station EWPW-24. Whip-poor-will candidate habitat locations are available in Attachment 6.5-B-17 in Appendix 6.5-B.
8	Table 6.5 – 20 Little Brown Myotis and Northern Myotis 6.5 - 87	*Little Brown and Northern Myotis – incidental take* – any adverse impacts to SAR bats or SAR bat habitat during hibernation (September 1 – April 30) or maternity season (May 1 – August 31) should be avoided. If these sensitive time periods cannot be avoided then an authorization under the ESA may be required.	n/a	Adverse impacts to SAR bat and bat habitat during the hibernation (August 1 – May 31) or maternity season (May 1 – August 31) will be minimized to the extent practicable. If there are potential adverse impacts to SAR bats and bat habitat during these windows then the necessary permitting will be completed. Table 6.5-40 has been updated to reflect the potential need for permitting where timing windows cannot be adhered to.
9	Table 6.5 – 20 Wildlife and Wildlife Habitat – All Bird Criteria	*Incidental take – Site preparation, construction and maintenance may result in the destruction of nests, eggs, and individuals of migratory birds (incidental take).* MECP SARB recommends the proponent conduct site preparation (tree and vegetation removal and	n/a	Vegetation clearing during the breeding bird timing window will be minimized to the extent practicable. If vegetation clearing is required during the breeding bird timing window then the necessary permitting will be completed. Section 6.5.7 has been updated to reflect the potential need for permitting where timing windows for vegetation clearing cannot be adhered to.

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	6.5 - 87	grubbing) outside of the active breeding bird season (April 15 – August 31). If the proponent chooses not to or cannot avoid site preparation during this time period, then an authorization under the ESA may be required.		
10	Table 6.5 – 20 Furbearers (American marten, beaver, gray wolf) and Gray Fox 6.5 - 87	***Incidental take*** *– Site preparation, construction and maintenance may result in the destruction of furbearer den sites and denning individuals (incidental take).* MECP SARB recommends site preparation, construction and maintenance occur outside of the denning period for Gray Fox (February 15 – July 15). If the proponent cannot avoid site preparation, construction and maintenance during this time period then an authorization under the ESA may be required.	n/a	Construction activities that could impact a gray fox den (or take place within 100 m of a den) will occur outside of the denning period. Clarification has been added to Section 6.5.7.3.5.
11	6.5.7.1.6 Fly Rock from Blasting *Potential Effects* Survival and Reproduction 6.5 - 94	Although Fly Rock is not considered to be much of a threat to SAR in the area, vibrations and noise from blasting may impact bat hibernacula. Disturbing bats during hibernation may lead to mortality as the disturbance may cause them to use up their fat stores too early. MECP SARB recommends that blasting, drilling or heavy equipment use should not occur within 500 meters of any bat hibernacula and no tree or vegetation removal or grubbing may occur within 200 meters of a bat hibernacula. If the proponent chooses not to or cannot commit to working outside of the recommended timing windows or buffer distances from hibernacula, then an authorization under the ESA may be required.	n/a	Comment noted. The assessment addresses these potential impacts and states in Section 6.5.7.7.1: *No tree removal or other construction activities will be completed within 200 m of hibernacula. Furthermore, no construction activities that produce loud noises and vibrations (e.g., drilling, blasting, and implosion splicing) to the extent practicable will be completed within 500 m of a hibernacula during the hibernation period (September 1 to May 30). These restrictions on activities are expected to limit effects on hibernating bats because the Project is not predicted to result in the removal or alteration of potential hibernation habitat. The main concern during the construction stage is the effect that sensory disturbance (e.g., noise and vibration) may have on hibernating bats.*
12	6.5.7.3 Gray Fox 6.5 - 110	*Mitigation measures will likely include:* *• Environmental training for workers, including information on den identification and procedures to follow if a den is identified.* *• Surveys to identify den sites within home ranges of known gray fox occurrence records.* *If an active den is identified during active construction, including during vegetation removal, work will stop and local MECP SARB offices will be contacted immediately. The den will be clearly marked, a 100 m buffer surrounding the den will be established and no vegetation*	n/a	Section 6.5.7.3.5 and Table 6.5-40 have been updated to specify how dens encountered during construction will be marked and buffered. MECP SARB will be contacted should a den be found during construction.

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		removal will proceed within that buffer until MNRF is engaged. MECP SARB acknowledges the mitigation measures identified in this section, however, has concerns about how a den will be marked if encountered during the active denning season (e.g. flagged or GPS point?). MECP advises minimizing any human presence at the den site as this may cause the female to abandon her pups. Should an active den be encountered in the Thunder Bay to Atikokan region where Gray Fox have been identified to occur,(attachment 6.5-B-1 maps 1,2,3 8 and 9), SARB acknowledges the stop work procedure and to contact MECP for next steps.		
13	6.5.7.7.1 Little Brown Myotis and Northern Myotis Habitat Loss 6.5-129	*Vegetation removal will occur between 200 m and 500 m* ***of three likely or possible hibernaculum****. This activity will not negatively impact hibernation habitat availability. Any Project activities that could cause loud noise and vibrations will not be conducted within 500 m of a hibernaculum during the hibernation period. Project activities causing loud noises and vibrations will not negatively impact hibernation habitat availability.* ***No Project activities are planned within 200 m of a hibernaculum*** *(Table 6.5-25).* Noise caused by heavy equipment and vibrations from drilling and blasting do not seem to impact hibernating bats when conducted at distances greater than 500 m from a hibernaculum. Maintaining a buffer of trees and vegetation within 200 m of a hibernaculum provide shelter and microclimate conditions for the hibernaculum. MECP SARB acknowledges Hydro One's commitment to avoid removing trees and vegetation within 200 m of a bat hibernaculum and avoid loud noises associated with drilling, blasting and implosion splicing within 500 m of a hibernaculum. Any tree or vegetation removal occurring between 200 meters and 500 meters of a bat hibernaculum is recommended to occur outside of the maternity season for bats (May 1 – August 31).	n/a	Section 6.5.7.7.1 has been updated to clarify.

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		If the proponent chooses not to or cannot meet these avoidance recommendations than an authorization under the ESA may be required. For your awareness, the paragraph repeats itself in the document (recommend removing duplicate paragraph).		
14	6.5.7.7.1 Little Brown Myotis and Northern Myotis 6.5 - 131	*No construction activities that produce loud noises and vibrations (e.g., drilling, blasting, and implosion splicing) will be completed within 500 m of a hibernacula during the hibernation period (September 1 to May 30).* MECP SARB acknowledges Hydro One's commitment to avoid construction activities that produce loud noises and vibrations such as drilling, blasting or implosion splicing within 500 m of a bat hibernaculum, however, recommends these activities should be avoided between August 1 – May 31 to include the most sensitive time periods around a hibernaculum including swarming and hibernation.	n/a	Section 6.5.7.7.1 has been updated with the timing window of August 1 - May 31.
15	6.5.7.7.1 Little Brown Myotis and Northern Myotis Survival and Reproduction 6.5 - 132	*Site clearing for the Project Footprint will result in removal of vegetation between 200 m and 500 m of three likely or possible hibernaculum* It is unclear when will tree removal occur in the zone between 200 m and 500 m of a hibernaculum. If clearing trees near a hibernaculum is required, MECP SARB recommends the proponent conduct tree and vegetation clearing within 200 m of a hibernaculum outside of the maternity season for bats (May 1 – August 31) providing noise and vibration created at the site is restricted to that associated with logging (e.g. chain saw, skidder, or mechanical harvesting equipment). If the proponent cannot adhere to avoiding the sensitive timing period for bats, or if tree and vegetation removal is required less than 200 m from a bat hibernaculum then an authorization under the ESA may be required.	n/a	Clearing will be conducted within the 200 – 500 m distance from some hibernacula. Clearing is not required within 200 m of a hibernaculum. Clearing will be conducted within the 200 - 500 m distance from hibernation habitat outside of the maternity season for bats (May 1 – August 31) providing noise and vibration created at the site is restricted to that associated with logging (e.g., chain saw, skidder, or mechanical harvesting equipment).

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16	6.5.7.7.1 Little Brown Myotis and Northern Myotis Survival and Reproduction 6.5 - 134	*No Project-related disturbance will occur within 200 m of a bat hibernaculum without engagement and approval of regulatory agencies.* *• Project activities causing loud noise or vibrations (e.g., drilling, blasting, implosion splicing) will not be undertaken within 500 m of a bat hibernaculum during the hibernation period (September 1 to May 30).* MECP SARB recommends no clearing of trees and vegetation within 200 m of a bat hibernaculum. If the proponent chooses not to or cannot avoid operating outside of this buffer than an authorization may be required. MECP SARB acknowledges Hydro One's commitment to avoid construction activities that produce loud noises and vibrations such as drilling, blasting or implosion splicing within 500 m of a bat hibernaculum, however, recommends these activities should be avoided between August 1 – May 31 to include the most sensitive time periods around a hibernaculum including swarming and hibernation.	n/a	Section 6.5.7.7.1 has been updated accordingly.
17	6.5.7.7.1 Little Brown Myotis and Northern Myotis Mitigation Measures 6.5 - 134	*If potential maternity roost habitat is to be removed during the roosting period, it will be subject to ESA permitting and site-specific mitigation measures to be developed in consultation with the MECP.* As previously indicated, if the proponent cannot adhere to avoiding and clearing of trees or vegetation during the recommended timing window for SAR bats of May 1 – August 31 then an authorization under the ESA may be required.	n/a	Comment acknowledged.
18	6.5.7.7.3 Incidental Take Mitigation Measures 6.5-135	*Clearing maternity roost habitat during the maternal roosting period (May 1 to August 31) will be avoided. Should this timing not be able to be maintained as identified, MECP SARB will be engaged.* If the proponent intends on clearing maternity roost habitat during the SAR bat sensitive timing window of May 1 – August 31 then an authorization under the ESA may be required.	n/a	Construction activities are planned within the 200 - 500 m area, but no work is planned within 200 m distance from a potential or confirmed hibernacula.

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		In areas within 500 m of a known or suspected hibernacula, construction activities causing sensory disturbance (e.g., drilling, blasting, implosion splicing) will be completed outside the hibernation period (September 1 to May 30). As noted in comment # 14 above, MECP SARB acknowledges Hydro One's commitment to avoid construction activities that produce loud noises and vibrations such as drilling, blasting or implosion splicing within 500 m of a bat hibernaculum, however, recommends these activities should be avoided between August 1 – May 31 to include the most sensitive time periods around a hibernaculum including swarming and hibernation. *Construction activities causing sensory disturbance and tree clearing will not be completed* ***within 200 m of potential hibernacula*** MECP SARB acknowledges this commitment and based on the Attachment 6.5-B-5 Candidate and Confirmed SAR Bat Hibernacula, shows the Andowan, Steep Rock, Spillway and Lakeshore hibernacula (Figures 1, 3 and 4 respectively) as being impacted by construction activities in the LSA. MECP SARB recommends the proponent follow comments pertaining to sensitive timing periods and buffers noted above. Please clarify if other tree and vegetation clearing activities are planned at the other confirmed or potential hibernacula.		
19	6.5.7.12 Bank Swallow 6.5-165	*The Project is predicted to remove 155 ha (3.3% of the LSA and 1.1% of the terrestrial RSA) of moderate to high suitability bank swallow habitat (Table 6.5-31), including 6.0 ha of Category 3 of protected habitat.* It is unclear as to what type of suitable habitat is being removed (e.g. feeding)	n/a	The nesting colony is near Ignace in the existing K&M Construction Aggregate Pit 15813. Bank Swallow candidate habitat locations are available in Attachment 6.5-B-13 of Appendix 6.5-B. Approximately 7 ha of Category 3 habitat will be removed for construction of a laydown/camp area on the opposite side of the highway.

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		The proponent refers to 6.0 ha of category 3 habitat impacted by the project. There is no reference to the GHD mapping or to which map in attachment 6.5-B-13 this occurs. Please provide the GHD mapping for known Bank Swallow nesting colonies (active or inactive) and identify where the colony occurs in the attachment. Please specify if the nesting location used to create the GHD mapping is in an existing aggregate pit, proposed aggregate pit or natural location (I.e. river bank). Will this location be utilized for aggregate material during the project?		According to the ESA GHD for Bank Swallow, Category 3 habitat is identified as suitable foraging habitat within 500 m of a colony. Section 6.5.7.12.1 was updated to provide a definition for what is considered Category 3 habitat.
20	6.5.7.12 Bank Swallow 6.5-167	*If an active/inactive bank swallow nesting colony is identified during pre-construction or during active construction, including during vegetation removal, work will stop and MECP and other appropriate agencies will be contacted immediately to discuss mitigation measures. Nest monitoring will be implemented to document nest use and potential abandonment.* MECP SARB recommends the proponent conduct tree and vegetation clearing and grubbing outside of the active breeding bird season (April 15 – August 31). If a Bank Swallow nesting colony is located within the LSA or found at any of the aggregate pit locations used to support the project, then MECP SARB recommends the proponent avoid work within 50 m of the active colony until nesting season has been completed. If the proponent cannot avoid the nesting season or the habitat, then an authorization under the ESA may be required. In the event the proponent requires stockpiling of soft materials such as aggregate (e.g. sand, A-gravel etc.)where Bank Swallow are present, MECP SARB recommends the proponent follow section 4.2.1 of the Best Management Practices for the Protection, Creation and Maintenance of Bank Swallow Habitat in Ontario https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&cad=rja&uact=8&ved=2ahUKEwiGvOb51fX_AhUEEFkFHaPBAuQQFnoECA0QAQ	n/a	The nesting colony is near Ignace in the existing K&M Construction Aggregate Pit 15813. Bank Swallow candidate habitat locations are available in Attachment 6.5-B-13 of Appendix 6.5-B. Approximately 7 ha of Category 3 habitat will be removed for construction of a laydown/camp area on the opposite side of the highway. Updated mitigation measures under Section 6.5.7.12.1 and 6.5.7.12.6 to include BMPs, vegetation clearing timing windows, 500 m buffer and permit requirements (where timing windows cannot be adhered to).

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		Q&url=https://files.ontario.ca/bansbmpenpdffinalv.1.117mar17.pdf&usg=AOvVaw0zIiWgbBeYxNAL-46msstj&opi=89978449 to avoid creating unintentional nesting habitat for the species that may result in delays to construction. For your awareness, Bank Swallow breeding colonies and congregation of burrows can be mapped using the General habitat Description.		
21	6.5.7.13 Chimney Swift 6.5 - 70	*Structures with barn swallow and chimney swift nests can be removed outside of the breeding season, following appropriate legislative requirements.* MECP SARB recommends the proponent conduct tree and vegetation clearing outside of the breeding bird window (April 15 – August 31). It is the proponent's responsibility to conduct breeding bird surveys and identify nesting sites for Chimney Swift that may be impacted by the proposed project. Any such structures observed with active roosting or nesting Chimney Swift would be considered Chimney Swift habitat. Any damage or destruction of SAR habitat is considered a contravention to the ESA and an authorization under the ESA may be required. MECP SARB recommends the proponent identify any of these locations up front with MECP SARB to determine if an authorization is required. For your awareness, Barn Swallow has been down-listed to a species of special concern and the species and its habitat are no longer protected under the ESA.	n/a	Mitigation measures were updated under Section 6.5.7.13.1 and 6.5.7.13.6 to clarify surveys at structures will be conducted for nesting and roosting individuals and to include vegetation/structure removal timing windows and registration/permitting requirements for removal of chimney swift nesting/roosting habitat. All bird statuses under the ESA, COSEWIC and SARA have been reviewed and updated in Table 6.5-2.
22	6.5.7.13 Chimney Swift Mitigation Measures 6.5 -178 - 179	*Surveys at identified active nest sites of known barn swallow and chimney swift colony occurrence records.* What kind of surveys were/are going to be completed? MECP SARB recommends the proponent follow the Breeding Bird Atlas link for Chimney Swift surveys.	n/a	Mitigation measures were updated in Section 6.5.7.13.1 to clarify surveys at identified chimney swift active nest sites will be conducted for nesting and roosting individuals in accordance with the Birds Canada SwiftWatch Protocol.
23	6.5.7.14 Bobolink	*The Project is predicted to remove 7 ha (1.6% of the LSA and 0.4% of the terrestrial RSA) of moderate to high suitability bobolink habitat*	n/a	Bobolink habitat availability in the study area is shown in Appendix 6.5-B, Attachment 6.5-B-16. Section 6.5.7.14.1 was updated to fix incorrect reference to the figures.

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	Habitat Availability 6.5 - 180	MECP SARB could not locate a map in Appendix 6.5 – A or any reference to Bobolink habitat mapping in the Wildlife Figures. Please provide a figure with the General Habitat Description mapping for Bobolink and provide the number of hectares impacted by the project. For your awareness, a link has been provided to the General Habitat Description for Bobolink.		The GHD mapping has been based on the two NHIC Element Occurrences near Dryden. There will be no impacts to protected Bobolink Category 1/2/3 habitat. No Bobolink habitat was confirmed during surveys.
24	6.5.7.14 Bobolink Habitat Availability 6.5 - 180	*Managing vegetation removal activities so that removal does not occur within the migratory bird nesting period (April 15 to August 31)* ***to the extent possible.*** • *If vegetation removal cannot be avoided during the migratory bird nesting period (i.e., April 15 to August 31),* ***pre-clearing nest searches will be completed.*** **"The Migratory Birds Convention Act, 1994 (**Government of Canada 1994**) prohibits the disturbance or destruction of migratory bird nests (**e.g., passerines and waterfowl**) during the breeding season."** MECP SARB supports the above statement and does not recommend nest searching during the active nesting period and recommends vegetation clearing and grubbing outside of the breeding bird active season (April 15 – August 31). If vegetation clearing and grubbing cannot be completed outside of the active breeding bird period, an authorization under the ESA may be required.	n/a	Section 6.5.7.14.1 was updated to include permit requirements (where timing windows cannot be adhered to). No Bobolink habitat was confirmed during surveys. There will be no impacts to protected Bobolink Category 1/2/3 habitat (identified based on NHIC EO records).
25	6.5.7.14 Bobolink Mitigation Measures 6.5 - 182	*If an active bobolink nest is identified during pre-construction surveys or during active construction and/or vegetation removal, work will stop and MECP and other appropriate agencies will be contacted immediately to discuss mitigation measures. Nest monitoring will be implemented to document nest use and potential abandonment* *"The Migratory Birds Convention Act, 1994 (Government of Canada 1994) prohibits the disturbance or destruction of migratory bird nests*	n/a	Section 6.5.7.14.6 was updated to include permit requirements (where timing windows cannot be adhered to). No Bobolink habitat was confirmed during surveys. There will be no impacts to protected Bobolink Category 1/2/3 habitat (identified based on NHIC EO records).

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		(e.g., passerines and waterfowl) during the breeding season." MECP SARB supports the above statement and does not recommend nest searches during the active breeding bird season and recommends the proponent avoid contravening the ESA by conducting any vegetation removal and grubbing outside of the active bird season (April 15 – August 31). If the proponent cannot adhere to working outside of the recommended timing window, then an authorization under the ESA may be required.		
26	6.5.7.14 Bobolink Mitigation Measures 6.5 - 186	*If vegetation removal cannot be avoided during the migratory bird nesting period (i.e., April 15 to August 31), pre-clearing nest searches will be completed.* As above in comment # 25.	n/a	Sections 6.5.7.14.1 and 6.5.7.14.6 were updated to include permit requirements (where timing windows cannot be adhered to). No Bobolink habitat was confirmed during surveys. There will be no impacts to protected Bobolink Category 1/2/3 habitat (identified based on NHIC EO records).
27	6.5.7.15 Eastern Whip-poor-will Habitat Loss 6.5 - 187	*The Project is predicted to remove 1,814 ha (3.0% of the LSA and 0.7% of the terrestrial RSA) of moderate to high suitability eastern whip-poor-will habitat (Table 6.5-35), including 1 ha of Category 2 habitat and 4 ha of Category 3 habitat* MECP SARB notes in Attachment 6.5-B-17 Eastern Whip-Poor-Will, Figures 10, 19 and 30 have confirmed breeding habitat in the ROW. Please provide the General Habitat Description mapping for each of the identified locations identified in your baseline data collection (following the guidance as found in the MNRF 2014 Survey Protocol for Eastern Whip poor will in Ontario) and for portions of the LSA, please map the GHD for all potential suitable nesting habitat to arrive at an estimation of habitat impacts requiring authorization.	n/a	Hydro One requested that MECP SARB provide guidance on mapping candidate EWPW habitat. For the purposes of the Final EA, only confirmed whip-poor-will habitat is being considered under the commitment to obtain an ESA authorization for damage/destruction of habitat.

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28	6.5.7.15 Eastern Whip-poor-will Mitigation Measures 6.5 - 190	*If vegetation removal cannot be avoided during the migratory bird nesting period (i.e., April 15 to August 31), pre-clearing nest searches will be completed and will be valid for a period up to 72 hrs. Pre-clearance searches will involve nest sweeps.* As per comment # 25.	n/a	Section 6.5.7.15.1 was updated to include permit requirements (where timing windows cannot be adhered to).
29	6.5.7.15 Eastern Whip-poor-will Mitigation Measures 6.5 - 190	*Surveys at known eastern whip-poor-will occurrence records* MECP SARB recommends the proponent conduct surveys at known occurrence and candidate locations following the MNRF Draft Survey Protocol for Eastern Whip Poor Will in Ontario (2014) and provide GHD mapping for these occurrences and for all potential suitable nesting habitat to arrive at an estimation of habitat impacts requiring authorization. How is proponent going to effectively survey all impacted regions of the ROW?	n/a	Eastern Whip-poor-will candidate habitat locations are available on Attachment 6.5-B-17 in Appendix 6.5-B. Section 6.5.7.15.6 was updated to include permit requirements (where timing windows cannot be adhered to). Hydro One requested that MECP SARB provide guidance on mapping candidate EWPW habitat. For the purposes of the Final EA, only confirmed whip-poor-will habitat is being considered under the commitment to obtain an ESA authorization for damage/destruction of habitat.
30	6.5.7.15 Eastern Whip-poor-will Mitigation Measures 6.5 - 190	*If an active eastern whip-poor-will nest is identified during pre-construction surveys or during active construction, including during vegetation removal, work will stop and MECP and other appropriate agencies will be contacted immediately to discuss mitigation measures. Nest monitoring will be implemented to document nest use and potential abandonment* As stated in comment # 29. In the event that an EWPW is found nesting in a recently cleared area or during construction, MECP SARB recommends the proponent stop work immediately and contact SARB regarding next steps.	n/a	The wording throughout Section 6.5.7 for all bird species was updated accordingly.

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31	6.5.7.15 Eastern Whip-poor-will Mitigation Measures 6.5 - 190	*Environmental training for workers, including information on active nest identification and procedures to follow if an active nest is identified.* Please include what the recommended procedure is for following up on an active nest if identified. MECP SARB recommends the proponent stop work, leave the area and contact MECP SARB for next steps.	n/a	The wording throughout Section 6.5.7 for all bird species was updated accordingly.
32	6.5.7.15 Eastern Whip-poor-will Incidental take - Mitigation Measures 6.5 - 193	*Eastern whip-poor-will nests, eggs, and/or individuals could be disturbed or destroyed during construction of access roads and the ROW, and maintenance of the ROW during operations.* SARB recommends the proponent conduct these activities outside of the active breeding bird season during any construction of the project including access roads, work camps, pole and line installation etc. If the proponent chooses not to or cannot operate outside of the breeding bird season, then an authorization under the ESA may be required.	n/a	Section 6.5.7.15.6 was updated to include permit requirements (where timing windows cannot be adhered to).
33	Table 6.5 – 37 Summary of Net Effects and Mitigation Measures to Wildlife	*Avoid vegetation removal and all construction activities that cause sensory disturbance within 100 m of gray fox den from February 15-July 15 of each year to avoid disturbing denning gray fox.* *• If a gray fox den is identified during construction or operations, and should this timing not be able to be maintained within the buffer widths identified, local MECP SARB offices will be contacted to develop a den management plan and appropriate Indigenous communities will be notified, where requested(b).* In the event that a Gray Fox den is encountered, If the proponent chooses not to or cannot avoid the sensitive timing period for Gray Fox denning (February 15 – July 15) then an authorization under the ESA may be required. A den management plan may be included as part of the mitigation, however, would not be considered sufficient as an overall benefit to the species.	n/a	Comment acknowledged. Any impacts within 100 m of a gray fox den during the timing window will require and ESA authorization.

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34		*If vegetation removal must be completed during the migratory bird nesting period, implement nest sweeps. Similar measures will be taken for vegetation removal during routine ROW maintenance* See MECP SARB's comment # 25.	n/a	Table 6.5-40 was updated to include timing window for migratory bird nesting period (April 15 to August 31) and additional mitigation measures for threatened and endangered SAR.
35	Table 6.5 – 37 Wildlife and Wildlife Habitat All bird Criteria Construction, Operation and Maintenance stages 6.5-210	MECP SARB recommends the proponent include Eastern Whip-poor-will, Chimney Swift, Bank Swallow, Bobolink, Eastern Meadowlark and the appropriate mitigation for these species. Mitigation is listed above but is lacking in this table.	n/a	Table 6.5-40 was updated to include buffers and permit requirements for Bank Swallow, Bald Eagle, Bobolink, Chimney Swift and Eastern Whip-poor-will (where timing windows cannot be adhered to). Timing window has been updated to March 1 to August 31 for Bald Eagle, April to October for Chimney Swift, and April 15 to August 31 for Bank Swallow, Bobolink and Eastern Whip-poor-will. No mitigation has been added for Eastern Meadowlark as this species has not been included in the EA due to lack of breeding records in the region. Furthermore, Bobolink mitigation will also protect Eastern Meadowlark (as they use similar habitats). Updated Section 6.5.3 to include rationale for exclusion of Eastern Meadowlark from the list of bird criteria to be carried forward in the assessment.
36	Table 6.5 – 37 Wildlife and Wildlife Habitat Project Component or Activity 6.5 - 209	*Construction stage:* *• Clearing, grading, earth moving, grubbing of vegetation, and stockpiling of materials along the ROW and other access and construction areas, and construction of infrastructure (e.g., access roads, bridges, temporary laydown areas, turnaround areas and temporary construction camps);* This paragraph should appear in the project component or activity section of the table as per comment # 35. Please add these activities under the project and component or activity section and address mitigation for these activities for each species as per direction in comment #35	n/a	The mitigation measures in Table 6.5-40 were updated to include criteria specific mitigations.

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37	Table 6.5 – 37 Little Brown Myotis and Northern Myotis Project Component or Activity 6.5 - 211	*Construction stage:* *• Clearing, grading, earth moving, grubbing of vegetation, and stockpiling of materials along the ROW and other access and construction areas, and construction of infrastructure (e.g., access roads, bridges, temporary laydown areas, turnaround areas and temporary construction camps)* MECP SARB recommends adding the above paragraph to the project component and activity section and including mitigative actions for SAR bats during these activities.	n/a	The mitigation measures in Table 6.5-40 were updated to include SAR bat specific mitigations.
38	Table 6.5 – 37 Little Brown Myotis and Northern Myotis Potential Effect	Incidental Take For your awareness, any site preparation involving drilling or blasting resulting in destruction of roosting or hibernating bats and their habitat would be in contravention to the ESA. If the proponent chooses not to or cannot follow the recommendations outlined in comment # 13, then an authorization under the ESA may be required.	n/a	Adverse impacts to SAR bat and bat habitat during the hibernation (August 1 – May 31) or maternity season (May 1 – August 31) will be minimized to the extent practicable. If there are potential adverse impacts to SAR bats and bat habitat during these windows then the necessary permitting will be completed. Table 6.5-40 has been updated to reflect the potential need for permitting where timing windows cannot be adhered to.
39	Table 6.5 – 37 Little Brown Myotis and Northern Myotis Potential Effect	*Avoid clearing maternity roost habitat from May 1 to August 31. Should this timing not be able to be maintained as identified, MECP SARB will be contacted for further discussion and appropriate Indigenous communities notified, where requested.* If the proponent chooses not to or cannot avoid the sensitive timing period for SAR bats, then an authorization under the ESA may be required.	n/a	Adverse impacts to SAR bat and bat habitat during the hibernation (August 1 – May 31) or maternity season (May 1 – August 31) will be minimized to the extent practicable. If there are potential adverse impacts to SAR bats and bat habitat during these windows then the necessary permitting will be completed. Table 6.5-40 has been updated to reflect the potential need for permitting where timing windows cannot be adhered to.
40	Table 6.5 – 37 Little Brown Myotis and Northern Myotis Potential Effect	*Within 500 m a bat hibernaculum, avoid any construction activities that may cause sensory disturbance to hibernating bats during the hibernation period (September 1 to May 30).* As stated in comment # 14.	n/a	Adverse impacts to SAR bat and bat habitat during the hibernation (August 1 – May 31) or maternity season (May 1 – August 31) will be minimized to the extent practicable. If there are potential adverse impacts to SAR bats and bat habitat during these windows then the necessary permitting will be completed. Table 6.5-40 has been updated to reflect the potential need for permitting where timing windows cannot be adhered to.

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41	6.5.8.7.3 Net Effects on Little Brown and Northern Myotis 6.5 - 235	*If tree clearing activities were to take place in suitable little brown myotis and northern myotis maternity roosting habitat during the maternity roosting period (May 1 to August 31), then some incidental take may occur but the effect is considered unlikely after mitigation. Incidental take of roosting little brown myotis and northern myotis will be restricted to the Project footprint and is considered to be infrequent because the mitigation is expected to be effective* If the proponent cannot commit to avoiding the active season for SAR bats, then an authorization under the ESA may be required.	n/a	Adverse impacts to SAR bat and bat habitat during the hibernation (August 1 – May 31) or maternity season (May 1 – August 31) will be minimized to the extent practicable. If there are potential adverse impacts to SAR bats and bat habitat during these windows then the necessary permitting will be completed. Table 6.5-40 has been updated to reflect the potential need for permitting where timing windows cannot be adhered to.
42	6.6.7.1.2.2 Mitigation below the High Water Mark Lake Sturgeon 6.6-91	The proponent has identified that mitigation measures and avoidance of in water works below the high-water mark should have no adverse impacts on SAR fish (e.g. Lake Sturgeon). The proponent has identified the restricted activity period for Lake Sturgeon as April 1 – June 30. MECP SARB acknowledges this time frame and recommends the proponent avoid any in water work during this period. Should any in-water work in Lake Sturgeon habitat be required, then an authorization under the ESA may be required.	n/a	This has been addressed in the Final EA Report. All sites with potential for Lake Sturgeon (i.e., desktop hydrological connections to Lake Sturgeon bearing waters or those that were identified in the desktop assessment and/or field to provide Lake Sturgeon habitat) had the Lake Sturgeon timing window applied. A statement was added regarding the need for an authorization under the ESA in Section 6.6.7.1.2.4 Reduce the Fish Mortality Risk Through Restricted Activity Timing Windows and Fish Rescues/Relocations.
43	6.4.7.5 Plant Species at Risk Black Ash Potential Effect, Habitat Quantity 6.4-80	*A total loss of 4 ha representing 10.8% habitat loss within the LSA, and 2.3% habitat loss within the RSA* Black Ash was added to the SARO list on January 26, 2022 and will receive protection for both the species and its habitat under the ESA (2007) as identified in O.Reg 23/22 s4. Currently, Black Ash is under a temporary suspension from the ESA which will be revoked as per O.Reg. 23/22 s4. Any Black Ash tree removal or habitat disturbance following the revoke date may require an authorization under the ESA. Please provide a map indicating where the Black Ash are located and the number of individuals that may be impacted by the project.	n/a	Candidate habitat for Black ash was completed for the effects assessment. It is understood that authorization under the ESA may be required for this species after the revoke date of the suspension. MECP SARB to provide further direction on the identification of all black ash trees within the Project footprint to contribute to the potential permitting process under the ESA.

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44	ATTACHMENT 6.4-A-1 Terrestrial Baseline Figures Steeprock Bat Hibernacula Survey Locations Figure 2.4 -2-4	Hydro One is proposing a new road within the 500 m buffer and the proposed hydro line passes through the 500 m buffer of the WCA 81 hibernacula for the Steep Rock site and a laydown area within the 500 m buffer of WCA 72 site. Additional concerns include implosion splicing within 500 meters of the hibernaculum, noise and vibration from drilling and blasting associated with construction and helicopter noise. MECP SARB recommends no sensory disturbance (implosion splicing, blasting or heavy vibration) within 500 meters of a bat hibernaculum from August 1 – May 31. If the proponent chooses not to or cannot operate outside of the recommended timing window, then an authorization under the ESA may be required.	n/a	Adverse impacts to SAR bat and bat habitat during the hibernation (August 1 – May 31) or maternity season (May 1 – August 31) will be minimized to the extent practicable. If there are potential adverse impacts to SAR bats and bat habitat during these windows then the necessary permitting will be completed. Table 6.5-40 has been updated to reflect the potential need for permitting where timing windows cannot be adhered to
45	ATTACHMENT 6.4-A-1 Terrestrial Baseline Figures Bat Hibernacula Survey Locations Figure 2.4-2-5	Hydro One is proposing new roads and the proposed hydro line passes through the 500 m buffer of both hibernacula for the Lakeshore Control site and the Spillway site. Additional concerns include implosion splicing within 500 meters of the hibernaculum, noise and vibration from drilling and blasting associated with construction and helicopter noise. MECP SARB recommends no sensory disturbance (implosion splicing, blasting or heavy vibration) within 500 meters of a bat hibernaculum from August 1 – May 31. If the proponent chooses not to or cannot operate outside of the recommended timing window, then an authorization under the ESA may be required.	n/a	Adverse impacts to SAR bat and bat habitat during the hibernation (August 1 – May 31) or maternity season (May 1 – August 31) will be minimized to the extent practicable. If there are potential adverse impacts to SAR bats and bat habitat during these windows then the necessary permitting will be completed. Table 6.5-40 has been updated to reflect the potential need for permitting where timing windows cannot be adhered to.
46	General Comment SAR species not considered in the Draft EA	The EA needs to address and identify potential impacts to Eastern Meadowlark, Red-headed Woodpecker, Short-eared Owl and Lesser Yellowlegs. Addressing these species now will aid in avoiding delays during the permitting process if required.	n/a	Section 6.5.3 was updated to include rationale for the exclusion of these four additional bird species from the list of bird criteria in the EA assessment. The rationale is consistent with that for exclusion of American White Pelican and Least Bittern.

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		For your awareness, the Short-eared Owl and Lesser Yellowlegs were added to the SARO list in 2023 as Threatened. Although these were listed following approval of the Terms of Reference, these species will need to be addressed and considered in the EA report.		
47	3.3.11 page 16	Any blasting or crushing will need to be a minimum of 500 m from any bat hibernacula or identified breeding bird locations. Will further surveys for breeding birds I.e. EWPW being conducted at these locations? reference to Appendix 3.0 B for locations of 24 aggregate features that may be exploited for materials; are any of these located near bat hibernacula or potential EWPW habitat? do any of these have existing Bank Swallow colonies or congregations of burrows? MECP SARB recommends operating outside of sensitive timing windows for SAR, if this cannot be avoided than an authorization under the ESA may be required. MECP SARB recommends the proponent follow the Best Management Practices for Bank Swallow while conducting aggregate pit work or storing stockpiled aggregate materials at a slope of 70 degrees or less.	n/a	There are no proposed aggregate pits within 500 m of Bank Swallow or Eastern Whip-poor-will confirmed habitat. Bank Swallow and Eastern Whip-poor-will candidate habitat locations are available on Attachment 6.5-B-16 in Appendix 6.5-B (bobolink) Mitigation measures in Section 6.5.7 were updated for birds to include BMPs, timing windows for works, 500 m buffers for moderate to high impact operations in protected habitat and permit requirements (where timing windows cannot be adhered to). Adverse impacts to SAR bat and bat habitat during the hibernation (August 1 – May 31) or maternity season (May 1 – August 31) will be minimized to the extent practicable. If there are potential adverse impacts to SAR bats and bat habitat during these windows then the necessary permitting will be completed.
48	3.3.12 page 17	MECP SARB recommends that helicopter pad areas be cleared outside of SAR sensitive timing periods, and should not be located within 500 m of any bat hibernacula. Are any proposed helicopter pads within 500 m of bat hibernacula? Should the proponent have reasons for not being able to adhere to the SAR sensitive timing windows then please provide literature and rationale to support these reasons. An authorization under the ESA may be required.	n/a	There are no proposed helicopter pads within 500 m of any potential or known hibernacula.

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1	6.5 Wildlife and Wildlife Habitat Table 6.5-2 page 6.5 - 11	For your awareness, Barn Swallow, included in this document as a threatened species, has been down listed to species of Special Concern under the ESA (2007) O.Reg. 230/08 Species at Risk in Ontario List, as such, the species and its habitat are no longer protected under the ESA.	n/a	Thank you for this input. The EA document has been revised accordingly.
2	6.5.5.3 Gray Fox Page 5.3 - 32	*"Dens can be found in modified burrows of other animals, hollow trees, hollow logs, woodpiles, rocky outcrops, cavities under rocks, piles of brush, slab, wood or sawdust, and abandoned buildings (MECP 2019)."* MECP SARB recommends the proponent avoid tree clearing and heavy equipment disturbance within 100 meters where an active gray fox den has been identified during the denning period (February 15-July 15). If the proponent cannot operate outside of the recommended timing window, then an authorization under the ESA may be required.	n/a	There are no active gray fox dens currently identified within the Project study areas or Project footprint. It is understood that the ESA prohibits damaging or destroying den sites. MECP SARB does not have a standardized protocol for surveying for gray fox and identification of den sites. This discussion will resume during the permitting phase of the Project.
3	6.5.5.7 Little Brown and Northern Myotis 5.7 pages 46 - 51	Maternity roost habitat – MECP SARB recommends the proponent conduct tree and vegetation removal outside of the active season (May 1 – August 31). If the proponent chooses not to or cannot avoid clearing outside of the active season for SAR bats, then an authorization under the ESA may be required.	n/a	Comment is acknowledged and timing restriction is incorporated into the EA document (Section 6.5.7.7; Section 6.5.8 and Section 6.5.9)
4	6.5.5.12 Bank Swallow 5.12 - 70	*"Field surveys in 2022 documented 15 individuals at one nesting colony within the LSA."* Where is this in relation to the planned ROW? Was the nesting colony observed in an existing aggregate pit? If this habitat is to be removed, it will require an authorization under the ESA. If the pit is active, excavation is allowed outside of the nesting season providing the remaining face is suitable for nesting. In areas outside of an active nesting site, MECP SARB recommends aggregate slopes and stock-piles of soft materials suitable for bank swallow nesting be maintained at an angle <70 degrees to prevent nesting by the species. Where nesting colonies occur or when stock piling materials, MECP SARB recommends the proponent should follow BMP for the protection and creation of bank swallow habitat	n/a	The nesting colony is near Ignace in the existing K&M Construction Aggregate Pit 15813. Approximately 7 ha of Category 3 habitat will be removed for construction of a laydown/camp area on the opposite side of the highway. An additional 3 laydown/camp areas are proposed within 1000 m of Category 3 habitat. The bullet point in Section 6.5.5.12 discussing the 2022 field survey results was updated to include the location. Updated mitigation measures under Section 6.5.7.12.1 and 6.5.7.12.6 to include BMPs, vegetation clearing timing windows, 500 m buffer and permit requirements (where timing windows are not adhered to). Bank Swallow candidate habitat locations are available in Attachment 6.5-B-13 of Appendix 6.5-B.

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5	6.5.5.13 Chimney Swift 5.13 - 70	Any candidate trees found within the LSA should be maintained where possible. If a candidate tree or occupied tree is required to be removed, then mitigation to avoid section 9 concerns is recommended by removing the tree outside of the active breeding bird season (April 15 – August 31). Should a nest tree require removal then an authorization under s.10 of the ESA may be required.	n/a	Vegetation clearing during the breeding bird timing window will be minimized to the extent practicable. If vegetation clearing is required during the breeding bird timing window then the necessary permitting will be completed. Section 6.5.7.13.1 has been updated to reflect the potential need for permitting where timing windows for vegetation clearing cannot be adhered to.
6	6.5.5.14 Bobolink 5.14 - 74	MECP SARB recommends that clearing any vegetation and grubbing occur outside of the active breeding bird season (April 15 – August 31).	n/a	Vegetation clearing during the breeding bird timing window will be minimized to the extent practicable. If vegetation clearing is required during the breeding bird timing window then the necessary permitting will be completed. Section 6.5.7.14.1 has been updated to reflect the potential need for permitting where timing windows for vegetation clearing cannot be adhered to. No vegetation removal is proposed within bobolink candidate habitat. Bobolink candidate habitat locations are available on Attachment 6.5-B-16 in Appendix 6.5-B.
7	6.5.5.15 Eastern Whip poor will 5.15-78	As in comment # 6.	n/a	Vegetation clearing during the breeding bird timing window will be minimized to the extent practicable. If vegetation clearing is required during the breeding bird timing window then the necessary permitting will be completed. Section 6.5.7.15.1 has been updated to reflect the potential need for permitting where timing windows for vegetation clearing cannot be adhered to. There will be some impacts from vegetation removal to Whip-poor-will candidate habitat at Station EWPW-24. Whip-poor-will candidate habitat locations are available in Attachment 6.5-B-17 in Appendix 6.5-B.
8	Table 6.5 – 20 Little Brown Myotis and Northern Myotis 6.5 - 87	*Little Brown and Northern Myotis – incidental take* – any adverse impacts to SAR bats or SAR bat habitat during hibernation (September 1 – April 30) or maternity season (May 1 – August 31) should be avoided. If these sensitive time periods cannot be avoided then an authorization under the ESA may be required.	n/a	Adverse impacts to SAR bat and bat habitat during the hibernation (August 1 – May 31) or maternity season (May 1 – August 31) will be minimized to the extent practicable. If there are potential adverse impacts to SAR bats and bat habitat during these windows then the necessary permitting will be completed. Table 6.5-40 has been updated to reflect the potential need for permitting where timing windows cannot be adhered to.
9	Table 6.5 – 20 Wildlife and Wildlife Habitat – All Bird Criteria	*Incidental take – Site preparation, construction and maintenance may result in the destruction of nests, eggs, and individuals of migratory birds (incidental take).* MECP SARB recommends the proponent conduct site preparation (tree and vegetation removal and	n/a	Vegetation clearing during the breeding bird timing window will be minimized to the extent practicable. If vegetation clearing is required during the breeding bird timing window then the necessary permitting will be completed. Section 6.5.7 has been updated to reflect the potential need for permitting where timing windows for vegetation clearing cannot be adhered to.

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	6.5 - 87	grubbing) outside of the active breeding bird season (April 15 – August 31). If the proponent chooses not to or cannot avoid site preparation during this time period, then an authorization under the ESA may be required.		
10	Table 6.5 – 20 Furbearers (American marten, beaver, gray wolf) and Gray Fox 6.5 - 87	***Incidental take*** *– Site preparation, construction and maintenance may result in the destruction of furbearer den sites and denning individuals (incidental take).* MECP SARB recommends site preparation, construction and maintenance occur outside of the denning period for Gray Fox (February 15 – July 15). If the proponent cannot avoid site preparation, construction and maintenance during this time period then an authorization under the ESA may be required.	n/a	Construction activities that could impact a gray fox den (or take place within 100 m of a den) will occur outside of the denning period. Clarification has been added to Section 6.5.7.3.5.
11	6.5.7.1.6 Fly Rock from Blasting *Potential Effects* Survival and Reproduction 6.5 - 94	Although Fly Rock is not considered to be much of a threat to SAR in the area, vibrations and noise from blasting may impact bat hibernacula. Disturbing bats during hibernation may lead to mortality as the disturbance may cause them to use up their fat stores too early. MECP SARB recommends that blasting, drilling or heavy equipment use should not occur within 500 meters of any bat hibernacula and no tree or vegetation removal or grubbing may occur within 200 meters of a bat hibernacula. If the proponent chooses not to or cannot commit to working outside of the recommended timing windows or buffer distances from hibernacula, then an authorization under the ESA may be required.	n/a	Comment noted. The assessment addresses these potential impacts and states in Section 6.5.7.7.1: *No tree removal or other construction activities will be completed within 200 m of hibernacula. Furthermore, no construction activities that produce loud noises and vibrations (e.g., drilling, blasting, and implosion splicing) to the extent practicable will be completed within 500 m of a hibernacula during the hibernation period (September 1 to May 30). These restrictions on activities are expected to limit effects on hibernating bats because the Project is not predicted to result in the removal or alteration of potential hibernation habitat. The main concern during the construction stage is the effect that sensory disturbance (e.g., noise and vibration) may have on hibernating bats.*
12	6.5.7.3 Gray Fox 6.5 - 110	*Mitigation measures will likely include:* *• Environmental training for workers, including information on den identification and procedures to follow if a den is identified.* *• Surveys to identify den sites within home ranges of known gray fox occurrence records.* *If an active den is identified during active construction, including during vegetation removal, work will stop and local MECP SARB offices will be contacted immediately. The den will be clearly marked, a 100 m buffer surrounding the den will be established and no vegetation*	n/a	Section 6.5.7.3.5 and Table 6.5-40 have been updated to specify how dens encountered during construction will be marked and buffered. MECP SARB will be contacted should a den be found during construction.

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		removal will proceed within that buffer until MNRF is engaged. MECP SARB acknowledges the mitigation measures identified in this section, however, has concerns about how a den will be marked if encountered during the active denning season (e.g. flagged or GPS point?). MECP advises minimizing any human presence at the den site as this may cause the female to abandon her pups. Should an active den be encountered in the Thunder Bay to Atikokan region where Gray Fox have been identified to occur,(attachment 6.5-B-1 maps 1,2,3 8 and 9), SARB acknowledges the stop work procedure and to contact MECP for next steps.		
13	6.5.7.7.1 Little Brown Myotis and Northern Myotis Habitat Loss 6.5-129	*Vegetation removal will occur between 200 m and 500 m* ***of three likely or possible hibernaculum****. This activity will not negatively impact hibernation habitat availability. Any Project activities that could cause loud noise and vibrations will not be conducted within 500 m of a hibernaculum during the hibernation period. Project activities causing loud noises and vibrations will not negatively impact hibernation habitat availability.* ***No Project activities are planned within 200 m of a hibernaculum*** *(Table 6.5-25).* Noise caused by heavy equipment and vibrations from drilling and blasting do not seem to impact hibernating bats when conducted at distances greater than 500 m from a hibernaculum. Maintaining a buffer of trees and vegetation within 200 m of a hibernaculum provide shelter and microclimate conditions for the hibernaculum. MECP SARB acknowledges Hydro One's commitment to avoid removing trees and vegetation within 200 m of a bat hibernaculum and avoid loud noises associated with drilling, blasting and implosion splicing within 500 m of a hibernaculum. Any tree or vegetation removal occurring between 200 meters and 500 meters of a bat hibernaculum is recommended to occur outside of the maternity season for bats (May 1 – August 31).	n/a	Section 6.5.7.7.1 has been updated to clarify.

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		If the proponent chooses not to or cannot meet these avoidance recommendations than an authorization under the ESA may be required. For your awareness, the paragraph repeats itself in the document (recommend removing duplicate paragraph).		
14	6.5.7.7.1 Little Brown Myotis and Northern Myotis 6.5 - 131	*No construction activities that produce loud noises and vibrations (e.g., drilling, blasting, and implosion splicing) will be completed within 500 m of a hibernacula during the hibernation period (September 1 to May 30).* MECP SARB acknowledges Hydro One's commitment to avoid construction activities that produce loud noises and vibrations such as drilling, blasting or implosion splicing within 500 m of a bat hibernaculum, however, recommends these activities should be avoided between August 1 – May 31 to include the most sensitive time periods around a hibernaculum including swarming and hibernation.	n/a	Section 6.5.7.7.1 has been updated with the timing window of August 1 - May 31.
15	6.5.7.7.1 Little Brown Myotis and Northern Myotis Survival and Reproduction 6.5 - 132	*Site clearing for the Project Footprint will result in removal of vegetation between 200 m and 500 m of three likely or possible hibernaculum* It is unclear when will tree removal occur in the zone between 200 m and 500 m of a hibernaculum. If clearing trees near a hibernaculum is required, MECP SARB recommends the proponent conduct tree and vegetation clearing within 200 m of a hibernaculum outside of the maternity season for bats (May 1 – August 31) providing noise and vibration created at the site is restricted to that associated with logging (e.g. chain saw, skidder, or mechanical harvesting equipment). If the proponent cannot adhere to avoiding the sensitive timing period for bats, or if tree and vegetation removal is required less than 200 m from a bat hibernaculum then an authorization under the ESA may be required.	n/a	Clearing will be conducted within the 200 – 500 m distance from some hibernacula. Clearing is not required within 200 m of a hibernaculum. Clearing will be conducted within the 200 - 500 m distance from hibernation habitat outside of the maternity season for bats (May 1 – August 31) providing noise and vibration created at the site is restricted to that associated with logging (e.g., chain saw, skidder, or mechanical harvesting equipment).

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16	6.5.7.7.1 Little Brown Myotis and Northern Myotis Survival and Reproduction 6.5 - 134	*No Project-related disturbance will occur within 200 m of a bat hibernaculum without engagement and approval of regulatory agencies.* *• Project activities causing loud noise or vibrations (e.g., drilling, blasting, implosion splicing) will not be undertaken within 500 m of a bat hibernaculum during the hibernation period (September 1 to May 30).* MECP SARB recommends no clearing of trees and vegetation within 200 m of a bat hibernaculum. If the proponent chooses not to or cannot avoid operating outside of this buffer than an authorization may be required. MECP SARB acknowledges Hydro One's commitment to avoid construction activities that produce loud noises and vibrations such as drilling, blasting or implosion splicing within 500 m of a bat hibernaculum, however, recommends these activities should be avoided between August 1 – May 31 to include the most sensitive time periods around a hibernaculum including swarming and hibernation.	n/a	Section 6.5.7.7.1 has been updated accordingly.
17	6.5.7.7.1 Little Brown Myotis and Northern Myotis Mitigation Measures 6.5 - 134	*If potential maternity roost habitat is to be removed during the roosting period, it will be subject to ESA permitting and site-specific mitigation measures to be developed in consultation with the MECP.* As previously indicated, if the proponent cannot adhere to avoiding and clearing of trees or vegetation during the recommended timing window for SAR bats of May 1 – August 31 then an authorization under the ESA may be required.	n/a	Comment acknowledged.
18	6.5.7.7.3 Incidental Take Mitigation Measures 6.5-135	*Clearing maternity roost habitat during the maternal roosting period (May 1 to August 31) will be avoided. Should this timing not be able to be maintained as identified, MECP SARB will be engaged.* If the proponent intends on clearing maternity roost habitat during the SAR bat sensitive timing window of May 1 – August 31 then an authorization under the ESA may be required.	n/a	Construction activities are planned within the 200 - 500 m area, but no work is planned within 200 m distance from a potential or confirmed hibernacula.

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		In areas within 500 m of a known or suspected hibernacula, construction activities causing sensory disturbance (e.g., drilling, blasting, implosion splicing) will be completed outside the hibernation period (September 1 to May 30). As noted in comment # 14 above, MECP SARB acknowledges Hydro One's commitment to avoid construction activities that produce loud noises and vibrations such as drilling, blasting or implosion splicing within 500 m of a bat hibernaculum, however, recommends these activities should be avoided between August 1 – May 31 to include the most sensitive time periods around a hibernaculum including swarming and hibernation. *Construction activities causing sensory disturbance and tree clearing will not be completed* ***within 200 m of potential hibernacula*** MECP SARB acknowledges this commitment and based on the Attachment 6.5-B-5 Candidate and Confirmed SAR Bat Hibernacula, shows the Andowan, Steep Rock, Spillway and Lakeshore hibernacula (Figures 1, 3 and 4 respectively) as being impacted by construction activities in the LSA. MECP SARB recommends the proponent follow comments pertaining to sensitive timing periods and buffers noted above. Please clarify if other tree and vegetation clearing activities are planned at the other confirmed or potential hibernacula.		
19	6.5.7.12 Bank Swallow 6.5-165	*The Project is predicted to remove 155 ha (3.3% of the LSA and 1.1% of the terrestrial RSA) of moderate to high suitability bank swallow habitat (Table 6.5-31), including 6.0 ha of Category 3 of protected habitat.* It is unclear as to what type of suitable habitat is being removed (e.g. feeding)	n/a	The nesting colony is near Ignace in the existing K&M Construction Aggregate Pit 15813. Bank Swallow candidate habitat locations are available in Attachment 6.5-B-13 of Appendix 6.5-B. Approximately 7 ha of Category 3 habitat will be removed for construction of a laydown/camp area on the opposite side of the highway.

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		The proponent refers to 6.0 ha of category 3 habitat impacted by the project. There is no reference to the GHD mapping or to which map in attachment 6.5-B-13 this occurs. Please provide the GHD mapping for known Bank Swallow nesting colonies (active or inactive) and identify where the colony occurs in the attachment. Please specify if the nesting location used to create the GHD mapping is in an existing aggregate pit, proposed aggregate pit or natural location (I.e. river bank). Will this location be utilized for aggregate material during the project?		According to the ESA GHD for Bank Swallow, Category 3 habitat is identified as suitable foraging habitat within 500 m of a colony. Section 6.5.7.12.1 was updated to provide a definition for what is considered Category 3 habitat.
20	6.5.7.12 Bank Swallow 6.5-167	*If an active/inactive bank swallow nesting colony is identified during pre-construction or during active construction, including during vegetation removal, work will stop and MECP and other appropriate agencies will be contacted immediately to discuss mitigation measures. Nest monitoring will be implemented to document nest use and potential abandonment.* MECP SARB recommends the proponent conduct tree and vegetation clearing and grubbing outside of the active breeding bird season (April 15 – August 31). If a Bank Swallow nesting colony is located within the LSA or found at any of the aggregate pit locations used to support the project, then MECP SARB recommends the proponent avoid work within 50 m of the active colony until nesting season has been completed. If the proponent cannot avoid the nesting season or the habitat, then an authorization under the ESA may be required. In the event the proponent requires stockpiling of soft materials such as aggregate (e.g. sand, A-gravel etc.)where Bank Swallow are present, MECP SARB recommends the proponent follow section 4.2.1 of the Best Management Practices for the Protection, Creation and Maintenance of Bank Swallow Habitat in Ontario https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&cad=rja&uact=8&ved=2ahUKEwiGvOb51fX_AhUEEFkFHaPBAuQQFnoECA0QAQ	n/a	The nesting colony is near Ignace in the existing K&M Construction Aggregate Pit 15813. Bank Swallow candidate habitat locations are available in Attachment 6.5-B-13 of Appendix 6.5-B. Approximately 7 ha of Category 3 habitat will be removed for construction of a laydown/camp area on the opposite side of the highway. Updated mitigation measures under Section 6.5.7.12.1 and 6.5.7.12.6 to include BMPs, vegetation clearing timing windows, 500 m buffer and permit requirements (where timing windows cannot be adhered to).

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		Q&url=https://files.ontario.ca/bansbmpenpdffinalv.1.117mar17.pdf&usg=AOvVaw0zIiWgbBeYxNAL-46msstj&opi=89978449 to avoid creating unintentional nesting habitat for the species that may result in delays to construction. For your awareness, Bank Swallow breeding colonies and congregation of burrows can be mapped using the General habitat Description.		
21	6.5.7.13 Chimney Swift 6.5 - 70	*Structures with barn swallow and chimney swift nests can be removed outside of the breeding season, following appropriate legislative requirements.* MECP SARB recommends the proponent conduct tree and vegetation clearing outside of the breeding bird window (April 15 – August 31). It is the proponent's responsibility to conduct breeding bird surveys and identify nesting sites for Chimney Swift that may be impacted by the proposed project. Any such structures observed with active roosting or nesting Chimney Swift would be considered Chimney Swift habitat. Any damage or destruction of SAR habitat is considered a contravention to the ESA and an authorization under the ESA may be required. MECP SARB recommends the proponent identify any of these locations up front with MECP SARB to determine if an authorization is required. For your awareness, Barn Swallow has been down-listed to a species of special concern and the species and its habitat are no longer protected under the ESA.	n/a	Mitigation measures were updated under Section 6.5.7.13.1 and 6.5.7.13.6 to clarify surveys at structures will be conducted for nesting and roosting individuals and to include vegetation/structure removal timing windows and registration/permitting requirements for removal of chimney swift nesting/roosting habitat. All bird statuses under the ESA, COSEWIC and SARA have been reviewed and updated in Table 6.5-2.
22	6.5.7.13 Chimney Swift Mitigation Measures 6.5 -178 - 179	*Surveys at identified active nest sites of known barn swallow and chimney swift colony occurrence records.* What kind of surveys were/are going to be completed? MECP SARB recommends the proponent follow the Breeding Bird Atlas link for Chimney Swift surveys.	n/a	Mitigation measures were updated in Section 6.5.7.13.1 to clarify surveys at identified chimney swift active nest sites will be conducted for nesting and roosting individuals in accordance with the Birds Canada SwiftWatch Protocol.
23	6.5.7.14 Bobolink	*The Project is predicted to remove 7 ha (1.6% of the LSA and 0.4% of the terrestrial RSA) of moderate to high suitability bobolink habitat*	n/a	Bobolink habitat availability in the study area is shown in Appendix 6.5-B, Attachment 6.5-B-16. Section 6.5.7.14.1 was updated to fix incorrect reference to the figures.

#	Document, Section and Page Number	Comment	Request/Recommendation	Hydro One Response
	Habitat Availability 6.5 - 180	MECP SARB could not locate a map in Appendix 6.5 – A or any reference to Bobolink habitat mapping in the Wildlife Figures. Please provide a figure with the General Habitat Description mapping for Bobolink and provide the number of hectares impacted by the project. For your awareness, a link has been provided to the General Habitat Description for Bobolink.		The GHD mapping has been based on the two NHIC Element Occurrences near Dryden. There will be no impacts to protected Bobolink Category 1/2/3 habitat. No Bobolink habitat was confirmed during surveys.
24	6.5.7.14 Bobolink Habitat Availability 6.5 - 180	*Managing vegetation removal activities so that removal does not occur within the migratory bird nesting period (April 15 to August 31)* ***to the extent possible.*** • *If vegetation removal cannot be avoided during the migratory bird nesting period (i.e., April 15 to August 31),* ***pre-clearing nest searches will be completed.*** **"The Migratory Birds Convention Act, 1994 (**Government of Canada 1994**) prohibits the disturbance or destruction of migratory bird nests (**e.g., passerines and waterfowl**) during the breeding season."** MECP SARB supports the above statement and does not recommend nest searching during the active nesting period and recommends vegetation clearing and grubbing outside of the breeding bird active season (April 15 – August 31). If vegetation clearing and grubbing cannot be completed outside of the active breeding bird period, an authorization under the ESA may be required.	n/a	Section 6.5.7.14.1 was updated to include permit requirements (where timing windows cannot be adhered to). No Bobolink habitat was confirmed during surveys. There will be no impacts to protected Bobolink Category 1/2/3 habitat (identified based on NHIC EO records).
25	6.5.7.14 Bobolink Mitigation Measures 6.5 - 182	*If an active bobolink nest is identified during pre-construction surveys or during active construction and/or vegetation removal, work will stop and MECP and other appropriate agencies will be contacted immediately to discuss mitigation measures. Nest monitoring will be implemented to document nest use and potential abandonment* *"The Migratory Birds Convention Act, 1994 (Government of Canada 1994) prohibits the disturbance or destruction of migratory bird nests*	n/a	Section 6.5.7.14.6 was updated to include permit requirements (where timing windows cannot be adhered to). No Bobolink habitat was confirmed during surveys. There will be no impacts to protected Bobolink Category 1/2/3 habitat (identified based on NHIC EO records).

#	Document, Section and Page Number	Comment	Request/Recommendation	Hydro One Response
		(e.g., passerines and waterfowl) during the breeding season." MECP SARB supports the above statement and does not recommend nest searches during the active breeding bird season and recommends the proponent avoid contravening the ESA by conducting any vegetation removal and grubbing outside of the active bird season (April 15 – August 31). If the proponent cannot adhere to working outside of the recommended timing window, then an authorization under the ESA may be required.		
26	6.5.7.14 Bobolink Mitigation Measures 6.5 - 186	*If vegetation removal cannot be avoided during the migratory bird nesting period (i.e., April 15 to August 31), pre-clearing nest searches will be completed.* As above in comment # 25.	n/a	Sections 6.5.7.14.1 and 6.5.7.14.6 were updated to include permit requirements (where timing windows cannot be adhered to). No Bobolink habitat was confirmed during surveys. There will be no impacts to protected Bobolink Category 1/2/3 habitat (identified based on NHIC EO records).
27	6.5.7.15 Eastern Whip-poor-will Habitat Loss 6.5 - 187	*The Project is predicted to remove 1,814 ha (3.0% of the LSA and 0.7% of the terrestrial RSA) of moderate to high suitability eastern whip-poor-will habitat (Table 6.5-35), including 1 ha of Category 2 habitat and 4 ha of Category 3 habitat* MECP SARB notes in Attachment 6.5-B-17 Eastern Whip-Poor-Will, Figures 10, 19 and 30 have confirmed breeding habitat in the ROW. Please provide the General Habitat Description mapping for each of the identified locations identified in your baseline data collection (following the guidance as found in the MNRF 2014 Survey Protocol for Eastern Whip poor will in Ontario) and for portions of the LSA, please map the GHD for all potential suitable nesting habitat to arrive at an estimation of habitat impacts requiring authorization.	n/a	Hydro One requested that MECP SARB provide guidance on mapping candidate EWPW habitat. For the purposes of the Final EA, only confirmed whip-poor-will habitat is being considered under the commitment to obtain an ESA authorization for damage/destruction of habitat.

#	Document, Section and Page Number	Comment	Request/Recommendation	Hydro One Response
28	6.5.7.15 Eastern Whip-poor-will Mitigation Measures 6.5 - 190	*If vegetation removal cannot be avoided during the migratory bird nesting period (i.e., April 15 to August 31), pre-clearing nest searches will be completed and will be valid for a period up to 72 hrs. Pre-clearance searches will involve nest sweeps.* As per comment # 25.	n/a	Section 6.5.7.15.1 was updated to include permit requirements (where timing windows cannot be adhered to).
29	6.5.7.15 Eastern Whip-poor-will Mitigation Measures 6.5 - 190	*Surveys at known eastern whip-poor-will occurrence records* MECP SARB recommends the proponent conduct surveys at known occurrence and candidate locations following the MNRF Draft Survey Protocol for Eastern Whip Poor Will in Ontario (2014) and provide GHD mapping for these occurrences and for all potential suitable nesting habitat to arrive at an estimation of habitat impacts requiring authorization. How is proponent going to effectively survey all impacted regions of the ROW?	n/a	Eastern Whip-poor-will candidate habitat locations are available on Attachment 6.5-B-17 in Appendix 6.5-B. Section 6.5.7.15.6 was updated to include permit requirements (where timing windows cannot be adhered to). Hydro One requested that MECP SARB provide guidance on mapping candidate EWPW habitat. For the purposes of the Final EA, only confirmed whip-poor-will habitat is being considered under the commitment to obtain an ESA authorization for damage/destruction of habitat.
30	6.5.7.15 Eastern Whip-poor-will Mitigation Measures 6.5 - 190	*If an active eastern whip-poor-will nest is identified during pre-construction surveys or during active construction, including during vegetation removal, work will stop and MECP and other appropriate agencies will be contacted immediately to discuss mitigation measures. Nest monitoring will be implemented to document nest use and potential abandonment* As stated in comment # 29. In the event that an EWPW is found nesting in a recently cleared area or during construction, MECP SARB recommends the proponent stop work immediately and contact SARB regarding next steps.	n/a	The wording throughout Section 6.5.7 for all bird species was updated accordingly.

#	Document, Section and Page Number	Comment	Request/Recommendation	Hydro One Response
31	6.5.7.15 Eastern Whip-poor-will Mitigation Measures 6.5 - 190	*Environmental training for workers, including information on active nest identification and procedures to follow if an active nest is identified.* Please include what the recommended procedure is for following up on an active nest if identified. MECP SARB recommends the proponent stop work, leave the area and contact MECP SARB for next steps.	n/a	The wording throughout Section 6.5.7 for all bird species was updated accordingly.
32	6.5.7.15 Eastern Whip-poor-will Incidental take - Mitigation Measures 6.5 - 193	*Eastern whip-poor-will nests, eggs, and/or individuals could be disturbed or destroyed during construction of access roads and the ROW, and maintenance of the ROW during operations.* SARB recommends the proponent conduct these activities outside of the active breeding bird season during any construction of the project including access roads, work camps, pole and line installation etc. If the proponent chooses not to or cannot operate outside of the breeding bird season, then an authorization under the ESA may be required.	n/a	Section 6.5.7.15.6 was updated to include permit requirements (where timing windows cannot be adhered to).
33	Table 6.5 – 37 Summary of Net Effects and Mitigation Measures to Wildlife	*Avoid vegetation removal and all construction activities that cause sensory disturbance within 100 m of gray fox den from February 15-July 15 of each year to avoid disturbing denning gray fox.* *• If a gray fox den is identified during construction or operations, and should this timing not be able to be maintained within the buffer widths identified, local MECP SARB offices will be contacted to develop a den management plan and appropriate Indigenous communities will be notified, where requested(b).* In the event that a Gray Fox den is encountered, If the proponent chooses not to or cannot avoid the sensitive timing period for Gray Fox denning (February 15 – July 15) then an authorization under the ESA may be required. A den management plan may be included as part of the mitigation, however, would not be considered sufficient as an overall benefit to the species.	n/a	Comment acknowledged. Any impacts within 100 m of a gray fox den during the timing window will require and ESA authorization.

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34		*If vegetation removal must be completed during the migratory bird nesting period, implement nest sweeps. Similar measures will be taken for vegetation removal during routine ROW maintenance* See MECP SARB's comment # 25.	n/a	Table 6.5-40 was updated to include timing window for migratory bird nesting period (April 15 to August 31) and additional mitigation measures for threatened and endangered SAR.
35	Table 6.5 – 37 Wildlife and Wildlife Habitat All bird Criteria Construction, Operation and Maintenance stages 6.5-210	MECP SARB recommends the proponent include Eastern Whip-poor-will, Chimney Swift, Bank Swallow, Bobolink, Eastern Meadowlark and the appropriate mitigation for these species. Mitigation is listed above but is lacking in this table.	n/a	Table 6.5-40 was updated to include buffers and permit requirements for Bank Swallow, Bald Eagle, Bobolink, Chimney Swift and Eastern Whip-poor-will (where timing windows cannot be adhered to). Timing window has been updated to March 1 to August 31 for Bald Eagle, April to October for Chimney Swift, and April 15 to August 31 for Bank Swallow, Bobolink and Eastern Whip-poor-will. No mitigation has been added for Eastern Meadowlark as this species has not been included in the EA due to lack of breeding records in the region. Furthermore, Bobolink mitigation will also protect Eastern Meadowlark (as they use similar habitats). Updated Section 6.5.3 to include rationale for exclusion of Eastern Meadowlark from the list of bird criteria to be carried forward in the assessment.
36	Table 6.5 – 37 Wildlife and Wildlife Habitat Project Component or Activity 6.5 - 209	*Construction stage:* *• Clearing, grading, earth moving, grubbing of vegetation, and stockpiling of materials along the ROW and other access and construction areas, and construction of infrastructure (e.g., access roads, bridges, temporary laydown areas, turnaround areas and temporary construction camps);* This paragraph should appear in the project component or activity section of the table as per comment # 35. Please add these activities under the project and component or activity section and address mitigation for these activities for each species as per direction in comment #35	n/a	The mitigation measures in Table 6.5-40 were updated to include criteria specific mitigations.

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37	Table 6.5 – 37 Little Brown Myotis and Northern Myotis Project Component or Activity 6.5 - 211	*Construction stage:* *• Clearing, grading, earth moving, grubbing of vegetation, and stockpiling of materials along the ROW and other access and construction areas, and construction of infrastructure (e.g., access roads, bridges, temporary laydown areas, turnaround areas and temporary construction camps)* MECP SARB recommends adding the above paragraph to the project component and activity section and including mitigative actions for SAR bats during these activities.	n/a	The mitigation measures in Table 6.5-40 were updated to include SAR bat specific mitigations.
38	Table 6.5 – 37 Little Brown Myotis and Northern Myotis Potential Effect	Incidental Take For your awareness, any site preparation involving drilling or blasting resulting in destruction of roosting or hibernating bats and their habitat would be in contravention to the ESA. If the proponent chooses not to or cannot follow the recommendations outlined in comment # 13, then an authorization under the ESA may be required.	n/a	Adverse impacts to SAR bat and bat habitat during the hibernation (August 1 – May 31) or maternity season (May 1 – August 31) will be minimized to the extent practicable. If there are potential adverse impacts to SAR bats and bat habitat during these windows then the necessary permitting will be completed. Table 6.5-40 has been updated to reflect the potential need for permitting where timing windows cannot be adhered to.
39	Table 6.5 – 37 Little Brown Myotis and Northern Myotis Potential Effect	*Avoid clearing maternity roost habitat from May 1 to August 31. Should this timing not be able to be maintained as identified, MECP SARB will be contacted for further discussion and appropriate Indigenous communities notified, where requested.* If the proponent chooses not to or cannot avoid the sensitive timing period for SAR bats, then an authorization under the ESA may be required.	n/a	Adverse impacts to SAR bat and bat habitat during the hibernation (August 1 – May 31) or maternity season (May 1 – August 31) will be minimized to the extent practicable. If there are potential adverse impacts to SAR bats and bat habitat during these windows then the necessary permitting will be completed. Table 6.5-40 has been updated to reflect the potential need for permitting where timing windows cannot be adhered to.
40	Table 6.5 – 37 Little Brown Myotis and Northern Myotis Potential Effect	*Within 500 m a bat hibernaculum, avoid any construction activities that may cause sensory disturbance to hibernating bats during the hibernation period (September 1 to May 30).* As stated in comment # 14.	n/a	Adverse impacts to SAR bat and bat habitat during the hibernation (August 1 – May 31) or maternity season (May 1 – August 31) will be minimized to the extent practicable. If there are potential adverse impacts to SAR bats and bat habitat during these windows then the necessary permitting will be completed. Table 6.5-40 has been updated to reflect the potential need for permitting where timing windows cannot be adhered to.

#	Document, Section and Page Number	Comment	Request/Recommendation	Hydro One Response
41	6.5.8.7.3 Net Effects on Little Brown and Northern Myotis 6.5 - 235	*If tree clearing activities were to take place in suitable little brown myotis and northern myotis maternity roosting habitat during the maternity roosting period (May 1 to August 31), then some incidental take may occur but the effect is considered unlikely after mitigation. Incidental take of roosting little brown myotis and northern myotis will be restricted to the Project footprint and is considered to be infrequent because the mitigation is expected to be effective* If the proponent cannot commit to avoiding the active season for SAR bats, then an authorization under the ESA may be required.	n/a	Adverse impacts to SAR bat and bat habitat during the hibernation (August 1 – May 31) or maternity season (May 1 – August 31) will be minimized to the extent practicable. If there are potential adverse impacts to SAR bats and bat habitat during these windows then the necessary permitting will be completed. Table 6.5-40 has been updated to reflect the potential need for permitting where timing windows cannot be adhered to.
42	6.6.7.1.2.2 Mitigation below the High Water Mark Lake Sturgeon 6.6-91	The proponent has identified that mitigation measures and avoidance of in water works below the high-water mark should have no adverse impacts on SAR fish (e.g. Lake Sturgeon). The proponent has identified the restricted activity period for Lake Sturgeon as April 1 – June 30. MECP SARB acknowledges this time frame and recommends the proponent avoid any in water work during this period. Should any in-water work in Lake Sturgeon habitat be required, then an authorization under the ESA may be required.	n/a	This has been addressed in the Final EA Report. All sites with potential for Lake Sturgeon (i.e., desktop hydrological connections to Lake Sturgeon bearing waters or those that were identified in the desktop assessment and/or field to provide Lake Sturgeon habitat) had the Lake Sturgeon timing window applied. A statement was added regarding the need for an authorization under the ESA in Section 6.6.7.1.2.4 Reduce the Fish Mortality Risk Through Restricted Activity Timing Windows and Fish Rescues/Relocations.
43	6.4.7.5 Plant Species at Risk Black Ash Potential Effect, Habitat Quantity 6.4-80	*A total loss of 4 ha representing 10.8% habitat loss within the LSA, and 2.3% habitat loss within the RSA* Black Ash was added to the SARO list on January 26, 2022 and will receive protection for both the species and its habitat under the ESA (2007) as identified in O.Reg 23/22 s4. Currently, Black Ash is under a temporary suspension from the ESA which will be revoked as per O.Reg. 23/22 s4. Any Black Ash tree removal or habitat disturbance following the revoke date may require an authorization under the ESA. Please provide a map indicating where the Black Ash are located and the number of individuals that may be impacted by the project.	n/a	Candidate habitat for Black ash was completed for the effects assessment. It is understood that authorization under the ESA may be required for this species after the revoke date of the suspension. MECP SARB to provide further direction on the identification of all black ash trees within the Project footprint to contribute to the potential permitting process under the ESA.

#	Document, Section and Page Number	Comment	Request/Recommendation	Hydro One Response
44	ATTACHMENT 6.4-A-1 Terrestrial Baseline Figures Steeprock Bat Hibernacula Survey Locations Figure 2.4 -2-4	Hydro One is proposing a new road within the 500 m buffer and the proposed hydro line passes through the 500 m buffer of the WCA 81 hibernacula for the Steep Rock site and a laydown area within the 500 m buffer of WCA 72 site. Additional concerns include implosion splicing within 500 meters of the hibernaculum, noise and vibration from drilling and blasting associated with construction and helicopter noise. MECP SARB recommends no sensory disturbance (implosion splicing, blasting or heavy vibration) within 500 meters of a bat hibernaculum from August 1 – May 31. If the proponent chooses not to or cannot operate outside of the recommended timing window, then an authorization under the ESA may be required.	n/a	Adverse impacts to SAR bat and bat habitat during the hibernation (August 1 – May 31) or maternity season (May 1 – August 31) will be minimized to the extent practicable. If there are potential adverse impacts to SAR bats and bat habitat during these windows then the necessary permitting will be completed. Table 6.5-40 has been updated to reflect the potential need for permitting where timing windows cannot be adhered to
45	ATTACHMENT 6.4-A-1 Terrestrial Baseline Figures Bat Hibernacula Survey Locations Figure 2.4-2-5	Hydro One is proposing new roads and the proposed hydro line passes through the 500 m buffer of both hibernacula for the Lakeshore Control site and the Spillway site. Additional concerns include implosion splicing within 500 meters of the hibernaculum, noise and vibration from drilling and blasting associated with construction and helicopter noise. MECP SARB recommends no sensory disturbance (implosion splicing, blasting or heavy vibration) within 500 meters of a bat hibernaculum from August 1 – May 31. If the proponent chooses not to or cannot operate outside of the recommended timing window, then an authorization under the ESA may be required.	n/a	Adverse impacts to SAR bat and bat habitat during the hibernation (August 1 – May 31) or maternity season (May 1 – August 31) will be minimized to the extent practicable. If there are potential adverse impacts to SAR bats and bat habitat during these windows then the necessary permitting will be completed. Table 6.5-40 has been updated to reflect the potential need for permitting where timing windows cannot be adhered to.
46	General Comment SAR species not considered in the Draft EA	The EA needs to address and identify potential impacts to Eastern Meadowlark, Red-headed Woodpecker, Short-eared Owl and Lesser Yellowlegs. Addressing these species now will aid in avoiding delays during the permitting process if required.	n/a	Section 6.5.3 was updated to include rationale for the exclusion of these four additional bird species from the list of bird criteria in the EA assessment. The rationale is consistent with that for exclusion of American White Pelican and Least Bittern.

#	Document, Section and Page Number	Comment	Request/Recommendation	Hydro One Response
		For your awareness, the Short-eared Owl and Lesser Yellowlegs were added to the SARO list in 2023 as Threatened. Although these were listed following approval of the Terms of Reference, these species will need to be addressed and considered in the EA report.		
47	3.3.11 page 16	Any blasting or crushing will need to be a minimum of 500 m from any bat hibernacula or identified breeding bird locations. Will further surveys for breeding birds I.e. EWPW being conducted at these locations? reference to Appendix 3.0 B for locations of 24 aggregate features that may be exploited for materials; are any of these located near bat hibernacula or potential EWPW habitat? do any of these have existing Bank Swallow colonies or congregations of burrows? MECP SARB recommends operating outside of sensitive timing windows for SAR, if this cannot be avoided than an authorization under the ESA may be required. MECP SARB recommends the proponent follow the Best Management Practices for Bank Swallow while conducting aggregate pit work or storing stockpiled aggregate materials at a slope of 70 degrees or less.	n/a	There are no proposed aggregate pits within 500 m of Bank Swallow or Eastern Whip-poor-will confirmed habitat. Bank Swallow and Eastern Whip-poor-will candidate habitat locations are available on Attachment 6.5-B-16 in Appendix 6.5-B (bobolink) Mitigation measures in Section 6.5.7 were updated for birds to include BMPs, timing windows for works, 500 m buffers for moderate to high impact operations in protected habitat and permit requirements (where timing windows cannot be adhered to). Adverse impacts to SAR bat and bat habitat during the hibernation (August 1 – May 31) or maternity season (May 1 – August 31) will be minimized to the extent practicable. If there are potential adverse impacts to SAR bats and bat habitat during these windows then the necessary permitting will be completed.
48	3.3.12 page 17	MECP SARB recommends that helicopter pad areas be cleared outside of SAR sensitive timing periods, and should not be located within 500 m of any bat hibernacula. Are any proposed helicopter pads within 500 m of bat hibernacula? Should the proponent have reasons for not being able to adhere to the SAR sensitive timing windows then please provide literature and rationale to support these reasons. An authorization under the ESA may be required.	n/a	There are no proposed helicopter pads within 500 m of any potential or known hibernacula.

Table 18: Ministry of Environment, Conservation and Parks, Groundwater – Charles Wakefield, Hydrogeologist

#	Document, Section and Page Number	Comment	Request/Recommendation	Hydro One Response
1	n/a	Excavations and re-grading may divert surface water and shallow groundwater from recharging vulnerable shallow wells under 10 m depth, which may cause them to go dry;	n/a	Groundwater and surface water diversion risks and mitigation measures are discussed in Sections 6.1, 6.2 and 6.3 of the Final EA report.
2	n/a	Permits to Take Water or EASRs may be required to allow dewatering of excavations required for tower foundations. These scenarios might include dewatering to depressurize areas where artesian groundwater conditions have been observed.	n/a	Comment acknowledged. Potential for artesian depressurization and additional mitigation measures were added Section 6.3.7.2 to ensure dewatering and dewatering well construction/decommissioning is carried out to regulatory requirements.
3	n/a	Not all shallow wells (<10m depth) are included in the MECP Water Well Record Database (WWR), especially dug wells which are sometimes constructed by the property owners.	n/a	Comment acknowledged. Text was added in Section 6.3.2 to acknowledge that the water well database information may not cover all wells in the area.
4	n/a	It is possible that not all areas along the ROW have alternative water supplies available to replace a well in the event of well interference (either quantity or quality).	n/a	In the event of well interference as a result of the Project, Hydro One will work with the landowner to provide alternative water supply. This additional mitigation has been added in Section 6.3.7.2, 6.3.7.3 and 6.3.7.5 and Table 6.3-7.
5	n/a	n/a	i) It should be noted that vulnerable areas may not be identifiable through high-level studies. To address this, some detailed investigations may be required, such as conducting door-to-door well surveys to identify shallow dug wells which may not have been included in the MECP Water Well Records (WWR) database; and ii) where there is potential for well interference, the proponent should confirm that there is a suitable alternative water supply available.	Hydro One will work with private landowners to identify nearby wells with the potential to be affected by the Project, including shallow dug wells, and ways in which construction activities and locations can be modified to reduce those effects, including avoiding excavation and blasting near private wells. This additional mitigation has been added in Sections 6.3.7.2, 6.3.7.3 and 6.3.7.5 and Table 6.3-7.
6	n/a	n/a	Groundwater discharges to surface water may be important to cold water aquatic habitat, if present and/ or to general water quality of the receiving waters, some of which may be used to supply drinking water, so, these should be protected.	Groundwater and surface water quantity and discharge risks and mitigation measures are discussed in Sections 6.2 and 6.3 of the Final EA report.
7	n/a	n/a	The proponent should conduct a hydrogeological assessment in areas where there is expected to be construction dewatering under flowing artesian conditions or where there are nearby wells and where deep excavations are required. The hydrogeological assessment should be completed prior to construction and make recommendations with respect to the potential monitoring and mitigation programs as necessary.	Dewatering activities will comply with O. Reg 387/04 under the *Ontario Water Resources Act.* The effect of dewatering activities on groundwater quantity within the potential radius of influence is considered temporary, with water levels anticipated to recover following the end of construction activities. Hydro One will work with private landowners to identify nearby wells with the potential to be affected by the Project, including shallow dug wells, and ways in which construction activities and locations can be modified to reduce those effects, including avoiding excavation near private wells. This mitigation measure and reference to O.Reg 387/04 has been added to Sections 6.3.7.2, 6.3.7.3 and 6.3.7.5

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ATTACHMENT 4.0-A-2

Indigenous Community Comment Responses

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Tables

Table 1: Gwayakocchigewin Limited Partnership – July 5 2023

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1	General	There should be a commitment to include the affected First Nations in the inspection of Decommissioned of Temporary Construction Infrastructure	Please include as a commitment.	Hydro One commits to developing an Indigenous Monitoring Plan in collaboration with affected First Nation communities, which will commit to inclusion of affected First Nations in the inspection of decommissioned and/or temporary construction infrastructure.
2	Section 3.0 – General Comment	There is no information in this Section on the width of the existing right-of-way that the proposed Waasigan transmission line will twin / parallel. This information would be useful for evaluating potential effects on vegetation and wildlife.	Please provide information on the width of the existing right-of-way that the proposed Waasigan transmission line will twin / parallel.	The width of the existing right-of-way is typically approximately 46 m; however, this may vary along the line. Additional clarification will be included in Section 3.0 of the final EA.
3	Section 3.0 – General Comment	The Environmental Protection Plan (EPP) has not been provided.	The EPP must be reviewed in place prior to construction. Affected First Nations must be given time to review and provide input. It is suggested that the EPP be provided to GLP at least 90 days in advance of construction.	The EPP will be provided to affected Indigenous communities for review and input at least 90 days in advance of construction.
4	Section 3.0 – General Comment	While some sub-sections of the Project description contain summary tables outlining the total project footprint specific to component type (e.g., Sect 3.3.8 temporary construction camps, Sect 3.3.11 aggregates pits), this information is missing from other sub-sections (e.g., Sect 3.3.4 – Access Roads). The summary tables outlining the spatial boundaries for each Valued Component (e.g., Sect. 6.4 – Vegetation & Wetlands, Sect. 6.5 Wildlife and Wildlife Habitat, etc.) state that the total project footprint is 2,867 ha and this appears to be consistent across multiple VCs. However, not all project components will have the same impacts to vegetation and wildlife, and so it is challenging to effectively assess potential effects in the absence of a summary table outlining the total footprint for all project component types.	Please provide a summary table detailing the total Project footprint by component type, including all components, to facilitate an in-depth analysis of the potential effects of the project and its components on each valued component.	A summary table detailing the total Project footprint, by component type, will be included in Section 3.0 of the final EA.
5	Section 3.2.2 – Environmental Planning	First sentence should read: Integration of environmental and Indigenous community considerations from the earliest stages of Project planning and design is an integral part of Hydro One's approach to developing projects.	Minor edit to wording is required.	The final EA will be updated accordingly.
6	3.3.4 - Access Roads	"To minimize future potential access development impacts, some access roads may be left permanently to support long-term inspection and maintenance activities and for multiple use/integration with other existing industrial operations (e.g., forestry operations within forest management areas). "	Need to indicate a limit and a commitment to work with affected First Nations on which access roads will be left.	As described in Section 3.0, approximately 30% of access roads and trails outside of the ROW will remain in place to provide access for operation and maintenance activities. Hydro One commits to engaging with affected First Nation communities on infrastructure that will be left in place to support operations and maintenance. This commitment will be included in the final EA as well as part of the Indigenous Monitoring Plan.

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7	Section 3.3.4 – Access Roads	This Section does not include detailed information on the total footprint of proposed access roads, including the preferred and alternative new access roads, as well as the existing roads with no improvements required and potential improvements required. While we understand that the number, location, and characteristics of existing and proposed new access roads will be refined through the detailed planning phase, this information is required in the Draft EA to effectively evaluate the proponent's assessment of potential effects to various valued components.	Please provide a summary of the total potential footprint of access roads in the EA, including: • Preferred new access roads. • Alternative new access roads • Existing roads with no improvements required. • Existing roads with potential improvements required. Please also specify the total area of roads (for each category) above that are proposed to overlap with the right-of-way and explain how this was accounted for in the calculation of the total project footprint.	A summary of the total potential footprint of access roads will be included in Section 3.0 of the final EA.
8	Section 3.3.5 Waterbody Crossings Appendix 6.6-B: Fish and Fish Habitat Summary and Mapbook at Proposed Equipment Waterbody Crossings and Applicable Timing Windows for the Project	The Draft EA states that rig mats will be used for waterbody crossings. Where new waterbody crossing structures are proposed, the primary preferred structures to be used are clear-span bridges, ice bridges/snow fills (for winter construction), culverts, and rig mats. It is acknowledged that rig- mats are necessary for access for heavy equipment, however, crossing wetlands and bogs with open water is of concern, as these are likely deemed fish-bearing, unless otherwise confirmed by intense fish sampling.	Where feasible, using rig mats for crossing wetlands should be limited and other more stable structures be prioritized. Where rig mats are necessary for crossing wetlands and other unstable or unconfined waterbodies the following mitigation measures should be used and explicitly included in the forthcoming EPP: • Prioritize wetland/wetted crossing during the frozen season to limit disturbance. • Where winter construction is not feasible, sediment and erosion control measures should be implemented (i.e., silt fencing, silt curtains, aqua dams, coffer dams etc.) to minimize disturbance to fish habitat. • Monitors should be on site during these crossings to monitor impacts to fish (i.e., distressed fish, stranded fish, mortalities) and be prepared for fish salvage, if required.	Section 6.6.7.1.2.1 and Table 6.6-23 of the final EA will be updated to include the following, "Where rig mats are necessary for crossing unstable or unconfined waterbodies the following mitigation measures will be used as appropriate including: 1) prioritize crossing during the frozen season to limit disturbance; 2) where winter construction is not feasible, sediment and erosion control measures will be implemented (i.e., silt fencing, silt curtains, aqua dams, coffer dams etc.) to minimize disturbance to fish habitat; and 3) onsite monitoring will be completed during these crossings to monitor impacts to fish (i.e., distressed fish, stranded fish, mortalities) and be prepared for fish salvage, where required. Commitments for involvement of Indigenous monitors will be included in the Indigenous Monitoring Plan.

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9	Section 3.0 Project Description – Section - 3.3.5 Spatial Boundaries – Water Crossings	It is stated that clearing at waterbody crossings along the transmission line alignment ROW will generally be limited to a 6 m wide ROW for equipment access to waterbody crossing structures.	The EA should include further clarification as to what scenarios may require further clearing from what is outlined in the approved EA design, and how affected Indigenous Nations and monitors will be notified where additional clearing is needed?	The EA specifies that “additional removal of incompatible vegetation may be required for technical or safety reasons as appropriate”. This includes vegetation (i.e., trees) that pose a hazard to the electrical facilities due to clearance issues whereas compatible vegetation (i.e., shrubs) will be retained. This will be standard at all watercourse crossings along the transmission line ROW. Additional information regarding scenarios and communication protocols with Indigenous Nations about further clearing will be included as part of the Indigenous Monitoring Plan, which will be developed in collaboration with affected First Nation communities.
10	Section 3.3.5 Spatial Boundaries – Water Crossings	The Draft EA states that following the removal of crossing materials, the waterbody banks will be returned to their original profile.	As part of the project description, this section of the Draft EA should include reference to the inclusion of Indigenous monitors being present during all reclamation activities to assess whether watercourses are returned to their pre-construction conditions. GLP will also be reviewing the EPP when available to ensure protocols are in place to ensure Indigenous monitors are included and present during all reclamation activities.	Section 3.0 of the final EA will be updated to state that, “banks will be recontoured as necessary to maintain similar hydrologic function to pre-construction”. A commitment to involve Indigenous monitors during reclamation activities will be included in the Indigenous Monitoring Plan.
11	Section 3.3.5 Spatial Boundaries – Water Crossings Appendix 6.6-B: Fish and Fish Habitat Summary and Mapbook at Proposed Equipment Waterbody Crossings and Applicable Timing Windows for the Project	HONI states that culvert selection will consider site-specific conditions such as the width of the waterbody crossing, fish habitat characteristics, substrate type, and hydrologic characteristics of the waterbody at the time of construction.	Additional information should be added to this section that clarifies how site conditions at the time of crossing construction will be incorporated into culvert selection in real time. This should include experienced and qualified professionals that will evaluate crossing requirements prior to construction. Indigenous monitors should be included and present for all culvert selection and implementation activities.	Culvert selection is based on desktop and field-collected data and should not be adjusted in real time. Culvert selection is primarily based on design flow calculations that consider the expected rainfall in the geographic area, the catchment basin area, the slope and composition of the channel, etc. Culvert design criteria dictate the function of the culvert including the minimum and maximum water levels in the culvert for fish passage, erosion control and the proper hydraulic function of the culvert. Each culvert is selected based on hydrology analysis, with the ultimate size of the culvert being selected to ensure that the normal water level rises no higher than half the diameter of the pipe, and no higher than the top of the pipe at the designed flood flow. All selections and installations are done according to the Ministry of Natural Resources and Forestry/Fisheries and Oceans Canada Protocol for the Review and Approval of Forestry Water Crossings (2017). Each waterbody crossing will be visited ahead of construction to ensure that the crossing location is conducive to a culvert install. If site specific features, such as a bedrock bottom,

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				prevent the installation of a culvert then a different crossing method will be chosen. All installations will follow the sediment control procedures outlined in the above stated protocol and those outlined in the final EA to minimize any impacts to the stream and surrounding environment. In-water work timing windows for the local area will be followed for all installations. Culvert installation will be overseen by qualified environmental staff from Hydro One's contractor and inspected both by Hydro One's environmental personnel and the regulators at their discretion.
12	Section 3.3.6 Equipment/Material Laydown Areas	Hydro One commits to progressively restoring areas to be used on a temporary basis during construction. Details will be provided in the EPP.	The draft Environmental Protection Plan has not yet been provided. The Draft EA includes some high-level detail on proposed mitigation protocols, issue-specific construction and operations management plans, follow-up monitoring programs and adaptive management frameworks and actions – however not enough to complete a fulsome review.	The EPP will be provided for affected Indigenous communities review at least 90 days in advance of construction. A process for monitoring will be developed in collaboration with affected First Nation communities and included as part of the Indigenous Monitoring Plan.
13	Section 3.3.8 Temporary Construction Camps	Address ESG issues and workplace safety policies. Construction camps must provide safety measures to protect vulnerable works from violence and discrimination. The proponent/drafter must establish policies that are specific to protecting the safety and security of Indigenous women, girls, and gender diverse people which shall include: a) creating safety protocols applicable to the project area (including construction camps); b) supporting community safety programs for the First Nations close to the proposed Project; c) implementing mandatory training for all employees on gender-based and sexual violence, anti-racism, cultural safety, diversity and inclusion, and the effects of colonization on Indigenous peoples; d) developing and implementing systems for tracking and reporting incidents of harassment and violence; e) exploring options to increase the representation of Indigenous women and gender diverse individuals in the workforce at all employment levels, and f) providing or contributing to local services for survivors of violence.	Section 7.2 contains little to no acknowledgement of the role resource camps play in exacerbating violence towards Indigenous women, girls, and gender diverse peoples, despite strong evidence of this and an imperative to address the issue. We maintain that, even if gender based analysis + (GBA+) is not required in Ontario Individual EAs, HONI has a moral and ethical obligation to their Indigenous partners to assess, prevent, and proactively have protocols in place for dealing with these issues. We maintain that Section 7.2 should assess these potential issues, and that HONI should proactively implement mitigation measures and policies that recognize disproportionate impacts to Indigenous women, girls, and gender diverse peoples.	Additional emphasis on the role resource camps play in relation to gender-based issues will be added to the final EA, based on both past projects and discussion with communities to better understand concerns from past projects. Hydro One acknowledges the importance of collecting Indigenous Knowledge to support the evaluation and development of mitigation measures. Hydro One will work with GLP on a community-led committee to provide feedback and develop additional mitigation measures, where required. In addition, Hydro One's contractor's protocols include established training for all employees and the contractor commits to policies a) to e) suggested by the GLP that are specific to protecting the safety and security of Indigenous women, girls, and gender diverse people. These will be added to the final EA as mitigation. Hydro One will continue discussions with the GLP regarding item f).

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		In addition, while gender-based analysis is not a mandatory component of comprehensive EAs under the Ontario Environmental Assessment Act, we strongly encourage the proponent to at least incorporate components of these analyses into the Waasigan Transmission Line project EA, so the potential project effects can be adequately predicted, and mitigation measure designed accordingly. For more detailed information and guidance refer to the following report: https://www.ourcommons.ca/DocumentViewer/en/44-1/FEWO/report-5		
14	Section 3.3.9 - Construction Office	The progressive restoration of mobile construction sites should be outlined in the EPP. Indigenous Nations should be involved in the planning of restoration activities, as well as the monitoring of program success.	The draft Environmental Protection Plan has not yet been provided. The Draft EA includes some high-level detail on proposed mitigation protocols, issue-specific construction and operations management plans, follow-up monitoring programs and adaptive management frameworks and actions – however not enough to complete a fulsome review.	The EPP will be provided for affected Indigenous communities review at least 90 days in advance of construction. A process for monitoring will be developed in collaboration with affected First Nation communities and included as part of the Indigenous Monitoring Plan.
15	Section 3.3.12- Helicopter Pads	The use of helicopters during the fall and spring hunting seasons require consultation with the First Nation to avoid the mere disruption or any infringement of exercising traditional and treaty rights to hunt.	This comment requests consultation (i.e., two-way dialogue and attempts to achieve consensus or compromise), further discussion, and reasonable efforts to limit the use of helicopters during the spring and fall hunting seasons. Developing a notification process doesn't address our concerns. Simply being aware of where/when helicopters are flying won't mitigate impacts to the exercise of traditional and treaty rights to hunt. It would be useful to have discussions centered around the following questions: • What are the affected Indigenous Nations approximate spring and fall hunting windows? • What species are being hunting during these periods? Are they likely to be disturbed by aircraft activity? • How might other important cultural activities associated with hunting (e.g., staying out on the land, teaching younger generations, etc.) be disrupted by aircraft activity?	Hydro One commits to consult with affected Indigenous communities on the plan for helicopter use on the Project and discussions will include the questions identified by the GLP. It is recognized that any notification process surrounding use of helicopters is not intended to remove all impacts but rather reduce overall potential impacts of helicopter use during hunting seasons. The majority of helicopter use is related to stringing activities which spans across multiple seasons. Additional helicopter work may be required in difficult terrain or if alternative construction methods are required for foundation and erection activities (i.e., flying in structures from fly yards). Hydro One commits to further discussion with affected Indigenous communities on priority hunting areas and helicopter activity within these areas. Helicopter use in these priority hunting areas will be limited to the extent reasonably possible. This may include adjusting flight paths around sensitive features or altering start and end times during the day for specific areas.

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			• What project activities involve helicopter flights? Which of these are mandatory or unavoidable? Are there any alternative delivery methods? • Does it make sense to delineate core, priority, or particularly sensitive hunting areas? How do these compare to areas where helicopter flight is required? Is it possible for helicopter flight paths to avoid these areas (incl. reasonable horizontal and vertical buffers)? • Is it possible to stage the project construction in such a way that all essential helicopter overflights can be completed outside spring and fall hunting windows? • Are there health and safety requirements related to the timing of helicopter inspections during the operations and maintenance phase? Is it possible to schedule routine inspections (vs. emergency inspections) outside of the spring and fall hunting seasons?	
16	Section 3.3.12 – Helicopter Pads	This Section contains unclear and insufficient information on helicopter activity required for the proposed Project. Section 3.3.12 overviews the proposed total area of individual helicopter pads, but the total number of helicopter pads required is unclear (e.g., “where helicopter pads are required, they will be generally spaces approximately every 5km” p. 3.4-19). Does this mean that there could be up to 72 helicopter pads required (for the 360km length of the ROW)? In addition, there is inconsistent information on what project activities helicopters will be required for. For example, Section 3.3.12 states that “helicopters may be used to transport material, equipment and personnel in areas that are difficult to access by ground vehicle, or for erection and stringing activities” (p.), however Table 3.4-1 specifies that only one helicopter is anticipated to be used in the constructions stage for stringing (p. 3.4-21) and Section 3.4.2 states that helicopters will be used for inspections during the operations phase. Finally, there is no information on the proposed helicopter flight paths, distances, frequency of use (e.g., anticipated number of flight	Please provide more detailed information regarding helicopter components and activities, including: • An estimated total number of helicopter pads • Proposed helicopter flight paths, distances and frequency of use • Any restrictions (seasonal, location-based) that helicopters will be required to adhere to. • Consistent information on which project activities for which helicopter may be required. This information should also be used to update the effects assessments for various valued components, particularly wildlife & wildlife habitat and First Nations rights, interests, and land use.	Hydro One commits to consult with affected Indigenous communities on the plan for helicopter use on the Project. More detailed information about helicopter components and activities will be included in the final EA including the information below. **Helicopter pads** are areas required for safe landing and take-off where helicopter activities are required (e.g., stringing). **Fly yards** are clearings where structures are assembled and flown to the structure locations to be erected using helicopter rather than assembling the structure at the end location and erected using cranes. **<u>Estimated Number of Helicopter Pads:</u>** • Required approximately every 5 km in the vicinity of the line (<70). **<u>Proposed Helicopter Flight Paths:</u>** • Flight paths will be governed by the location of fly yards and helicopter pads which may need to be adjusted as construction operations are being completed. Flight paths are generally restricted to the proximity within/along the transmission line ROW.

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		hours), or other flight requirements and restrictions (e.g., flight altitudes, etc.). There is also no information on the anticipated timing of helicopter flights, and whether helicopter activity will be restricted or prohibited at certain times of the year (e.g., sensitive periods for wildlife, hunting season, etc.) This information is required to evaluate the potential effects of the Project's helicopter activity on wildlife and the ability of Indigenous land users to exercise their rights (e.g., hunting). Aircraft overflights and landings cause many species of wildlife to elicit physiological and/or behavioural responses that reduce the animals' fitness or ability to survive. This can be particularly harmful if aircraft activity is frequent/persistent or if it occurs during sensitive windows or areas (e.g., breeding, wintering periods / habitats) (Churchill & Holland, 2003). In addition, aircraft activity can adversely affect Indigenous land users' harvesting success and peaceful enjoyment while out on the land.		• When using helicopter techniques for erecting structures (i.e., towers), helicopters will fly directly between the fly yards and the structure sites. Due to the weight of the structures, the helicopter cannot easily adjust flight paths and must use the most direct path possible. • Total number of helicopters anticipated on the project will be less than four; however, this is subject to change based on construction execution requirements, weather and/or access or other factors impacting planned execution methods. • Where helicopter erection is required, helicopter use will be characterized by periods of heavy activity while lifting the structures into place. The yards will be busy for several days while any one place on the line will only be impacted for a very short period (e.g., five minutes to set the tower) before the helicopter moves to the next structure. A second helicopter may be required to move crews from structure to structure if road access is unavailable. • During stringing activities, helicopters will operate within a pull location for a few days then move down the corridor a few kilometres. Other activities, such as hanging marker balls where needed, etc., will be very quick, requiring only a few minutes per ball. **Restrictions:** • Helicopters are restricted from flying over populated areas while long-lining loads. • Traffic control is necessary when carrying external loads (i.e., structures) across major roadways. • Helicopters will operate constantly throughout the stringing activity at or slightly below structure top height (35 to 50 m) • Helicopters will not fly during nighttime or under severe weather. **Activities Requiring Helicopters:** • Foundations: unlikely (typically limited to isolated areas). • Erection: currently not anticipated, but will be required if construction approach changes to require assembly of structures in fly yards and flown to site. • Stringing: all stringing activities will require helicopter use.

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17	Section 3.4.1.3 - Construction of Access Roads	Under the heading - 'Construction of Access Roads, Watercourse Crossings, Laydown Areas, and Construction Camps' - at each of these areas, it is indicated that, where necessary, sediment and erosion control measures will be implemented.	These must be detailed in the EPP and provided to affected Indigenous Nations for review.	Comment noted. Sediment and erosion control measures will be detailed in the EPP, which will be provided to affected Indigenous communities for review and input at least 90 days in advance of construction.
18	Section 3.4.1.4. Materials and Equipment Delivery	Material will be transported to the ROW using flatbed transport trucks and pickups/trailers, where possible. Off- road track units may be used where trucks cannot drive. Helicopters may also be used to transport material, equipment and personnel in areas that are difficult to access by ground vehicle. The proponent should ensure that the Construction Environmental Protection Plan includes appropriate wildlife mortality mitigation and monitoring measures, to account for increased volume of traffic (off-road and heavy machinery) in the Project area. More specific recommendations will be provided upon review of the wildlife baseline and effects assessment.	While HONI has committed to implementing several wildlife mortality mitigation measures, the Draft EA does not specify that a fulsome plan will be put in place. We recommend building upon these individual measures and compiling them into a cohesive plan.	The EPP will include a plan for wildlife management, including mitigation measures to reduce impacts to sensitive species, process when discovering wildlife features of concern, and procedures to document and limit human-wildlife interactions and encounters.
19	Section 3.4.1.5 – Tower Structure Foundation – Installation	In cases where structures must be located in wetlands or waterbodies, HONI states that appropriate precautions will be taken to protect the environment and the foundation.	Further details should be provided as to what constitutes "appropriate protection". Mitigation measures for working in water should include appropriate sediment control measures including silt curtains, aqua dams, coffer dams and fish salvages where necessary to eliminate disturbance or distress to fish and fish habitat.	Comment noted. Mitigation measures for working in water will be detailed in the EPP, which will be provided to affected Indigenous communities for review and input at least 90 days in advance of construction. Currently, no structures are anticipated to be placed below the highwater mark (HWM), with the understanding that if works were to be located within the HWM, Hydro One's contractor would seek the necessary permits and approvals. Relevant mitigation is presented in Section 6.2.7.1 (Changes to Surface Water Quantity and Surface Water Quality from Short-term Water Discharges) and Section 6.6.7.1.1.1 (Placement of Materials and Water Crossing Structures), which will also be included in the EPP.
20	Section 3.4.1.5 – Tower Structure Foundation – Installation	While the proponent has committed to developing a Blasting and Communication Management Plan, there's no indication that this will involve holding further discussions with the GLP member Nations on measures to minimize blasting during the hunting seasons.	Consultation or notification should occur with First Nations Partners prior to blasting during the fall hunting season.	The current access plan minimizes the need for blasting operations. Where blasting activities are required, all blasting operations will occur in accordance with the EPP Blasting and Communication Management Plan. The process and procedures for notifications and minimizing effects of blasting activities (i.e., avoidance of sensitive features and timing windows, where possible) will be developed collaboratively with Indigenous communities.

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21	Section 3.4.1.5 – Tower Structure Foundation – Installation	Potential for blasting to impact harvesting rights. Blasting should be avoided during sensitive windows for wildlife species and key harvesting periods for Indigenous Nations (e.g., moose hunting season) to prevent potential sensory disturbance to wildlife and impacts on harvesting success.	The proponent commits to avoiding construction activities that produce loud noises (including blasting) within 500m of a hibernacula during the hibernation period. However, there's no indication that blasting will be avoided during sensitive periods for other wildlife species.	Where blasting activities are required, they will be completed in compliance with all applicable regulatory requirements specific to sensitive species and minimum setback or timing restrictions. The process and procedures for notifications and minimizing effects of blasting activities (i.e., avoidance of sensitive features and timing windows, where possible) will be developed collaboratively with affected First Nation communities .
22	Section 3.4.1.5 – Tower Structure Foundation – Installation	It is stated that "While every attempt will be made to locate tower foundations out of wetlands, it may be necessary to locate some structures in wetlands or waterbodies." Despite the recent updates to the Ontario Wetland Evaluation System Indigenous Nations expect that the proponent will continue to adhere to best practices in wetland evaluation, avoidance, and protection out of respect for the ecological integrity of their traditional territories.	Though generally, we appreciate the commitment to avoid siting towers in wetland and waterbodies and understand that changes may be required at the detailed design phase, we request to review the Detailed Project Plans.	Detailed Project Plans are not anticipated to be required due the level of detail included in the Project EA. The Project footprint including the right-of-way, tower locations, temporary workspaces, and access requirements are available and will remain available using an online web viewer and will include pertinent data layers, such as wetland and waterbodies, habitat, etc. The web viewer will allow Hydro One to share Project footprint changes with affected Indigenous communities in a timely and ongoing manner as the Project evolves.
23	3.4.1.11 - Decommissioning of Temporary Construction Infrastructure	"Approximately 30% of access roads and trails outside of the ROW will remain in place to provide access for operation and maintenance activities. All others will be decommissioned and rehabilitated using applicable and appropriate methods and standards."	Can this be quantified in Hectares? There should be engagement with the affected First Nations.	The approximate number of hectares of permanent access will be added to the final EA. As noted in comment #6, the commitment around which access roads will be left in place to support operations and maintenance will be developed in collaboration with the affected Indigenous communities.
24	3.4.1.12 Post-Construction Monitoring	"Hydro One, with their contractor, will prepare and implement a post-construction monitoring plan after the completion of the construction activities and continue into the operation and maintenance stage and will include activities such as examining and documenting the success of revegetation and rehabilitation measures. Typically, a one- to two-year period will be specified for correction of any construction defects for the transmission line."	There should be a commitment to include Affected First Nations in this process.	Comment noted. The post-construction monitoring plan will be developed in collaboration with affected First Nation communities as part of the Indigenous Monitoring Plan.
25	Section 3.4.1.12 Post-Construction Monitoring	HONI will prepare and implement a post-construction monitoring plan once construction activities are completed. Monitoring will continue through the operation and maintenance stages of the Project and will include documenting the success of revegetation and rehabilitation measures. Affected Indigenous Nations must have meaningful participation enacted by review of the plan, Environmental Monitors meaningfully involved, and assess whether implemented measures have been successful.	The Draft Environmental Protection Plan, including mitigation and monitoring measures, has not yet been provided. Once it has, discussions on Indigenous monitoring approaches should proceed.	Comment noted. The post-construction monitoring plan will be developed in collaboration with affected First Nation communities as part of the Indigenous Monitoring Plan.
26	Section 3.4.1.13 – Potential Emissions, Discharges and Waste	We appreciate HONI's commitment to implement a Dust Control/air Quality Plan.	Review of the plan is required.	The Dust Control/air Quality Plan will be included as part of the EPP that will be provided to affected Indigenous communities for review and input at least 90 days in advance of construction.

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27	Section 3.4.1.13 – Potential Emissions, Discharges and Waste	Noise, emissions, discharges, and waste have potential to impact traditional harvesting, land use, and Aboriginal rights. • Noise must be minimized during harvesting periods (e.g., moose season) to minimize potential impacts on the harvesting success of Indigenous Nations. At a minimum, this should be avoided in certain areas (e.g., critical harvesting locations). More detailed recommendations will be provided upon review of project baseline data (including IK study results) and effects assessments. • HONI must engage with each Indigenous Nation on timing for high value hunting seasons and how to mitigate impacts / disruptions.	It will not be sufficient for HONI to simply inform the affected Indigenous Nations when/where disruptive activities will be occurring so they can consider alternative hunting areas. Indigenous harvesters often invest huge amounts of time (e.g., scouting locations, trial and error with candidate hunting sites, stewarding lands) and resources (e.g., fuel, equipment purchase/maintenance, etc.) in the ongoing exploration and use of hunting areas. Oftentimes these harvesting locations have been invested in and cared for by Indigenous peoples and their ancestors, and knowledge of where to go and how to best hunt in that location is based on generations of knowledge sharing. In addition, cumulative effects should be considered (are suitable alternative hunting habitats in the territory of other Nations, are there are other areas free of disturbance or landscape alteration, etc.) Just because there may be similar candidate hunting areas outside of the project footprint / LSA, it does not mean those areas are equivalent to areas that have been invested in or can be utilized without cost (e.g., financial, intangible, time investment). We understand that noise and disruptive activities are an unavoidable component of this Project, but additional measures should be taken to ensure adequate consultation (i.e., two-way dialogue and attempts to achieve consensus or compromise) on this matter occurs.	This process will be developed in collaboration with affected First Nation communities and included as part of the Indigenous Monitoring Plan and Traditional Land and Resource Use Management Plan. Where sensitive harvesting areas are identified by Indigenous communities, Hydro One will discuss appropriate mitigation measures that can be implemented to reduce overall impact to harvesting activities. Where reasonably possible, mitigation measures may include adjusting construction schedules in specific areas, fencing off sensitive plant communities, or maintaining access to harvesting areas during construction where safe to do so.
28	Section 3.4.1.13 – Potential Emissions, Discharges and Waste	Request for Harvesting Protection Plan. A specific plan is required to ensure that disruption of key harvesting periods is minimized.	The draft Environmental Protection Plan is outstanding, however the Draft EA does not contain any indication that a Harvesting Protection Plan will be developed.	A Traditional Land and Resource Use Management Plan will be developed in collaboration with affected First Nation communities.

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29	3.4.3 Retirement	General	Process should include engagement with affected First Nations.	This will be developed in collaboration with affected First Nation communities and included as part of the Indigenous Monitoring Plan.
30	3.4.3 Retirement	Transmission facilities that are retired from service are often left in place (idle) for potential future use.	Once retired from service, they should be decommissioned, not left idle.	Hydro One will adhere to applicable regulations at the time of decommissioning.
31	4.5 Indigenous Engagement	Shouldn't the Waasigan Indigenous Consultation Plan be included somewhere for reference?	Please provide the Indigenous Consultation Plan in the EA.	The Project Indigenous Consultation Plan will be included in the final EA.
32	Section 5.0 Environmental Assessment Approach - Table 5.2-1: Criteria Indicators	The table includes a column titled "Rationale for Selection" indicating why the various valued components (VC's) have been selected for inclusion as Criteria. In most cases the rationale is due to "importance to indigenous communities" or a general commitment from HONI to limit effects. The table does list the need to comply with legal protections for fish and fish habitat (e.g., Fisheries Act), but does not include reference to the Species at Risk Act when mentioning at risk or species of special concern.	The table should be revised to include reference to the Species At Risk Act (SARA), as well as Provincial regulations, policies or permitting relevant to in-water work or working in fish habitat in Ontario.	The final EA will be updated accordingly.
33	Section 5.0 Environmental Assessment Approach – Table 5.2-1: Criteria Indicators - Fish and Fish Habitat.	The table lists four (4) fish species to be included as specific criteria under Fish and Fish Habitat, including Northern Pike, Walleye, Lake Trout and Brook Trout.	In the "Rationale for Selection" the table should also include all relevant fish species that are important to the affected Indigenous communities. This may include sauger, small-mouthed bass, yellow perch, rainbow trout, as well as all baitfish species. In addition, the updated Fisheries Act includes unauthorized Harmful Alteration, Destruction, or Disruption (HADD) of fish habitat, which now includes habitat of all fish species within a project footprint. Thus, ultimately, the list of species included as Criterion for the Project should include all fish species known to exist within the project footprint, and not limited to valued sportfish.	The final EA will be updated accordingly.
34	Section 5.0 Environmental Assessment Approach - Table 5.2.1: Acoustic Vibration and Environment.	Although HONI has expressed that fish and the aquatic environment were considered in the assessment of effects from acoustic and vibration during construction and operation, the mitigation measures to minimize effects on fish and fish habitat are vague and only state that blasts will be designed to minimize ground vibrations that can cause slope instability and impact to fish and fish habitats.	Further detail should be provided that outlines how blasting effects will be mitigated near fish habitat. Mitigations should include carrying out blasting during appropriate timing windows, monitoring fish habitat during blasting events and ensuring sediment and erosion control measures are in place and effective during blasting events. A response plan should be developed to respond to distress or mortalities of fish during blasting events.	Potential effects, mitigation measures and net effects of blasting near fish habitats is discussed in detail in Section 6.6.7.2. Mitigation measures include creation of a Blasting Plan that respects fish and fish habitat, following the DFO guidelines for the use of explosives in or near fish-bearing waters (Wright and Hopky 1998) and permitting approval requirements. Access has been designed to minimize blasting requirements. Where practicable, ripping or rock hammer will be used as opposed to blasting where rock is encountered to prevent impacts associated with blasting or explosives use throughout construction.

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				Blast patterns will be designed to limit the total ground disturbance to only the area required for access and construction, as required for structure pad leveling or access development. Blasting delays (staggered detonation) and blast mats will be used to control noise and reduce fly rock associated with blasting activities and the potential for impacts outside of the ROW, as required.
35	Section 5.0 Environmental Assessment Approach - Table 5.2.1	Table 5.2.1: Vegetation and Wetlands - Plant Species. Under criterion (Plants of Traditional Use), it would be helpful to list specific plants that are of importance to affected Indigenous communities (i.e., wild rice, sage, blueberries, chaga, Labrador tea, sweetgrass etc.). Please also clarify whether this will include fungus and/or lichen species of importance to affected Indigenous Nations.	Specific traditional use plant species are not listed in Table 5.2-1, however this isn't a major concern. The greater concern is that there isn't a comprehensive list of traditional use plant species included in the Draft EA or its appendices. While we appreciate HONI's efforts to include select traditional use plant species in the Draft EA, these only represent a subset of important species identified by the GLP member Nations and there is no clear rationale why those specific species were selected for inclusion.	The final EA will be updated to include additional traditional plant information that has been made available. An extensive list of traditional use plant species was compiled and is located in Appendix 6.4-D. Species which were identified as a traditionally important species by more than one Indigenous Community has been highlighted in Section 6.4.5.2.6. From this list, representative species were carried forward as part of the assessment and include representative of species occurring in each of the three ecosystem types (upland, wetland and riparian).
36	Table 5.2-1 - Wildlife and Wildlife Habitat - Birds.	We note that Table 5.2-1 of the Draft EA does not list Waterfowl (Trumpeter swan) as a criterion.	However, this is a minor error that needs to be corrected.	The final EA will be updated accordingly.
37	Table 5.2-1 - First Nations Rights, Interests and Use of Land and Resources (Section 7.7) - Indicators – Sense of Peace.	It is recommended that HONI quantify potential impacts on Indigenous "peaceful enjoyment" of lands by applying a 500m buffer around project components and expressing this as a total area and percentage of the project study areas. This buffer should also be applied in the cumulative effects assessment component of this EA.	While the Proponent included quality of experience/sense of place in areas used for traditional purposes as an indicator in Section 7.7., only qualitative methods were used to measure this change. As previously suggested, this should also be measured quantitatively by applying a 500m buffer around project components (and for the cumulative effects assessment around other disturbances in the RSA).	The local study area for the assessment includes the Project footprint and a 2 km buffer on the transmission line ROW, 1.5 km buffer on the TS footprints and a 500 m buffer on access roads, supporting structures and aggregate pits. The suggested buffer area is covered by the assessment within the LSA. The area of potential Project effects including indirect effects and the potential area of effects including indirect effects from reasonably foreseeable developments that may act cumulatively are considered in the discussion of cumulative effects (rather than overlap of specific buffers around infrastructure). This discussion includes quantitative and qualitative assessment.

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38	5.3 Define Assessment Boundaries	We note and accept HONI's decision to delineate moose RSA boundaries according to WMUs. However, we note that some WMUs that overlap the LSA (WMU 15B, 11A, 11C) have been excluded from the RSA.	The moose RSA should be revised to include these.	Rationale for the selection of the WMUs to make the moose RSA is provided in Section 6.5.4.2. WMU 11C has now been added into the moose RSA as it encompasses Quetico Provincial Park (a protected area being important refuge habitat for wildlife) and the Project footprint is close to the park that we feel like it should be included in the moose and gray wolf RSA.. Rationale for excluding the larger WMU that interacts with the terrestrial LSA (15A) because it has very minimal overlap and would dilute the impacts of the Project should we include it. Additional rationale for not expanding the RSA to include these three WMUs is taken from previous experience on provincial EAs in northern Ontario wherein the provincial regulators had concern for using too large of an RSA which acts to dilute the population level effects (i.e., make the project effects on moose populations appear less).
39	5.6.5 Assessment the Significance of an Effect	"The assessment of significance involves the professional judgment of experienced specialists. The extent to which the professional experience of the EA team was used in the assessment of significance is described in Sections 6.0 and 7.0."	The significance of an effect on Aboriginal Rights can only be assessed by the specific Indigenous Community that will be experiencing the effect. The EA document should identify Indigenous Community Knowledge Holders as the experts/specialist for assessing the significance of an effect on Indigenous Rights Holders.	The final EA will be updated to acknowledge the importance of Indigenous community perspectives in relation to assessing the significance of an effect on Indigenous Rights and qualifier or removal of the assessment of significance column in the table within Sections 7.7 and 7.8.
40	5.7 Assess Cumulative Effects	The Assessment of cumulative Effects on IK in Traditional Territory, should be assessed by the communities in that individual Traditional Territory since effects on a small tract of traditional territory could be devastating to an Indigenous community and potentially unrecognized by no effects on a larger tract of another community's traditional territory. At minimum the Cumulative Effects should be assess by Treaty Territory.	At minimum the Cumulative Effects should be assess by Treaty Territory.	Within Section 7.7 of the final EA, the cumulative effects discussion has been updated to further acknowledge the changes to the regional landscape over time, reflecting past and current non-project land disturbances including through climate change, linear disturbances (i.e., roads, trails, railway, pipelines, etc.), mining claims and active exploration areas, areas affected by wildfire, parks and protected areas and others. Within this discussion it is acknowledged that cumulative change within the region can result in variation in impact by community. For specific projects identified for consideration of cumulative effects in Section 7.7, recognition of the Treaty Territory within which they are located have been added.
41	5.7 Assess Cumulative Effects	Through the project EA, HONI has an opportunity to conduct a cumulative effects assessment that goes beyond minimum standards in the Ontario Environmental Assessment Act and is conservatively protective of the cultural sustainability of Indigenous peoples. The First Nations Major Project Coalition Major Projects Assessment Standards sets out guiding principles for doing this, including Standard 8.1, which recommends demonstration of a similar rigor	There is no acknowledgement of the First Nations Major Project Coalition Major Projects Assessment Standards in the Draft EA. The proponent did not attempt to complete the cumulative effect assessments with a similar rigor and level of effort as the Project-	See comment #40 regarding the expanded characterization of change in the regional landscape over time in the cumulative effects discussion of Section 7.7 in the final EA. The net effects as a result of the Project related to change in the practices of rights and interests by Indigenous communities are now presented within this regional context, in additional to the assessment of specific potential cumulative effects of

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		and level of effort in cumulative effects assessments as in Project-specific effects assessments. Specifically, affected Indigenous Nations expect that all components, criteria, indicators, and measurements applied to the project-specific assessment will too be applied to the cumulative effects assessment on a broader scale.	specific effects assessments. For example, only net effects were carried through the cumulative effects assessment when they could have been included to assess whether potential effects were meaningful on a regional scale considering the broader context of disturbance. In addition, the proponent attempted to quantify potential effects where possible in the project-specific effects assessments, but the cumulative effects were only measured qualitatively (which can be more subject to biased presentation of results). It is particularly disappointing that this higher standard wasn't even applied to Section 7.7.12 (First Nations rights, interests, and use of land and resources). This could have been done by collecting and analyzing publicly available spatial data on land disturbances to paint a more accurate picture of the regional lands available and suitable for supporting the exercise of rights (harvesting, fishing, gathering, etc.). This type of assessment provides a more accurate depiction of the barriers and challenges First Nations currently face in exercising their Aboriginal and Treaty rights, which is otherwise oversimplified when assuming that all unoccupied Crown land is candidate land for the exercise of rights. Completing a more robust cumulative effects assessment does not necessarily have to mean that the proponent is solely responsible for mitigating regional-scale issues (this is also, in part, the duty of the Crown and other project proponents). Instead, it would represent a stronger commitment from the proponent to	reasonably foreseeable projects that overlap in time, space and effect. Quantitative information is integrated to support elements of the assessments.

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			help illuminate the issues faced by its Indigenous partners, acknowledge how its own project may exacerbate these issues and mitigate them within the scope of power and responsibility, and supporting their Indigenous partners' broader calls to other responsible parties to help address these issues. We continue to encourage the proponent to enhance the cumulative effects assessment, specifically in Section 7.7.12, and are happy to provide more specific guidance on ways this can be done in a reasonable timeframe.	
42	5.7 Assess Cumulative Effects	While the proponent included a comprehensive list of reasonably foreseeable future projects (largely those that would trigger formal permits / approvals) in the effects assessment sections of the Draft EA, there was no consideration of non-project past and current disturbances on a regional scale. Examples of past and current non-project land disturbances that could have been scoped into the assessment and measured quantitatively include (but are not limited to): climate change, linear disturbances (roads, trails, railway, pipelines, etc.), mining claims and active exploration areas, areas affected by wildlfire, parks and protected areas, etc.	We continue to encourage the proponent to enhance the cumulative effects assessment, specifically in Section 7.7.12, by adding consideration of these non-project past and current land disturbances and are happy to provide more specific guidance on ways this can be done in a reasonable timeframe.	See comment #40.
43	5.7 Assess Cumulative Effects	HONI only carried forward select net effects (for example, in Section 7.7., only those that have a probable or certain likelihood of occurrence and non-negligible magnitude).	Please refer to above response for rationale on why cumulative effects assessments should be completed with a similar rigor and method as project-specific effects assessments.	See comments #40 and #41. The consideration of cumulative effects in Section 7.7 evaluates selected net effects (those that have a probable or certain likelihood of occurrence and non-negligible magnitude); however, additional narrative for broader effects within the context of additional discussion reflecting past and current non-project land disturbances related to change in the practices of rights and interests by Indigenous communities has been included.
44	5.7 Assess Cumulative Effects	It is unclear how HONI will determine whether net project effects are likely to additively or synergistically contribute to the effects of other past, present, or reasonably foreseeable developments in the project-specific effects assessment stage. This consideration is not defined in Tables 5.6-1 or 5.6-2. In addition, this is a question that should be answered within the cumulative effects assessment, instead of being scoped out in advance.	While explanations were provided, our recommendation is still that the proponent should carry forward all net project effects to the cumulative effects assessment.	See comment #43.
45	6.1.7 – Potential Effects, Mitigation Measures, and Net Effects	Mitigation measures for impacts to this valued component will be outlined in the Access Plan, Soil Management Plan, Invasive Species and Biosecurity Management Plan, Blasting and	Impacted Indigenous Nations must be provided with the plans to review and provide input, in order to help ensure	Comment noted. These plans will be included as part of the EPP that will be provided to affected Indigenous communities for review and input at least 90 days in advance of construction.

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		Communication Management Plan, Waste Management and Disposal Plan, and Environmental Protection Plan.	impacts to this component are adequately addressed.	
46	6.1.7.2 – Alterations to Geologic Features due to Excavation and Blasting	Blasting may be used during the construction phase, and has been included in the assessment. Impacts from blasting should include contamination of local soils from residual blasting materials.	Please confirm if the Blasting and Communication Management Plan, as well as EPP, will address potential contamination of soils during blasting. In addition, provide a rationale as to why potential contamination associated with blasting was not considered in section 6.1.7.4.	A Blasting and Communication Management Plan will be included as part of the EPP and address potential contamination of soils during blasting. Where practicable, ripping or rock hammer will be used as opposed to blasting where rock is encountered to prevent impacts associated with blasting or explosives use throughout construction. Blasting operations will adhere to applicable permits, regulations, guidelines, and requirements for storage, transportation and use of explosives. If contaminated soils are encountered, excavated or suspected during construction based on observations of visual staining, odours or other methods, the measures provided in the Spill Prevention and Response Plan will be implemented. This includes cleaning up spills, disposing of waste material (i.e., used spill response material and/or contaminated soils) at an approved disposal site and restore the area to the satisfaction of the Owner and regulatory agencies.
47	6.1.7.4 – Changes to Soil Quality due to Chemical or Hazardous Material Spills	HONI and their contractors will develop and implement a Spill and Emergency Preparedness and Response Plan. Spill kits will be deployed to at-risk areas and equipment. The Plan will follow industry standards and regulatory requirements.	Please confirm that emergency response also includes notification of impacted Indigenous Nations. Also please provide additional information on what is considered to be at-risk areas and equipment. Impacted Indigenous Nations must review, and provide input into, the Spill and Emergency Preparedness and Response Plan.	A Spill and Emergency Preparedness and Response Plan will be included as part of the EPP that will be provided to affected Indigenous communities for review and input at least 90 days in advance of construction.
48	6.1.7.6 – Introduction/Spread of Contaminants or Contaminated Soils during Construction	Contaminated soils may be introduced or encountered during construction. It is not clear if this includes consideration of changes in soil chemical characteristics (i.e., pH, nutrient content) that may cause changes in soil quality. This could, for example, include leaching of naturally occurring metals due to changes in pH from soil mixing and/or dust deposition.	Impacts to soil quality due to changes in soil characteristics in the construction phase must be considered in the assessment.	The final EA will be updated to consider potential impacts to soil quality due to changes in soil characteristics in the construction phase.
49	6.2.5.2 – Baseline Conditions	Surface water quality was assessed as part of baseline studies completed for the project. Exceedances of relevant guideline values were noted for metals including cadmium, iron and lead, within the RSA.	Given the already elevated levels of these chemicals in surface water, it is important to work to ensure that additional metals are not released into waterbodies during all project phases. This may be especially important during construction and decommissioning, and these chemicals parameters should be	Mitigation measures and monitoring will be included in the Spill Prevention and Emergency Spill Response and Erosion and Sediment Control Plans as part of the EPP that will be provided to affected Indigenous communities for review and input at least 90 days in advance of construction. Based on the results of the baseline studies and associated effects assessment for the surface water concentrations, Project activities are not expected to result in measurable

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			included in water quality monitoring programs.	increases to metals concentrations in the surface water environment, with the understanding that several design measures and mitigation measures will be employed during construction to mitigate the potential for unforeseen release of sediment or deleterious substance (that could theoretically result in changes to downstream water quality). Environmental monitoring (including water quality sampling/testing) will be conducted during construction to verify the performance and effectiveness of the planned mitigation.
50	6.2.5.2	A summary of surface water quality for each of the tertiary watersheds assessed is provided. It would be helpful to provide this information in table format for ease of comparison between waterbodies and with future monitoring results. Please provide range in concentrations (min and max) as well as the median for each parameter.	Please provide a table summarizing the water quality data described for each watershed included in the assessment.	The final EA will be updated with a summary of the observed water quality conditions for each watershed.
51	6.2.7.1 – Potential Effects, Mitigation Measures, and Net Effects	Sources of water during construction include dewatering activities, wash water, and domestic water from camps and offices. Water quantity and quality monitoring will be completed, where appropriate to evaluate if the Water Taking and Discharge Plan is effective at mitigating impacts.	Please provide additional details on the monitoring to be completed. It is unclear what is meant by “where appropriate” and what criterion would be used to make decisions around where, when and how water quantity and quality monitoring will be done.	Monitoring of water quality and streamflow conditions will be targeted at waterbodies that include greater sensitivity or implication to change from the standpoint of fish habitat, species at risk, channel stability, drainage pattern, or other environmental considerations. The specific monitoring locations will be determined during the permitting and design stages of the Project. However, it is expected that waterbodies of varying size (small, medium, large) would be captured, recognizing that this would allow the performance/effectiveness of mitigation measures to be evaluated at a range of scales.
52	6.2.7.1 Potential Effects, Mitigation Measures, and Net Effects	Water taking and discharge activities will be determined during the permitting and design phase of the project.	GLP member Nations must be provided with copies of permits and ECAs associated with water taking and discharge.	This process will be included as part of the Indigenous Monitoring Plan.
53	6.2.7.5, 6.2.7.10, and Table 6.2-10	Refuelling, service, and maintenance of vehicles and equipment will generally be carried out in designated areas at temporary construction camps and temporary laydown areas a minimum of 30 m from waterbodies. These areas will be designed and constructed to collect and contain minor leaks and spills. If refuelling within 30 m of a waterbody cannot be avoided, additional mitigation measures in the spill prevention plan will be implemented.	It was previously stated that fueling of equipment will not be permitted within 100m of a permanent waterbody (i.e., lake, river or stream) unless a spill prevention plan is in place. In addition, GLP member Nations would like to review and provide comment on the Spill Prevention and Emergency Response Plan.	Comment noted. The EPP will include Spill Prevention and Emergency Spill Response Plans that will be provided to affected Indigenous communities for review and input at least 90 days in advance of construction.
54	6.2.7.8 Changes to Surface Water Quality from the Wash-off of Organic Debris from Work Sites to Nearby Waterbodies, and/or Increased Rates of	Where disturbed and exposed areas are externally draining, the mitigation measures to avoid sediment mobilization to watercourses includes activities such as seeding, surface roughening (scarification), lockdown netting, straw bales, straw and/or wood fibre logs, rock check dams, silt fences, sediment traps/basins, diversion swales/dykes and collection ditching.	When releasing draining water or other highly turbid water near watercourses, construction crews should employ sediment bags attached to the end of discharge hoses and pipes to limit turbidity and excess sediments from reaching watercourses.	Sedimentation in the receiving environment will be controlled by directing sediment laden water to various temporary storage and settlement features (i.e., sumps, settling ponds or catch basins) prior to discharge.

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	Erosion in Disturbed and Exposed Areas with Sediment Transport and Delivery to Adjacent Waterbodies			Alternately, where appropriate, the sediment laden water will be directed to drain/filter through low gradient, well-vegetated areas away from watercourses (i.e., using pumps, hoses, etc.). Sediment control measures will be incorporated prior to construction activities or immediately after disturbance on site-specific cases throughout the Project to avoid introduction of sediment to the environment, and, as part of this, to stabilize drifting soils or loss of topsoil, as practicable. Sediment control measures may include silt fences, filter bags, straw bale fences, berms, ponds and gravel or vegetative filters, check dams, erosion control blankets, and other features.
55	Table 6.2-10: Summary of Effects and Mitigation Measures to Surface Water Quality and Quantity	Even with the effective implementation of mitigation measures, changes to land cover may result in a measurable increase in stream flows, water levels, and erosion sedimentation processes at receiving water bodies and that changes to land cover may also result in an increase to the concentrations of suspended solids in receiving water bodies.	Where feasible, the activities that may lead to increased sediment mobilization or increased turbidity to watercourses should be avoided during periods of extreme rain events to minimize the cumulative effects of the activities. Further, these activities should be avoided during sensitive timing windows for fish depending on the watercourse. These mitigations should be included in Table 6.2-10: Summary of Effects and Mitigation Measures to Surface Water Quality and Quantity as well as the forthcoming EPP.	The following additional contingency measures will be implemented as appropriate in the event of excessive rain, wet weather or flood-like conditions (when the planned activity could cause significant damage to soils, such as rutting by traffic through the topsoil, soil structure damage during soil handling, or compaction and associated pulverization of topsoil structure damage due to heavy traffic): • Re-schedule work or reduce/detour traffic in areas where soils are considered to be excessively wet. • Restrict construction traffic, where feasible, to equipment with low-ground pressure tires or wide pad tracks. • During extreme wet conditions, work only in non-problem areas, such as well-drained soil or well-sodded lands, until conditions improve. • Limit vehicle access through soft/wet areas to periods when frozen conditions occur (i.e., early morning/evening) and have crews park in a stable area and walk to on-site equipment if feasible. • Install access or rig matting in problem areas to protect soils. • In extreme cases, consider suspending work until soils dry out or appropriate site-specific mitigation can be used to prevent soil disturbance.
56	Table 6.2-10	A Spill Prevention and Emergency Response Plan will be prepared. This should include a communications plan should impacts to surface water from a release/spill occur, and impacted Indigenous Nations must be notified.	Provide the Spill Prevention and Emergency Response Plan to GLP member Nations for review/input and ensure that timely notification to these same Nations is included, should a release/spill occur.	Comment noted. An Emergency Spill Response Plan will be included as part of the EPP that will be provided to affected Indigenous communities for review and input at least 90 days in advance of construction.

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57	Table 6.2-10: Summary of Effects and Mitigation Measures to Surface Water Quality and Quantity	In reference to blasting activities, changes to surface water quality from the wash-off of explosives spills and residues from blasting activities to nearby waterbodies is anticipated. The mitigations described include the development of a Blasting Management Plan that describes specific measures that would be implemented if blasting is required.	The Blasting Management Plan should be included in the EPP and be available to GLP for review prior to any blasting activities are carried out. The plan should include how crews will identify and respond to distress or mortalities of fish during blasting events.	Blasting operations conducted near a fish-bearing waterbody will be carried out in accordance with DFO's Measures to Avoid Causing Harm to Fish and Fish Habitat Including Aquatic Species at Risk and Guidelines for the Use of Explosives in or Near Canadian Fisheries Water.
58	Table 6.2-10: Summary of Effects and Mitigation Measures to Surface Water Quality and Quantity	The table and section describe expected changes to surface water quantity and quality from short-term water taking.	When taking water from any fish-bearing stream, all pipes, pumps and hoses should be equipped with fish screens to prevent the unintentional fish mortalities when drawing water.	Comment noted. Water taking will be undertaken in accordance with applicable regulatory guidance and best management practices.
59	Table 6.2-10: Summary of Effects and Mitigation Measures to Surface Water Quality and Quantity	There is the potential for changes to surface water quality and maintenance from the wash-off of accidental spills and leaks to nearby waterbodies. HONI will prepare and a Spill Prevention and Emergency Response Plan that describes specific measures that would be implemented if a spill occurred.	The Spill Prevention Plan should be included in the EPP and a draft should be provided to GLP member Nations for review and comment prior to construction mobilization to site.	A Spill Prevention Plan will be included as part of the EPP that will be provided to affected Indigenous communities for review and input at least 90 days in advance of construction.
60	6.3.7.1 – Changes to Groundwater Quality from Spills	An Environmental Protection Plan and Spill and Emergency Preparedness and Response Plan will be developed to mitigate risks to groundwater quality from spills.	Please provide both plans to affected Indigenous Nations for review and comment. These same Nations should be notified of a potential spill and groundwater impact in a timely manner.	An EPP and Spill and Emergency Preparedness and Response Plan will be included as part of the EPP that will be provided to affected Indigenous communities for review and input at least 90 days in advance of construction.
61	6.3.7.2 – Changes to Groundwater Levels and Flows from Excavations and Dewatering Activities	Some project activities (i.e., installation of structures) will require excavation work. This has the potential to affect groundwater levels and flow (including direction), and subsequently surface water such as lakes, rivers, and streams, as well as springs (potentially).	During the detail design phase, we should be notified of areas where excavation work is planned so that we can work with monitors to assess potential impacts to groundwater and/or nearby surface water bodies. Please provide the Groundwater Dewatering and Discharge Plan for review and input.	A Groundwater Dewatering and Discharge Plan will be included as part of the EPP that will be provided to affected Indigenous communities for review and input at least 90 days in advance of construction. Notifications and monitoring commitments will be developed in collaboration with affected First Nation communities and included as part of the Indigenous Monitoring Plan.
62	6.3.7.3 – Changes to Groundwater Quality from Excavations and Dewatering Activities	Poured concrete used for construction of project components has the potential to impact groundwater quality. For example, the pH of nearby groundwater may increase.	Please provide additional detail on how a change in pH may impact leaching of contaminants from soil to groundwater, and transport of contaminants to nearby surface water. How will this be monitored? Given that some local waterbodies were found to have elevated levels of chemical parameters, including metals, this pathway needs to be considered in the assessment. Also, given the concern expressed by Indigenous community members around spring water, how	Any water that contacts uncured or partly cured concrete will be isolated, held, and/or treated until the pH meets provincial water quality criteria and turbidity is reduced to an acceptable level prior to releasing. Water that does not meet provincial water quality criteria will not be released into the environment. Additional details will be provided in the final EA and appropriate mitigation measures included in the EPP that will be provided to affected Indigenous communities for review and input at least 90 days in advance of construction. A process for monitoring will be developed in collaboration with

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			will monitoring be done to capture impacts to springs that may be used as a source of drinking water.	affected First Nation communities and included as part of the Indigenous Monitoring Plan.
63	6.3.7.5 – Changes to Groundwater Quality from Blasting for Road, Quarry, and Foundation Construction	Blasting can also affect groundwater quality through the release of residual chemicals and input of suspended fine particles. In addition, blasting can result in rock fractures which can alter groundwater flow patterns.	It is unclear if water quality monitoring programs will be designed to capture water quality during times of blasting.	Required water quality monitoring would be based on regulatory permits. The Blasting and Communications Plan will be included as part of the EPP that will be provided to affected Indigenous communities for review and input at least 90 days in advance of construction. A process for monitoring will be developed in collaboration with affected First Nation communities and included as part of the Indigenous Monitoring Plan.
64	6.3.7.7 – Changes to Groundwater Quality due to Discharge from Construction Activities	Groundwater impacts can also result from water discharge from equipment cleaning and temporary camp operations.	Please provide the Waste management and Disposal Plan, as well as Groundwater Dewatering and Discharge Plan for review.	A Waste Management and Disposal Plan and Groundwater Dewatering and Discharge Plan will be included as part of the EPP that will be provided to affected Indigenous communities for review and input at least 90 days in advance of construction.
65	6.3.10 – Cumulative Effects Assessment	Given that the proposed Goliath Gold Project (gold mine) will overlap the project footprint, the net effects of both projects could overlap.	How will HONI work with Treasury Metals Inc. (Goliath Gold) to assess cumulative effects from both projects? Will monitoring data be shared so that a more robust assessment of potential cumulative impacts from both projects can be completed? Even if this project is expected to be on the order of 5% or less of the relative magnitude of the Goliath Gold Project, the cumulative impacts on groundwater must be adequately assessed given the high importance of water to our Nations.	A cumulative effects assessment is completed to identify if additional mitigation measures or monitoring is required in addition to the Project specific requirements. Both Treasury Metals and Hydro One will implement their respective mitigation measures and monitoring required under their EAs. The Project is predicted to have limited short-term effects during installation of tower footings that may overlap the area of influence for groundwater drawdown for the Goliath Gold Project. As such, additional mitigation measures and monitoring beyond the Project-specific requirements is not required. Hydro One will continue to engage with Treasury Metals related to planned construction activities and timing.
66	Section 6.4.2, p. 6.4-4; Appendix 6.4A, Section 2.3	It is not clear whether the proponent acquired and reviewed any existing desktop information sources related to non-native and invasive plant species with the potential to occur in the vegetation study areas (e.g., NHIC data, EDDMapS), as these are not accounted for in Section 6.4.2 or in Appendix 6.4A Section 2.3. We note that field teams identified any introduced and invasive plant species that were opportunistically detected during terrestrial baseline field programs, but due to the scale of the Project it is very possible that some species that occur in the study areas were missed.	Please clarify whether existing desktop data sources (e.g., NHIC, EDDMapS) were used to identify non-native and invasive species with confirmed or potential occurrence with the Project study areas. If these sources were not consulted, then we recommend that the Proponent review them and revise the vegetation and wetlands baseline characterization and effects assessments as necessary.	The botanical inventory compiled following the 2022 field program was cross-referenced against other resources, including local lists provided by the Thunder Bay Field Naturalist and EDDMapS. Invasive and non-native species observed during the field program were discussed in the EA report. A comprehensive discussion related to known non-native and invasive species can be found in the final EA (Appendix 6.4-A and Section 6.4.5)

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67	Section 6.4.5.2.6 – Description of the Existing Environment	This Sections includes a list of traditional use plant species that were documented as part of the baseline characterization. However, it's not clear why these specific species were selected for inclusion in the Draft EA. Were they identified by the GLP member Nations as the most important or sensitive to disturbance? Were they species that Indigenous field team members detected and identified during the ELC and botanical surveys program? While we recognize that this is not a comprehensive list, and that it is not possible to assess the potential effects to all traditional use species of importance individually, we note that HONI was provided with a list of well over 200 traditional use plant species and has narrowed the list down to 14. A rationale for why these species were selected needs to be provided to assist with evaluating HONI's assessment of potential effects to vegetation and wetlands.	Please provide a rationale for why the 14 traditional use plant species listed in Section 6.4.5.2.6 were selected for inclusion in the baseline characterization and effects assessment.	The species discussed in the EA report reflect a list of traditional use species generated through consultation with Indigenous monitors during the 2022 field season. Traditional use plant information obtained since completion of the draft EA, including the extensive list of traditional use plants issued by Fort William First Nation, are incorporated into the final EA. An extensive list of traditional use plant species was compiled and is located in Appendix 6.4-D. Species which were identified as a traditionally important species by more than one Indigenous Community has been highlighted in Section 6.4.5.2.6. From this list, representative species were carried forward as part of the assessment and include representative of species occurring in each of the three ecosystem types (upland, wetland and riparian).
68	Draft EA Section 6.4.5.2.6 (Table 6.4-12); Section 6.4.7.7 (Table 6.4-19); Appendix 6.4A, Section 3.1.4, p. 3.1-94; Attachment 3A, Table 2	During the ELC field program, the proponent and Indigenous crew members documented when select traditional use plants were found within specific ecosites (e.g., common bearberry was found in the coniferous forest ecosite B049). However, the draft EA uses the community series level (e.g., coniferous forest, deciduous forest, etc.) to characterize the vegetation community baseline including for traditional use plant species. This results in a potential overestimate of the total areas within the LSA and the RSA that traditional use plant species have the potential to occur. For example, common bearberry may not actually occur in all types of coniferous forest ecosites that overlap the study areas, yet it is presented this way in Section 6.4.5.2.6 (p. 6.4-45). In addition, there is very little acknowledgement of the relative abundance of these species within each ecosite or general habitat type, which compounds the issue. Following the example of common bearberry (confirmed in ecosite B049), this species (ARCTUVA) was not listed within the top 4 dominant ground cover species for any of the B049 ecosites from the ELC program (Appendix 6.4A, Attachment A3, Table 2) suggesting that, while it is confirmed present (on the species list) it is in low abundance. This issue also carries forward to the assessment of change in habitat for plants of traditional use (Section 6.4.7.7, Table 6.4-19).	The results in Sections 6.4.5.2.6 should not be presented in a way that overestimates potential total available habitat for traditional use plant species. Ideally (and if possible, based on available data), Table 6.4-12 should be revised to summarize available habitat at the ecosite level vs. general habitat type level to provide more accurate results. Also, the written summaries of results (P. 6.4-44 through 6.4-48) should include discussion on the relative abundance of these plant species within each ecosite or general habitat type, ideally based on data collected during the field program. At the very least (and if the above changes are deemed unnecessary) Section 6.4.5.2.6 should be updated to include clear disclaimers on how the data should be interpreted. Similar changes should also be made in Section 6.4.7.7 and Table 6.4-19.	A disclaimer is provided in the final EA (Section 6.4.5.2.6) as to how the use of habitat groupings (and lack of site specific measures) in the assessment overestimates the distribution and abundance of traditional use plants. Given the size of the Project study area used for field surveys it was not possible to determine the abundance of traditional use plants in each vegetation community or ecosite type to provide a more accurate measure of the abundance of traditional use plant availability. Therefore, we relied on desktop-based analysis using the Forest Resource Inventory (FRI) data. This data has the primary objective of supporting Sustainable Forest Licence (SFL) holders' decisions making in Forest Management. The classification of forested communities to "primary Ecosite" (pri_eco in the metadata) was used as a tool to assist in the development of vegetation ecosite base mapping for the Project. However, it's limitations as a tool for this usage were identified during the assessment through other desktop data sources (i.e., wetlands mapping) and ground truthing ecosites (i.e., accuracy of ecosite classification in FRI mapping was limited). Therefore, grouping ecosites into broader categories helped to reduce some of the uncertainty. Section 6.4.11 of the EA discusses the prediction confidence in the assessment. It is noted that FRI ecosite data used as the basis of the analysis was accurate 53% of the time when compared to ecosites assessed during the 2022 field program. While considering this, there remains limitations

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				when discussing abundance of any species. Additional disclaimer statements will be added to Section 6.4.11 to address the study limitations. Given the size of the Project, it was determined that being conservative in this manner was better than underestimating the potential effects. The species discussed in the EA report reflect a list of traditional use species generated through consultation with Indigenous monitors during the 2022 field season. Traditional use plant information obtained since completion of the draft EA, including the extensive list of traditional use plants issued by Fort William First Nation, will be incorporated into the final EA.
69	Table 6.4-13 (p. 6.4-50)	Table 6.4-13 states that dust and air emissions and subsequent deposition, and introduction and spread of noxious and invasive plant species do not have the potential to affect vegetation communities within the Operations phase of the Project. As outlined in Section 3.4.2, the proponent will continue to use vehicles during the Operations phase to conduct essential activities (ROW inspections, ground patrols, vegetation management, ongoing repairs and maintenance, etc.) and this activity will generate dust/air emissions and could also introduce or contribute to the spread of noxious and invasive species.	Please revise Table 6.4-13 to more accurately capture the potential for Operations phase activities to generate dust/air emissions and help introduce/spread noxious and invasive plant species. Revisions should be made throughout Section 6.4.7 accordingly.	The final EA is updated accordingly.
70	Section 6.4.7.2.3 – Potential Effects, Mitigation Measures and Net Effects	Section 6.4.7.2.3 states that the proponent prefers to reclaim disturbed areas through natural recovery versus seeding (except in erosion prone areas). However, a rationale has not been provided. It is also not clear what factors are driving this preference (e.g., ecology, project feasibility / finances, etc.)	Please provide a detailed explanation for why natural recovery (vs. seeding) is the preferred reclamation approach. This should include evidence that the proponent has evaluated factors that may influence the success of natural recovery, such as: • viability of the baseline soil seedbank / plant propagule and potential effect of compaction and disturbance on it • risk of non-native and invasive species introduction, • adjacent vegetation community composition and the potential for plant invasion • site factors such as location, conditions, size, shape, and soil characteristics.	Enhanced vegetation recovery methods (e.g., seeding, planting seedlings) will be implemented where these enhanced methods are appropriate. For example, Hydro One will plant seedlings along new off-RoW access roads in conservation reserves and provincial parks. Further, areas that are subject to erosion, and waterbody crossing locations that have been removed after construction will be seeded with an approved forestry seed mix. A process for monitoring will be developed in collaboration with affected First Nation communities and included as part of the Indigenous Monitoring Plan.

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			The GLP member Nations note that the proponent's preference for natural recovery should be based on best practice in ecological restoration over project cost considerations and affected First Nations must be involved in the restoration approach.	
71	Section 6.4.7.5, p. 6.4-80	We note that a total of 4 ha of confirmed and candidate black ash habitat will be permanently lost due to the Project footprint. To mitigate this effect, HONI states that further consultation with the MECP is required to determine whether permits/authorizations will be required for the removal of black ash trees, since ESA protections will come into effect in January 2024. The GLP member Nations are aware that, despite the recent listing of black ash as Endangered under the *Endangered Species Act*, the Minister has issued an order for the temporary suspension of protection. The GLP member Nations strongly disagree with this decision and note that it does not make any ecological sense to delay protections for the sake of having more time to figure out exactly what those protections should be; time and trial and error are of the essence when it comes to the protection and recovery of species at risk. Black ash is a tree species of great historic importance to Ojibwe peoples as it was uniquely suitable for activities such as basket weaving and in the construction of birch bark canoes. The looming decimation of black ash trees (due to the spread of emerald ash borer) equates to the decimation of these important cultural practices. The GLP member Nations are concerned that this temporary moratorium may be extended, and that MECP may not require HONI to obtain and overall benefit permit for the removal of these trees.	The GLP member Nations request that, regardless of MECP advice, HONI voluntarily commit to compensating for the loss of black ash trees within their respective territories.	Compensation will be addressed outside of the EA. Hydro One has also committed to undertaking a biodiversity initiative specific for this project to offset habitat loss or transition (long-term change). The scope of the biodiversity initiative is expected to be determined post-EA completion; however, typically involve the funding of third-party, including Indigenous community-led, opportunities or projects.
72	Section 6.4.7.7.2, p. 6.4-48 – Upland Ecosystems	Section 6.4.7.2.2. states that the proponent will mitigate the impacts of fugitive dust emissions by using watering and dust suppressants in areas where there are residences or sensitive receptors within approximately 200m of the Project footprint. While the GLP member Nations are generally supportive of the use of dust mitigation for the purposes of safety and ecosystem protection, there are some concerns and information gaps. First, there is little information on the type of dust suppressant that the proponent intends to use. The GLP member Nations note that there are a variety of dust suppressant types, including but not limited to water, salts and brines, petroleum-based organics, synthetic polymers. While effective at mitigating one environmental problem (fugitive dust emissions) these can also create new environmental and health liabilities (e.g., introduction of hazardous constituents, overuse of water resources) As previously stated, the GLP member Nations will not accept the use of harmful contaminants within their respective traditional territories.	Please specify which dust suppressants the proponent intends to use to mitigate fugitive dust emissions, and provide detailed information such as material safety data sheets (MSDS) for further review. Please clarify what is considered a "sensitive receptor". If not already included in the proponent's definition, the GLP member Nations request that this include areas identified as important for the exercise of rights as well as previously un-mapped areas where traditional use plant and medicines species occur. Further discussion will be required regarding	Construction will implement effective dust suppression techniques, such as on-site watering, as necessary to minimize fugitive dust at worksites and access roads as required. Calcium chloride may be used along municipal roads near residences to reduce dust and improve safety where there is increased Project traffic interface with public road users. Application of calcium chloride will be completed in consultation with road authorities. A Dust Control/Air Quality Plan will also be included as part of the EPP that will be provided to affected Indigenous communities for review and input at least 90 days in advance of construction. Further discussion with affected First Nation communities will occur during development of the Traditional Land and Resource Use Management Plan

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		Second, it is not clear what the proponent considers “sensitive receptors”. Is this specific to sensitive plant species, wetlands, and waterbodies? Does this include areas of importance to First Nations for the exercise of rights, or previously un-mapped areas where important traditional use plants are found? Finally, more detailed information on dust suppressant application is required, including frequency and method of application, ideal application conditions (e.g., weather), whether any monitoring will take place to evaluate the effectiveness of dust suppression, etc.	the type of dust suppressant and method that is used in these areas. Please also provide a detailed fugitive dust mitigation plan, including the above information, as well as application frequencies, methods, and conditions.	
73	Section 6.4.7.7.1, p. 6.4-8 – Plants of Traditional Use	This Section states that a total of 28 ha of wild rice stands (meeting Significant Wildlife Habitat criteria) will be permanently lost due to the Project. The proponent outlines steps that have been taken to minimize the permanent loss of vegetation communities and select species, but there is no mention of any measures to compensate for the loss of habitat for this culturally important food source. Northern wild rice is an important native cereal crop that has been harvested by First Nations land users for centuries and used for sustenance and ceremonial purposes. However, wild rice stands are increasingly being threatened by changes in water levels, shoreline developments, and competition from non-native invasive species. The GLP member Nations have repeatedly expressed that potential impacts to wild rice stands are at the top of their list of concerns regarding the Project. As such, HONI should pursue efforts to compensate for the loss of wild rice stands.	The GLP member Nations request that HONI commit to compensating for the direct loss of wild rice habitat resulting from the Project. The exact compensation measures should be discussed further with the GLP member Nations, but could include projects focused on the removal of non-native species in historic wild rice stands or funding research on wild rice seed bank dynamics, for example. We note that one of the GLP member Nations (Seine River First Nation) has experience conducting wild rice recovery research (Dysievick et al., 2016) and as such should be deeply involved in this compensation work.	Hydro One has committed to undertaking a biodiversity initiative specific to this project to offset habitat loss or transition (long-term change) that may occur as a result of the Project. The scope of the biodiversity initiative is expected to be determined post-EA completion; however, typically such initiatives involve the funding of third-party opportunities or projects, such as wetland and wildlife habitat creation and enhancement (e.g., wild rice habitat creation), aquatic habitat restoration and enhancement activities, or invasive species inventory or removal, among others. Following completion of the EA process, Hydro One will engage with Indigenous communities, local communities and interested parties to discuss the implementation of the biodiversity initiative for the Project.
74	Table 6.4-20; Section 6.4.2	Mitigation measures to reduce ecosystem loss and alternation include avoiding the siting of temporary and permanent structures in wetlands, or within a 30m setback of wetlands. We also note that the proponent reviewed the MNRF’s database of provincially significant wetlands (PSWs) as an information source when conducting the baseline characterization of vegetation and wetlands. There is no follow-up reference to PSWs in Section 6.4 and it is unclear whether any PSWs are found within the Vegetation & Wetlands Study Areas. We note that the GLP member Nations are aware of the recent changes to the Ontario Wetland Evaluation System (OWES), and that these will likely result in a significant number of PSWs losing their status. The GLP member Nations disagree with this policy change and continue to require that any developments or activities are set back at least 120 m from PSWs.	Please clarify whether there are any PSWs in the Vegetation & Wetlands study areas. If so, the GLP member Nations request that the previous OWES classification system be respected, with 120m buffers adhered to for all proposed components (temporary and permanent).	Mapping of PSWs is limited in the Project area. Two wetlands occur within the Project Footprint, as previously mapped by the Province: McVicar’s Creek (2 ha; evaluated in 2015) and Little Falls (4 ha; evaluated in 2004). Wetlands were assessed in accordance with the old OWES. In Ontario, the 120m setback from designated significant features (e.g. PSWs) is the distance from the feature for considering potential negative impacts under the Provincial Policy Statement (Ontario 2020) as discussed in the Natural Heritage Reference Manual (Ontario 2010) For this project, potential negative impacts to wetlands are assessed in the EA. The impact assessment was used to determine the appropriate protective buffer from the feature (based on the existing buffer and the sensitivity of the feature and the development proposed within proximity to the wetland) . There are many examples in Ontario where a 30m protective buffer has been applied to PSWs (and in many

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				cases compatible development (e.g. SWM pond) allowed within the 30m buffer). In some cases, a buffer less than 30 m has been permitted, with the condition of enhanced mitigation and/or habitat creation, and as determined on a site-by-site basis.
75	Table 10.6-1, p. 10.6-11	In general, the Draft EA (Section 11) contains very little information on proponent's proposed construction vegetation monitoring methods. It is necessary for the GLP member Nations to review detailed construction (and operations) monitoring protocols prior to construction. These monitoring programs are counted among the mitigation measures since these monitoring programs are being touted as a mitigation measure and used to evaluate and carry forward net project effects.	The GLP member Nations must be given an opportunity to review detailed vegetation construction (and operations) monitoring protocols prior to the construction, in order to make an informed decision on the adequacy of the proponent's EA significance determinations.	A monitoring framework is included in the EA and a process for monitoring will be developed in collaboration with affected First Nation communities and included as part of the Indigenous Monitoring Plan.
76	Table 10.6-1, p. 10.6-11	Table 10.6-1 states that the proponent will aim to minimize the establishment of invasive weed species by monitoring topsoil piles annually during construction and into the operation and maintenance stage for 3 years. Appropriate invasive species management procedures will be implemented. The GLP member Nations note several concerns with this proposed monitoring scope and approach. First, non-native and invasive plant species have the potential to be introduced (or spread) throughout the entire Project footprint (e.g., access roads, construction camps, etc.) not just in soil topsoil piles. By focusing only on monitoring topsoil piles, HONI may be missing the potential introduction or spread of invasive species throughout the majority of the Project footprint. For a project of this scale, that is a considerable total area going unmonitored. Second, only monitoring for non-native and invasive species on an annual basis is unlikely to maximize opportunities to detect and effectively remove them. For example, invasive species become detectable at varying points in the growing season (e.g., early, mid, late). If the proponent were to complete monitoring in the early growing season, it is possible that they would miss the opportunity to detect late-season growing invasives. In addition, effective removal of invasive often requires careful timing. For example, some invasive plant species become much more challenging to eradicate if they are not pulled before seeding. If the proponent were to only monitor for invasive species after they had gone to seed, this may drastically reduce their chances of effectively removing it for the following years.	The proponent must enhance their proposed invasive species monitoring program in order for it to be successful. Specifically, this should include: • Monitoring all project components (e.g., roads, the ROW) – not just topsoil piles • Monitoring multiple times per season to maximize likelihood of detection and responsiveness. Commit to prohibiting the use of chemical invasive species management methods.	Through engagement during the draft EA process, Hydro One heard feedback from Indigenous communities and stakeholders regarding concerns with the use of herbicides to remove and manage vegetation on the Project. After extensive consideration of this feedback, herbicides will not be used during construction of the Project or for future maintenance of this transmission line. The final EA has been updated to reflect this. Effective measures to monitor and prevent spread of invasive species will be detailed within the Vegetation Management Plan. A process for monitoring will be developed in collaboration with affected First Nation communities and included as part of the Indigenous Monitoring Plan.

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77	Section 6.5.4.2 – Spatial Boundaries p.6.5-18; Table 6.5-3	The Regional Study Area (RSA), which is primarily used to characterize cumulative effects of the Project, for the moose and gray wolf criteria excludes Wildlife Management Units (WMUs) 11C, 11A and 15A on the basis that they do not intersect with the Project footprint. However, they do intersect the Local Study Area (LSA), which is primarily used to characterize the indirect effects of the Project. Excluding these areas of overlap where there may be indirect impacts to moose and gray wolf will result in an underestimate of potential cumulative effects on these criteria.	Please revise the moose and gray wolf RSA to include WMUs 11C, 11A, and 15A. If HONI considers this unnecessary, please explain (quantify, ideally) how the exclusion of these areas of overlap will have a negligible impact on the predicted cumulative effects on moose and gray wolf outlined in the Draft EA.	Please refer to the response to comment #38.

78	Section 6.5.5.1.1, p. 6.5-21 – Description of Existing Environment	This section provides a summary of how linear disturbance densities and total habitat disturbance values were calculated for criteria in the Wildlife and Wildlife Habitat VC. However, there is no list of which linear and disturbance features were scoped into these analyses, or what buffers were applied to each point and line disturbance type (to create area-based footprints). This information is necessary to evaluate whether HONI's approach to calculating linear densities and total disturbance areas is sufficiently conservative.	Please provide the following information:
			• A list of linear feature types that were included in (and excluded from) the linear density analysis.
			• A list of disturbance features that were included in (and excluded from) the total habitat disturbance analysis.
			• A list of which buffers were applied to the disturbances classified as points or lines, for the purposes of the total disturbance analysis.
				The "Draft Environmental Assessment Interactive Mapping Tool" on the Project website can be used to support the analysis that is described in the EA and view WMUs and linear features.
				• A list of linear feature types that were included in (and excluded from) the linear density analysis.
				  ◦ Included: ORN Road Segment, OTN Trail Segment, Trail Segment (Restricted data layer), Utility Line
				• A list of disturbance features that were included in (and excluded from) the total habitat disturbance analysis.
				• Included:
				  ◦ FRI Polytype: UCL
				  ◦ Aggregate Site – Authorized Active
				  ◦ Intersections between ORN Highways and OHN Watercourse
				  ◦ Fire Disturbance
				  ◦ AR Harvest Depletions
				  ◦ ORN Road Segment
				  ◦ ORWN Track
				  ◦ OTN Trail Segment
				  ◦ Trail Segment (Restricted data layer)
				  ◦ Utility Line
				  ◦ HONI Existing TL ROW
				• A list of which buffers were applied to the disturbances classified as points or lines, for the purposes of the total disturbance analysis.
				  ◦ 200 m on point intersection between ORN Highways and OHN Watercourse
				  ◦ 500 m buffer on ORN Highways and Track
				  ◦ 10 m buffer on ORN Roads (excluding highway)
				  ◦ 1.5 m buffer on Trails
				  ◦ 5 m buffer on Utility Lines

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79	Section 6.5.5.2 - Description of Existing Environment	Section 6.5.5.2 reports on the baseline density of linear features within the moose and gray wolf LSA and RSA in paragraph for, but does not include a map of these results, which would be helpful for identifying spatial patterns. Figure 6.5-3 does include linear features (primary, secondary, local roads and railways), but it is difficult to see these next to the moose habitat suitability symbology. This section also doesn't include a detailed breakdown of linear density by feature type, which would be useful for interpreting the nuances of existing threats to moose, since different linear density types can have different effects on the species.	Please provide a map of the baseline linear density analysis results, including different symbology for the different types of linear features, if possible. It would also be helpful to include WMU boundaries for ease of interpreting the results alongside provincial moose management data. Please also provide a table breaking down linear density analysis results, according to linear feature type (e.g., primary roads, secondary roads, railways, etc.).	The Project web viewer can be used to support the analysis that is described in the EA and view WMUs and linear features. Linear and non-linear infrastructure, including roads, utility lines, airports, and buildings, that are a result of human alteration contributed to creation of a single 'disturbance' layer. This layer was used to better understand areas within each of the Project footprint, LSA and RSA that do not contribute to the available ecosystem.
80	Section 6.5.5.2, Table 6.5-4, p. 6.5-26; Appendix 6.5-A, Section 3.1 Description of Existing Environment	Table 6.5-4 provides an overview of baseline moose habitat availability in the LSA and RSA, according to habitat suitability category (e.g., high, moderate, low, etc.), including a disclaimer that approx. 14% (163,463 ha) of the "poor" habitat is Lake Superior. According to Appendix 6.5-A (Wildlife and Birds Habitat Models), Section 3.1, suitable habitats within 500m of high-impact disturbances (i.e., highways and built-up residential, commercial, and industrial areas) were assigned a suitability rank or poor based on scientific knowledge and as a precautionary approach. To assist with evaluating the findings outlined in Table 6.5-4, it would be useful to understand what total area and percentage of the "Poor" habitat includes areas within the 500m buffer of high-impact disturbances.	Please provide the total area and percentage of "Poor" moose habitat that includes areas within the 500m buffer of high-impact disturbances. It would also be useful to see these areas highlighted on a map to understand how they influence the spatial distribution of "poor" quality moose habitat in the LSA and RSA that is specifically assigned as such due to the addition of the 500m buffer.	The area calculations were updated based on the Final EA Project footprint and Table 6.5-4 was updated to note that the RSA was clipped to the boundary of Lake Superior.
81	Section 6.5.5.2, p. 6.5-29 Description of Existing Environment	Moose home range estimates are provided for WMUs 5, 8, 9A, 12A, and 12B within this section, and it is also specified that home range estimates for WMU 13 are not available. However, there is no mention of moose home range estimates for WMU 11B (or 11A, 11C, and 15B, which have been requested for addition to the moose and gray wolf RSA).	Please provide moose home range estimates for WMUs 11A, 11B, 11C, and 15B to assist with the interpretation of Draft EA results.	This information has been removed from the EA. Information on population trends for WMU 11B, and 11C has been added into the EA. Information on WMU 11A and 15B has not been included as these WMUs have minimal interaction with the LSA and inclusion would cause a dilution of effects. See response to Comment #38 above.
82	Section 6.5.7.2.1, Table 6.5.-21, p. 6.5-97 Potential Effect, Mitigation Measures and Net Effects Assessment	According to Section 6.5.7.2.1 and Table 6.5-21, the total change in moose habitat resulting from the Project is 2,417 ha, which differs from the total Project footprint of 2,867 ha. The 450 ha difference is not explained in this section. Does this account for habitat with an "Unknown" suitability for moose that will be permanently lost due to the Project? According to Table 6.5-4, moose habitat was classified as "Unknown" when not described by FRI ecosite polygons, fire disturbance layers, or harvest data and this accounts for 12,584 ha or 12.0% of the LSA. An area of this size should be accounted for within the proponent's calculations of change in moose habitat availability, and in the absence of data the proponent should err on the side of caution in assuming it may have some degree of suitability for moose.	Please provide an explanation for why 450 ha are unaccounted for in the calculations of change in habitat available for moose. If this is due to the loss of "Unknown" habitat, the proponent should conservatively assume that this has some degree of suitability to moose. If the proponent considers this approach unnecessary, please explain why.	This was likely an error in transcription of values into the table. The numbers in the final EA have been revised as per revisions from the study areas.

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83	Sect 6.5.7.2.2. Potential Effect, Mitigation Measures and Net Effects Assessment	This Section states that “sensory disturbance is not expected to influence moose survival and reproduction because increases in moose movement rates caused by avoidance of humans are unlikely to have a measurable effects on the overall energy budget of moose that are in good condition” (p. 6.5-100). However, the proponent hasn’t provided any evidence that the moose within the WMUs overlapping the Project study areas are generally in good condition.	Please provide evidence to substantiate the assumption that moose within the WMUs overlapping the Project study areas are in “good condition”, and so sensory disturbance is not expected to influence their survival and reproduction.	Section 6.5.8, 6.5.9 and 6.5.10.1 has been updated to provide further explanation of the results of the assessment as such: moose densities are mostly below the desired ecological goals, which indicates uncertainty in their ability to absorb existing effects from disturbances in the Baseline Characterization. The combined evidence concerning the cumulative changes to moose habitat availability, distribution, and survival and reproduction in the moose and gray wolf RSA from Baseline Characterization to the Cumulative Effects Assessment suggests that moose populations would likely continue to maintain their current state in the moose and gray wolf RSA, although possibly at a lower abundance. Specific areas of concern and site-specific mitigation measures can be identified by GLP and Indigenous communities though the Traditional Land and Resource Use Management Plan.
84	Section 6.5.7.2.1, Table 6.5.-21, p. 6.5-97 Potential Effect, Mitigation Measures and Net Effects Assessment	The GLP member Nations are extremely concerned about the potential for the project to alter predator-prey dynamics and feel that this has not been adequately evaluated or addressed in the Draft EA. First, baseline linear density values in the LSA (1.78km/km^2) and RSA (0.5km/km^2) are alarming and either well above, or very close to the 0.6km/ km^2 threshold at which populations of large vertebrates (such as moose) are known to decline (Beazley et al., 2004; Forman et al., 1997). This evidence is consistent with the results of MNRF aerial surveys for the WMUs overlapping the study areas, which show that moose populations have been declining throughout the past decade. In addition, moose populations in these WMUs are currently well below 2030 population objectives and recent data show that calf recruitment is below minimum desired values (30 calves per 100 cows) in many of the WMUs overlapping the study area (13, 11C, 12B, 12A, 5) indicating barriers to future population growth and potential predation pressure. Together, this evidence indicates that there is notable existing pressure on moose populations within the study areas and as such a precautionary approach to mitigating the potential effects on moose (including its key threats of habitat loss/alteration, and altered predator-prey dynamics) is warranted. Despite this, there is little substantial discussion in Section 6.5.7.2 about the potential influence of the project on predation of moose by wolves and bears (e.g., by providing open sightlines and travel corridors). Discussions related to moose interactions with the project footprint are mainly centered around barriers to moose movement, use of the corridor for browse, and avoidance of linear transport corridors. While we acknowledge that the Waasigan line will largely parallel an existing corridor, but there is no discussion on how	Please revise Section 6.5. to include: • More detailed information on linear density calculation methods, data inputs, and spatial distribution (see above comment) • Improved evidence-based discussion on how linear corridors influence predator-prey dynamics (sightlines, predation efficiency), types of mitigation measures and their effectiveness (including consideration of time lags in effectiveness and potentially competing priorities) • Improved predator-prey mitigation measures, based on outcomes of the above research	Section 6.5.7.2.5 on the Use of Linear Corridors and Converted Habitat speaks to the impact of linear corridors. Specific areas of concern and site-specific mitigation measures can be identified by GLP and Indigenous communities though the Traditional Land and Resource Use Management Plan.

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		corridor widening may influence predation, or other factors influencing increased predation rates (e.g., site conditions, retention of compatible vegetation, ROW segment distance and orientation, etc.). Consequently, the proponent has proposed little in terms of predatory sightline and travel corridor mitigation. Specifically, the proponent proposes to restore temporary components (through natural recovery) and allow compatible vegetation to re-establish along the ROW. The GLP member Nations note that there will be a time lag before these measures are likely to be effective at mitigating predator-prey dynamics, and that the proponent's definition of compatible vegetation is nuanced and has not yet been fully explained.		
85	Appendix 6.4-A, Section 3.2.2.2	Section 3.2.2.2 shows that western painted turtles and snapping turtles were observed during visual encounter surveys (basking, swimming) and opportunistically (often crossing or nesting on roads). In addition, it has been concluded that the project will result in the loss or disturbance of 271 ha of turtle wintering areas, which represents 9% of the project footprint. However, Section 6.5.7.8.3 states that work in wetlands will occur during winter months when turtles are overwintering, with no indication that efforts will be made to deter turtle species from overwintering in the wetlands to be disturbed. In addition, despite the documented occurrence of turtles crossing and nesting on roadways in the study areas, the proponent has not proposed to scope turtles into wildlife road mortality mitigation and monitoring, which is focused on large mammals.	Please confirm that the proponent will not proceed with disturbing wetlands used for overwintering by turtles during the overwintering period. If this is unavoidable, exclusion fencing should be installed around overwintering wetland habitat that is scheduled to be disturbed in advance of turtle migration to overwintering habitats. Please also include turtles in wildlife road mortality mitigation, monitoring, and adaptive management protocols.	Exclusion fencing was included in the draft EA with respect to preventing turtles from entering the Project construction area from overwintering areas. Exclusion fencing to prevent turtles from entering overwintering areas may not be feasible given the scale of the Project and the efficacy of this mitigation measure may be limited. However, this mitigation measure was added to the final EA and will be implemented where practicable and appropriate. Isolating and dewatering the aquatic work area prior to September 1st was added to the final EA as another possible mitigation measure that could be implemented where practicable and appropriate. This mitigation measure may not be appropriate in many instances given the ripple effects to other environmental discipline (i.e., surface water and fish and fish habitat).
86	Section 6.5.7.17, Table 6.5-37 Potential Effect, Mitigation Measures and Net Effects Assessment	Table 6.5-37 states that a 400m setback will be applied to bald eagle nests where possible to minimize effects on active nests, and that where trees containing bald eagle nests may need to be cut down, nest boxes or platforms will be installed as compensating nesting habitat.	Please provide additional information to support that this is enough to compensate for loss of trees with nests.	Although Bald Eagles often reuse nests year after year, pairs often have alternate nests in their territory (average 1.5; maximum 5) and may switch nest sites in successive years, especially after a nest failure (Buehler 2022). In addition, there is evidence of Bald Eagle use of artificial nesting platforms and successful fledging (Bortolotti et al. 1988; Hunter et al. 1997; Marion et al. 1992). Given that Bald Eagles typically have more than one nest in their territory and have been known to successfully nest on artificial structures, the installation of nesting platforms is anticipated to provide suitable compensation for the loss of particular nest trees. This mitigation is included in the final EA.

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87	Section 6.5.7.2. Potential Effect, Mitigation Measures and Net Effects Assessment	We note that criteria selected for the wildlife and wildlife habitat valued component generally represent a good variety of taxa and includes a good balance between species at risk and species of cultural importance to the GLP member Nations. However, we note that HONI didn't select an insect criterion (e.g., monarch butterfly) and it is not clear why.	Please provide a rationale why no insect criteria were selected for inclusion in Section 6.5.	Feedback regarding the inclusion of an insect criterion was not identified during the Terms of Reference or EA stage of the Project. The requested indicator is not planned to be added to the final EA based on further discussions with GLP.
88	Appendix 6.4A, Section 2.2.2, p. 2.2-22; Section 3.1.4	This Section provides a very high-level summary of how Indigenous Knowledge was considered in the development of the terrestrial baseline report, including information shared by Indigenous field crew members, the review process for the draft Terrestrial Field Work Plan, and engagement with communities. While the GLP member Nations appreciate HONI's efforts to solicit this information, it is not clear what input was received or how this shaped field data collection protocols, results and analysis methods. For example, were field protocols modified to include opportunities for Indigenous crew members to share Indigenous Knowledge (e.g., audio recording oral histories)? We note that Section 3.1.4 includes summaries of Indigenous Knowledge related to traditional use plant species, their specific uses, and components of the plants that are harvested. Was similar detailed information collected for wildlife species and their habitats? Were any changes made to field protocols (e.g., identifying candidate survey locations based on land users' Knowledge of their territory, identifying priority species to survey, etc.), or was scoping done according to western scientific protocols and legislative requirements, exclusively? Were members from Indigenous Nations given the opportunity to review and help interpret field studies results, considering Indigenous Knowledges and worldviews, or was this done using western scientific analysis methods, exclusively? We note that avoiding two areas of cultural significance at the request of a community is more so a gesture of respect, and does not necessarily constitute Indigenous Knowledge shaping terrestrial baseline study design and results.	Please provide specific examples of: • Indigenous Knowledge shared by Indigenous field crew members, including how it was documented, analyzed, and presented in the Terrestrial Baseline Report. • Feedback that was provided on the draft Terrestrial Field Work Plan and how this resulted in changes to plan scoping (e.g., revising survey locations or valued components, adjustments to data collection or interpretation methods)	Indigenous knowledge (IK) shared by Indigenous field crew members was noted on field data forms and compiled and added to the datasets and reporting as appropriate (e.g., use of Labrador tea as a medicine). There was not a significant amount of data shared by Indigenous field crew members to be quantitatively analyzed with the datasets collected during field studies. IK received is being incorporated into the final EA. There was a limited amount of data shared by Indigenous field crew members for wildlife species and their habitats. Field protocols and field survey location were not substantially changed based on land users' knowledge of their territory as we did not have this input at the time of surveys. However, a few examples of changes made at the time of field planning consist of: • Turtles identified as priority species and turtle surveys undertaken and snapping turtle added as a Criterion in the EA. • Wabigoon Lake First Nation indicated a protected area where they did not want field work conducted and so survey locations were relocated outside of this area. For the most part scoping was done to meet the commitments made in the Terms of Reference for the Project and any input received on the TOR. The field survey methods used western scientific protocols exclusively. Members from Indigenous Nations were given the opportunity to review and help interpret field studies results when they were available to do so (e.g. while in the field and at night to QA/QC results, add IK to daily reports). A WSP staff member from LDML was involved in field work, data analysis and reporting, using western scientific analysis methods.
89	2.9 General Comment	All other components have an Anishinaabemowin translation.	Please provide wording for Fish and Fish Habitat.	The final EA will be updated accordingly to include the Anishinaabemowin translation for Fish and Fish Habitat (Giigoonyag Endanakiiwaad).

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90	Table 6.6 – B.1 Proposed Equipment Waterbody Crossing Methods and Applicable Timing Windows	GLP recommended previously that construction of access roads and water crossings be done under frozen conditions (winter) to minimize sediment mobilization and disruption to fish habitat during open water season. HONI noted that the EA will include a water crossing list that includes the preliminary crossing type.	The Draft EA does provide a list of crossing types, however, additional context would be beneficial as to the rationale for the selection of crossing type. It appears that watercourse width is the focal criteria that defines the type of crossing but should also consider the quality of habitat. GLP continue to strongly encourage HONI to make efforts to complete all sensitive and unstable watercourse crossings in frozen conditions to limit extensive erosion and sediment mobilization during construction where feasible.	Please refer to the response to comment #11 regarding crossing type selection.
91	Appendix 6.6-B: Fish and Fish Habitat Summary and Mapbook at Proposed Equipment Waterbody Crossings and Applicable Timing Windows for the Project Table 6.6 – B.1 Proposed Equipment Waterbody Crossing Methods and Applicable Timing Windows -	The Draft EA does not include any adaptive management strategy in the case that their selected watercourse crossings are infeasible during the timing of construction, for example, if snow fill or ice-bridges are not possible due to poor weather conditions, or if clear-span bridges are infeasible due to flooding or unstable banks.	The EA and EPP should provide a distinction between the “primary” crossing method and “secondary or contingency” crossing method, in the case that the initial crossing method is infeasible. The selection of these crossing types should consider how environmental conditions and physical characteristics of the site may prevent implementation of the primary crossing method.	Please refer to the response to comment #11 regarding crossing type selection. In addition, the EA includes mitigation measures applicable to the types of crossings that may be used on the Project. These mitigation measures would still be applicable if the crossing type were to change.
92	Table 6.6 – B.1 Proposed Equipment Waterbody Crossing Methods and Applicable Timing Windows - and Section 6.6.7.1.2.4 Reduce the Fish Mortality Risk Through Restricted Activity Timing Windows and Fish Rescues/Relocations	HONI are proposing to implement a number of snow fill crossings throughout the proposed route. The selection of these types of crossings may be valid, however there is no mention of how these potential streams will be determined to be “frozen to bottom” before snow filling. In the event these watercourses contain water or ice during crossing construction, there should be a system in place to ensure fish are not stranded, distressed, or killed in overwintering pools.	The EPP should have specific protocols to adequately determine streams are “frozen-to-bottom” before snowfill crossings are put in place to confirm there is no winter fish habitat and avoid inadvertently filling or obstructing flowing watercourses that could be providing important over-wintering habitat for fish downstream. If conditions at these crossings prevent the feasible implementation of snow fill or ice bridge crossings, the EA should state how adaptive management will be used to implement more appropriate structures (i.e. culverts or clear-span bridges) to avoid impacts to fish and fish habitat.	Adaptive management strategies and specific protocols will be covered in the EPP and will be developed in conjunction with GLP. The EPP will be provided to affected Indigenous communities for review and input at least 90 days in advance of construction.

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93	Appendix 6.6-B: Fish and Fish Habitat Summary and Mapbook at Proposed Equipment Waterbody Crossings and Applicable Timing Windows for the Project Table 6.6 – B.1 Proposed Equipment Waterbody Crossing Methods and Applicable Timing Windows	The table proposed “one-time ford’s” for watercourses classified as No Defined Channel (NDC). Although it’s acknowledged that these types of crossings are likely not fish-bearing, there should be a system in place to minimize the use of these crossings during periods of flow (if present) as there may still be impacts to downstream habitats from sediment mobilization by driving equipment through flowing watercourses, even those defined as NDC.	Please include details on practices or procedures for minimizing impacts to downstream fish habitat during one-time fords if flowing conditions are found. Further, please provide clarification on whether “one-time” refers to a single passing of the channel for access, or if these crossings will be used indefinitely during the construction phase of the project.	Fording is discussed in detail in Section 6.6.7 of the final EA. Fording will be avoided to the extent possible; in the event that fording is required, it will be a one-time crossing (over and back) with clearing and bridge installation equipment in flowing water conditions with stable beds and low sloping banks or approaches. Any fording will follow DFO’s Code of Practice for Temporary Fords (DFO 2022f).
94	Section 6.6.7.2.1.2 Injury or Mortality to Fish through Blasting, Section 6.9.8.2 Increased Vibrations During the Construction Stage - Potential Effects	In reference to mitigation measures to the effects from blasting on fish and fish habitat, the EA states that a Blasting and Communication Management Plan will be prepared and implemented by Hydro One with their contractor(s) for the Project that describes specific measures that would be implemented if blasting is required.	The Blasting Management Plan should be included in the EPP and be available to GLP for review prior to any blasting activities are carried out. The plan should include how crews will identify and respond to distress or mortalities of fish during blasting events.	Comment noted. A Blasting Management Plan will be included as part of the EPP that will be provided to affected Indigenous communities for review and input at least 90 days in advance of construction.
95	2.10 Overall	We have concerns around air emissions and climate change impacts. As partners, we want to lessen air pollution associated with project activities to the greatest extent possible.	The contractor should consider the use of electric vehicles to carry out project construction, if there is opportunity to do so. We recognize that EV availability is very limited at this point but the contractor could consider if the option is available.	Comment noted. While Hydro One’s contractor may not be in a position to commit to EVs to carry out construction, measures to reduce air emissions will be included in the EPP.
96	6.7.7.1 – Change in Criteria Air Contaminants and Fugitive Dust Emissions	Idling vehicles contribute to emissions of air pollutants.	Please encourage anti-idling for project construction work.	Section 6.7.7.1 notes that vehicles and equipment will be turned off when not in use, where reasonable and practicable.
97	Table 6.7-6	Table 6.7-6 provides a summary of the monitoring data available from each of the identified stations from 2015 to 2019. At the time of this assessment, complete datasets were available up until 2020; however, 2020 datasets were not used due the impacts of the COVID-19 pandemic on many air quality emission sources including industry and transportation.	We are currently seeing, and have seen over the past years, impacts to air quality in northern Ontario due to widespread forest fires. Please provide additional information on whether the use of these data are conservative given no data from 2020 and on were used.	Forest fires can impact concentrations of $PM_{2.5}$ during these occurrences, while the most recent forest fires that occurred since 2020 are not included in the background air quality data, a five-year data base was used to establish existing air quality. The 90th percentile of this data was used to establish background air quality for periods of 24 hours or less. The maximum annual average was used to establish background. This is a conservative approach as it assumes higher than typical background air quality concentrations. The Project may be a source of $PM_{2.5}$ emissions during construction only. If poor air quality due to forest fires occurs during construction, construction activities will be reviewed and halted if necessary.

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98	6.8.1 – Input from Engagement	Migisi Sahgaigan expressed concern around the need for all phases of the project to be considered in the estimate of GHG emissions. HONI indicated that emissions from the operations phase are not estimated as the emissions from this phase are considered small compared to the emissions during construction (particularly from land clearing). Emissions during operations would only be associated with maintenance vehicles and use of SF6 as an insulator.	Can additional details be provided around GHG emissions from the operations phase to get a better sense of how much less emissions would be (relatively) during this phase in comparison to construction? The transmission line is expected to be in operation for a significant amount of time versus the limited time period for project construction. Over time, would GHG emissions from operations be significant?	Hydro One is committed to adapting to and mitigating the impacts of climate change, including reducing their GHG emissions. Operation of the Project will align with company targets to achieve corporate-wide GHG emissions reductions, including achieving net-zero by 2050. The pathways and actions towards achieving these targets are still being developed by Hydro One; however, it will include conversion of fleet vehicles to electric or hybrid as feasible and reducing SF6 emissions, thereby reducing the GHG emissions from the operation of the project. As presented in Hydro One's 2021 Sustainability Report, corporate-wide operational Scope 1 and Scope 2 emissions were 305,129 tonnes CO_2e, which includes fuel consumption, generation, operation and maintenance vehicles, SF6 use, electricity use and line loss for all of Hydro One transmission and distribution activities across the province, of which the Project would be a subset of. These corporate-wide emissions are smaller than the emissions associated with the one-time construction emissions from the Project which are predicted to be 511,563 CO_2eq. Therefore, the GHG emissions associated with the operation of the Project would be much less than those associated with the construction of the line.
99	6.8.8.1.2 Potential Effects, Mitigation Measures, and Net Effects	Vehicles and equipment will be turned off when not in use, as practicable, and equipment will be well maintained to maximize fuel efficiency. Multi-passenger vehicles will be used to transport personnel, where practicable. Electric or hybrid vehicles will be used for operation and maintenance activities where possible.	We are keen to see these included in a GHG Reduction Strategy for the project. A more formal commitment is requested to ensure every effort is being made to implement these initiatives.	Included in the EPP will be measures to reduce GHG emissions committed to in the EA, including turning off vehicles and equipment when not in use, as practicable, maintaining equipment to maximize fuel efficiency, using multi-passenger vehicles will be used to transport personnel, where practicable, and using electric or hybrid vehicles for operation and maintenance activities, where possible. These measures referenced in the EA will be included in the EPP and a commitment to include a GHG Reduction Strategy in the EPP will be made in the EA.
100	Table 6.8-10 Summary of Annual Greenhouse Gas Emissions (Highest Year)	More than 98% of GHG emissions during the highest year are attributed to land clearing.	Could initiatives be developed with impacted Indigenous Nations to offset some impacts of land-clearing. These initiatives could be community-led and incorporate both IK and science. Examples could include tree planting in communities.	As detailed in Section 10, Hydro One has committed to undertaking a biodiversity initiative to offset habitat loss resulting from the Project. This could aid in mitigating impacts from land clearing for the Project. The scope of this initiative is expected to be determined post-EA completion and will include engagement with Indigenous communities. Text has been added to Section 2.8.8.1.2 to indicate this.

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101	6.9.4.3 Ontario Hydro Protocol -	When referencing how noise and vibration will be addressed during the operational phase of the line, the Draft EA references a seemingly dated guidance document in the Ontario Hydro Protocol from 1981. The document sets out the design philosophy and criteria that are applied by Hydro One for limiting audible noise from construction of new or upgraded facilities.	Regardless of the validity of the document, the EA should include additional reference to more updated protocols for addressing and assessing the levels of noise from operations of modern transmission lines. The EA could include other protocols from national or international standards to support the assessment of noise from transmission lines that are more relevant to current and modern design and materials.	The 1981 Ontario Hydro noise protocol has not been updated or superseded so it is still considered to be applicable for this project. The Ontario Hydro protocol provides noise limits consistent with those provided in more recent guidance documents on assessing noise from transmission lines.
102	Section 6.9.8.2 Increased Vibrations During the Construction Stage - Potential Effects	Waterbodies closest to the blasting area will be isolated (e.g., silt curtain or cofferdam or alternate) to keep fish from entering the area during the blasting periods. A fish rescue/relocation will be completed to remove fish from the isolated areas. Fish rescues will be completed by fisheries biologists/environmental technicians, according to the conditions within an obtained MNRF LCFSP.	Specific protocols should be developed that specify how isolations and fish salvages will be carried out during blasting and isolation activities. Indigenous monitors should be included and present during the implementation of mitigation measures during blasting and isolation activities.	A Blasting Management Plan will be included as part of the EPP that will be provided to affected Indigenous communities for review and input at least 90 days in advance of construction. An Indigenous Monitoring Plan will be developed in collaboration with affected First Nation communities.
103	2.13 General	How will herbicides/pesticides be referenced in the EA given Hydro One's commitment to GLP on this matter	Search of the document of all references, and update as required.	Through engagement during the draft EA process, Hydro One heard feedback from Indigenous communities and stakeholders regarding concerns with the use of herbicides to remove and manage vegetation on the Project. After extensive consideration of this feedback, herbicides will not be used during construction of the Project or for future maintenance of this transmission line. The final EA has been updated to reflect this.
104	7.7.2 First Nations	Input from each of the affected Indigenous Nations has been provided for use in the EA.	Confirm each First Nation has been offered the opportunity to review their section	All EA sections, including the draft assessment of effects to First Nation Rights, Interests and Land Uses in Section 7.7, were provided to community contacts for each First Nation being engaged as part of the Project for review. Distribution and receipt of comments from communities are reflected in the engagement section of the final EA report and in the Record of Consultation (distribution was through a secure link to download Section 7.7 to First Nations being engaged as part of the Project, along with USB copies of the remaining sections of the EA and Record of Consultation).
105	7.7.2 First Nations	Summary of engagement with the GLP communities does not include all the issue raised.	GLP First Nations to review the individual summaries to ensure they are accurately representative of the comments made	Comments presented in Table 7.7-1 are intended to summarize comments received linked to assessment of First Nations rights, interests, and land use that were documented during the reporting period. Where GLP have shared that a number of the issues they wish to see reflected were provided as comments through the ToR process, the additional topics of input shared at the ToR staged linked to this assessment have been added to the Table for inclusion in the final EA.

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106	7.7.3 Input from Engagement	Information from GLP not correctly attributed to GLP	Include all GLP comments raised by GLP Consultants	See comment #105 above. Where topics were raised by multiple sources, this is acknowledged.
107	7.7.3 Input from Engagement	It is difficult to understand how there is only one comment from GLP Protection Committee or GLP. More comments below (as well as others) should be jointly attributed to GLP.	Hydro One should review the record of engagement to ensure the GLP comments are included and properly referenced	See comment #105 above. Where topics were raised by multiple sources, this is acknowledged.
108	7.7.6.2 Spatial Boundaries	Local study area definition – Why are we using Terrestrial study area instead of local study area for limits of work? Is the LSA used for assessing impacts to FN rights, then why is it appropriate to use TSA for limits of work?	Hydro One to confirm	As noted, in Section 11.0 of the draft EA, “for the purposes of the limits of work, this is defined as the terrestrial study area, which includes the Project footprint plus a 1 km buffer. Some refinements are further restricted, such as the 50 m movement noted below. The following project components can be moved up to 50 m within the terrestrial study area assessed as part of this EA, if (1) notification, and where practical advance notice, is provided to affected Indigenous communities, (2) previously identified areas of ecological, cultural and spiritual significance to affected Indigenous communities are avoided to the extent possible, and (3) culturally appropriate mitigation and monitoring measures, developed collaboratively with affected Indigenous communities and outlined in the EPP, are implemented: • ROW and temporary pull sites; • Access roads; and • Water crossings.” The LSA for the assessment of First Nation Rights and Interests in Section 7.7 includes the Project footprint and a 2 km buffer on the transmission line ROW, 1.5 km buffer on the transformer station footprints and a 500 m buffer on access roads, supporting structures and aggregate pits. Using a 1 km buffer as the boundary for the limits of work is intended to allow some flexibility in the physical alignment of the ROW and the terrestrial local study area is used as an area within which ground cover has been characterized. The LSA for the assessment of First Nations Right and Interests is intended to capture local direct and indirect effect of the Project that may extend beyond the Project footprint.

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109	7.7.8.1 Access to Resources and 7.7.8.3 Fish Harvesting	Seine River First Nation Chief had identified a portage crossing that may be impacted.	Hydro One to follow up	The general area of a portage location was shared as an area drawn on map during an Open House. The final EA has been updated to reflect this general area and discussion will continue with GLP advisors regarding how to use this general location as a prompt during further discussion with communities regarding the specific location and any mitigation of concerns.
110	7.7.8.2 Wildlife Harvesting	Have trapline owners impacted by the project footprint been contacted?	Hydro One to confirm	Contact information for trapline license holders is not publicly available. Project notifications have been shared to MNRF to distribute mailed copies to licence holders. If there are trapline operators interested in self-identifying to Hydro One, it becomes possible to contact them directly to discuss the Project.
111	7.7.8.2. Wildlife	There are no Protection Committee comments	PC raised the issue of new corridor interference with the existing wildlife trails which impact hunting and trapping	See comment #105 above. Acknowledgement of the GLP Protection Committee concern related to potential interference with existing wildlife trails that may impact hunting and trapping activities.
112	7.7.8.1 – Access to Resources	“To date, no specific areas of concern within the LSA used for hunting have been shared through engagement or specific IK studies.” This is not true, GLP has expressed concern about the impact to hunting from construction activities (helicopters, equipment, etc.)	Update to EA	This statement was intended to reflect specific areas of concern directly crossed by the Project footprint. When the draft EA was released, individual crossing points of specific or important hunting locations crossed by the Project footprint had not been specifically identified to Hydro One. Since release of the draft EA, additional information and has been made available by communities regarding the nature of use as well as some specific locations of concern and the assessment has been updated. Section 7.7.10.2 of the draft EA, included indication that harvesting of wildlife, fish and plants takes place in portions of the LSA and included assessment of potential for effects to hunting, particularly for activities that overlap primary hunting periods. This assessment has been updated to recognize additional areas of concern shared.
113	Table 7.7-4: Project-Environment Interactions for First Nations Rights, Interests and Use of Land and Resources	Where is the mention of potential impacts from Herbicides/Pesticides?	Please update EA.	Table 7.7-4 presents criteria and indicators. The assessment of indicator, “Availability of harvested resources and quality of experience sense of place in areas of use for traditional purposes” includes assessment of potential effects from herbicides/pesticides. Through engagement during the draft EA process, Hydro One heard feedback from Indigenous communities and stakeholders regarding concerns with the use of herbicides to remove and manage vegetation on the Project. After extensive consideration of this feedback, herbicides will not be used during construction of the Project or for future

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				maintenance of this transmission line. The final EA has been updated to reflect this.
114	7.7.10.1 Changes in the Area (ha) of Unoccupied Crown Land Converted to Occupied Crown Land	"Crown land used for temporary workspaces, camps, and access roads will only be unavailable during the site- specific construction stage, after which they will be reclaimed and become available for use again." This seems to imply that all will be restored, but my understanding is that some access roads may be retained. "the Project will result in a net change to the area 2,071.6 ha of unoccupied Crown land being converted to occupied Crown land during the construction and operation and maintenance stages, which is predicted to impact this use of land and resources for the current and traditional exercise of Indigenous rights and interests.	Mitigation measure should be a commitment to engage with the First Nations on any access roads that will remain. Confirm that the 2,071.6 is the remaining footprint after certain areas are re-claimed after construction	As noted in comment #6, the commitment around which access roads will be left in place to support operations and maintenance will be developed in collaboration with the affected Indigenous communities.
115	7.7.8.4 Plant and Material Harvesting	The traditional plant list provided by FWFN is not included	Include FWFN Traditional Plant list	The final EA has been updated to include the traditional plant list shared by Fort William First Nation, attached to Section 6.4 Vegetation and Wetlands and referenced in Section 7.7. Hydro One is working with those Indigenous Communities who provided Indigenous Knowledge to incorporate this knowledge in a way that respects the confidentiality of the information shared. .
116	7.7.9 Potential Project Environmental Interactions	Disturbance to hunting during construction as well as loss of habitat is not reflected in table 7.7-4	Amend table 7.7-4	The assessment of the indicator, "Availability of harvested resources (considering outcomes of assessments for wildlife, vegetation, fish) for the criteria of Traditional Use of Land and Resources", includes consideration of the potential change in use of habitat from sensory disturbance. This acknowledgement is added in Table 7.7-4 by adding "including sensory disturbance" to this indicator name.
117	7.7.10.1 Changes in area to unoccupied crown land to occupied crown Land	GLP communities are not waiving the Crowns duty to consult on the taking up of unoccupied crown land	The EA must recognize the Crowns duty to consult	This section in the final EA will be updated to acknowledge that "As described in Section 7.7.1.2, the Governments of Canada and Ontario hold the duty to consult Indigenous communities about this Project. The Crown may delegate to a proponent the procedural aspects of consultation, but the ultimate legal responsibility to meet the duty to consult, including regarding the status of crown lands, lies with the Crown."
118	7.7.10.2 Changes in Availability of to Harvesting Resources	The loss of use due to the use of helicopters in not addressed	Timing, seasonality and notifications must be required prior to the use of helicopters during the fall season or in proximity to traplines.	Table 7.7-5 notes Project components and/or activities that may potentially impact changes in the availability of harvesting resources. The operation of vehicles, helicopters and construction equipment are noted as activities that may change the availability of harvested resources. Additional specific acknowledgement of helicopter use is added to 7.7.10.2 Changes in Availability of Harvested Resources. The following mitigation measures relate to communication on timing of activities:

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				• Communications Plan will establish the communications process for both formal and informal communications with Indigenous communities, project stakeholders, and other organizations. • Provide adequate notification of maintenance activities to affected Indigenous communities, landowners, and stakeholders along the Project corridor as required under Project permits, approvals, and agreements, including sharing approximate dates that work may be done in an area prior to commencing work in the area. • Signage will be posted along public roadways in proximity to areas of maintenance activities as appropriate to alert other land users that workers are in the area, such as during hunting seasons or periods of harvests indicated by Indigenous communities. Signs will be placed in engagement with the appropriate authorities. See also comment #15 for further information on helicopter use including commitments to affected Indigenous communities on engagement.
119	Table 7.7-5 Potential Effects and Mitigation Measures to Section 35 Rights	Use of Aggregate Pits does not require advanced Indigenous community notification or consultation	Duty to Consult remains with the Crown on any new aggregate permits.	The final EA will be updated to acknowledge that development of new aggregate resources will undergo the applicable permitting process, including any required engagement.
120	Table 7.7-5 Potential Effects and Mitigation Measures to Section 35 Rights	Decommissioning of Temporary Access Roads do not take into consideration Indigenous Harvesting access.	GLP communities must be consulted prior to the decommissioning of temporary access roads	As noted in comment #6, the commitment around which access roads will be left in place to support operations and maintenance will be developed in collaboration with the affected Indigenous communities.
121	Table 7.7-5 Potential Effects and Mitigation Measures to Section 35 Rights	Operations of Vehicles, Helicopters and Construction Equipment does not identify a reduced use as a potential mitigation measure	Include a reduction of in use of vehicles, helicopters and construction equipment during hunting season,	See comment #15 and #16 as they pertains to helicopter use – the same comments apply to other types of vehicles and equipment. As noted in comment #15 related to helicopter use, it is recognized that any notification process of construction activities during hunting seasons are not intended to mitigate all impacts but rather reduce overall potential impacts. Where priority hunting areas are identified, some flexibility in adjusting activities might be possible. This may include adjusting access paths around sensitive features or altering start and end times during the day for specific areas.
122	7.7.10.2 Changes in the Availability of Harvested Resources	“Notice will be provided to affected Indigenous communities prior to the start of construction. During hunting seasons or periods of harvests, signage will be posted along public roadways in proximity to areas of construction and maintenance activities as appropriate to alert other land users that workers are in the area.”	There should be engagement with the First Nations prior to understand their harvesting timelines, and try to mitigate impacts during those periods	See comment #121. The notification process will be developed in collaboration with affected Indigenous communities and may be part of the Traditional Land and Resource Use Management Plan.

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123	7.7.10.2 Changes in the Availability of Harvested Resources	On page 7.7-41, last paragraph, it states that there is a lack of acceptance of use of chemicals to control vegetation due to “perceived risk of long-term effects”.	Please revise wording to state “potential risk” rather than “perceived risk”.	Hydro One will adjust the phrasing to indicate the risk as “potential” rather than “perceived”.
124	Table 7.7-5	It is stated that HONI will provide notification of construction activities to affected Indigenous communities…including sharing approximate dates that work may be done in an area…”	Affected Indigenous Nations must be involved in decisions regarding dates to avoid sensitive timing windows (including high hunting periods).	See comment #121. The notification process will be developed in collaboration with affected Indigenous communities and may be part of the Traditional Land and Resource Use Management Plan.
125	Section 7.7 – General Comment	It is mentioned several times throughout this section (and the Draft EA overall) that detailed results of Indigenous Knowledge studies or mapping sessions were not fully completed or available to HONI while the document was being drafted. Ideally these would be completed prior to the release of the EA, but we acknowledge the strong effort made to collect and incorporate this information by HONI.	IK collection is ongoing and new information should be incorporated into the EA when possible, acknowledging that the affected Indigenous Nations do want the project to keep moving forward.	Hydro One is working with Indigenous communities who provided Indigenous Knowledge to incorporate this information into the EA in a way that respects the confidentiality of the information and follows OCAP principles. As additional IK becomes available, it will be incorporated into the project at that time.
126	Section 7.7.5, Table 7.7-2	HONI selected the potential change in area of Crown land occupancy as an indicator of change in the use of land and resources for the exercise of rights. We note that Crown land occupancy provides a very cursory indication of areas where First Nations land users exercise their rights, since not all Crown land is: • ecologically suitable (considering the quality and availability of desired wildlife, fishes, plants); • accessible (considering physical barriers or resources required such as gas, off-road vehicles, etc.); or • safe (considering terrain, potential hazards, proximity to other resource developments and risk of contamination). Considering this, the assessment results of this indicator must be interpreted with a coarse grain of salt and in very close conjunction with the assessment results of other indicators.	We recommend that the proponent add this disclaimer to Section 7.7.5, and ensure that sufficient additional analysis on the nuances of access to lands and barriers faced by Indigenous harvesters (on a project-scale, and on a regional scale through the cumulative effects assessment) in order to strengthen Section 7.7.5	Further narrative has been added to the assessment of conversion of unoccupied Crown Land in Sections 7.7 and 7.8 noting the limits on use of Crown land by Indigenous harvesters considering access and suitability (e.g., ecological suitability, safety).
127	Section 7.7.5, Table 7.7-2	A key indicator missing from Table 7.7-2 is the change in the actual and perceived quality of harvesting resources. First, it is possible that accidents and malfunctions, spills, and/or the use of pesticides will introduce contaminants to areas where First Nations harvest wildlife, fish, and plant resources. Even if HONI proposes to minimize the use of herbicides and mitigate accidents/malfunctions/spills, this remains a potential pathway to contaminating First Nations foods and medicines sources that should be assessed [actual impacts] Second, First Nations land users are often strongly averse to harvesting wildlife, fish, and plants/medicines in areas close to resource development projects due to a perceived risk of contamination. In this sense, the presence of resource development footprint/activities alone (even those with contaminant mitigation programs) can lead to avoidance of areas that may have otherwise been used for harvesting consumables. Even if this change is based on risk perception, it is a measurable change in use of the land and its resources due to project development.	To ensure that the potential change in use of land and resources for the exercise of rights is sufficiently comprehensive, we recommend adding a fourth indicator (actual and perceived quality of harvesting resources).	Through engagement during the draft EA process, Hydro One heard feedback from Indigenous communities and stakeholders regarding concerns with the use of herbicides to remove and manage vegetation on the Project. After extensive consideration of this feedback, herbicides will not be used during construction of the Project or for future maintenance of this transmission line. The final EA has been updated to reflect this. In Table 7.7-2 in the final EA, an additional indicator has been added to the criteria of “Use of land and resources for the current and traditional exercise of Indigenous rights” titled “Quality of experience/sense of place in areas of use for traditional purposes, including sensory disturbance through Project-related changes to air quality, acoustics, and visual landscape (aesthetics).” This indicator includes elements of the actual and perceived changes in harvested resources.

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				The assessment of effects included in both the draft and final EA in Section 7.7.10.5 Changes in Quality of Experience/Sense of Place, describes actual and perceived quality of harvesting resources, as well as to cultural practices, which aligns with the inclusion of the indicator in Table 7.7-2.
128	Section 7.7.6.2, Table 7.7-3	Table 7.7-3 shows that the Project footprint for the First Nations Rights, Interests, and Land/Resource Use valued component is 4,295 ha, which is nearly twice as big as the Project footprint for other valued components (e.g., vegetation, wildlife). Similarly, the Section 7.7. LSA (167,516 ha) and RSA (765,183 ha) are also much bigger. It is not clear why much larger study areas are being used for Section 7.7. For example, are specific Project components considered to have a potential effects on the exercise of First Nations rights, but not on wildlife species? We also note that there are important linkages between these Sections in that the results of Section 6.4 and 6.5 are being used as key inputs to Section 7.7 (e.g., change in habitat moose habitat availability is being used to help assess changes to First Nations harvesting). It's not clear how fair comparisons can be made when the study areas for these respective valued components are so significantly different.	Please explain why a much larger study area is being used for Section 7.7., relative to Sections 6.4-6.5, for example. Considering this, please also explain how fair linkages can be made between Section 7.7. and Sections 6.4 and 6.5 despite the difference in spatial boundaries.	The area of the Project footprint for the assessment has been updated to the reflect adjustments to the Project footprint since the draft EA within the final EA. The area of the Project footprint considered in this assessment includes the area of existing roads, roads to be improved and new roads. The Local Study Area (LSA) was defined to align with the air quality LSA to capture potential for sensory disturbance. The Regional Study Area (RSA) was defined based on the study area shared in the Terms of Reference provided to support planning for Indigenous knowledge studies. Section 5.3.1 notes that the role of the RSA is to "measure broader-scale existing environment conditions and provide regional context for the maximum predicted geographic extent of direct and indirect effects from the Project (e.g., changes to downstream water quality, migratory ranges, or changes to the economy, including regional employment and incomes). Cumulative effects from the Project in combination with past, present, and reasonably foreseeable future developments are typically assessed at this larger spatial scale". The area used for the RSA of the First Nations Rights, Interests, and Land/Resource Use assessment is the area within which alternative routes, including the preliminary Project footprint, were identified and was provided as a basis for consideration during initial IK study gap analysis planning and scoping in 2019 and represents a maximum extent considered in IK studies received to date. This area acts as a representation for the potential areas of the traditional territory for communities being engaged that may be affected by Project or cumulative effects. The study areas defined in Sections 6.4 Vegetation and Wetlands or Section 6.5 for Wildlife and Wildlife Habitat are defined to understand the potential project and cumulative effects for the specific criteria assessed. The findings of these assessments act as an input to the understanding of potential for effects to First Nations Rights, Interests, and Land/Resource Use.

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129	Section 7.7.8.1 (p. 7.7-26)	Section 7.7.8.1 (and Section 7.1) provides a list of publicly documented trails (Ontario Trail Network data), including snowmobile, ski, bike, and resource user trails, that transect the Project footprint. Were these features scoped into the linear density analysis completed for Section 7.5? While wildlife species tend to avoid primary roads (e.g., highways) by greater distances secondary or tertiary roads (with lower traffic volumes, used primarily for off-road vehicles and foot traffic) can also have negative effects on wildlife species.	Please clarify whether Ontario Trail Network data was scoped into the linear density analysis for Section 7.5. If it was not, please re-run the linear density analysis and revise results interpretation to include these features.	Ontario Trail Network data were used as an input into Section 7.5 of the final EA.
130	Section 7.7.10.6, Table 7.7-5	Table 7.7-5 lists measures that the proponent will take to mitigate the change in availability of harvested resources due to the Project. However, there is no mention of providing the GLP member Nations with an opportunity to conduct pre-clearing harvests for food plants, medicines, and materials. While this will not fully mitigate the permanent loss of habitat for these species, it will ensure plant materials that are otherwise useable do not go to waste.	Please commit to providing the GLP member Nations with an opportunity to conduct pre-clearing harvests for food plants, medicines, and plant materials. Note that since the GLP member Nations make use of many different plants and medicines, which are available for harvest at different times of the year. Thus, there should be multiple pre-clearing harvests taking place over various periods of the year. A schedule, list of target species, and key locations should be discussed between the GLP member Nations and the proponent sufficiently in advance to allow a multi-season harvest.	Opportunities to conduct pre-clearing harvests, and the process and procedures for them, will be included in the Traditional Land and Resource Use Management Plan which will be developed collaboratively with affected First Nation communities.
131	Table 8.0-1: Summary of Net Effects Assessment	The summary of net effects assessment table does not include a summary of effects from blasting on fish and fish habitat.	The table should be updated to include a summary of net effects from blasting on fish and fish habitat.	The assessment of effects in Section 6.6 identifies a number of mitigation measures including compliance with permit conditions and best practices related to blasting to limit potential for effects to fish and fish habitat as a result of blasting during construction. For example, blasting will occur on land and will follow the recommended setback distances to fish-bearing waterbodies No net effects are identified considering the effective implementation of mitigation measures, and accordingly not included in Section 8.0.
132	Section 10.1 - Indigenous and Stakeholder Engagement	HONI has stated they are committed to providing clear, ongoing, and timely information as it relates to Project activities throughout all stages of the Project. They have stated that they will employ Indigenous Environmental Monitors and/or Guardians and will collaborate with communities in implementing monitoring of Project-related effects and compliance monitoring throughout all Project stages. Although these commitments are acknowledged, they appear to suggest that information will flow to the community rather than communities having a meaningful part of the design and implementation of environmental monitoring.	GLP remain interested and motivated in working collaboratively to develop a standalone independent indigenous-led environmental monitoring program. Further, this commitment to fund and support an independent indigenous environmental monitoring program should be explicitly described at various points in the EA when discussing personnel involved in monitoring.	As Section 10.1 notes, Hydro One remains committed to employing Indigenous Environmental Monitors and/or Guardians and will collaborate with communities to implement the monitoring of Project-related effects and compliance monitoring throughout all Project stages. This commitment is noted in throughout the EA including in Section 10.1, Section 7.7.13, Section 7.5.11. Section 7.3.11 notes that as part of the construction workforce accommodation management plan, a monitoring program is proposed, to track various metrics including the number of

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		In addition, this brief mention of a commitment to employing indigenous EM's is not carried through to following sections when describing who will be part of various monitoring components.		Indigenous peoples trained and hired. Section 7.3.11 also indicates the Indigenous Participation Plan will track various performance measures related to community member training and employment. Section 7.7.4 indicates knowledge shared by Indigenous field monitors informed the baseline data for the EA.
133	Section 10.2 - Environmental Protection Planning	HONI states that an EPP will be developed for the Project, and will describe the industry standards, best management practices (BMPs), and site-specific mitigation for environmental protection that will be implemented during the construction of the Project and will integrate the results and recommendations of the Draft EA Report to be implemented during Project construction.	A draft EPP would have been helpful to include as an appendix to the Draft EA to allow input. Regardless, GLP remains interested in reviewing and providing input to the EPP when available. The EPP should be developed and approved by the First Nations before construction begins.	Comment noted. The EPP will be provided to affected Indigenous communities for review and input at least 90 days in advance of construction.
134	Section 10.2.2 – Contingency Plans, Management Plans and Construction Execution Plans	Numerous plans are listed in the EA.	GLP will need to review each plan and provide comment.	These plans will be included as part of the EPP that will be provided to affected Indigenous communities for review and input at least 90 days in advance of construction.
135	Section 10.2.3 - Environmental Inspection and Monitoring	HONI states they will employ the services of an Environmental Inspector(s) during construction of the Project to assist with monitoring. In addition, HONI states that a Qualified Person (QP) may also be retained in specific circumstances where additional guidance, direction or supervision is required to complete a Project activity or address a concern.	GLP are interested in ensuring that the Environmental Inspectors are comprised of independent third parties to eliminate any real or perceived conflicts related to how environmental mitigations and monitoring activities are implemented or reported on. Please provide further clarification on how the authority of EI's will remain independent from the Proponent.	Comment noted. The EPP will be provided to affected Indigenous communities for review and input at least 90 days in advance of construction. Additional information can be provided in the final EA related to commitments for Indigenous monitors.
136	Section 10.2.4 - Orientation and Training -	When discussing monitoring orientation and training, HONI states that they will provide project-specific training to relevant Project personnel including Environmental Inspectors, contractor managers and contractor supervisors. There is no explicit commitment of providing orientation and training to indigenous monitors.	The Draft EA should include a clear commitment to include indigenous monitors in all project-specific orientation and training related to environmental monitoring.	The final EA will be updated and an Indigenous Monitoring Plan will be developed in collaboration with affected First Nation communities.
137	Section 10.3	List of commitments are to be summarized in Appendix 10.0-A	GLP will review when made available.	This will be included in the final EA.
138	Section 10.5 - Information Management and Reporting	The Draft EA states that results of monitoring programs will be reported and submitted to the MECP or to the relevant regulatory agency as required. HONI will also complete a self-assessment to document compliance with the commitments made in the amended EA Report, including implementation of mitigation measures and conditions of approval. The compliance self-assessment will be completed both during and after the construction stage. The results	GLP would like to see specific direction in the EA to ensure First Nations are provided the results of all monitoring programs, including during and after construction, as well as the monitoring self-assessments.	This process will be developed in collaboration with affected First Nation communities as part of the Indigenous Monitoring Plan.

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		of all monitoring activities, including the self -assessments should also be provided to the First Nations communities.		
139	Table 10.6-1: Construction Monitoring Program - Surface Water Monitoring Program	The Draft EA states that surface water monitoring will be conducted during instream construction (e.g., installation and removal of culverts) or active water taking and discharge, but that the specific monitoring locations will be determined during the permitting and design stages of the Project and it is expected that waterbodies of varying size (small, medium, large) would be captured, allowing performance/effectiveness of mitigation measures to be evaluated at a range of scales. This statement appears to suggest that monitoring may not be carried out during all in-stream activities across all watercourses, but rather a subset of small, medium and large watercourses.	Please clarify in this section of the Draft EA that surface water monitoring will occur during all in-water activities across all waterbody types.	The final EA will be updated with details indicating that monitoring will occur during installation and removal of watercourse crossings for all instream construction activities. This will include monitoring surface water conditions and employing additional mitigation measures as appropriate.
140	Table 10.6-1: Construction Monitoring Program - Surface Water Monitoring Program	Generally, the parameters proposed to be monitored during surface water monitoring are reasonable, however more detail is needed on the timing, frequency and methods. Further, there is no mention of what constitutes elevated TSS, or what response will be carried out if TSS or turbidity exceeds acceptable levels for fish present.	GLP are expecting these details to be included in the forthcoming EPP, but it would be beneficial to include them in the Draft EA as well. There should be explicit details on timing, frequency and methods, including how turbidity exceedances will be defined, identified and responded to. Considering the importance of fish and fish habitat, particularly at sensitive watercourses, a stand-alone Water Quality Monitoring (WQM) Plan should be developed for the project that outlines the protocols involved in monitoring in-water work to ensure that fish and fish habitat are adequately protected. The WQM plan should include detailed procedures for monitoring turbidity in the water courses (i.e. identifying turbidity exceedances) as well as to monitor for fish impacts from accidents/malfunctions while construction is carried out in streams.	Section 10.0 includes the proposed monitoring framework for the Project. Additional details will be included as part of the EPP that will be provided to affected Indigenous communities for review and input at least 90 days in advance of construction.

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141	Table 10.6-1: Construction Monitoring Program -	Regarding the installation of temporary culverts, HONI states that monitoring will be conducted in the spring following installation and will continue annually in the spring until the structure is removed. This statement appears to suggest that monitoring at temporary culverts will only occur after their installation rather than during. Further, regarding culvert installation more generally, it's unclear if culverts will be installed in the "dry" by creating diversions of flow, or if they will be installed during flowing conditions, which can be significantly more detrimental to sensitive fish habitat, both at the crossing and to downstream habitats.	Please clarify if the intention is to only monitor temporary culvert installation after installation, instead of during. GLP would like to see monitoring occurring during all in-water activities, particularly during important culvert installation which can alter and disturb downstream habitat if not installed appropriately, regardless of whether they are permanent or temporary structures. Further, more detail should be included on how all culverts will be installed (i.e. in dry conditions using diversions, or in-water during flowing conditions) and how their effectiveness at maintaining natural flow conditions will be determined during installation.	Monitoring will occur during installation works and be ongoing for the duration of the project until the culvert is removed as part of reclamation activities. Additional language has been added to Section 6.6.12 Monitoring within the Fish and Fish Habitat assessment. Culvert installations will occur in dry conditions where risk to negatively impact fish or fish habitat has been identified (within Section 6.6.7). Stream measurements and flow calculations in accordance with MNRF requirements will be made prior to installation of crossing structures to ensure adequate sizing is completed to maintain natural flow conditions. Additional language has been added to Section 6.6.7.
142	Table 10.6-1: Construction Monitoring Program – Fish and Fish Habitat	When monitoring effectiveness of design features and mitigation measures related to waterbody crossings, HONI states they will use site-specific adaptive management that may include additional erosion and sediment control measures (e.g., additional seeding/re-vegetation or the implementation of other channel stabilization measures) when necessary. If adaptive management is required, engagement with MNRF and DFO will occur prior to any instream construction activities, where appropriate (e.g., placement of additional fill, re-grading and/or stabilization of bed or banks).	The First Nations should also be included any notifications or reporting related to changes or adaptive management of environmental mitigation measures.	This process will be developed in collaboration with affected First Nation communities as part of the Indigenous Monitoring Plan.
143	Table 10.6-1: Construction Monitoring Program – Fish and Fish Habitat	There is no specific mention of adaptive management or responses related to the potential need for fish salvages in the event fish become stranded or distressed due to improper water crossing construction or other in-water activities.	The Draft EA and EPP need to have response measures and protocols in place for fish salvages and minimizing fish stress and mortality. GLP are interested in reviewing these specific protocols in the EPP when available.	Comment noted. These protocols will be included as part of the EPP that will be provided to affected Indigenous communities for review and input at least 90 days in advance of construction.
144	11.3.1.2 Proposed Limits of Work	If helicopter pads are to be moved along the ROW, notification, and where practical, advance notification will be provided to affected Indigenous communities.	GLP want a firm commitment that advance notification will be provided.	This can be further developed in collaboration with GLP as part of the Traditional Land and Resource Use Management Plan.
145	11.3.1.2 Proposed Limits of Work	Aggregate sites may be located and if this occurs, HONI states that Indigenous community consultation requirements will be completed.	Please confirm what the exact consultation requirements are.	Hydro One and its contractor commit to engaging with the GLP on any new aggregate pits or relocation of aggregate pits already identified in the Project footprint in advance of making these changes.

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146	11.3.1.3 Notice Commitments	Hydro One will provide notification to Indigenous communities as described in Section 11.3.1.3.	See comment below on who receives the notice. Advance notice should be at least 7 days in advance of the work	Hydro One expects a 7-day notice will be possible for most situations, but there may be instances where a relatively small change does not warrant the full 7 day notice (e.g., site specific changes related to beaver dam in work area). Notification procedures will be further discussed with GLP and outlined in the Indigenous Monitoring Plan.
147	11.3.1.3 Notice Commitments	Indigenous monitors representing Indigenous communities will be notified of design refinements falling within the limits of work. For design changes requiring agency approval, Indigenous monitors will be engaged to confirm if any concerns exist that warrant discussion before proceeding with the change.	Notice should be through each community's identified community contact.	Notification procedures, including the appropriate community contacts, will be further discussed and confirmed with GLP and outlined in Indigenous Monitoring Plan.

Table 2: Grand Council Treaty #3 - Territorial Planning Unit (TPU) – July 6th, 2023

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1	Sections 7.7.1.2.1ff, and elsewhere	In addition to the eleven formally engaged First Nations, the EA needs to recognize the Treaty and Inherent Rights of all Treaty #3 First Nation members in the project area and the Anishinaabe Nation in Treaty #3. Throughout the EA, whenever rights, benefits, impacts, opportunities etc. of individual First Nations are recognized, the same attention needs to be paid to the Anishinaabe Nation in Treaty #3 as a whole to recognize the territory as shared. We regret that our comments on the Terms of Reference for the EA in this regard have not sufficiently been incorporated.	N/A	Hydro One's engagement with Indigenous communities on the Project is guided by consultation planning developed in response to the Memorandum of Understanding (MOU) between the Crown (represented by Ministry of Energy) and Hydro One dated September 8, 2016, and updated in January 2022. The MOU formalizes the procedural aspects of consultation, roles and responsibilities of the Crown and Hydro One, including communication and coordination mechanisms. Updates in January 2022 resulted in response to a request in October 2021 by the Ministry of Energy that Hydro One contact all communities on the Project consultation list to provide them with an opportunity to review and discuss potential amendments to the Waasigan Transmission Line Consultation Plan made pursuant to the 2016 MOU. In an October 25, 2018 letter to Hydro One and subsequent amendment letter dated April 15, 2020, the Ministry of Energy delegated the procedural aspects of consultation to Hydro One. In this letter, and reflected in the subsequent consultation plan, the Ministry of Energy determined Hydro One's proposed Waasigan Transmission Line may have the potential to affect First Nation and Métis communities who hold or claim protected Aboriginal or treaty rights. The Crown listed communities to be consulted on the basis they have or may have constitutionally protected Aboriginal or treaty rights that may be adversely affected by the Project, including the following First Nations within the Treaty #3 area: Migisi Sahgaigan (Eagle Lake First Nation), Wabigoon Lake First Nation, Nigigoonsiminikaaning First Nation, Ojibway Nation of the Saugeen, Lac La Croix First Nation, Lac Seul First Nation, Seine River First Nation, Mitaanjigamiing First Nation and Couchiching First Nation, as well as Métis communities. The Ministry of Energy recommended that Hydro One copy Grand Council Treaty #3 on correspondence. Hydro One continues to engage with communities identified by the Crown, as well as the Gwayakocchigewin Limited Partnership (GLP) which includes seven member communities who are Treaty #3 First Nations identified by the Crown, and will continue to notify Grand Council Treaty #3 throughout the EA process. The consultation plan states that Hydro One recognizes that potential impacts on Indigenous communities with traditional

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				territories intersected by the Project may be greater than impacts on other communities. Capacity funding has been provided to Grand Council Treaty #3 to support their engagement, communication and participation throughout the EA, including outreach to Treaty #3 Nations as well as sitting at the GLP Protection Committee table.
2	Sections 7.7., 4.5	The TPU appreciates that HONI recognizes traplines in the project area and informed trapline holders about the project. Given their knowledge of and interest in the land affected by Waasigan TL, we expect all trapline holders within the LSA to be engaged and consulted and that their rights be explicitly stated in the EA.	N/A	Contact information for trapline license holders is not publicly available. Project notifications have been shared to MNRF to distribute mailed copies to license holders. If there are trapline operators interested in self-identifying to Hydro One, it becomes possible to contact them directly to discuss the Project.
3	Section 7.7	Since not all Treaty #3 First Nation members participated in the EA (nor wish to, or have access to) the TPU advises that all land in the Treaty #3 Territory must be assumed to be land of the Anishinaabe Nation in Treaty #3 and in the spirit of treaty partnership requires authorization for a project to move forward.	N/A	Hydro One will continue to engage with First Nation communities, GLP and notify the TPU as identified in Comment #1 throughout the EA and through permitting activities, aligned with the MOU and the Consultation Plan. Hydro One continues to seek guidance from its First Nation project partners regarding Indigenous rights and authorizations.
4	Section 1.7	The TPU requests that the consent of any First Nation rights holders and impacted communities will be added to the list of regulatory approvals and authorizations.	N/A	See Comment #3.
5	Section 7.5.5.2.6.3	The Anishinaabe Nation in Treaty #3 does not recognize distinct Métis communities within Treaty #3 Territory. The Halfbreed Adhesion to Treaty #3 refers to citizens of the Anishinaabe Nation in Treaty #3 who lived as Indians with Indians in the Rainy River district and are recognized by Indian status currently.	N/A	Comment noted
6	Section 7.8	As a result of comment 5, Grand Council Treaty #3 rejects all claims to collective Métis rights within Treaty #3 territory, including those that have let Hydro One to engage with groups of self-proclaimed Métis as special rights holders. Their over-involvement erodes Treaty Rights. For more information, refer to the following press releases by Grand Council Treaty #3. 2023, May 3, Grand Council Treaty #3 Rejects Métis Claim as Treaty Participant, Opposes Proposed MNO Self-Government Legislation 2023, June 19, Grand Council Treaty #3 Rejects Métis Claim as Treaty Participant, Opposes Proposed MNO Self-Government Legislation	N/A	Comment noted

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7	N/A	The TPU requests greater recognition of Manito Aki Inaakonigewin and Treaty #3 laws and protocols throughout the EA. Following Manito Aki Inakonigaawin, we are concerned that features of the land in the project area (such as rocks, animals, plants, the land itself, and bodies of water) are represented as inanimate, rather than beings with spirits. We request that all creation are consulted through Ceremony and that impacts on them as individual, spirited beings are considered in the EA. For more information on how Manito Aki Inaakonigewin may be implemented in development projects, refer to the Manito Aki Inaakonigewin Toolkit published by Grand Council Treaty #3.	N/A	Section 5.1 of the EA Report outlines examples of cultural training and teachings shared by Indigenous communities that have influenced the content of this report and the EA process for the Project, including a session attended by project team members on the Manito Aki Inakonigaawin Toolkit. Section 7.7.1.2.1 of the EA Report indicates Manito Aki Inakonigaawin requires those who may affect the environment of Treaty #3 territory or the exercise of rights and interests of the Anishinaabe, to consult with the Nation (Grand Council Treaty #3 2022). As noted in Comment #1 Hydro One is actively engaging with Indigenous communities and working with Indigenous communities to incorporate Indigenous Knowledge into the EA and development of plans for actions and monitoring leading into construction, during construction and into the Operations Phase of the Project.
8	N/A	The TPU assumes that proper protocol will be rendered throughout the construction phase as mandated by Manito Aki Inaakonigewin and Treaty #3 Community protocols and as requested by the identified Treaty #3 rights holders. Through Manito Aki Inaakonigewin, Ceremony is a critical aspect of the permitting process and must be sufficiently resourced by HONI.	N/A	See Comment #7 Hydro One is supporting proximate Treaty #3 communities to conduct their ceremonies throughout construction of the project. The proper protocols have also been requested and provided to Hydro One and its contractors by Treaty #3 communities to ensure the appropriate community protocols are identified and followed.
9	Section 7.5	The TPU requests that the EA and the Archaeological Resources Contingency Plan recognize Anishinaabe ownership over archeological resources from Treaty #3 ancestors and commits to the repatriation of artifacts and human remains as directed by Treaty #3 First Nations.	N/A	Section 7.5 of the EA Report documents that archaeological assessment will be undertaken by a licensed consultant archaeologist, following the recommended measures in the Standards and Guidelines for Consultant Archaeologists (MTCS 2011). Avoidance and protection of archaeological resource sites is the preferred approach per the Standards and Guidelines for Consultant Archaeologists (MTCS 2011). Hydro One is committed to ensuring that all Indigenous communities have access to the cultural heritage and archaeological work that is completed along the transmission line. This includes working with interested parties to ensure that culturally appropriate items are repatriated accordingly. The assessment notes that "*In the event that archaeological resources not previously identified are suspected or encountered unexpectedly during construction, implement the following mitigation measures:* • *Suspend activity at that location and do not allow work to resume until permission is granted by Hydro One who will engage Indigenous communities and their elders to obtain direction.*

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				• *Following engagement with the affected Indigenous communities and their elders, Hydro One will bring in a licenced archaeologist and contact the MCM.* • *The licenced archaeologist will develop an appropriate mitigation measures plan including engagement with Hydro One, affected Indigenous communities, their elders and stakeholders, and if necessary, the appropriate regulatory agencies."*
10	Section 7.5., executive summary)	The TPU recognizes HONIs commitment to engage First Nations in Waasigan's archeological program. We are satisfied with your response to our comment #9 on the Terms of Reference that "Hydro One will include Indigenous communities and IK in any archaeological assessments to be completed for the Project and recognizes the importance of providing these opportunities." and that "Funding to support the hiring of consultants will be provided through the Phase 2 Capacity Funding Agreements.". To give us greater confidence that HONI will follow through with these commitments, the TPU requests to include these statements in the EA.	N/A	Mitigations measures in Section 7.5 of the EA Report include that "*The Stage 2 Archaeological Assessment (and Stage 3 and 4, if required) should be undertaken as soon as possible in the Detailed Planning Phase, prior to construction.* • *Further archaeological work will involve Indigenous community members interested in and/or knowledgeable about the area.* • *Training of the Indigenous community members about archaeological fieldwork methods, as well as general theory, will be built into the Project scope. Training of local Indigenous community members will build capacity for future archaeological projects within and outside their traditional territories."*
11	Section 10.5	The TPU requests that the public will have freedom of information access to the information collected during the Waasigan monitoring program, except for Traditional Knowledge not cleared by the respective Treaty #3 communities for sharing. Additionally, data sharing agreements should be in place to share information to all Treaty #3 communities and GCT3.	N/A	Section 10.0 of the Draft EA reports that "*Hydro One commits to sharing the list of EA commitments defined for the Project and the associated monitoring framework (Sections 10.3 and 10.4) with Indigenous communities. The purpose of sharing and engaging on these proposed plans and commitments will be to provide communities with the opportunity to comment on and participate in the development of the monitoring and follow-up programs and plans*." These comments on access to the monitoring outcomes will be recorded for consideration during development of ongoing monitoring plans.
12	Section 10.5	In addition to the general freedom of information access to monitoring data, First Nation communities must have ownership, control, access, and possession (OCAP) over all data collected from their respective communities.	N/A	Hydro One acknowledges the importance of OCAP principles and respects the confidentiality of the information shared by Indigenous communities. Hydro One is committed to upholding OCAP principles regarding information shared by Indigenous communities to inform the EA.
13	N/A	The EA draft frequently states that some measures are "limited to the extend practicable". Who defines what is "practicable" and how is "practicability" assessed by third parties including First Nation rights holders? The TPU requests that Treaty #3 Communities potentially affected by any deviations from pre-defined measures be notified, and that they be consulted on any deviations that may substantially affect their interests.	N/A	The degree to which mitigations are considered practicable (i.e., able to be done or put into practice successfully) will ultimately be determined by the contractor in compliance with the plans to be developed in support of the EA. As discussed in Comment #11, development of plans will include review and comment by Indigenous communities and monitoring can include participation by communities.

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14	N/A	The TPU requests that net effects considered "not significant" in the EA will still be diligently monitored to ensure they are in fact not significant to the environment and affected people. Furthermore, we second GLP's comment that the significance of effects on Aboriginal and Treaty Rights can only be assessed by the specific communities bearing the effect.	N/A	The Final EA has been updated to acknowledge the relationship between the Crown and Indigenous community perspectives in relation to significance of an effect on Aboriginal and Treaty Rights. Additional qualification around characterization of effects and the potential significance of Project activities has been added to Sections 7.7 and 7.8.
15	Section 10.0., Appendix 10.0	The TPU requests full disclosure of all Environmental Commitments that Hydro One will be making in relation to the Environmental Assessment as they are developed.	N/A	See Comment #11.
16	Section 11.3.1.3	The TPU requests that the Change Management System will include a dated inventory of changes to the approved EA. This will allow Treaty #3 communities, ministries, and the public to easily review the latest changes without being distracted by previous changes.	N/A	Section 11.3.3 of the EA Report outlines the process for Change Management and notes that "*changes identified will follow an internal process for tracking (documentation) and assessment".* In the event refinements are required, the time period within which the change was proposed and rationale for the change will be communicated aligned with the notification process outlined in Section 11.3.1.3.
17	Section 10.3	The TPU requests that all Environmental Commitments and proposed deviations from previously made Environmental Commitments will be shared with the TPU and engaged First Nations.	N/A	See Comment #11. Hydro One will abide by the commitments made in the EA. Deviations from these commitments would be in contravention to the EA approval unless an EA amendment is sought, which would involve Indigenous communities engagement.
18	Section 6.4	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 as vegetation (blueberries, medicines, etc.) which are a vital aspect of Treaty #3 culture.	N/A	Through engagement during the draft EA process, we heard feedback from Indigenous communities and stakeholders regarding concerns with the use of herbicides to remove and manage vegetation on the Project. After extensive consideration of this feedback, herbicides will not be used during construction of the Project or for future maintenance of this transmission line. The final EA has been updated to reflect this.
19	Sections 6.4ff	The TPU requests that special care 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). In particular, we are concerned about the removal of 4 hectares of Black Ash habitat. Have permissions be granted to remove this endangered species habitat?	N/A	Considerations for Project approvals and potential permits under Ontario's *Endangered Species Act* (ESA) and the federal *Species At Risk Act* (SARA) are underway. Additional work to define Project-specific and site-specific impacts to SAR and SAR habitat will be completed in advance of construction. Hydro One will obtain any required permits and approvals for impacts to SAR and SAR habitat that cannot be avoided which will include details on specific mitigation to minimize impacts as well as impact offsetting or compensation measures for each SAR, as required by the applicable legislation.

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20	Section 9	The TPU requests that the cumulative impacts of Waasigan TL and "lands taken up" by other development on Aboriginal and Treaty Rights under Section 35 of the Constitution Act, 1982 be considered. This request comes in the light of the Yahey v British Columbia decision by the B.C. Supreme Court that found that the cumulative impacts of multiple developments can infringe on a First Nation's ability to exercise their treaty rights.	N/A	Within Section 7.7 of the Final EA, the cumulative effects discussion has been updated to further acknowledge the changes to the regional landscape over time, reflecting past and current non-project land disturbances including through climate change, linear disturbances (roads, trails, railway, pipelines, etc.), mining claims and active exploration areas, areas affected by wildfire, parks and protected areas and others. Within this discussion it is acknowledged that cumulative change within the region can result in variation in impact by community. The net effects as a result of the Project related to change in the practices of rights and interests by Indigenous communities are now presented within this regional context, in additional to the assessment of specific potential cumulative effects of reasonably foreseeable projects that overlap in time, space and effect. Quantitative information is integrated to support elements of the assessments.
21	Section 10	Although the TPU endorses the compensation of unavoidable damages, the EA must not give the impression that compensation measures mitigate or alleviate the harm done to all of Creation.	N/A	Comment noted.
22	Section 22	The TPU requests that the Traffic Access Management Plan defines safety protocols to ensure that Treaty #3 right holders have safe access to construction areas when requested, and that they will be allowed to pass construction areas when these cannot be reasonably circumvented.	N/A	Passage across the right-of-way during construction will be permitted; however in order to ensure the safety of land users and construction personnel, there may be periods of restricted access along the ROW at specific locations where active construction is occurring. Field personnel will help individuals requiring access through the work area to be escorted safely as appropriate.
23	N/A	The TPU welcomes the training opportunity provided and committed to for First Nations formally involved with Waasigan. Given the rights of all Treaty #3 communities across the territory, including the Local and Regional Study Areas of the transmission Line, we like to see that these training opportunities will be extended and actively advertised to all Treaty #3.	N/A	[Chi Mino Ozhitoowin has been engaged to identify and provide training opportunities to interested Treaty #3 community members]
24	Section 10.2.4	The TPU recommends cultural awareness training integrated in the worker orientation and training program. This would help workers understand the need to respect Treaty #3 protocols as part of the construction process and provide an opportunity for mutual learning and reconciliation.	N/A	See Comment #23.
25	N/A	Should Hydro One not be granted the approvals to proceed after completing the Environmental Assessment, and a ‘Plan B’ be required to execute this Project, the TPU requests that potentially affected communities be involved in the planning of a ‘Plan B’ in the very early stages of discussion.	N/A	Comment noted.

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26	N/A	The TPU encourages HONI to reconsider its use of the term "wilderness" to describe Anishinaabe cultural landscapes (which comprise the entire project area). The term "wilderness" may be offensive to some as it erases the sophisticated ways Treaty #3 ancestors have interacted with the environment since time immemorial.	N/A	Hydro One acknowledges the request to reconsider the use of the term “wilderness” and has made adjustments to the language in Section 7.7 of the Final EA.
27	N/A	The TPU requests that all Contingency Plans, Management Plans, and Construction Execution Plans listed under 10.2.2 and the Environmental Protection Plan will be shared with the TPU, First Nations, and the general public for review and that an appropriate time for review will be provided before any plan can be implemented.	N/A	Section 7.7 notes that “*Hydro One commits to sharing the list of EA commitments defined for the Project and the associated monitoring framework (Sections 10.3 and 10.4) with Indigenous communities. The purpose of sharing and engaging on these proposed plans and commitments will be to provide communities with the opportunity to comment on and participate in the development of the monitoring and follow-up programs and plans*.” Engagement will be guided by the Indigenous Consultation Plan.

Table 3: Métis Nation of Ontario, Lands, Resources and Consultations – August 3, 2023

#	Document, Section and Page Number	Details	Comment	Hydro One Response
1.	Executive Summary, Page ES-1 (PDF Page 4)	"While Hydro One is identified as the proponent for the Project, Hydro One is working in partnership with nine First Nations that will have the opportunity to invest in 50 per cent of the Waasigan Transmission Line Project; eight of those communities make up the Gwayakocchigewin Limited Partnership (GLP) – Migisi Sahgaigan, Fort William First Nation, Lac La Croix First Nation, Lac Seul First Nation, Nigigoonsiminikaaning First Nation, Ojibway Nation of Saugeen, Seine River First Nation and Wabigoon Lake Ojibway Nation – and Lac des Mille Lacs First Nation."	It is assumed that the offered investment opportunity to the noted nine First Nation communities is deemed an accommodation measure by Hydro One. As there is no hierarchy of rights within the *Constitution Act, 1982*. The tiering of Indigenous groups with some (First Nations) emphasized and others (Métis) minimized is inappropriate. Particularly, as the NWOMC and Region 2 have established rights in proximity to the Project. Further, within the NWOMC and Region 2 Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project it was found that there would be impacts to the NWOMC and Region 2; mitigation and accommodation are owed in this case as well. Direct and proportional accommodation measures must be discussed with the NWOMC and Region 2.	The Hydro One First Nation equity model is not an accommodation measure for unmitigated impacts as assessed under the environmental assessment. It is a new corporate partnership model that is being applied to large-scale transmission infrastructure projects across Ontario by Hydro One. As such, the First Nation partnership does not diminish any of the rights of the NWOMC nor of Region 2, nor the duty of the Crown to consult with NWOMC and Region 2 regarding the Waasigan Transmission Line Project. Hydro One has provided capacity funding over several years for the NWOMC and Region 2 to engage with Hydro One and participate meaningfully in the project's development. We are committed to continued engagement with the NWOMC and Region 2 to continue to understand interests and discuss potential mitigation or accommodation measures.
2.	Executive Summary, Page ES-20, (PDF Page 23)	"While Hydro One always strives to avoid and minimize potential effects to the natural and socio-economic environments, and restore areas that are affected by the Project, Hydro One acknowledges that there may be adverse effects that cannot be avoided, or that occur even when appropriate mitigation and restoration measures are employed. Natural environment examples include the long- term transition of incompatible vegetation, such as forest communities to compatible vegetation communities including meadows or shrub thickets. Because these net effects cannot be further avoided or mitigated, they are typically compensated for by undertaking positive environmental activities."	Please provide further details on what positive environmental activities are and how the NWOMC and Region 2 can be involved, subject to capacity and availability.	Hydro One has committed to undertaking a biodiversity initiative specific to this project to offset habitat loss or transition (long-term change) that may occur as a result of the Project. The scope of the biodiversity initiative is expected to be determined post-EA completion; however, typically such initiatives involve the funding of third-party opportunities or projects, such as wetland and wildlife habitat creation and enhancement, aquatic habitat restoration and enhancement activities, or invasive species inventory or removal, among others. Following completion of the EA process, Hydro One will engage with Indigenous communities, local communities and interested parties to discuss the implementation of the biodiversity initiative for the Project.
3.	1.0 Introduction, Figure 1.1-1, Page 1.1-4 (PDF Page 8)	Figure	This figure only displays "preferred route transmission line". In a notice regarding the Preliminary Preferred Route provided by Hydro One to the NWOMC and Region 2 on November 25, 2022 Hydro	The alternative route evaluation process, which was completed in accordance with the approved Terms of Reference (ToR), took into account information provided by NWOMC and Region 2. The ToR set out the draft criteria and indicators to be used in the route evaluation process. Preliminary criteria and

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			One indicated that there are “many more opportunities… to influence the final Project footprint” and that “[w]hat is being proposed can change if there are specific areas of interest and/or concern, and as more Indigenous Knowledge and land use information is shared”. The NWOMC and Region 2 require confirmation that the feedback provided to Hydro One is no longer being considered and that this route option is finalized. This must be provided in writing with specific reference to the NWOMC and Region 2 previous comments related to the route options.	indicators based on those proposed in the TOR (Appendix C) were provided to MNO and their advisors on September 1, 2022. Revised criteria were shared with MNO on October 13, 2022, integrating available data representative of key areas of input/value shared by Indigenous Communities, where community shared input/Indigenous Knowledge studies were not yet available. These indicators were influenced by net effects assessment criteria shared by NWOMC and Region 2 input during the TOR stage and included: Area (ha) of Crown land crossed by the alternative route preliminary footprint, Length (km) of alternative route preliminary footprint located parallel to existing linear infrastructure, Area (ha) of Significant Wildlife Habitat that could provide habitat for some species of harvested plants or wildlife species, Area (ha) of the alternative route preliminary footprint with archaeological potential, and distance to closest Indigenous Reserve. No comments were received on the criteria through MNO or their advisors. Section 2.2.1.3 confirms the Indigenous culture, values, and land use included in the evaluation methodology. Recognition that elements of Indigenous community concerns related to routing, such as alignment with existing linear features, minimizing crossing of natural areas and minimizing overlap with water crossings are included in the list of routing principles in Section 2.2.1.2.1 of the Final EA. Appendix 2.0-A also includes details of the alternative route evaluation process and outcomes. In the Final EA, Hydro One will include additional detail about the consideration of concerns expressed by NWOMC and Region 2. Hydro One has provided capacity funding over several years for the NWOMC and Region 2 to engage with Hydro One and participate meaningfully in the project’s development. While the preferred route has been identified, Hydro One commits to engaging with the NWOMC and Region 2 on potential refinements to the Project footprint and incorporation of site-specific mitigation in order to avoid or minimize impacts to NWOMC

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				and Region 2. These refinements can continue to be made post-EA under the limits of work set out in the EA.
4.	1.0 Introduction, 1.7.2.2 Other Federal Approvals, Page 1.7-19 and 1.7-20 (PDF Pages 23 and 24)	"Based on current information, other permits, approvals, and/or authorizations under federal legislation may be required (Table 1.7-2). Similar to other provincial approvals that may be required, this list is subject to change as design is refined and new information is received and considered." AND "Authorization may be required for construction activities if the activity is determined to cause death of fish and/or the harmful alteration, disruption, and/or destruction (HADD) to fish habitat. This applies to work being conducted in or near waterbodies that directly or indirectly support fish."	The NWOMC and Region 2 have rights and interests related to fish and fish habitat which were referenced within the NWOMC and Region 2 Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project. This includes specific harvesting of bass, northern pike/jackfish, pickerel/walleye, trout and crappie within the Local Study Area. In the event of harmful alteration, disruption, and/or destruction (HADD) to fish habitat, NWOMC and Region 2 require additional engagement. Further, where there is a requirement for a fish and fish habitat offset plan, the NWOMC and Region 2 require involvement in the development and execution, subject to capacity and availability.	Hydro One commits to further discussion with the NWOMC and Region 2 on HADD requirements associated with the Project once those requirements are known.
5.	2.0 Evaluation of Alternatives, Page 2.1-10 (PDF Page 5)	"Therefore, the evaluation of alternatives meets the requirements of subsection 6.1(2) and includes an assessment of the "alternative methods" and the "do nothing" alternative, but does not include an assessment of other "alternatives to" the project or re-examine the "purpose of the undertaking" as the province (Ministry of Energy and Independent Electricity System Operator [IESO]) established the need and justification for the Project as previously discussed in Section 1.0 of the EA.""	Please note, the NWOMC and Region 2 were not consulted on the need and justification of the Project as described in Section 1.0 of the EA. This lack of input into the purpose of the undertaking must be remedied in future IESO determinations. While it is understood that this is outside the scope of this EA and EA process, Hydro One can communicate the need for future consultation with IESO.	Comment acknowledged. Hydro One has connected the NWOMC and Region 2 with IESO for further discussions.
6.	2.0 Evaluation of Alternatives, 2.1.3 Advantages and Disadvantages of Alternatives to the Project, Page 2.1-12 (PDF Page 7)	"The Environmental Assessment Act does not differentiate between the importance of the different environments (that is, natural, social, economic cultural, built); however, the Code of Practice acknowledges that the effects to one environment may be greater than the effects to another (MECP 2014). In the case of the Project, there are disadvantages to the natural environment as a result of the construction of the Project, but the need for the Project and the socio-economic benefits to the region outweigh the advantages of not undertaking the Project.	The statements within this section are problematic for two reasons. First, the Hydro One EA does not consider the NWOMC and Region 2 Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project which had a finding of impacts to NWOMC and Region 2 criteria. No	Hydro One commits to continuing to engage with the MNO on the information provided in the NWOMC and Region 2 Traditional Knowledge and Land Use Study for the Project. While the preferred route has been determined, Hydro One commits to engaging with the MNO on potential refinements to the Project footprint and incorporation of site-specific mitigation in order to avoid or minimize impacts to NWOMC and Region 2.

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		Given the purpose of the Project to meet Ontario's current and future electricity delivery needs, the relative socio- economic advantages (e.g., to maintain a reliable and cost- effective long-term electricity supply to the northwest Ontario) offset the relative disadvantages. The selection of the Project as the preferred alternative is supported by the identification of the Project as a priority project for the province."	mitigation has been collaboratively developed, therefore, these impacts remain. Secondly, this section implies that the socio-economic advantages offset the "relative disadvantages" of the Project, including impacts to NWOMC and Region 2 rights and interests. Further discussion is required between Hydro One and the NWOMC and Region 2 related to the above noted issues. Further, the NWOMC and Region 2 require information on the rubric used in the public interest determination described within this section in order to evaluate the rigor applied.	Hydro One is also committed to working with NWOMC and Region 2 to develop a community-based monitoring program in areas of high interest to MNO. As acknowledged in comment #5, the EA does not include an examination of the need for the Project (or "purpose of the undertaking") as this has been established by provincial agencies, including IESO. Hydro One would be happy to facilitate a meeting between the NWOMC and Region 2 and IESO.
7.	2.0 Evaluation of Alternatives, 2.2.1.2.1 Development of Transmission Line Right-of- Way, Page 2.2-16 (PDF Page 11)	"Standard transmission line routing principles were used to refine the alternative routes to define the most favourable Project footprint that would have the least overall impacts from a socio-economic, natural environment, and technical and cost perspective., including: • Minimize potential effects on established land uses, such as residences, agricultural operations, built-up areas, industrial facilities, airstrips, etc.; • Follow existing linear features to minimize new disturbance and vegetation clearing; • Use of existing roads (where practicable) for improved access, to reduce new vegetation clearing, and to avoid impacts to the environment; • Follow property and land use boundaries to minimize potential effects on private land owners and existing land uses; • Keep routes as straight as reasonably possible, to reduce length of the transmission line, workspace requirements, and the number of deflection structures; • Minimize length of the transmission line through sensitive natural environmental areas, such as watercourses, recreation areas, parks, and sensitive wildlife habitat; • Minimize crossing existing transmission infrastructure; • Minimize length of the transmission line through wet areas and steep slopes for better access and to reduce environmental effects; and • Ensure all electrical system constraints and considerations are respected."	There is no mention within this section of consideration of Indigenous rights and interests to define the most favorable Project footprint. As the NWOMC and Region 2 have expressed concern related to the preferred route this must be listed as a consideration and should have been used in the identification of the right-of-way.	While the preferred route has been determined, Hydro One commits to engaging with the NWOMC and Region 2 on potential refinements to the Project footprint and incorporation of site-specific mitigation in order to avoid or minimize impacts to NWOMC and Region 2. Section 2.2.1.3 confirms the Indigenous culture, values, and land use included in the evaluation methodology. Recognition that elements of Indigenous community concerns related to routing, such as alignment with existing linear features, minimizing crossing of natural areas and minimizing overlap with water crossings are included in the list of routing principles in Section 2.2.1.2.1 of the Final EA.. Appendix 2.0 also includes details of the alternative route evaluation process and outcomes. In the Final EA, Hydro One will include additional detail about the consideration of concerns expressed by NWOMC and Region 2.

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8.	2.0 Evaluation of Alternatives, 2.2.1.2.1 Development of Transmission Line Right-of- Way, Page 2.2-16 (PDF Page 11)	“Once preliminary ROWs and access plans for the alternative routes were developed, a field reconnaissance program was completed to validate desktop features, verify constructability, and identify new constraints.”	The NWOMC and Region 2 were not involved in the field reconnaissance program referenced and were not able to identify new constraints in partnership with Hydro One. Additional discussion related to route options is required.	Hydro One commits to engaging with the NWOMC and Region 2 on potential refinements to the Project footprint and incorporation of site-specific mitigation in order to avoid or minimize impacts to NWOMC and Region 2.
9.	2.0 Evaluation of Alternatives, 2.2.1.2.1 Development of Transmission Line Right-of- Way, Page 2.2-18 (PDF Page 13)	“Hydro One will attempt to accommodate the preferences of Indigenous communities and stakeholders regarding positioning of structures, to the extent reasonably practicable. Additional site-specific siting of transmission structures will be determined during detailed design in response to feedback and to meet design requirements as appropriate.”	The NWOMC and Region 2 require capacity funding and ongoing involvement in the detailed design phase of the Project to allow for input into the siting of transmission structures to ensure avoidance of areas of critical importance to the NWOMC and Region 2 and to understand where permanent loss of Crown land will occur.	Hydro One is willing to provide opportunities for the NWOMC and Region 2 to provide input on the Project’s detailed design.
10.	2.0 Alternative Route Evaluation Methodology, 2.2.1.3 Alternative Route Evaluation Methodology, Page 2.2-21 (PDF Page 16)	“The GoldSET™ alternative route analysis process is based on a simplified multi-criteria analysis, which is widely used to combine often diverse regulatory, Indigenous and stakeholder goals with project performance criteria.”	In the early stage of the Project when the GoldSET alternative route analysis was undertaken, the NWOMC and Region 2 faced capacity constraints which limited involvement. NWOMC and Region 2 undertook workshops to gather Indigenous perspectives on route selection. The information requested by Hydro One at the time included rankings of areas of importance and spatial or geographic information specifically related to the ranked information. Following the workshops, the NWOMC and Region 2 developed two documents and submitted them to Hydro One. Within these documents, significant limitations were noted in relation to the filed material including: **<u>Traditional Land Use Data</u>** In preparation for workshops conducted in relation to Indigenous perspectives into the route selection model, the NWOMC and Region 2 created maps that included the existing traditional land use (“TLU”) information that overlapped the Study Area. This information was to assist Participants in identifying areas of importance. However, Participants expressed concern because the existing MNO TLU data has only been collected in response to past projects that have funded TLU studies. The TLU data available is concentrated in areas where these previous projects have occurred, resulting	See response to comment #3. Hydro One has provided capacity funding to support the NWOMC and Region 2 to participate in the alternative route analysis process. Funding was eligible to be used for the activities requested by the NWOMC and Region 2, including Traditional Land Use studies, Cultural Heritage studies, Regional Consultation Committee meetings and workshops, engagement meetings and workshops with Hydro One, the hiring of professional/legal services and consultants, staffing for the NWOMC and Region 2, as well as travel and other meeting costs. Hydro One also offered flexibility in the use of capacity funding to mee the needs of the NWOMC and Region 2. The funding agreement is still active. Correspondence shared to NWOMC and Region 2 on August 2, 2023 includes responses to three questions from NWOMC and Region 2 that provide additional details on how feedback from the NWOMC and Region 2 was considered as part of the alternative route evaluation.

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			in data gaps. Participants were concerned about providing input on areas of importance without having sufficient information to inform these decisions. . **Insufficient Representation in TLU Data or Workshops** During the workshops, Participants noted that in order to make informed decisions about the important areas, more input from a higher portion of land users would be required. It was also noted that, because of insufficient representation, the use of the information provided within this Report should only be used by Hydro One for initial modelling. As potential routes are further defined, the MNO must be provided another opportunity for input on the route options to ensure the insufficient representation can be addressed. **Time to Conduct the Workshops** As this was the first time Participants were being presented with information about this Project, as well as with the concept of mapping and ranking important areas, Participants felt there was not enough time in a single workshop to properly assess, identify and rank important areas. **Compatibility of the Exercise** This exercise was also identified as not being fully compatible with Métis rights and interests. Many aspects of Métis rights are intangible and do not readily translate into mapped information. This information is then lost in the process of static data collection and quantification. These issues and limitations have persisted as there were/are time sensitive constraints on both sides which limited involvement in further route definition prior to draft EA submission. Further engagement on the route is required.	

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11.	2.0 Evaluation of Alternatives, 2.2.3 Alternative Route Segments Through Provincial Parks, Conservation Reserves and Protected Areas, Page 2.2- 30 (PDF Page 25)	“The Project is proposing to cross Turtle River-White Otter Provincial Park, Campus Lake Conservation Reserve and Quetico Provincial Park (access road use only). During Project planning, each protected area was reviewed individually to determine the appropriate and feasible mitigation measures that could be implemented to decrease potential adverse effects on the environment. The lowest cost was not the overriding justification for selection of the Project footprint within the two provincial parks and one conservation reserve crossed. During construction of the Project, mitigation measures will be implemented to minimize environmental effects and protect ecological integrity, as outlined in the EA. Project engineering and mitigation measures will be further refined through engagement with regulatory agencies during the permitting and detailed planning stage of the Project.”	Within a memorandum submitted to Hydro One, the NWOMC and Region 2 noted that within Hydro One documentation, an advantage listed for the Preliminary Preferred Route for Section 4 is that it included the “[s]mallest area of sensitive areas identified by Indigenous communities;” however, the list of disadvantages includes: Largest area of conservation reserves, Greatest number of watercourses and waterbodies, and trails, and Largest area of archaeological potential and significant wildlife habitat. Further, in these previously provided comments within the memorandum and letter, the NWOMC and Region 2 noted concerns around decreases in available Crown land to support the exercise of Métis traditional practises. Conservation reserves (e.g., Campus Lake) are provincial Crown land which are one of the six primary Crown land use designations. Importantly, the exercise of some Métis rights can be undertaken in these areas (e.g., gathering, fishing) and they are important areas for the continuation of Métis cultural well-being (e.g., connection to land and cultural activities such as canoeing). Overall, within this submission, citizens expressed that the advantages listed for the Preliminary Preferred Route for Section 4 do not outweigh the disadvantages. As mitigation measures have not yet been developed in collaboration with the NWOMC and Region 2 this must be undertaken and mitigation measures must be fully developed prior to Project construction.	Hydro One commits to engaging with the NWOMC and Region 2 on potential refinements to the Project footprint and incorporation of site-specific mitigation in order to avoid or minimize impacts to NWOMC and Region 2. Correspondence shared to NWOMC and Region 2 on August 2, 2023 includes responses to three questions from NWOMC and Region 2 that provide additional details on how feedback from the NWOMC and Region 2 was considered as part of the alternative route evaluation.

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12.	2.0 Evaluation of Alternatives	All	Hydro One has not included summaries of engagement with the NWOMC and Region 2 that informed GoldSET alternative route analysis. The NWOMC and Region 2 provided substantial feedback on the alternative routes, including preliminary modelling input in 2019 and a memorandum and letter in February 2023, as well as through the findings within the Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project. Hydro One's assessment of alternative routes does not cite or weigh comments provided by NWOMC and Region 2 in its decision, and Hydro One remains in favour of the preferred route. It appears that based on Section 2.0 Evaluation of Alternatives, Hydro One will select the most cost beneficial route. This is without meaningfully considering feedback provided by the NWOMC and Region 2. The NWOMC and Region 2 require further engagement with the NWOMC and Region 2 on the final selection of a route.	See responses to comments #3 and #10. In the final EA, Hydro One will include additional detail about the consideration of concerns expressed by NWOMC and Region 2 and how information provided has informed the route analysis for the Project.
13.	Appendix 2.0B, 1.0 Introduction, Page 2.1-1 (PDF Page 4)	"Section 21 of the PPCRA lists conditions for approval that must be met for the Minister to approve a utility corridor in provincial parks and conservation reserves. They are: There are no reasonable alternatives; Lowest cost is not the sole or overriding justification; and Environmental impacts have been considered and all reasonable measures will be undertaken to minimize harmful environmental impact and to protect ecological integrity."	This Section specifies that in order for a utility corridor to be approved within a provincial park or conservation reserve, there must be no reasonable alternative. However, the route option which follows Highway 622 is more preferred from an "Indigenous Culture, Values and Land Use" perspective; with the only constraining factor appearing to be an increased cost. This illustrates that there are reasonable alternatives to the selected preferred route. Further engagement related to this is required.	Hydro One commits to further engagement with the NWOMC and Region 2 on the effects related to provincial parks and conservation reserves, including on any required modifications to their Management Plans and Statements.
14.	Appendix 2.0B, 2.0 Analysis of Management Plans and Statements, Page 2.2-3 (PDF Page 6)	"A review was completed of the applicable provincial park management plans and conservation reserve management statement to determine if any modifications would be needed to allow for the planning of the Project."	The NWOMC and Region 2 were not engaged by Hydro One to determine potential modifications required to Management Plans and Statements to allow for planning of the Project. This is of particular concern as there are anticipated amendments required to the Turtle River- White Otter Lake Provincial Park management plan and White Otter Enhanced Management Area to allow for new transmission corridors.	Hydro One commits to further engagement with the NWOMC and Region 2 on the effects related to provincial parks and conservation reserves, including on any required modifications to their Management Plans and Statements.

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			Further engagement with NWOMC and Region 2 is required by Hydro One, particularly in light of comments submitted in February 2023 which outline the importance of these provincial parks and conservations areas. Additionally, consultation is required by MNRF on any proposed changes to the noted management plans.	
15.	3.0 Project Description, 3.2.2 Environmental Planning, Page 3.3-3 (PDF Page 8)	"This Project has included consideration of various alternative routes to meet Project objectives (see Section 2.0). These were evaluated on Indigenous, natural, socio- economic, and technical considerations. This evaluation process also included input from Indigenous, public and stakeholder engagement."	As noted in Comment #10 the NWOMC and Region 2 have faced capacity constraints which limited involvement in early modelling activities. Indeed, the NWOMC and Region 2 2019 submission noted significant limitations. Please see Comment #10 for detailed limitations. This means that the referenced data which was used in the evaluation process was limited and was not meant to fully represent all values related to the NWOMC and Region 2 rights and interests. Therefore, further engagement is required.	During the ToR development, Hydro One worked with the MNO to provide capacity funding in order to facilitate meaningful participation in the process. This included supporting the MNO in completing two routing workshops, holding engagement sessions during the ToR development. Capacity funding was also provided for the MNO to begin to gather Indigenous knowledge to inform the project. Capacity funding has also been provided throughout the Environmental Assessment process for NWOMC and Region 2 to participate meaningfully in alternative route evaluation engagement activities. In the final EA, Hydro One will include additional detail about the consideration of concerns expressed by NWOMC and Region 2 and how information provided, including that during the ToR stage, has informed the route analysis for the Project. Hydro One commits to engaging with the NWOMC and Region 2 on potential refinements to the Project footprint and incorporation of site-specific mitigation in order to avoid or minimize impacts to NWOMC and Region 2.

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16.	3.0 Project Description, 3.2.2 Environmental Planning, Page 3.3-3 (PDF Page 8)	“After the EA stage, detailed planning and the construction execution approach will be finalized for the Project, including incorporation of route refinements, mitigation, and monitoring, as identified in this report, and applicable permits.”	The NWOMC and Region 2 require future engagement following the EA stage to ensure Métis input into the detailed planning and construction execution. Additionally, Hydro One should begin engagement on potential route refinements, mitigation, and monitoring prior to the issuance of the Final EA.	In the final EA, Hydro One will include additional detail about the consideration of concerns expressed by NWOMC and Region 2 and how information provided has informed the Project. Hydro One commits to engaging with the NWOMC and Region 2 on potential refinements to the Project footprint and incorporation of site-specific mitigation in order to avoid or minimize impacts to NWOMC and Region 2. These refinements can continue to be made post-EA under the limits of work set out in the EA.
17.	3.0 Project Description, 3.3.1 Transmission Line and Right of Way, Page 3.3-4 (PDF Page 9)	“Preliminary tower locations are shown on the preliminary Project footprint map book provided in Appendix 3.0-B. These locations may change as detailed planning is completed, including geotechnical studies.”	The NWOMC and Region 2 require ongoing engagement in relation to the tower locations and footprint. This must include ongoing dialogue about the amount of Crown land that will be permanently lost through the construction of towers and their footprint and include consideration of Crown Land Offsets. Tower locations can represent a permanent loss of Crown lands available for the exercise of Métis rights and interests. In previous regulatory processes within Canada, this permanent loss was offset/compensated for through a Crown Land Offset Plan.[1] Therefore, additional dialogue and consideration of offsets as mitigation/accommodation is required.	Section 3.0 is the Project Description and is intended to describe the technical components of the Project. Consideration of potential effects of change in occupation of Crown Land relative available for the exercise of Métis rights and interests are considered in Section 7.8. In advancing on-going discussion of mitigation and as noted in later comments related to the effects assessment, Hydro One commits to engaging with the NWOMC and Region 2 on potential refinements to the Project footprint, including to tower locations, and incorporation of site-specific mitigation in order to avoid or minimize impacts to NWOMC and Region 2. These refinements can continue to be made post-EA under the limits of work set out in the EA.
18.	3.0 Project Description, 3.3.4 Access Roads, Page 3.3-8 (PDF Page 13)	“In the event there are no existing roads or trails that connect to the ROW, Hydro One may need to build new access roads.”	The NWOMC and Region 2 require in depth engagement in relation to any new access road not contemplated in the Draft or Final EA as it can increase and/or exacerbate impacts on NWOMC and Region 2 rights and interests. Further, it can result in an additional taking up of Crown land, reducing the land available to Métis harvesters and land users. Additionally, capacity funding must be provided to allow for the NWOMC and Region 2 to continue engagement into the detailed planning and design phase where the number, location and characteristics of these roads will be refined.	Hydro One commits to engaging with the NWOMC and Region 2 on the development of a communication protocol for any changes required to the Project footprint in the detailed design and construction phase of the Project. Hydro One has a capacity funding agreement in effect with the NWOMC and Region 2 to support continued engagement.

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19.	3.0 Project Description, 3.3.5 Waterbody Crossings, Page 3.3-11 (PDF Page 16)	“Removal of riparian vegetation will be limited to the extent necessary, and to the requirement of the access road or trail width only. Removal of compatible vegetation at waterbody crossings along the transmission line alignment ROW will generally be limited to a 6 m-wide ROW for equipment access to waterbody crossing structures (e.g., temporary bridges). Additional removal of incompatible vegetation may be required for technical or safety reasons as appropriate.”	Additional detail is required in relation to the removal of riparian vegetation as this is important from a water quality and biodiversity perspective. It is unclear from this section if riparian vegetation and “incompatible vegetation” refer to the same thing. If these terms are interchangeable, additional detail is required on what types of riparian vegetation may be deemed incompatible by Hydro One and be subject to removal.	Incompatible vegetation includes any species that have the ability to interfere with safe operation of the transmission line. For example, trees and shrubs that may grow tall enough to interfere with the transmission line conductors. Removal of incompatible species from riparian areas will be done selectively through mechanical means.
20.	3.0 Project Description, 3.3.5 Waterbody Crossings, Page 3.3-11 (PDF Page 16)	“Culvert selection will consider site-specific conditions such as the width of the waterbody crossing, fish habitat characteristics, substrate type, and hydrologic characteristics of the waterbody. Culverts will be sized to handle peak flow and aligned parallel to the waterbody channel on a straight section of uniform gradient. Installation and removal practices will follow MNRF and DFO’s advice on erosion and sediment control to avoid causing death of fish and/or the harmful alteration, disruption or destruction of fish habitat (MNR 1990, 2010a, 2010b; DFO 2022a, Canada 1985).”	In the event of any identified harmful alteration, disruption or destruction of fish habitat, the NWOMC and Region 2 requires involvement in the development of any fish and fish habitat compensation plan. Further, additional engagement is required with the NWOMC and Region 2 on erosion and sediment control measures in conjunction with DFO.	Hydro One commits to providing opportunities for NWOMC and Region 2 involvement in monitoring programs. Erosion and sediment control measures will be outlined in the Project Environmental Protection Plan, which will be provided to the NWOMC and Region 2 for review prior to construction.
21.	3.0 Project Description, 3.3.6 Equipment/Material Laydown Areas, Page 3.3- 12 (PDF Page 17)	“Where Crown land is needed to erect supporting infrastructure (e.g., construction offices, laydown areas and/or work camps, etc.), permits and authorizations from the MNRF will be acquired, as required.”	The NWOMC and Region 2 require notification and potential engagement where Crown land is required for erection of supporting infrastructure as Crown land is critical to the exercise of NWOMC and Region 2 harvesting rights. Where Crown land is permanently required, Crown Land Offsets must be considered.	The Project footprint in the Draft EA and that will be included in the Final EA presents the location of supporting infrastructure for the Project (i.e., laydown areas, construction camps, etc.). Hydro One commits to engaging with the NWOMC and Region 2 on potential refinements to the Project footprint and incorporation of site-specific mitigation in order to avoid or minimize impacts to NWOMC and Region 2.
22.	3.0 Project Description, 3.3.8 Temporary Construction Camps, Page 3.3.-12 (PDF Page 17)	“Lodging and accommodation for construction workers will be required during the construction stage. Construction camps are expected to be established along the transmission line to provide accommodation to workers on a temporary basis in select locations along the preferred route.”	NWOMC and Region 2 citizens who were interviewed for the Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project indicated that a work camp in proximity to Atikokan could positively benefit the Métis community by supporting the local economy, hiring local workers, and supporting local suppliers. This information was provided to Hydro One as part of the February 2023 submission. Further in this submission, additional details were requested about the work camps at Sedgwick	Section 2.2.7 of the Final EA speaks to where camp locations are being planned, including some revisions in preferred areas from the Draft EA. Additional information on the intended layout and capacity in Section 3.4.8. At peak construction periods, a temporary camp is expected to house up to 350 people. The assessment of effects in Section 7.3 Economy describes measures to encourage economic benefits to communities though camps, including that Hydro One and its contractor will:

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			and Kashabowie. In response, Hydro One encouraged the NWOMC and Region 2 to engage with the yet to be determined contractor for camp construction to discuss potential camp locations. Further engagement is required on the locations of the work camp and more information is required on the identified work camps at Sedgwick and Kashabowie, in advance of contractor assignment to allow for accurate assessment of potential impacts.	• Develop and implement the Indigenous Participation Plan. • Support Indigenous Communities, local, and regional procurement where practicable. Potential effects to community well-being related to camps are assessed in Section 7.4, including suggested mitigation. Hydro One commits to engaging with the NWOMC and Region 2 on potential refinements to the Project footprint and incorporation of site-specific mitigation in order to avoid or minimize impacts to NWOMC and Region 2. See also Comment #31 linked to the identification of the contractor for the Project.
23.	3.0 Project Description, 3.3-1 (Table) Temporary Construction Camps, Page 3.3-13 (PDF Page 18)	All	During the Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project, NWOMC and Region 2 participants were concerned with the location and size of construction camps. Please provide more information on the locations and number of workers these construction camps would accommodate.	The Project footprint in the Draft EA and that will be included in the Final EA presents the location of supporting infrastructure for the Project (i.e., laydown areas, construction camps, etc.). See Comment #22.
24.	3.0 Project Description, 3.3.10 Temporary Land Permissions, Page 3.3-15 (PDF Page 20)	"Temporary land permissions will be required at some locations along the ROW to accommodate construction activities, such as providing additional working space, stockpiling, and equipment/material laydown or to facilitate conductor pulling/tensioning. These sites are anticipated to be decommissioned and restored following construction. Appropriate approvals, agreements and/or authorizations will be obtained for any Crown land or private lands required for construction activities."	The NWOMC and Region 2 require notification of and engagement on any temporary land permissions sought by Hydro One to accommodate construction activities. Further, the term 'temporary' must be adequately defined so that the NWOMC and Region 2 can evaluate whether the duration of these land permissions negatively impact Métis rights and interests.	The Project footprint in the Draft EA and that will be included in the Final EA presents the location of temporary supporting infrastructure for the Project (i.e., features that support the construction phase including laydown areas, construction camps, etc.). Hydro One will consult with the NWOMC and Region 2 on the access roads that will be left in place to support operation and maintenance of the Project.
25.	3.0 Project Description, 3.3.12 Helicopter Pads, Page 3.4-17 (PDF Page 22)	"Hydro One and their contractor(s) will develop a notification process for Indigenous communities on the use of helicopters during the fall and spring hunting season."	Within the NWOMC and Region 2 Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project harvesting and land use activities were noted to have seasonal parameters. For example, fishing is reported as a year round activity, trapping is undertaken in the spring, fall, and winter, and gathering is noted to occur in late summer and early fall.	Hydro One commits to consult with affected Indigenous communities on the plan for helicopter use on the Project. Hydro One commits to further discussion with affected Indigenous communities on priority hunting areas and helicopter activity within these areas.

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			Additional discussion is required to ensure that a plan is developed to inform/notify Métis harvesters and land users of helicopter use.	
26.	3.0 Project Description 3.3.11 Aggregate Pits, Page 3.4-17 (PDF Page 22)	"Hydro One does not anticipate becoming the long-term permittee of new pits for the construction of the line. Hydro One continues to work with Indigenous communities near off-reserve gravel pits to develop or adapt facility permitting to allow the supply of aggregates to the Project. Further, any rights associated with aggregate pits that are developed by the contractor for the Project will be offered to Indigenous Businesses prior to completing any reclamation activities. Discussions will continue with Indigenous communities, sustainable forest licence holders (where applicable) and appropriate regulatory agencies regarding required approvals."	Hydro One states that they will offer Indigenous Businesses rights associated with aggregate pits. To date, there has not been discussion of this with NWOMC and Region 2. The NWOMC and Region 2 require equal business opportunities as are offered to First Nations, and request that Hydro One commit to providing business opportunities such as the above to NWOMC and Region 2 businesses, where applicable.	Hydro One commits to engaging with the NWOMC and Region 2 on aggregate use and the offering of rights associated with aggregate pits before reclamation. Hydro One and its contractors are committed to discussing business participation opportunities with all Indigenous communities.
27.	3.0 Project Description, 3.4.1.2 Vegetation Removal, Grubbing, and Grading the ROW, Page 3.4-19 (PDF Page 24)	"Vegetation removal along the ROW will take into consideration: widths of waterbodies; location of wetlands; locations of known archaeological and cultural heritage sites; areas of commercial timber and the method of cutting and storing commercial timber, and required riparian buffer zones (e.g., for waterbodies and other sensitive natural features)."	This section does not include Indigenous rights and interests as a consideration in relation to vegetation removal. Hydro One must include consideration of Indigenous rights and interests; particularly the rights and interests of the NWOMC and Region 2.	The section referenced here is intended to provide the description of Project activities planned. The assessment of effects to the rights and interests of the NWOMC and Region 2 as a result of Project activities is included in Section 7.8 of the EA Report.
28.	3.0 Project Description, 3.4.1.5 Tower Structure Foundation Installation, Page 3.4-22 (PDF Page 27)	"It may be necessary to blast a hole in which to pour the concrete foundation in the bedrock. Once the area is prepared for installation, a drilling unit will be mobilized to the site. Contingent upon access and terrain, it is expected that the mobilization of the blasting equipment and materials will either occur using reasonable conventional ground access or be air-lifted into the area. Notification requirements for blasting will be outlined in the Blasting and Communication Management Plan to be prepared prior to construction. All blast operations shall be carried out in accordance with DFO guidelines (Wright and Hopky 1998) and *Ontario Provincial Standard Specification 120 General Specification for the Use of Explosives."*	Blasting has potential to result in adverse impacts to NWOMC and Region 2 harvesters through either nuisance, discomfort and/or displacement of harvested animals. Blasting is intermittent, unpredictable and can result in a startle response and increased avoidance behaviors which can alter patterns of the exercise of rights. Further, annoyance from blasting is subjective and can be premised on an expectation for quiet which can be disrupted by the intermittent and unpredictable nature of blasting. There is also potential for effects to NWOMC and Region 2 rights holders through displacement of wildlife where blasting could result in disruption to wildlife movement and avoidance of habitat. These potential impacts were not considered in Volume 7.8 or discussed otherwise in the EA. The NWOMC and Region 2 require further assessment and engagement related to blasting	The current access plan for construction minimizes the need for blasting operations. Where blasting activities are required, all blasting operations will occur in accordance with the EPP Blasting and Communication Management Plan. The process and procedures for notifications and minimizing effects of blasting activities (i.e., avoidance of sensitive features and timing windows, where possible) will be developed collaboratively with Indigenous communities.

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			for integration in the Final EA. Additionally, the NWOMC and Region 2 require additional discussion regarding blasting alternatives that can be employed.	
29.	3.0 Project Description, 3.4.1.11 Decommissioning of Temporary Construction Infrastructure, Page 3.4-24 (PDF Page 29)	"Areas with low risk of erosion will be left to naturally revegetate following grading and stabilizing activities. Any areas that demonstrate or pose high risk to erosion will require additional mitigative measures, including soil stabilization and seeding as appropriate."	The NWOMC and Region 2 require involvement and input into the natural revegetation referenced for construction infrastructure as this method has varying results for forested ecosystems. Further, where any identified seed mixtures will be used as mitigation, the NWOMC and Region 2 require input and involvement to ensure the revegetation is conducive to supporting Métis harvest in the future.	Hydro One commits to further engagement on the plan for restoration and to providing opportunities for NWOMC and Region 2 involvement in monitoring programs.
30.	3.0 Project Description, 3.4.1.12 Post-Construction Monitoring, Page 3.4-25 (PDF Page 30)	"Hydro One, with their contractor, will prepare and implement a post-construction monitoring plan after the completion of the construction activities and continue into the operation and maintenance stage and will include activities such as examining and documenting the success of revegetation and rehabilitation measures. Typically, a one- to two-year period will be specified for correction of any construction defects for the transmission line."	The NWOMC and Region 2 require notification of, and input into, the post-construction monitoring plan to ensure revegetation measures are successful and supportive of Métis harvesting rights and interests.	Hydro One commits to providing opportunities for NWOMC and Region 2 involvement in monitoring programs.
31.	3.0 Project Description, 3.6.1 Construction Workforce, Page 3.6-32 (PDF Page 37)	"To the extent possible, Hydro One will source the workforce locally for the construction of the Project. If the necessary labour skills for construction cannot be sourced locally, labour will need to be sourced from other areas in Ontario or outside of Ontario, if required. However, opportunities for employment of nearby residents are possible if the appropriate training and qualifications are obtained in time to meet the construction schedule."	In feedback provided in February 2023, the NWOMC and Region 2 noted citizens' concerns about opportunities for Métis citizens and businesses to fill employment positions and contracts, and felt as though Métis citizens and businesses are often excluded in favour of First Nation members and businesses. In this submission, the NWOMC and Region 2 requested more information on how Hydro One can ensure equitable benefits for Métis. This must be discussed through additional engagement and details presented in the final EA to ensure Hydro One compliance.	The NWOMC and Region 2 were invited to participate in the Early Contractor Involvement (ECI) process between March 2021 and spring 2022. The process was designed to support early engagement between two potential contractors and Indigenous communities and facilitated the contractors learning more about the potential skills and resources available locally in Indigenous communities. Following a competitive procurement process, Valard was selected as the project's contractor and continues to engage with the NWOMC and Region 2 about potential employment and procurement interests.
32.	Section 4.0 Engagement Summary, 4.2.1 Engagement, Page 4.2-4 (PDF Page 9)	"The Crown has also advised that the Project may have adverse impacts on Aboriginal or Treaty rights asserted by present day Métis communities affiliated with the Métis Nation of Ontario (MNO) that claim to be connected to historic Métis communities in the vicinity of Rainy River/Lake of the Woods and Northern Lake Superior: • MNO Northwestern Ontario Métis Community (also known as MNO Region 1) • MNO Northern Lake Superior Métis Community (also known as MNO Region 2) • Red Sky Métis Independent Nation."	The Red Sky Métis Independent Nation is not affiliated with the Métis Nation of Ontario, NWOMC, or Region 2. Please refine the language within this section to provide this distinction. Potential text could include: "The Crown has also advised that the Project may have adverse impacts on Aboriginal or Treaty rights asserted by present day Métis communities affiliated with the Métis Nation of Ontario (MNO) that claim to be connected to historic Métis communities in the vicinity of Rainy River/Lake of the Woods and Northern	Section 4.0 has been revised as follows, "The Crown has also advised that the Project may have adverse impacts on Aboriginal or Treaty rights asserted by present day Métis communities affiliated with the Métis Nation of Ontario (MNO) that claim to be connected to historic Métis communities in the vicinity of Rainy River/Lake of the Woods and Northern Lake Superior (NWOMC and Region 2), or consist of descendants of signatories to the Robinson Superior Treaty 1850 (Red Sky Métis Independent Nation)."

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			Lake Superior **(NWOMC and Region 2), or consist of descendants of signatories to the Robinson Superior Treaty 1850 (Red Sky Métis Independent Nation)**." [emphasis on added text]	
33.	Section 4.0 Engagement Summary, 4.5.3.2 First Nation Partner Communities, Pages 4.5-36- 4.5-37 (PDF Pages 51-52)	"As described in Section 1.0, eight First Nations have formed the Gwayakocchigewin Limited Partnership (GLP) to partner with Hydro One on the Project for the opportunity to invest in the ownership of the Waasigan Transmission Line Project once constructed. The First Nations that formed the GLP are: Fort William First Nation, Lac La Croix First Nation, Lac Seul First Nation, Migisi Sahgaigan (Eagle Lake First Nation), Nigigoonsiminikaaning First Nation, Ojibway Nation of Saugeen, Seine River First Nation and Wabigoon Lake Ojibway Nation. The GLP aims to maximize long-term, sustainable socio-economic benefits for its partner First Nations. The GLP structure includes a Board Director and an Environmental Protection Committee member from each of the member communities."	Hydro One lists a partnership that was formed with First Nations for this Project. The First Nations that form the partnership will either benefit from investment in the Project or apply the earnings from the investment as an accommodation measure. The NWOMC and Region 2 have not been afforded similar economic opportunity or accommodation, despite identification of Project impacts on the NWOMC and Region 2 criteria through the NWOMC and Region 2 Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project. As noted by Hydro One on PDF page 7 of the 4.0 Engagement Summary: "Ontario, as the Crown, has a legal obligation to consult with Indigenous peoples where it contemplates decisions or actions that may negatively affect asserted or established Indigenous or Treaty Rights. The duty to consult, and where appropriate accommodate, is rooted in: • The Honour of the Crown (a legal principle that requires the Crown, as represented by the federal and provincial governments, to act honourably in their dealings with Indigenous communities); and • The protection of Indigenous and Treaty Rights under Section 35 of the Constitution Act, 1982." Economic opportunities such as those provided to the GLP can be considered accommodation measures. The NWOMC and Region 2 should be provided equitable accommodation measures to those offered to GLP.	See response to comment #1.

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			The NWOMC and Region 2 request further engagement with Hydro One to discuss an equitable accommodation measure.	
34.	Section 4.0 Engagement Summary 4.5-16 (Table) Key Issues or Concerns from Indigenous Community Participants, Page 4.5-89 (PDF Page 94)	Table	Hydro One listed “Multiple Indigenous communities” several times in the Community/Organization column of this table. The NWOMC and Region 2 have identified an ongoing concern with the uncertainty of whether information provided by the NWOMC and Region 2, including concerns with Project impacts to rights and interests, will be meaningfully considered in Hydro One’s assessments. It is important that Hydro One provide a disaggregated list of communities/organizations that provided specific issues and concerns to allow for streamlined issues tracking through the Final EA.	Table 4.5-16 and summary of input from engagement tables in other chapters have been updated in the Final EA to reflect the names of contributing communities and organizations where feedback has been shared by multiple parties. For example, “Multiple Indigenous communities, including NWOMC and Region 2”.
35.	5.0 Environmental Assessment Approach, 5.1 Consideration of Indigenous Teachings, Page 5.1-6 (PDF Page 9)	“MAI and other teachings reflecting Anishinaabe world view shared specific to this EA process include highlighting the following: • Respect for cultural protocols and ceremony in effective engagement and decision making. • Protection of the ability to exercise rights and interests for future generations. • The sacred role of nibi (water) and interconnectedness of all beings. • Importance of considering how effects of one Project may act cumulatively with other activities. • Wabigoon Lake Ojibway Nation cultural awareness training (completed by all Hydro One team members and contractors including engagement and field staff prior to completing work within the traditional territory). • Respect for cultural protocols and ceremony in effective engagement and decision making. • Observation of cultural protocols and ceremonial practices to prepare for activities on the land. • Métis Nation of Ontario (MNO) 101 training sessions and through comments from the MNO submitted on behalf of the Northwestern Ontario Métis Community and Northern Lake Superior Métis Community: • Respect for cultural protocols in effective engagement and decision making. • Protection of the ability to exercise rights and interests for future generations.	Although Indigenous world views and understandings may align with one another, this does not mean that they are fully reflective of each other. The Métis Nation of Ontario (MNO) 101 training sessions and comments should not be attributed to the Anishinaabe world view. Please update this section in the Final EA to describe varying Indigenous worldviews.	Section 5.0 has been revised to correct this error by rephasing to say “Varying Indigenous worldviews shared specific to this EA process include highlighting the following: …”

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		• Importance of considering how effects of one Project may act cumulatively with other activities."		
36.	5.0 Environmental Assessment Approach, Table 5.2-1: Criteria and Indicators for Net Effects Assessment, Page 5.2-9 (PDF Page 12)	"Indicators • Habitat quantity considering: • change to amount (ha) of mapped suitable habitat with high potential to support plant SAR, plant SOCC, traditional use plants in the study area. • Habitat distribution considering: • change to spatial configuration of habitat in the study area, including the effects on plant dispersal and population distribution. • Survival and reproduction considering: • change to plant SAR, plant SOCC populations or traditional plant populations through changes in survival and recruitment, as well as changes in the number of documented occurrences of plant SAR, plant SOCC or traditional use plants in the study area."	It is recommended that habitat quality be included as an indicator for vegetation and wetlands. Habitat quantity, distribution, survival, and reproduction are not fully representative of the availability of plants used and harvested by Indigenous peoples. For example, plants/vegetation may have ample habitat quantity, distribution, and reproduction/survival rates but may be of lower quality due to project related activities which would impact NWOMC and Region 2 preferences in harvesting and consuming them.	Potential for the Project to affect plants due to changes in quality of habitat, such as hydrology, soil quality or through changes in dust and air emissions (and subsequent deposition) for example, are addressed through the indicators of "ecosystem condition" for the criteria of upland ecosystems, riparian ecosystems and wetland ecosystems, as well as through survival and reproduction for plant species and risk, plant species of conservation concern and plants of traditional use in Section 6.4. In Table 5.2-1, the ecosystem condition indicator is defined to consider: "change to the integrity or naturalness of vegetation communities in the study area, including their ability to support the communities of organisms naturally associated with them." Section 7.8 builds on the findings of these assessments to comment on how Project effects to vegetation and wetlands may relate to NWOMC and Region 2 preferences in harvesting and consuming them.
37.	5.0 Environmental Assessment Approach, Table 5.2-1: Criteria and Indicators for Net Effects Assessment, Page 5.2-11 (PDF Page 14)	"Indicators Habitat quantity considering: change to amount (ha) of SAR critical habitat in the study area. Habitat distribution considering: change to spatial configuration of critical habitat in the study area, including the effects on movement corridors and habitat connectivity. Survival and recruitment considering: change to SAR populations through changes in survival and recruitment."	It is recommended that habitat quality is included as an indicator for both Wildlife and Wildlife Habitat, and Wildlife and Wildlife Habitat – Species at Risk. Habitat quantity, distribution, survival and reproduction are not fully representative of the health of animals that Indigenous peoples have relationships with or harvest. For example, animals/wildlife may have ample habitat quantity, distribution, and reproduction/survival rates but may be of lower quality due to project related activities which impacts NWOMC and Region 2 preferences in harvesting and consuming them.	Potential for the Project to affect wildlife due to changes in quality of habitat, such as hydrology, soil quality or through changes in dust and air emissions (and subsequent deposition) for example, are addressed through the indicators of habitat availability and survival and recruitment in Section 6.5. Table 5.2-1 has been updated in the Final EA to correct the name and definition for the habitat availability indicator from "habitat quality considering change to amount (ha) of wildlife habitat in the study area" to "Habitat availability considering: change to amount (ha) of wildlife habitat in the study area **and animal use of available habitat".** Section 7.8 builds on the findings of these assessments to comment on how Project effects to wildlife may relate to NWOMC and Region 2 preferences in harvesting and consuming them.

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38.	5.0 EA Approach, 5.3.1 Spatial Boundaries, Page 5.3-19 – 5.3-20 (PDF Page 22-23)	• "Project footprint – This is established to identify the physical area required for Project construction and operation, which represents the area of direct disturbance. The Project footprint includes the following Project components, which are described in more detail in Section 3.3:
		  • transmission line right-of-way (ROW);
		  • expansion of the existing Lakehead, Mackenzie and Dryden transformer stations within Hydro One property;
		  • separation of approximately 1 km of the existing 230 kV transmission circuits out of Mackenzie TS;
		  • temporary and permanent access roads;
		  • water crossings;
		  • equipment and material laydown areas;
		  • temporary construction camps and offices;
		  • temporary land rights area such as pull sites;
		  • aggregate pits; and
		  • helicopter pads.
		• Local study area (LSA) – This encompasses the area within which most effects of the Project are expected to occur and are likely to be measurable. This study area is the primary focus of data collection to characterize the existing environment. The LSA for most criteria includes lands within approximately 1 km of the Project footprint.
		• Regional study area (RSA) – This includes areas beyond the LSA (generally up to approximately 5 km or more from the Project footprint) used to measure broader-scale existing environment conditions and provide regional context for the maximum predicted geographic extent of direct and indirect effects from the Project (e.g., changes to downstream water quality, migratory ranges, or changes to the economy, including regional employment and incomes). Cumulative effects from the Project in combination with past, present, and reasonably foreseeable future developments are typically assessed at this larger spatial scale."
			Please update the spatial boundaries considering accurate locations of construction camps.	The Project footprint has been updated in the final EA to account for any changes to the footprint since the release of the draft EA. The Project footprint has also been made available for NWOMC and Region 2 review and comment through sharing of GIS shapefiles and an online webviewer.

39.	5.0 Environmental Assessment Approach, 5.6.5 Assess the Significance of Net Effects, Page 5.6-27 (PDF Page 30)	"Based on the application of significance criteria, a significance conclusion is made for each criterion. A description of how significance was determined for each criterion is presented in Table 5.6-2. Additional details about the approach and methods for characterizing net effects and determining significance for criteria and criteria- specific definitions of significance are provided in Sections 6.0 and 7.0."	The NWOMC and Region 2 have not been engaged by Hydro One on key aspects of the assessment approach including the identification of technically and economically feasible mitigation measures, the prediction of net effects, the characterization of net effects (including development of definitions of significance factors used to characterize net effects), and the assessment of significance of net effects. The NWOMC and Region 2 Traditional Knowledge and Land Use Study for	Section 5.0 of the EA is intended to present the general approach to assessment of effects applicable to all assessment criteria. Information specific to the assessment of effects to the exercise of Métis rights and interests is provided in Section 7.8. Please see response to Comment #194 for further discussion. Hydro One commits to engaging with the NWOMC and Region 2 on potential refinements to the Project

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			the Waasigan Transmission Line Project can only provide preliminary information as Hydro One is best placed and responsible for mitigation development. Further engagement is required to complete these necessary steps. In absence of this engagement, the current conclusions are deficient.	footprint and incorporation of site-specific mitigation in order to avoid or minimize impacts to NWOMC and Region 2.
40.	6.2 Surface Water, Table 6.2-1: Summary of Comments Raised during Engagement Related to Surface Water, Page 6.2-2 (PDF Page 8)	Indigenous Community or Stakeholder Group	Please update reference to Métis Nation of Ontario Region 1 to display the Northwestern Ontario Métis Community or NWOMC and Region 2.	Comment noted. The final EA will be updated accordingly.
41.	6.2 Surface Water, Table 6.2-1: Summary of Comments Raised during Engagement Related to Surface Water, Page 6.2-2 (PDF Page 8)	How Addressed in the Environmental Assessment: "….The use of herbicides and pesticides on the Waasigan Transmission Line is currently under review by Hydro One. Hydro One is committed to not using herbicides and pesticides in areas identified by impacted First Nations that may impact their treaty rights, and commits to further discussion with Métis communities on its use."	Please provide additional clarity on the discrepancy in commitment related to herbicide and pesticide use between First Nations and Métis. The NWOMC and Region 2 have provided detailed information within their Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project in relation to their rights and interests which Hydro One can similarly inform the commitment to not applying herbicide and pesticide. Additional explanation is required.	Through engagement during the draft EA process, Hydro One heard feedback from Indigenous communities and stakeholders regarding concerns with the use of herbicides to remove and manage vegetation on the Project. After extensive consideration of this feedback, herbicides will not be used during construction of the Project or for future maintenance of this transmission line. The Final EA is updated to reflect this change.
42.	6.2 Surface Water, 6.2.7.1 Changes to Surface Water Quantity and Surface Water Quality from Short-Term Water Discharges, Page 6.2-48 (PDF Page 54)	"As part of the permitting and/or approvals process associated with EASR, PTTW, and ECA, a water taking and discharge plan and supporting technical analysis will be developed for each source of construction water, wastewater and wash water, as required, noting that, by design, the applicable water quantity and quality criteria (e.g., effluent limits) associated with the plan will be protective of the existing surface water, groundwater and natural environment conditions in the local area and, in turn, are expected to result in minimal changes (if any) to streamflows, water levels, and the concentrations of suspended solids and chemical constituents in nearby waterbodies."	As there is reliance on these yet to be developed water taking and discharge plan, as well as supporting technical analysis, the NWOMC and Region 2 requires notification and potential involvement in the development and execution of these documents to ensure surface water quality is not impacted by short-term water discharges.	These plans will be included as part of the EPP that will be provided to affected Indigenous communities for review and input at least 90 days in advance of construction.

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43.	6.2 Surface Water, 6.2.7.1 Changes to Surface Water Quantity and Surface Water Quality from Short-Term Water Discharges, Page 6.2-48 (PDF Page 54)	"Water quantity and quality monitoring will be completed, where appropriate, to confirm the effectiveness of the discharge plan and associated mitigation measures, as well as to maintain and demonstrate compliance with regulatory permits/approvals."	Additional engagement is required to identify the NWOMC and Region 2 preferred level of involvement in future water quantity and quality monitoring.	Hydro One commits to providing opportunities for NWOMC and Region 2 involvement in monitoring programs, including in water monitoring.
44.	6.2 Surface Water, 6.2.7.1 Changes to Surface Water Quantity and Surface Water Quality from Short-Term Water Discharges, Page 6.2-49 (PDF Page 55)	"Wash water from cleaning concrete mixing equipment and delivery systems, as well as from vehicles and equipment, will be collected in designated wash-out sites, located at least 30 m from a water body. The wash-out site will be monitored regularly to verify that runoff from the area does not report to a waterbody. Following the construction phase, all temporary wash-out sites will be capped with local backfill and re-graded prior to construction crews departing the site."	Releases of cementitious materials have the potential to increase water pH (i.e., render it extremely alkaline or 'basic'). This can cause fish mortality or longer-term ill- health in fish. There must be greater consideration in the final EA of construction effects which could result in accidental release of high pH wash water beyond identification in mitigation measures alone.	The 30 m buffer applied to waterbodies as well as monitoring at wash out sites will protect against wash water impacting the pH of nearby fish habitat. Hydro One with their contractor(s) will prepare and implement a Spill Prevention and Emergency Response Plan that describes specific measures that would be implemented if a spill or accidental release occurs. Indigenous communities being engaged as part of the Project may choose to undertake community-defined monitoring to observe the implementation of mitigation defined in the EA.
45.	6.2 Surface Water, 6.2.7.2 Changes to Surface Water Quality from the Transport and Delivery of Airborne Particulate Matter to Nearby Waterbodies, Page 6.2-50 (PDF Page 56)	"Mitigation measures planned to reduce the potential effects of airborne particulate matter on the surface water environment include: … Minimizing dust generating activities, as practicable and where required, during periods of high wind to limit dust emissions and spread;"	Additional details are required on how Hydro One will minimize dust generating activities, particularly in relation to on-site concrete mixing as concrete dust has the potential to alter water pH, affecting fish mortality and long term health.	Additional detail on dust suppression activities will be included in the EPP which will be provided for affected Indigenous communities review at least 90 days in advance of construction.
46.	6.2 Surface Water, 6.2.7.2 Changes to Surface Water Quality from the Transport and Delivery of Airborne Particulate Matter to Nearby Waterbodies, Page 6.2-51 (PDF Page 57)	"The results of a screening level assessment of air emissions during the construction stage indicated that, with the implementation of the above mitigation measures (also summarized in Table 6.2-10), there would be no net effects on existing ambient concentrations of particulate matter. To that end, no net effects to surface water quality are expected as a result of the transport and delivery of airborne particulate matter."	The described mitigation measures are vague and do not provide sufficient detail to address potential effects. Please provide additional detail for NWOMC and Region 2 evaluation, in particular in relation to the minimization of dust generating activities.	Additional detail on dust suppression activities will be included in Dust Control/Air Quality Plan as part of the EPP that will be provided for affected Indigenous communities review and input at least 90 days in advance of construction. Construction will implement effective dust suppression techniques, such as on-site watering, as necessary to minimize fugitive dust at worksites and access roads as required. Calcium chloride may be used along municipal roads near residences to reduce dust and improve safety where there is increased Project traffic interface with public road users. Application of calcium chloride will be completed in consultation with road authorities.

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47.	6.2 Surface Water, 6.2.7.4 Changes to Surface Water Quality from the Wash-off of Organic Debris and Chemical Constituents from Vegetation Maintenance Activities to Adjacent Waterbodies, Page 6.2-52 (PDF Page 58)	“Mechanical and chemical vegetation maintenance activities along the ROW could result in changes to surface water quality, if not mitigated. If not mitigated, potential effects may include the transport of organic debris and chemical constituents to nearby waterbodies, with the opportunity for increased concentrations of suspended solids and chemical constituents in the receiving water.”	Chemical vegetation maintenance is noted within the NWOMC and Region 2 Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project as a key concern and Métis Preferences were noted to have likely impacts based on vegetation management activities. As noted within Table 6.2-1, there is a discrepancy on how herbicide and pesticide use is being handled in relation to First Nations and Métis. The importance of this indicator as well as the discrepancy in management should be reflected within the narrative around potential effects. Please update.	See response to comment #41.
48.	6.2 Surface Water, 6.2.7.4 Changes to Surface Water Quality from the Wash-off of Organic Debris and Chemical Constituents from Vegetation Maintenance Activities to Adjacent Waterbodies, Page 6.2-52 (PDF Page 58)	The use of herbicides and pesticides on the Waasigan Transmission Line is currently under review by Hydro One. Hydro One is committed to not using herbicides and pesticides in areas identified by impacted First Nations that may impact their treaty rights, and commits to further discussion with Métis communities on its use.	Please see Comment #48	See response to comment #41.
49.	6.2 Surface Water, 6.2.8.1 Net Effects Characterization Approach, Page 6.2-76 (PDF Page 82)	High Magnitude - A discernable effect that is substantially detrimental – the effect can pose a serious risk and represents a Management concern.	Within this characterization, moderate magnitude is defined as a “potentially detrimental effect”, however, high is a “substantially” detrimental effect. The use of the qualifier “substantially” increases the scale of magnitude and should be re-evaluated to allow for fair consideration of net effects.	The magnitude effect level description for moderate magnitude and high magnitude have been updated to more closely align with the magnitude effect levels for fish and fish habitat. This includes removing the reference to “substantially”.
50.	6.2 Surface Water, 6.2.8.2 Net Changes to Surface Water Quantity and Surface Water Quality from Short- term Water Discharges, Page 6.2-77 (PDF Page 83)	“The net effect was assessed as negligible in magnitude because short-term water discharge activities will be carried out in accordance with the conditions and requirements of EASR, a PTTW, or ECA, recognizing that the water taking and discharge plans associated with these permits and approvals are by design protective of the existing surface water, groundwater and natural environment conditions in the local area and, in turn, are expected to result in minimal changes (if any) to streamflows and/or water levels at receiving waterbodies, and minimal changes (if any) to surface water quality at nearby waterbodies.”	The identified magnitude must be reconsidered following additional consideration of impacts from concrete wash water and concrete dust on water quality.	Compliance with setbacks and validation through monitoring as outlined in response to comment #44 represent mitigation measures identified to limit potential for impacts to surface water quality through management of concrete wash water. Deposition of dust to surface water is also considered in Section 6.2.7.2 *Changes to Surface Water Quality from the Transport and Delivery of Airborne Particulate Matter to Nearby Waterbodies* where the mitigation measure of “employing dust suppression at concrete batch plants, work sites, and on access roads, as appropriate” is stated. With effective implementation of these measures and of the monitoring plans identified, no “measurable change (discernable) that

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				is expected to be at or slightly exceed the limits of baseline conditions or guideline values" are anticipated. Accordingly, no change to the current determination of magnitude is evaluated to be warranted.
51.	6.2 Surface Water, 6.2.11 Monitoring, Page 6.2-85 and 6.2-86 (PDF Page 91 and 92)	All	The NWOMC and Region 2 require further engagement on potential surface water monitoring to identify level of involvement required.	Hydro One commits to providing opportunities for NWOMC and Region 2 involvement in monitoring programs, including water monitoring.
52.	6.4 Vegetation and Wetlands, 6.4.1 Input from Engagement, Page 6.4-1 (PDF Page 8)	Indigenous Community or Stakeholder	Please update reference to Métis Nation of Ontario Region 1 to display the Northwestern Ontario Métis Community or NWOMC and Region 2.	Comment noted. The final EA will be updated accordingly.
53.	6.4 Vegetation and Wetlands, 6.4.1 Input from Engagement, Page 6.4-1 (PDF Page 8)	How addressed in the Environmental Assessment "The use of herbicides and pesticides on the Waasigan Transmission Line is currently under review by Hydro One. Hydro One is committed to not using herbicides and pesticides in areas identified by impacted First Nations that may impact their treaty rights, and commits to further discussion with Métis communities on its use."	Please provide additional clarity on the discrepancy in commitment related to herbicide and pesticide use between First Nations and Métis. The NWOMC and Region 2 have provided detailed information within their Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project in relation to their rights and interests which Hydro One can similarly inform the commitment to not applying herbicide and pesticide. Additional explanation is required.	See response to comment #41.
54.	6.4 Vegetation and Wetlands, 6.4.5.1 Methods, Page 6.4-13 (PDF Page 20)	"The ability of a criterion to accommodate disturbance was evaluated using the concept of ecological resilience. Ecosystem resilience is the capacity of an ecosystem to cope with disturbances without shifting into a qualitatively different state (Holling 1973). A resilient ecosystem can tolerate change and, if disturbed, can renew itself. This renewal can be accelerated with reclamation practices if biodiversity is considered during the planning process. If an ecosystem has limited resilience, it is vulnerable to the effects of disturbance such that it may shift into a different state and become functionally different (Folke et al. 2004). Ecosystem resilience can vary by criterion and this variation has important implications for assessing effects on ecosystem function (Elmqvist et al. 2003, Folke et al. 2004, Peterson et al. 1998)."	While it is positive to see an integrative approach to consideration of ecosystem level effects; the approach, as described, does not consider that while ecosystems may be resilient to change on a longer timescale, Indigenous rights are much more susceptible to short- term change. This must be considered in the Final EA. Further, while it is noted that "Potential Project effects on species of use by Indigenous communities are discussed in … Section 7.8" there is a lack of integration of NWOMC and Region 2 information into this volume and this requires additional consideration.	Section 6.4 of the Final EA has been updated to reference information provided by NWOMC and Region 2 related to traditional use plants. Practice of Indigenous rights related to traditional use plants - include the context offered here that the practice of Indigenous rights are much more susceptible to short-term change (compared with the resilience of vegetation ecosystems) have been supplemented in Section 7.8 of the Final EA.

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55.	6.4 Vegetation and Wetlands, 6.4.5.2 Results, 6.4.5.2.1 Upland Ecosystems, Page 6.4-27 (PDF Page 34)	"The following describes the effects of upland ecosystem availability as based on established SWH criteria. The draft SWH Criteria Schedule for Ecoregion 3W (MNRF 2017) was used as the criteria to evaluate the habitat of vegetation SWH as part of the baseline characterization. SWH is categorized into two types: rare vegetation communities and specialized habitat for wildlife."	No criteria related to Métis rights and interests was applied to describe the effects of upland ecosystem availability. This is despite the NWOMC and Region 2 providing key Ecoregions used in harvesting to Hydro One as part of the Baseline Data Collection Survey Results document in 2021. Please provide detail on why this information was not integrated into either baseline conditions or description of effects.	Input on ecosystem types preferred for harvest shared in the Baseline Data Collection Survey Results document shared by NWOMC and Region 2 in 2021 has been added to characterization of baseline and effects in Section 6.4 of the Final EA. Assessment of effects to practice of Indigenous rights by NWOMC and Region 2 have been similarly supplemented in Section 7.8 of the Final EA.
56.	6.4 Vegetation and Wetlands, 6.4.5.2.3 Riparian Ecosystems, 6.4-35 (PDF Page 42)	"Overall, 77.1% of habitat adjacent to watercourses and waterbodies in the LSA is naturally vegetated in the baseline characterization, which is above the resource management criterion of 75.0% naturally vegetated stream length recommended by Environment Canada (2013) to prevent degradation of these ecosystems. Within the RSA, 71.0% of the area adjacent to watercourses and waterbodies is naturally vegetated. Changes to ecosystem availability appear to be within the resilience and adaptability limits of this criterion in the baseline characterization despite historical losses to riparian areas."	Within this section it is identified that Environment Canada recommends a criterion of 75% naturally vegetated stream length to prevent degradation of ecosystems; however it is further indicated that within the RSA only 71% of areas adjacent to watercourses and waterbodies are naturally vegetation and within the LSA only 77.1% are naturally vegetated. This is in exceedance of Environment Canada recommendations for the RSA and very close to exceedance within the LSA. Please describe how the identified exceedance and near exceedance is assessed, particularly as the Project plans for more riparian vegetation removal as per 3.0 Project Description, 3.3.5 Waterbody Crossings.	Between the Draft EA and the Final EA, improvements were made to the access plan and some other elements of the Project design. Following updated analysis, it has been determined that >98% of riparian habitat within each of the LSA and RSA will be preserved (Section 6.4.7.4.1 of the Final EA). Revised EA metrics are based a more current disturbance layer (Section 6.4.5.1.1 of the Final EA), while also considering the most current footprint and access plan.
57.	6.4 Vegetation and Wetlands, 6.4.5.2.6 Plants of Traditional Use, Page 6.4- 41 (PDF Page 48)	"Traditional use plants include species collected for sustenance, cultural and medicinal purposes. Section 7.7.8.4 highlights the importance of traditional use plants for each Indigenous community."	Section 7.7.8.4 is specifically referenced within this section as having additional details related to the importance of traditional use plants for each Indigenous community, however Section 7.7.8.4 is only related to First Nation rights, interests, and use of land and resources. This reflects the lack of consideration by Hydro One of NWOMC and Region 2 data. Further engagement is required to ensure a fulsome consideration of NWOMC and Region 2 data.	As noted in comment #54 Section 6.4 of the Final EA has been updated to reference information provided by NWOMC and Region 2 related to traditional use plants, discussed further in Section 7.8.

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58.	6.4 Vegetation and Wetlands, 6.4.5.2.6 Plants of Traditional Use, Page 6.4- 41 (PDF Page 48)	"Traditional use plants include species collected for sustenance, cultural and medicinal purposes. Section 7.7.8.4 highlights the importance of traditional use plants for each Indigenous community. The information shared by community members is discussed herein; however, is not considered a comprehensive list. **Habitat Quantity** Plant species of traditional use that were documented as part of the baseline characterization (Appendix 6.4-A) include: • Eastern white cedar (kiizhig, giizhik/oog, gizhikens iizhikaandag/oog [Oji-Cree and Ojibway dialects]); • Paper birch (wiigwaas (-an) (-ag), wiigwaasaatig/oog, wiigwaasi-mitig, wiigwaasimizh [Oji-Cree and Ojibway dialects]); • Showy mountain ash (Sorbus decora; makwaminaatig/oog, makwamin/an, adjimag, mahkwaomiinaatig [Oji-Cree and Ojibway dialects]); • Chokecherry (Prunus virginiana; osisaweminaatig/oog, osisawemin/an, asa/isaweminagaawanzh [Ojibway dialects]); • Common bearberry (Arctostaphylos ura-ursi; kinnikinnik, menozhaatig [Oji-Cree dialects]); • Early lowbush blueberry (Vaccinium angustifolium; miinens, miin/an, miinaatig/oog [OjiCree and Ojibway dialects]); • Highbush cranberry (Viburnum opulus; aniibiminaatig/oog, aniibimin/an [Ojibway dialects]); • Labrador tea (Rhododendron groenlandicum; ashkiigobag/oon, mashkiikaang niibiish, waabashkikiibag [Ojibway dialects]); • Saskatoon berry (Amelanchier alnifolia; zigwaakominaatig/oog, ozigwaakomin/an, gozigwaakominagaawanzh, gozigwaakomin(-an), ozagadigon, zhigaagomiinen,zhigaagomiinaatig [Oji-Cree and Ojibway dialects]); • Canada wild ginger (Asarum canadense; namepin [Ojibway dialect]); • Common yarrow (Achillea millefolium; waabigooniinzens [Ojibway dialect]); • Prickly rose (Rosa acicularis; oginiiwaabigwanaatig/oog, oginiiwaabigwan/iin [Ojibway dialects]); and Various grasses, including sweetgrass (Hierochloe odorata; mishkosiiwiingoshk [Ojibway dialect]) and wild rice (manoomin, manoominaatig/oon, manoominashk/oon [Ojibway dialect]).	Hydro One has not included a comprehensive list of key plant species harvested by the NWOMC and Region 2, including chaga, fiddleheads, mushrooms and sage. While it is noted that this is not a comprehensive list, the reference to the First Nations only volume points to a lack of consideration of Métis data. It further highlights the lack of integration of the Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project Please update this section to fully reflect information provided by the NWOMC and Region 2.	While the NWOMC and Region 2 Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project was not received in time to be integrated into the full Draft EA, the Final EA will be updated to integrate information provided in this study, guided by these comments.
59.	6.4 Vegetation and Wetlands, 6.4.5.2.6 Plants of Traditional	Plant species details (various)	No discussion was undertaken by Hydro One to understand the uses of various plant species by the NWOMC and Region 2 for integration in this	While the NWOMC and Region 2 Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project was not received in time to be integrated into the full Draft EA, the Final EA

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	Use, Page 6.4- 44 (PDF Page 51)		descriptive section. The only data included is specifically related to First Nations. There is no hierarchy of rights within the *Constitution Act, 1982*. The tiering of Indigenous groups with some (First Nations) emphasized and others (Métis) minimized is inappropriate. Particularly, as the NWOMC and Region 2 have established rights in proximity to the Project. Please continue engagement with the NWOMC and Region 2 to understand the uses of various plant species and update this section in the Final EA.	will be updated to integrate information provided in this study, guided by these comments.
60.	6.4, Vegetation and Wetlands, 6.4.7 Potential Effects, Mitigation Measures, and Net Effects, Page 6.4-54 (PDF Page 61)	"Because these net effects cannot be further avoided or mitigated, they are typically compensated for by undertaking positive environmental activities (e.g., the creation of new naturalized habitats or enhancement of existing habitats at outside of the Project footprint). For more information on how Hydro One will be offsetting net effects of the Project, see Section 11.0 of the draft EA."	Hydro One implies that new natural habitats will be created or existing habitats will be enhanced outside the Project footprint. Section 11.0 is referenced as a containing more detail on positive environmental activities; however, the section fails to elaborate further on the topic. Please provide additional details both through engagement and within the Final EA on how and what new habitats will be created or how existing habitats will be enhanced.	See response to comment #2.
61.	6.4 Vegetation and Wetlands, 6.4.7.1.3 Chemical or Hazardous Material Spills, Page 6.4-57 (PDF Page 64)	"The implementation of a Spill and Emergency Preparedness and Response Plan, and training of personnel in safe handling of chemicals and hazardous materials are anticipated to minimize the frequency, spatial extent and severity of spills. Given implementation of the mitigation measures described above, spills in the Project footprint are not expected to result in measurable changes to soil quality and plants."	Hydro One states that a Waste Management Plan and a Spill Prevention and Emergency Response Plan will be developed. Chemical or Hazardous spills have the potential to impact the environment, safety, and perceptions of the NWOMC and Region 2. It is critical the NWOMC and Region 2 has opportunity to provide input on these plans, subject to capacity and availability, and are involved in the execution of these Plans, once implemented.	These plans will be included as part of the EPP that will be provided to affected Indigenous communities for review and input at least 90 days in advance of construction.
62.	6.4 Vegetation and Wetlands, 6.4.7.1.3 Chemical or Hazardous Material Spills, Page 6.4-57 (PDF Page 64)	"The Project will also implement mitigation measures to limit erosion of soil from wind and water, such as selectively cutting vegetation and restricting clearing within areas with steep slopes in a Soil Management Plan."	Hydro One states a Soil Management Plan will be created to limit erosion of soil from wind and water. A reduction in soil quantity and quality has the potential to indirectly result in impacts plant species used by the NWOMC and Region 2 in the exercise of their Métis rights and interests.	These plans will be included as part of the EPP that will be provided to affected Indigenous communities for review and input at least 90 days in advance of construction.

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			Hydro One must ensure the NWOMC and Region 2 has opportunity to provide input on these plans, subject to capacity and availability, and are involved when plans are implemented.	
63.	6.4 Vegetation and Wetlands, 6.4.7.2.1 Ecosystem Loss and Alteration, Page 6.4-64 (PDF Page 71)	"The greatest loss of upland habitat loss within the LSA consists of coniferous forest (1,065 ha; 2.8% of change within the LSA)."	Additional engagement is required with the NWOMC and Region 2 as coniferous forest was identified as the second most typically harvested ecosystem as per the 2021 Baseline Data Collection Survey Results Document provided to Hydro One. As this is also represents the greatest habitat loss from the Project, additional discussion is required to ensure mitigation measures are appropriate and monitoring is sufficient.	Hydro One commits to engaging with the MNO on incorporation of site-specific mitigation in order to avoid or minimize impacts to NWOMC and Region 2 and providing opportunities for NWOMC and Region 2 involvement in monitoring programs.
64.	6.4 Vegetation and Wetlands, 6.4.7.2.1 Ecosystem Loss and Alteration, Page 6.4-64 (PDF Page 71)	"Despite some increase in fragmentation, overall most upland ecosystems are expected to remain abundant and well connected across the LSA and RSA to support healthy and functioning ecosystems."	There is no consideration within this section of how the increased fragmentation will impact Métis harvesting and land use. This must be considered and discussed within this Section of the Final EA to ensure fulsome integration of NWOMC and Region 2 data.	Section 6.4.7.2.1 evaluates Project effects using indicators specific to the quantity, distribution and condition of vegetation and wetland ecosystems. Effects of these physical changes to the landscape are considered with respect to the practice of rights and interests for Métis harvesters and land users in Section 7.8. Section 6.4.5.1 Methods of the Draft EA notes that "Potential Project effects on species of use by Indigenous communities are discussed in further detail in Section 7.7 (First Nations Rights, Interests and Use of Land and Resources) and Section 7.8 (Métis Rights, Interests and Use of Land and Resources)." This has been revised to reflect that "Potential Project effects on **vegetation and wetland communities or species that may affect use by Indigenous communities** are discussed in further detail in Section 7.7 (First Nations Rights, Interests and Use of Land and Resources) and Section 7.8 (Métis Rights, Interests and Use of Land and Resources)."

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65.	6.4 Vegetation and Wetlands, 6.4.7.2.1 Ecosystem Loss and Alteration, Page 6.4-65 (PDF Page 72)	“The use of herbicides and pesticides on the Waasigan Transmission Line is currently under review by Hydro One. Hydro One is committed to not using herbicides and pesticides in areas identified by impacted First Nations that may impact their treaty rights, and commits to further discussion with Métis communities on its use.”	Please provide additional clarity on the discrepancy in commitment related to herbicide and pesticide use between First Nations and Métis. The NWOMC and Region 2 have provided detailed information within their Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project in relation to their rights and interests which Hydro One can similarly inform the commitment to not applying herbicide and pesticide. Additional explanation is required.	See response to comment #41.
66.	6.4 Vegetation and Wetlands, 6.4.7.2.2 Dust and Air Emissions, and Subsequent Deposition & Subsequent Dust and Air Emissions, and Subsequent Deposition, Page 6.4-66 (PDF Page 73)	“Accumulation of dust produced from the Project may result in local and direct changes to vegetation. Dust that falls directly on plants can have a physical effect by smothering plant leaves or blocking stomata openings (Farmer 1993). Crusts forming on leaves can reduce net photosynthesis (Brandt and Rhoades 1973). After many cycles of crusting, the annual growth rate of plants can be reduced or cease, and crusting can even lead to death. Walker and Everett (1987) and Everett (1980) reported that few vascular plant species showed physiological effects from dust, except where vegetation was subject to very high dust loading. Auerbach et al. (1997) found that although plant species composition may change and aboveground biomass may be reduced by dust deposition, ground cover is still maintained.”	In addition to the effects of mentioned by Hydro One, the deposition of dust on harvested vegetation can negatively impact harvesting experiences through increased avoidance behaviours and increased negative perceptions of harvested plant species. This must be discussed and explored within the Final EA.	Construction will implement effective dust suppression techniques, such as on-site watering, as necessary to minimize fugitive dust at worksites and access roads as required. Calcium chloride may be used along municipal roads near residences to reduce dust and improve safety where there is increased Project traffic interface with public road users. Application of calcium chloride will be completed in consultation with road authorities. A Dust Control/Air Quality Plan will also be included as part of the EPP that will be provided to NWOMC and Region 2 for review. In addition, Hydro One commits to providing opportunities for NWOMC and Region 2 involvement in monitoring programs.
67.	6.4 Vegetation and Wetlands, 6.4.7.2.2 Dust and Air Emissions, and Subsequent Deposition, Page 6.4-66 (PDF Page 73)	“A Blasting and Communications Management Plan will be prepared and implemented to limit the amount of chemical residue in the environment.”	Hydro One states that their contractors will prepare a Blasting and Communication Management Plan. Given the potential impacts from blasting on dust levels air quality, and soil, it is critical the NWOMC and Region 2 has opportunity to provide input on these plans, subject to capacity and availability, and are involved when Plans are implemented. Additionally, the NWOMC and Region 2 require additional discussion regarding blasting alternatives that can be employed.	These plans will be included as part of the EPP that will be provided to affected Indigenous communities for review and input at least 90 days in advance of construction.
68.	6.4 Vegetation and Wetlands, 6.4.7.2.3 Introduction and Spread of Noxious and Invasive Plant Species, Page 6.4-69 (PDF Page 76)	“Natural recovery is the preferred method over seeding of reclamation on level terrain where erosion is not expected. Seeding is required in erosion prone areas and as such these areas will be seeded with a native cover crop and certified seed mix approved by the applicable regulatory agency for appropriate ecosystems (e.g., seeds of plant species that prefer humid/wet conditions are to be spread in wetlands) to promote plant species establishment during reclamation, as soon as feasible after construction.”	The NWOMC and Region 2 requires involvement and input into any selection and identification of seed mixtures to ensure the revegetation is conducive to supporting Métis harvest in the future.	Hydro One commits to further engagement on the plan for restoration, including revegetation, and to providing opportunities for NWOMC and Region 2 involvement in monitoring programs.

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69.	6.4 Vegetation and Wetlands, 6.4.7.3.2 Dust and Air Emissions, and Subsequent Deposition, Page 6.4-74 (PDF Page 81)	“In areas where there are residences or sensitive receptors located within approximately 200 m of the Project footprint, emphasis will be placed on comprehensive implementation of mitigation measures, in particular dust suppression activities such as watering and dust suppressants.”	Dust suppressants are of concern to the NWOMC and Region 2 as they can potentially impact subsistence vegetation and displace potential harvesters who would otherwise use the area in the exercise of their rights should awareness or evidence of dust suppressants be identified. Hydro One should engage with the NWOMC and Region 2 further to discuss the usage of dust suppressants to ensure comprehensive understanding of potential impacts and proper protocols/situations for usage/deployment.	See response to comment #66.
70.	6.4 Vegetation and Wetlands, 6.4.7.7 Plants of Traditional Use, Page 6.4-86 (PDF Page 93)	“Fourteen plant species of traditional use were determined as part of the baseline characterization of the LSA and RSA (Table 6.4-12; Appendix 6.4-A).”	While the fourteen plants listed in Section 6.4.5.2.6 Plants of Traditional Use were noted to not be a comprehensive listing, it appears from this section that these plant species were the only ones considered as part of the baseline characterization and effects assessment. As previously noted, there are additional plants used and of importance to the NWOMC and Region 2 as evidenced within the Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project. The assessment must consider these plants and include specific details within the Final EA.	The Final EA will be updated to integrate information provided by NWOMC and Region 2 in the Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project.
71.	6.4 Vegetation and Wetlands, 6.4.7.7 Plants of Traditional Use, Page 6.4-86 (PDF Page 93)	“97% in the LSA and 99% in the RSA of habitats to plant species of traditional use are predicted to remain intact in terms of net effects.”	In many EA processes the NWOMC and Region 2 have experienced the proponents and the Crown indicating that NWOMC and Region 2 citizens can move elsewhere in the exercise of their Section 35 rights. In these instances, this is due to resources being available in other locales, and the implication that the impact to a specific place can be lessened by availability of resources elsewhere. This approach disconnects the provided Indigenous Knowledge and dissociates it from the richness and value of the key location to Métis citizens. While traditional use could be practiced in other locales, it may not have the specific cultural context required to allow for the exercise of Métis rights and interests. This must be contemplated by Hydro One in their Final EA.	As noted in Comment #64, Section 6.4.7.7 evaluates Project effects using indicators specific to the quantity, distribution and condition of vegetation and wetland ecosystems. Effects of these physical changes to the landscape are considered with respect to the practice of rights and interests for Métis harvesters and land users in Section 7.8. Within the Final EA, the comment provided here regarding the specific cultural context required to allow for the exercise of Métis rights and interests at a given location has been used to supplement the assessment of effects to Changes in Perception of “Place” – Harvesting Sites in Section 7.8.

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72.	6.4 Vegetation and Wetlands, Table 6 4-20: Potential Effects, Mitigation Measures, and Predicted Net Effects for Vegetation and Wetlands, Page 6.4-92 (PDF Page 99)	Criteria – Plant Species of Traditional Use	The mitigation measures proposed were not developed in collaboration with the NWOMC or Region 2. Further engagement is required to ensure that mitigation measures can be co-developed and will sufficiently address impacts to NWOMC and Region 2 rights and interests.	Hydro One commits to engaging with the NWOMC and Region 2 on potential refinements to the Project footprint and incorporation of site-specific mitigation in order to avoid or minimize impacts to NWOMC and Region 2.
73.	6.4 Vegetation and Wetlands, Table 6.4-20: Potential Effects, Mitigation Measures, and Predicted Net Effects for Vegetation and Wetlands, Page 6.4-95 (PDF Page 102)	"Progressive reclamation of disturbed areas will be practiced. Natural recovery is the preferred method over seeding of reclamation on level terrain where erosion is not expected. If seeding is required, seed erosion prone areas with a native cover crop and certified seed mix approved by the applicable regulatory agency for appropriate ecosystems (e.g., seeds of plant species that prefer humid/wet conditions are to be spread in wetlands) to promote plant species establishment during reclamation. Seeding will follow as close as possible to final cleanup and topsoil material replacement pending seasonal or weather conditions."	In areas of soil compaction, it has been shown that forest ecosystems do not restore naturally both during and following reclamation. Without assistance, these ecosystems remain can remain as open spaces, primarily overgrown with grass. The NWOMC and Region 2 require additional information on the 'natural recovery' proposed by Hydro One, how this approach will be monitored for success, and opportunities for NWOMC and Region 2 involvement, subject to capacity and availability.	Hydro One commits to further engagement on the plan for restoration to providing opportunities for NWOMC and Region 2 involvement in monitoring programs.
74.	Wildlife and Wildlife Habitat, Input from Engagement, Page 6.5-2 (PDF Page 12)	Indigenous Community or Indigenous Group/Stakeholder	Please update reference to Métis Nation of Ontario to display the Northwestern Ontario Métis Community or NWOMC and Region 2.	Comment noted. The final EA will be updated accordingly.
75.	6.5 Wildlife and Wildlife Habitat, 6.5.1 Input from Engagement, Page 6.5-2 (PDF Page 12)		There is no reference to comments made by the NWOMC and Region 2 within the February 2023 memorandum and letter within this summary of comments raised during engagement table. In fact, Hydro One only included one topic that was discussed during engagement initiatives. Other items raised related to wildlife and wildlife habitat include: • Teaching/transmission of knowledge to next generation • **Acoustic, air quality and visual impacts** • **Harvesting seasonality and times**	Input related to the indicators of wildlife and wildlife habitat (e.g., acoustic, air quality; harvesting seasonality and times; already declining quantity and quality of harvested resources; avoidance and preferences by wildlife; cumulative effects) has been added to Table 6.5.1 of the Final EA. Other areas of input related to the practice of rights and interested has been added to Section 7.8.

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			• **The impact on the already declining quantity and quality of harvested resources** • **Avoidance and preferences** • **Cumulative effects** • Level of engagement with Hydro One to date Please update this table in the Final EA to provide a complete list of comments raised during engagement related to wildlife with both the NWOMC and Region 2.	
76.	6.5 Wildlife and Wildlife Habitat, 6.5.2 Information Sources, Page 6.5-6 and Page 6.5-7 (PDF Page 16 and 17)	"Information incorporated into the wildlife assessment was obtained from the following sources … For the purposes of the EA, sufficient information was deemed to be available from the references listed above to assess the potential effects of the Project on wildlife"	The NWOMC and Region 2 Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project was not referenced as a source for "information incorporated into the wildlife assessment…". This is problematic as this Study included details on important wildlife species, preferences, harvesting timing windows, and seasonality which could inform the assessment of potential effects of the Project on wildlife. Please confirm whether the Study was considered in the assessment. If yes, please update this listing to include the Study. If not, please reassess using this important Indigenous Knowledge provided by the NWOMC and Region 2	While the NWOMC and Region 2 Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project was not received in time to be integrated into the draft EA, the final EA will be updated to integrate information provided in this study.
77.	6.5 Wildlife and Wildlife Habitat, 6.5.3 Criteria and Indicators, Page 6.5-8 (PDF Page 18)	"In cases where effects would be similar for multiple wildlife species or taxa groups (e.g., raptors), only one species was selected as a criterion for the Project to minimize ecological and assessment redundancy."	Although the NWOMC and Region 2 understand that selecting one species as criterion for the assessment may be appropriate for some species, the NWOMC and Region 2 is concerned that this method will result in impacts to other animals and/or their habitats not fully being assessed. This is because some animals may consume different foods, have different seasonality, and/or have vastly different habitats. This is emphasized within the EA itself whereby the use of indicator or umbrella species is noted to potentially "overlook habitat conditions or ecological processes that are important for wildlife, but not associated with an indicator species."	Section 6.5 of the Final EA has been updated to reference information provided by NWOMC and Region 2 related to identified wildlife with habitat along the preferred route. Practice of Indigenous rights related to wildlife with habitat along the preferred route - include the context offered here have been supplemented in Section 7.8 of the Final EA.

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			Further, by using this method, it is unclear as to whether Hydro One considered all wildlife that are important to the NWOMC and Region 2 for harvesting and cultural practices. During the data collection stage for the NWOMC and Region 2's Traditional Knowledge and Land Use Study, participants reported harvesting or encountering habitats for the following species along the preferred route: • Bear • Beaver • Chicken • Coyote • Deer • Duck • Fisher • Fox • Grouse • Lynx • Marten • Moose • Otter • Partridge • Prairie Chicken • Rabbit • Spruce Hen • Squirrel • Weasel • Wolf • Wolverine Please confirm whether Hydro One considered all species or representative indicator species.	

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78.	6.5 Wildlife and Wildlife Habitat, 6.5-2: Rational for Selected Wildlife and Wildlife Habitat Criteria, Page 6.5-9 (PDF Page 19)	Table	This table describes various rationale for wildlife and wildlife habitat criteria selection, but appears to have not considered importance to the Métis. Many of the species listed are important to Métis harvesters for subsistence or for cultural purposes. It is unclear whether Hydro One considered the importance of wildlife and wildlife habitat criteria to the Métis specifically for subsistence and/or cultural purposes with the current wording of this table. Please update in the Final EA to specifically indicate where Métis data was used in the rationale for selection. If Métis data was not considered, please refer to the Waasigan Traditional Knowledge and Land Use Study and further engage the NWOMC and Region 2 to ensure important Métis data is used in the definition of wildlife and wildlife habitat criteria.	While the NWOMC and Region 2 Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project was not received in time to be integrated into the full Draft EA, the Final EA will be updated to integrate information provided in this study, guided by these comments.
79.	6.5 Wildlife and Wildlife Habitat, 6.5.3.2 Measurement Indicators, Page 6.5-13 (PDF Page 23)	“Each indicator was assessed quantitatively where sufficient information existed to support an assessment, and qualitatively where necessary, with the support of scientific literature and expert opinion.”	Each indicator was not assessed with the support of NWOMC and Region 2 provided data, including the Traditional Knowledge and Land Use Study. Please update the Final EA to ensure indicators are assessed utilizing NWOMC and Region 2’s information.	Section 6.5 of the Final EA has been updated to reference information provided by NWOMC and Region 2 related to identified wildlife with habitat along the preferred route.
80.	6.5 Wildlife and Wildlife Habitat, 6.5.3.2 Measurement Indicators, Page 6.5-14 (PDF Page 24)	“Consequently, a detailed and transparent account of predicted effects associated with estimated cumulative changes to each measurement indicator were provided for each criterion using available scientific literature, publicly available data, data collected during the baseline field program, and logical reasoning (i.e., a weight of evidence, or reasoned narrative approach).”	See comment #79.	See response to comment #79.
81.	6.5 Wildlife and Wildlife Habitat, 6.5.5.1 Measurement Indicators, Page 6.5-10 (PDF Page 30)	“For each identified wildlife criterion, the existing environment is described to provide context for the assessment. Baseline characterization for each wildlife criterion was completed using baseline field surveys, digital data provided by Hydro One Networks Inc. (Hydro One), available in-house at WSP, (including Ministry of Natural Resources and Forestry [MNRF] Land Information Ontario [LIO] and Natural Heritage Information Centre [NHIC] data), and obtained through publicly available databases, published reports and grey literature, IK (Indigenous Knowledge)/Traditional Land and Resource Use (TLRU) studies received from Indigenous communities, habitat maps, and through available literature relevant to wildlife in the criterion-specific RSAs.”	Hydro One has not considered the NWOMC and Region 2 Traditional Knowledge and Land Use Study to inform baseline characterization. Please update the Final EA to ensure the baseline characterization is informed by NWOMC and Region 2 information.	While the NWOMC and Region 2 Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project was not received in time to be integrated into the draft EA, the final EA will be updated to integrate information provided in this study.

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82.	6.5 Wildlife and Wildlife Habitat, 6.5-20 Measurement Indicators, Page 6.5-85 (PDF Page 95)	“The use of herbicides and pesticides on the Waasigan Transmission Line is currently under review by Hydro One. Hydro One is committed to not using herbicides and pesticides in areas identified by impacted First Nations that may impact their treaty rights, and commits to further discussion with Métis communities on its use.”	Please provide additional clarity on the discrepancy in commitment related to herbicide and pesticide use between First Nations and Métis. The NWOMC and Region 2 have provided detailed information within their Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project in relation to their rights and interests which Hydro One can similarly inform the commitment to not applying herbicide and pesticide. Additional explanation is required.	See response to comment #41.
83.	6.5 Wildlife and Wildlife Habitat, 6.5.7.1.2 Dust, Air Emissions, and Depositions, Page 6.5-90 (PDF Page 100)	“The risk of air and dust emissions and subsequent deposition causing chemical changes to the environment and affecting wildlife habitat will be minimized by the implementation of mitigation measures including maintenance of vehicles and equipment, coordination of worker transportation, and compliance with regulatory approvals and permits.”	General maintenance and compliance with regulatory approvals and permits is insufficient to mitigate impacts from air and dust emissions on wildlife and wildlife habitat. Please continue engagement with the NWOMC and Region 2 to discuss mitigation measures which can reduce net effects to Métis rights and interests, as well as wildlife and wildlife habitat.	Hydro One commits to engaging with the NWOMC and Region 2 on potential refinements to the Project footprint and incorporation of site-specific mitigation in order to avoid or minimize impacts to NWOMC and Region 2. These refinements can continue to be made post-EA under the limits of work set out in the EA.
84.	6.5 Wildlife and Wildlife Habitat, 6.5.7.1.3 Herbicide Application, Page 6.5-91 (PDF Page 101-102)	“Herbicide application associated with maintaining vegetation along the ROW will be used to maintain vegetation at an appropriate height to protect the infrastructure and improve public and worker safety. Improper herbicide application techniques can indirectly reduce or degrade wildlife habitat through changes in soil quality and ecosystem availability. A change in local soil quality and ecosystem availability from herbicide application has the potential to affect wildlife habitat availability.”	Herbicide application can impact wildlife habitat availability, the plants that wildlife consume, and in turn, impact the health of wildlife and the health of Métis citizens that may consume them. Continued engagement is required with the NWOMC and Region 2 regarding the use of herbicides and pesticides. Further, the NWOMC and Region 2 require Hydro One to update this section to reflect the impact that herbicide and pesticide application may have on wildlife (in addition to their habitat). See comment #82.	See response to Comment #41.
85.	6.5 Wildlife and Wildlife Habitat, 6.5.7.1.4 Introduction and Spread of Noxious and Invasive Plant Species, Page 6.5-92 (PDF Page 102)	**“Mitigation Measures** The introduction and spread of noxious and invasive plant species will be prevented or minimized through the implementation of an Invasive Species and Biosecurity Management Plan. Mitigation measures are summarized in Table 6.5-37. The effectiveness of mitigation measures will be evaluated during construction and post-construction, and mitigation measures will be modified or enhanced as necessary through adaptive management.”	Hydro One has not indicated opportunities for NWOMC and Region 2 involvement in post-construction activities. The NWOMC and Region 2 require involvement, subject to capacity and availability, in post-construction monitoring to identify noxious and invasive plant species and be involved in their safe effective removal.	Hydro One commits to providing opportunities for NWOMC and Region 2 involvement in monitoring programs.

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86.	6.5 Wildlife and Wildlife Habitat, 6.5.7.1.6 Fly Rock from Blasting, Page 6.5-94 (PDF Page 104)	“If blasting is required, the Blasting and Communication Management Plan to be developed by the contractor(s) will be adhered to and will include mitigation measures such as using blast mats or controlled blasting techniques to minimize fly rock.”	Hydro One has indicated that the contractors will develop the Blasting and Communication Management Plan. Blasting not only has the potential to disturb and impact wildlife, but it has the potential to impact the ability of NWOMC and Region 2 members exercising their rights and interests. NWOMC and Region 2 harvesters and land users have preferred harvesting times and conditions that must be considered should Hydro One undertake blasting. Further, blasting poses a safety concern for NWOMC and Region 2 members who may be out on the land. In order to remedy this, subject to capacity, NWOMC and Region 2 require engagement on the development of the Blasting and Communication Management Plan. The NWOMC and Region 2 must be notified before blasting occurs, with sufficient time to notify members. The NWOMC and Region 2 urge Hydro One to engage with the NWOMC and Region 2 on what that involvement may look like and determine when blasting times are appropriate for NWOMC and Region 2 citizens. Additionally, the NWOMC and Region 2 require additional discussion regarding blasting alternatives that can be employed.	The current access plan for construction minimizes the need for blasting operations. Where blasting activities are required, all blasting operations will occur in accordance with the EPP Blasting and Communication Management Plan. The process and procedures for notifications and minimizing effects of blasting activities (i.e., avoidance of sensitive features and timing windows, where possible) will be developed collaboratively with Indigenous communities.
87.	6.5 Wildlife and Wildlife Habitat, 6.5.7.1.6 Fly Rock from Blasting, Page 6.5-94 (PDF Page 104)	“Ammonium nitrate explosives may be used to remove bedrock for the placement of new access roads and structures. Use of explosives produces fly rock, which has potential to cause wildlife injury and mortality, particularly with slow moving animals with limited home ranges, and lead to reduced survival and reproduction.”	Blasting is not clearly assessed within the wildlife and wildlife habitat section of the draft EA. Blasting has potential to result in adverse effects to both wildlife and NWOMC and Region 2 harvesters or land users through either nuisance or discomfort. Blasting is intermittent, unpredictable and can result in a startle response and increased avoidance behaviors which can alter patterns of the exercise of rights. Further, annoyance from blasting is subjective and can be premised on an expectation for quiet which can be disrupted by the intermittent and unpredictable nature of blasting; and there is also potential for indirect	Section 6.5 has been updated in the Final EA to specifically reference potential for sensory disturbance as a result of blasting. Section 7.8 has been updated to acknowledge potential for sensory disturbance to land users as a result of blasting.

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			effects to Métis rights holders through displacement of wildlife where blasting could result in disruption to wildlife movement and loss of habitat.	
88.	6.5 Wildlife and Wildlife Habitat, 6.5.7.1.7 Chemical or Hazardous Material Stored on the Project Site, or Spills, Page 6.5-95 (PDF Page 105)	"Hydro One and their contractor(s) will prepare and implement an Environmental Protection Plan (EPP) and Spill and Emergency Preparedness and Response Plan that will include procedures to decrease the risk of an accidental spill occurrence and timely clean-up if a spill were to occur."	See comment #87. Hydro One indicated that their contractors will prepare and implement an EPP and Spill and Emergency Preparedness and Response Plan. Spills and emergencies have the potential to impact NWOMC and Region 2 rights and interests. It is important that the NWOMC and Region 2 has opportunity, subject to capacity and availability, to provide input on these plans and are involved in their implementation.	The EPP and Spill and Emergency Preparedness and Response Plan will be provided to affected Indigenous communities for review and input at least 90 days in advance of construction.
89.	6.5 Wildlife and Wildlife Habitat, 6.5.7.2.4 Increase in Public Access, Page 6.5- 102 (PDF Page 112)	"Hydro One will limit unauthorized access to provincial parks by installing signage on access roads where permissible by MNRF."	The implementation of signage, signalling unauthorized access, may result in NWOMC and Region 2 harvesters avoiding the area due to increased negative perceptions or safety concerns. Hydro One has not considered the impact that this mitigation measure may have on NWOMC and Region 2 harvesters or land users. The NWOMC and Region 2 require additional engagement with Hydro One to determine how to mitigate impact from signage limiting unauthorized access.	This mitigation measure is specific to areas within provincial parks. Hydro One commits to further engagement with the NWOMC and Region 2 on the effects related to provincial parks and conservation reserves, including on any required modifications to their Management Plans and Statements. Additional context guided by this comment, can be included in Section 7.8.10.7 which describes the change in Perception of Place related to harvesting sites. Hydro One commits to engaging with the MNO on potential refinements to the Project footprint and incorporation of site-specific mitigation in order to avoid or minimize impacts to NWOMC and Region 2. These refinements can continue to be made post-EA under the limits of work set out in the EA.
90.	6.5 Wildlife and Wildlife Habitat, 6.5.7.3.4 Increase in Public Access, Page 6.5-109 (PDF Page 119)	"Hydro One will limit unauthorized access to provincial parks by installing signage on access roads where permissible by MNRF."	See comment #89.	See response to comment #89.

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91.	6.5 Wildlife and Wildlife Habitat, 6.5.7.3.5 Incidental take, Page 6.5-109 (PDF Page 119)	“The denning period for gray fox occurs from mid-February to mid-July. Gray fox is listed as threatened on the provincial ESA and the federal SARA. The ESA prohibits the killing or harming of species identified as endangered or threatened in the various schedules to the Act. The ESA also provides habitat protection to all species listed as threatened or endangered.”	While gray fox is not noted within the NWOMC and Region 2 Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project, stewardship of lands, resources, and species is an important value that is intertwined in NWOMC and Region 2 cultural practices. Stewardship is an expression of NWOMC and Region 2 governance and is important for maintaining healthy, flourishing ecosystems, and in promoting biodiversity. Therefore, the NWOMC and Region 2 require involvement in managing species at risk, including the gray fox. This should be developed into a monitoring plan, with NWOMC and Region 2 involvement, subject to capacity and availability.	Hydro One commits to providing opportunities for NWOMC and Region 2 involvement in monitoring programs.
92.	6.5 Wildlife and Wildlife Habitat, 6.5.7.4.2 Sensory Disturbance, Page 6.5-112 (PDF Page 122)	“The effects of corona noise on gray wolf are unknown; however, studies on other mammals have shown that noise levels at transmissions lines do not deter wildlife (Goodwin 1975; Manitoba Hydro 2010). Corona noise from the transmission line is not anticipated to cause gray wolves to avoid the ROW and so is not anticipated to reduce habitat availability. Additionally, packs with home ranges that overlap the Project footprint may currently be habituated to corona noise due to the presence of the existing ROW.”	Hydro One states within this section that the effects of corona noise on gray wolf is unknown, but determines that the project will not cause gray wolf to avoid the transmission line, thereby reducing habitat availability. NWOMC and Region 2 members have reported concerns and experiences with corona noise causing disturbance to harvesters, land users, and wildlife. Therefore, the NWOMC and Region 2 require that, where uncertainty remains, Hydro One take a precautionary approach, and assume corona noise will lead to gray wolf avoidance of the ROW.	Section 6.5 of the Final EA has been revised to reflect that: • The effects of corona noise on gray wolf have not been extensively researched; • Studies on other mammals have shown that noise levels at transmissions lines do not deter wildlife (Goodwin 1975; Manitoba Hydro 2010). • NWOMC and Region 2 members have reported concerns and experiences with corona noise causing disturbance to harvesters, land users, and wildlife • The assessment of effects has been adjusted to reflect that avoidance of the ROW by gray wolf may occur; given the large home range of packs and evidence that wolves use linear corridors for traveling, this is not anticipated to change the findings of the assessment to gray wolf.
93.	6.5 Wildlife and Wildlife Habitat, 6.5.7.4.4 Increase in Public Access, Page 6.5- 114 (PDF Page 124)	“Hydro One will limit unauthorized access to provincial parks by installing signage on access roads where permissible by MNRF.”	See comment #89.	See response to comment #89.

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94.	6.5 Wildlife and Wildlife Habitat, 6.5.7.4.4 Increase in Public Access, Page 6.5- 118 (PDF Page 128)	“During operations, compatible vegetation in the ROW will be allowed to grow back to provide some cover and reduce line-of-sight for predators. These mitigation measures are expected to minimize the potential effects on American marten habitat and survival and reproduction.”	Marten is an important species to the NWOMC and Region 2. There is no mention of involving Indigenous groups in post-construction monitoring initiatives, such as monitoring the effectiveness of revegetation for marten habitat, survival, and reproduction. The NWOMC and Region 2 require involvement in developing and carrying out monitoring plans, subject to capacity and availability.	Hydro One commits to providing opportunities for NWOMC and Region 2 involvement in monitoring programs, including engagement on development and implementation of the plan for monitoring.
95.	6.5 Wildlife and Wildlife Habitat, 6.5.7.5.4 Increase in Public Access, Page 6.5-121 (PDF Page 131)	“Hydro One will limit unauthorized access to provincial parks by installing signage on access roads where permissible by MNRF.”	See comment #89.	See response to comment #89.
96.	6.5 Wildlife and Wildlife Habitat, 6.5-37 Summary of Net Effects and Mitigation Measures to Wildlife, Page 6.5-204 (PDF Page 214)	“Burning of slash will be in accordance with regulatory approvals and permits and subject to agreements with landowners, Sustainable Forest Licence (SFL) holders (e.g., overlapping agreements).”	Additional engagement is required with the NWOMC and Region 2 to ensure that burning of slash is scheduled outside of critical harvesting windows, and that burning times are communicated to NWOMC and Region 2 citizens.	Hydro One commits to engaging with the MNO on potential refinements to the Project footprint and incorporation of site-specific mitigation in order to avoid or minimize impacts to NWOMC and Region 2.
97.	6.5 Wildlife and Wildlife Habitat, 6.5-37 Summary of Net Effects and Mitigation Measures to Wildlife, Page 6.5-206 (PDF Page 216)	“Implement dust control measures (e.g., spray dust control solution that holds moisture for a long period of time causing dust to settle).”	Dust suppressants are of concern to the NWOMC and Region 2 as they can potentially impact subsistence vegetation and displace potential harvesters who would otherwise use the area in the exercise of their rights should awareness or evidence of dust suppressants be identified. Hydro One should engage with the NWOMC and Region 2 further to discuss the usage of dust suppressants to ensure comprehensive understanding of potential impacts and proper protocols/situations for usage/deployment.	See response to comment #66.
98.	6.5 Wildlife and Wildlife Habitat, 6.5-37 Summary of Net Effects and Mitigation Measures to Wildlife, Page 6.5-209 (PDF Page 219)	“Refueling, service and maintenance of vehicles and equipment will generally be carried out in designated areas at temporary construction camps and temporary laydown areas a minimum of 30 m from waterbodies.”	Refuelling at construction camps and laydown areas has the potential for unplanned release that could impact wildlife and wildlife habitat. This has not been adequately assessed in the draft EA. More engagement is required to determine the potential impacts of refueling, service, and maintenance of vehicles.	The EPP and Spill and Emergency Preparedness and Response Plan will be provided to affected Indigenous communities for review and input at least 90 days in advance of construction.

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			Additionally, Hydro One must develop communication plans to inform and involve (subject to capacity and availability) the NWOMC and Region 2 should a fuel leak or accident involving the fuel station occur.	
99.	6.5 Wildlife and Wildlife Habitat, 6.5-37 Summary of Net Effects and Mitigation Measures to Wildlife, Page 6.5-209 (PDF Page 219)	“Temporary access roads, construction camps, waterbody crossings, and laydown areas will be reclaimed at the end of construction.”	There is limited information on what reclamation activities will take place. For reclamation to be sufficient, land must be returned as close to its former state as possible. The NWOMC and Region 2 require involvement, subject to capacity and availability, in reclamation and monitoring of post-construction activities. Please provide more information on how Hydro One plans to involve the NWOMC and Region 2.	Hydro One commits to further engagement on the plan for restoration and to providing opportunities for NWOMC and Region 2 involvement in monitoring programs.
100.	6.5 Wildlife and Wildlife Habitat, 6.5-38 Magnitude Effect Levels for Wildlife, Page 6.5-213 (PDF Page 223)	“Magnitude was defined for each net effect using a narrative or numeric quantification (e.g., number of hectares, number of individuals), except where the intensity or degree of change was negligible.”	Measuring magnitude by using a numeric quantification on biophysical components only may not result in a full understanding of impacts, specifically to NWOMC and Region 2 rights and interests. This is especially true, when NWOMC and Region 2 avoid the Project area due to perceived effects on wildlife and wildlife Habitat. In this case, where Hydro One’s assessment results in a negligible degree of change on a biophysical aspect, the degree of change may be much larger in magnitude in relation to NWOMC and Region 2 rights or interests. NWOMC and Region 2 requires a re-evaluation of the magnitude determination through further engagement.	Section 6.5 evaluates Project effects using indicators specific to the availability and distribution of wildlife habitat, and to the ability of wildlife to survive and reproduce. Numerical quantification of change such as change in the amount of habitat area available to a given species in hectares, linear feature density as a measure of habitat distribution or a calculated potential change in abundance represent measures defined to understand the selected indicators. Narrative description is used in Section 6.5.8 to characterize the net effects predicted, including to put the numeric input in context for why a specific magnitude level is defined. Effects of these physical changes to the landscape and to wildlife are further considered with respect to the practice of rights and interests for Métis harvesters and land users, in Section 7.8. Indicators within Section 7.8 include change in perception of place, disruption of sense of place, reduction in cultural practices or change in teaching/ transmittal of knowledge. Within the Final EA, the comment provided here regarding the specific cultural context required to allow for the exercise of Métis rights and interests at a given location has been used to supplement the assessment of effects to Changes in Perception of “Place” – Harvesting Sites in Section 7.8.

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101.	6.6 Fish and Fish Habitat, Page 6.6-2 (PDF Page 8)	“A limited list of species of Indigenous community concerns were provided during engagement and included the following species: Whitefish (i.e., Lake Whitefish), Walleye, Muskie (i.e., Muskellunge), Sturgeon (i.e., Lake Sturgeon), trout (i.e., Brook Trout, Rainbow Trout and Lake Trout), smallmouth bass and small-bodied fish (i.e., bait fish). These species were included in the effects assessment and are discussed in detail in the sections below. Species of importance to Indigenous communities have also been assessed as part of the socio-economic assessment and, as such, are included in Sections 7.7 and 7.8.”	In addition to the identified species and criteria species listed within this Section, the NWOMC and Region 2 Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project also includes Crappie as a key harvested species. Please update this section and overall assessment within the Final EA.	Comment noted. The referenced text in Section 6.6 has been updated in the Final EA to include crappie as a key harvested fish species, as shared by NWOMC and Region 2 and how crappie are reflected in the assessment of effects. Section 7.8 has also been updated accordingly.
102.	6.6 Fish and Fish Habitat, 6.6-1 (Table) Summary of Comments Raised during Engagement Related to Fish and Fish Habitat, Page 6.6-4 (PDF Page 10)	Indigenous Community or Stakeholder	Please update reference to Métis Nation of Ontario Region 1 and Region 2 to display the Northwestern Ontario Métis Community or NWOMC and Region 2.	Comment noted. The final EA will be updated accordingly.
103.	6.6 Fish and Fish Habitat, 6.6-1 (Table) Summary of Comments Raised during Engagement Related to Fish and Fish Habitat, Page 6.6-5 (PDF Page 11)	“The transmission line will prohibit the use of herbicides within the 30 m waterbody buffer unless the herbicide application is conducted by ground application equipment or otherwise approved by the relevant regulatory agency. The use of herbicides and pesticides and the potential interaction with fish and fish habitat is considered in Section 6.6.7.”	The application method of herbicide and pesticide is not relevant and does not mitigate the NWOMC and Region 2’s detailed concerns with usage (as outlined in the Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project). Additional engagement is required in order to ensure Hydro One’s understanding of the content of the Traditional Knowledge and Land Use Study and allow for integration of this information into the Final EA.	See response to comment #41.
104.	6.6 Fish and Fish Habitat, 6.6-2 (Table) Source Information used in the Baseline Characterization, Page 6.6-11 (PDF Page 17)	Table	The NWOMC and Region 2 provided Hydro One the Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project that contains existing condition information reported by NWOMC and Region 2 members who have extensive knowledge of the lands and resources surrounding the Project. Hydro One has not referenced the NWOMC and Region 2 Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project in the list of sources used in the Baseline Characterization.	While the NWOMC and Region 2 Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project was not received in time to be integrated into the draft EA, the final EA will be updated to integrate information provided in this study.

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			Please update the Baseline Characterization to use and include the Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project.	
105.	6.6 Fish and Fish Habitat, 6.6.5.1.2 Baseline Characterization Data Collection, Page 6.6-27 (PDF Page 33)	“Indigenous communities identified interested community members to participate in field work as equal members of the field team. Eleven community representatives participated in the aquatics field program. Their contribution to the success of the field program was acknowledged in Appendix 6.6-A: Fish and Fish Habitat Baseline Report, Section 2.2.1.”	As the NWOMC and Region 2 were not community representatives that participated in the aquatics field program, the NWOMC and Region 2 require engagement with Hydro One to ensure NWOMC and Region 2 existing condition information from the Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project is accurately captured in the Final EA.	In advance of and during the field program, the MNO received advanced notification of studies to be completed and were invited to participate in the field program. Indigenous communities were also provided bi-weekly updates during field season which included a description of the field crew members that participated, notable findings and other observations. The final EA will be updated to integrate information provided by NWOMC and Region 2 in the Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project.
106.	6.6 Fish and Fish Habitat, 6.6.5.2.4.4 Species of Indigenous Concern, Page 6.6-49 (PDF Page 55)	“Species of Indigenous concern were selected based on engagement feedback received by the Grand Council Treaty #3 and EnCompass were included in the effects assessment within the RSA and LSA and are discussed in detail in the sections below. A limited species list was provided and included: • Whitefish (i.e., Lake Whitefish); • Walleye (see Section 6.6.5.2.5.4) and Sauger; • Muskie (i.e., Muskellunge); • Sturgeon (i.e., Lake Sturgeon) (see Section 6.6.5.2.3.1); and • Trout (i.e., Brook Trout, Rainbow Trout and Lake Trout) (see Sections 6.6.5.2.5.1 and 6.6.5.2.5.2). • Smallmouth Bass (See section 6.6.5.2.6) • Yellow Perch Baitfish species (i.e., small-bodied fish species)	Hydro One did not consider information provided by the NWOMC and Region 2 from the Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project in the selection of aquatic Species of Indigenous concern. within the Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project, citizens reported additional species of importance: Crappie Northern Pike Salmon Suckers (White, Spotted, etc.) Please ensure that all information provided by the NWOMC and Region 2 is incorporated in the Final EA, and that species of importance are listed.	While the NWOMC and Region 2 Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project was not received in time to be integrated into the draft EA, the final EA will be updated to integrate information provided in this study.
107.	6.6 Fish and Fish Habitat	Entire section	Throughout Section 6.6, Hydro One identifies the potential of species present in the LSA. The NWOMC and Region 2 Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project lists species that have been harvested by members in the LSA. Additional species include: • Bass • Northern Pike	The Final EA will be updated to integrate information provided by NWOMC and Region 2 in the Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project.

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			• Walleye • Trout Instead of integrating this source, Hydro One relies on other sources when determining the potential of the species to be present. As noted within the draft EA, Hydro One "…is committed to considering Indigenous Knowledge at all stages of the Project", therefore, information reported by the NWOMC and Region 2 should be included in the Final EA. Please update Section 6.6 to include the information provided by the NWOMC and Region 2 and acknowledge that the species listed above have been found in the LSA by NWOMC and Region 2 citizens.	
108.	6.6 Fish and Fish Habitat, 6.6-23 Potential Effects, Mitigation Measures, and Predicted Net Effects for Fish and Fish Habitat, Page 6.6-125 (PDF Page 131)	"Dust control practices (e.g., wetting with water) will be implemented at work sites and on access roads near residential areas or other areas as practicable;"	In Section 6.5, Hydro One stated that they would "Implement dust control measures (e.g., spray dust control solution that holds moisture for a long period of time causing dust to settle)." This does not align with this Section 6.6-23, where Hydro One states they will use water to control dust. Please clarify what will be used to control dust and update the Final EA.	Construction will implement effective dust suppression techniques, such as on-site watering, as necessary to minimize fugitive dust at worksites and access roads as required. Calcium chloride may be used along municipal roads near residences to reduce dust and improve safety where there is increased Project traffic interface with public road users. Application of calcium chloride will be completed in consultation with road authorities. A Dust Control/Air Quality Plan will also be included as part of the EPP that will be provided to NWOMC and Region 2 for review. The EPP will be provided for affected Indigenous communities review at least 90 days in advance of construction. In addition, Hydro One commits to providing opportunities for NWOMC and Region 2 involvement in monitoring programs.
109.	6.6 Fish and Fish Habitat, 6.6.12 Monitoring Page 6.6- 147 (PDF Page 153)	Entire section	There are no details on Indigenous involvement in monitoring. The NWOMC and Region 2 request details on involvement in monitoring and managing fish species at risk so that interest can be evaluated.	Hydro One commits to providing opportunities for NWOMC and Region 2 involvement in monitoring programs.

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110.	6.6A Fish Baseline Report, 2.21 Indigenous Participation, Page 2.2-15 (PDF Page 20)	Entire section	As the NWOMC and Region 2 were not community representatives that participated in the aquatics field program, the NWOMC and Region 2 require engagement with Hydro One to ensure NWOMC and Region 2 existing condition information from the Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project is accurately captured in the Final EA.	Hydro One commits to continuing to engage with the MNO on the information provided in the NWOMC and Region 2 Traditional Knowledge and Land Use Study for the Project.
111.	6.6A Fish Baseline Report, 2.21 Indigenous Participation, Page 2.3-16 (PDF Page 21)	“Hydro One is committed to considering Indigenous Knowledge at all stages of the Project. Indigenous Knowledge was shared through a variety of sources, including from Indigenous field crew members, Indigenous Knowledge studies completed by Indigenous communities and/or through engagement with Indigenous communities. Indigenous Knowledge received in relation to fish and fish habitat was highlighted and incorporated in the baseline studies and effects assessments, where it was shared by Indigenous communities for inclusion.”	Within this Section, Hydro One stated that IK received in relation to fish and fish habitat was incorporated in the baseline studies and effects assessment but does not cite which IK was utilized. As critical details related to the NWOMC and Region 2 Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project are not present in the baseline characterization or effects assessment, it can be assumed this has not occurred for the draft EA. Please continue engagement with the NWOMC and Region 2 to ensure adequate integration of the Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project within the Final EA. In instances where information is used, the NWOMC and Region 2 request that Hydro One cite the NWOMC and Region 2 TKLUS.	The Final EA will be updated to integrate information provided by NWOMC and Region 2 in the Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project., guided by these comments.
112.	6.6A Fish Baseline Report, 2.3.2 Background Data Review, Page 2.3-18 – 2.3- 21 (PDF Page 23-26)	Table	Please see comment #111.	See response to comment #111.
113.	6.7 Air Quality, 6.7.7.1 Change in Criteria Air Contaminants and Fugitive Dust Emissions, Page 6.7- 14 (PDF Page 19)	“The potential sources of air and fugitive dust emissions are from equipment, vehicles and activities associated with construction of the Project. Specifically, construction activities have the potential to temporarily affect local air quality in the immediate vicinity of the Project. Emissions from construction are primarily comprised of fugitive dust (i.e., particulate matter that is suspended in air by wind action and human activity) and tailpipe emissions (i.e., CAC) from the movement and operation of construction equipment and vehicles.”	It was noted in the Project Description volume that there may be blasting required for tower structure foundations which will consist of blasting a hole for concrete foundation in the bedrock. This blasting will result in fugitive dust which is not listed in this section as a potential source of emission. This must be considered. Additionally, the NWOMC and Region 2 require	It is understood that blasting may be required for tower structure foundations at some locations, which will consist of blasting a hole for concrete foundation in the bedrock. This activity may result in the release of particulate matter, including SPM, PM10 and PM2.5. Blasting, if required, will not occur concurrently with any other construction activities and will be very short term and infrequent in nature. For safety reasons, blasting will not occur in

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			additional discussion regarding blasting alternatives that can be employed.	locations close to occupied sensitive receptors. Emissions from blasting were therefore not quantified as they are anticipated to be very localized and would not be expected to overlap with the main ROW construction activities.
114.	6.7 Air Quality, 6.7.7.1 Change in Criteria Air Contaminants and Fugitive Dust Emissions, Page 6.7- 15 (PDF Page 20)	“In areas where there are residences or sensitive receptors located within approximately 200 m of the Project footprint, emphasis will be placed on comprehensive implementation of mitigation measures, in particular dust suppression activities, such as watering and/or applying dust suppressants. Fugitive dust controls on unpaved roads and material handling activities range from a 10% to 90% control efficiency; in particular, the use of dust suppressant on unpaved roads has a published control efficiency of 84% (Western Governors’ Association 2006).”	Dust suppressants are of concern to the NWOMC and Region 2 as they can potentially impact subsistence vegetation and displace potential harvesters who would otherwise use the area in the exercise of their rights should awareness or evidence of dust suppressants be identified. Hydro One should engage with the NWOMC and Region 2 further to discuss the usage of dust suppressants to ensure comprehensive understanding of potential impacts and proper protocols/situations for usage/deployment.	See response to comment #66.
115.	6.7 Air Quality, 6.7.7.1 Change in Criteria Air Contaminants and Fugitive Dust Emissions, Page 6.7- 14 to 6.7-30 (PDF Page 19 to 35)	All	There is no consideration of a potential interaction with NWOMC and Region 2 rights through increased negative perceptions. This interaction can result in increased avoidance behaviors around the Project area as well as a decrease in preferred conditions necessary for the exercise of rights. Please update the assessment of air quality to consider perceptive effects to Métis citizens.	The assessment of Project effects to the criteria of air quality is assessed using the indicators and measures identified in Table 6.7-2 which focus on understanding the predicted change to ambient criteria air contaminants and fugitive dust in the study area. This prediction supports the assessments of change to other criteria considered in the EA, including to surface water or soil quality, vegetation, wildlife or fish, to cultural resources, or to humans. Effects of these physical changes to the landscape are further considered with respect to the practice of rights and interests for Métis harvesters and land users, in Section 7.8, including under the indicator for change in perception of place.
116.	6.7 Air Quality, 6.7.7.1 Change in Criteria Air Contaminants and Fugitive Dust Emissions, Page 6.7- 29 (PDF Page 34)	“Where reasonable and practicable, vehicles and equipment will be turned off when not in use and will be regularly serviced, maintained, and inspected for leaks. In addition, other dust control practices (e.g., wetting with water or a chemical dust suppressant) will be implemented.”	Dust suppressants are of concern to the NWOMC and Region 2 as they can potentially impact subsistence vegetation and displace potential harvesters who would otherwise use the area in the exercise of their rights should awareness or evidence of dust suppressants be identified. Hydro One should engage with the NWOMC and Region 2 further to discuss the usage of dust suppressants to ensure comprehensive	See response to comment #66.

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			understanding of potential impacts and proper protocols/situations for usage/deployment.	
117.	6.7 Air Quality, Table 6.7-21 Potential, Effects, Mitigation Measures, and potential net effects, Page 6.7-31 (PDF Page 36)	"Hydro One or its contractor(s) will prepare and implement a Dust Control/Air Quality Plan prior to construction."	Hydro One states that their contractors will prepare a Dust Control/ Air Quality Plan prior to construction. Dust and air quality could impact the perception NWOMC and Region 2 members have of the area, contributing to a reduction in visibility, and conditions of remoteness; these factors could contribute to avoidance behaviors, persisting beyond the construction phase. It is critical that the NWOMC and Region 2, subject to capacity and availability, have the opportunity to provide input on these plans and are involved when plans are implemented.	See response to comment #66.
118.	6.9 Acoustic and Vibration Environment, Table 6.9-1: Summary of Comments Raised During Engagement, Page 6.9-3 (PDF Page 8)	Indigenous Community or Indigenous Group/Stakeholder	Please update reference to Métis Nation of Ontario to display the Northwestern Ontario Métis Community or NWOMC and Region 2.	Comment noted. The final EA will be updated accordingly.
119.	6.9 Acoustic Environment, 6.9.8.2 Increased Vibrations During the Construction Stage, Page 6.9-37 (PDF Page 42)	"Prior to commencing preliminary design and construction, discussions with the utility owners/operators will be carried out to confirm the applicable vibration criteria. Further vibration assessment will be carried out for specific utilities where required to determine potential vibration impacts once more detailed design and supporting information is available (e.g., locations where blasting is expected to be required)."	Hydro One has indicated that the contractors will develop the Blasting and Communication Management Plan. Blasting not only has the potential to disturb and impact wildlife, but it has the potential to impact the ability of NWOMC and Region 2 members to exercise their rights and interests. NWOMC and Region 2 harvesters and land users have preferred harvesting times and conditions that must be considered should Hydro One undertake blasting. Further, blasting poses a safety concern for NWOMC and Region 2 members who may be out on the land. In order to remedy this, and subject to capacity, NWOMC and Region 2 require engagement on the development of the Blasting and Communication Management Plan. The NWOMC and Region 2 must be notified before blasting occurs, with sufficient time to notify members. NWOMC and Region 2 urge Hydro	See response to comment #86.

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			One to engage with the NWOMC and Region 2 on what that involvement may look like and determine when blasting times are appropriate for NWOMC and Region 2 citizens.	
120.	6.9 Acoustic and Vibration Environment, 6.9.8.1 Increased Noise During the Construction Stage, Page 6.9-31 (PDF Page 36)	"Due to the sound characteristic expected with an implosion cable splicing method (i.e., impulsive), additional advanced communication with regard to the cable splicing schedule shall be provided to potentially affected PORs. In areas where noise levels are expected to be elevated for a limited time, notification will be provided."	Additional information is required. Are the NWOMC and Region 2 considered 'potentially affected PORs". If yes, how will the cable splicing schedule be disseminated? Further, how does notification mitigate the impacts on Métis harvesters and land users? The noise will still be present, will still contribute to avoidance behaviors – potentially increased due to advanced notification; resulting in impacts to Métis rights and interests. Please continue engagement with the NWOMC and Region 2 in relation to these above noted items.	The Final EA identifies notifying Indigenous communities along ROW prior to noisy activities (including splicing) as one mitigation measure. Hydro One commits to further engagement with the NWOMC and Region 2 on the communication process and mitigation measures related to noise.
121.	6.9 Acoustic and Vibration Environment, 6.9.8.2 Increased Vibrations During the Construction Stage, Page 6.9-31 (PDF Page 36)	"This mitigation includes, reducing the explosive charge weight detonated at a given instant within the blast, staggering the detonations, and using blast mats, as appropriate. Such mitigation strategies will be outlined specifically within the Blasting Management Plan prepared by Hydro One and its contractor(s)."	Subject to capacity and availability, the NWOMC requires engagement and involvement in the development and execution of the Blasting Management Plan referenced. Additionally, the NWOMC and Region 2 require additional discussion regarding blasting alternatives that can be employed.	See response to comment #86.
122.	6.9 Acoustic and Vibration Environment, 6.9.8.4 Potential Effects, Mitigation Measures, and Predicted Net Effects, Page 6.9-42 (PDF Page 47)	"Minimize human annoyance at identified PORs, as appropriate."	Additional detail is required on how human annoyance is categorized and will be reduced as a mitigation measure. Particularly as human annoyance is linked with increased avoidance behaviors of Métis harvesters and land users.	The assessment of effects in Section 6.9 includes measures such as those identified by Health Canada and industry guidance on human perception of vibration, including from blasting. Section 6.9 of the Final EA has been updated to rephrase, where many of the recommended mitigation measures serve to achieve reducing potential for human annoyance through vibration, including "locating and operating construction equipment as far as possible from PORs."
123.	6.9 Acoustic Environment, 6.9.12 Monitoring, Page 6.9-53 (PDF Page 58)	"A noise monitoring program is not recommended for the Project, however vibration monitoring is expected to be required for both aggregate pits (i.e., quarries) and general construction blasting activities to align with MECP/MNRF requirements and general industry practices, respectively. Specific vibration monitoring requirements will be established during the design stage prior to construction activities commencing."	Corona noise and the "hum" that can be heard from an operating transmission line results in real and perceived impacts to NWOMC and Region 2 citizens. The NWOMC and Region 2 have communicated these concerns to Hydro One through the completion of the NWOMC and Region 2 Traditional Knowledge and Land Use Study for	Hydro One commits to providing opportunities for NWOMC and Region 2 involvement in monitoring programs.

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			the Waasigan Transmission Line Project. This should be integrated into the noise assessment. Additionally, Hydro One has stated that the effects of corona noise on gray wolf is unknown, but then determines that the project will not cause gray wolf to avoid the transmission line, thereby reducing habitat availability. Without a noise monitoring program, Hydro One cannot verify the net effects predictions of the EA and there will be no resolution in relation to gray wolves or Métis harvesters or land users. The NWOMC and Region 2 requires involvement in monitoring, subject to capacity and availability, and urges Hydro One to incorporate noise monitoring in its monitoring program to understand the impacts on wildlife. With involvement in noise monitoring, the NWOMC and Region 2 can assist with determining noise impacts on wildlife, as well as NWOMC and Region 2 members who utilize the land within the Project area for practice of rights and interests.	
124.	7.1 Non-Indigenous Land and Resource Use, 7.1.7.1.1.1 Aaron Provincial Park, Page 7.1-25 (PDF Page 32)	“Cultural Features: No cultural resources have been identified in Aaron Provincial Park (MECP 2021a).”	The NWOMC and Region 2 have identified cultural features within Aaron Provincial Park which were collected as part of the Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project, including: a historic occupation/camp/cabin, a contemporary gathering site and a historic canoe route. Additionally there are snow machine trails, land portages and contemporary canoe routes present. Please update this listing and evaluation. Further, additional engagement with the NWOMC and Region 2 on these sites is required.	While no work will occur within Aaron Provincial Park for this Project, Section 7.1 of the Final EA will be updated to acknowledge the information provided by NWOMC and Region 2 in the Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project.

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125.	7.1 Non-Indigenous Land and Resource Use, 7.1.7.1.1.2 Butler Lake Provincial Park, Page 7.1-26 (PDF Page 33)	“Cultural Features: Members of Wabigoon Lake Ojibway Nation are known to harvest wild rice from the creek draining from Butler Lake into Wabigoon Lake (MECP 2021o).”	The NWOMC and Region 2 have identified cultural features within Butler Lake Provincial Park which were collected as part of the Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project, including: a historic occupation/camp/cabin, a contemporary gathering site and a historic canoe route. Additionally there are motor boat routes snow machine trails, land portages and contemporary canoe routes present. Please update this listing and evaluation. Further, additional engagement with the NWOMC and Region 2 on these sites is required.	While no work will occur within Butler Lake Provincial Park for this Project, Section 7.1 of the Final EA will be updated to acknowledge the information provided by NWOMC and Region 2 in the Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project.
126.	7.1 Non-Indigenous Land and Resource Use, 7.1.7.1.1.3 Lola Lake Provincial Park, Page 7.1-27 (PDF Page 34)	“Cultural Features: Lola Lake Provincial Park does not contain any known cultural resources within the park area (MECP 2021g).”	The NWOMC and Region 2 have identified cultural features within Lola Lake Provincial Park which were collected as part of the Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project, including: a historic occupation/camp/cabin, and a sacred/spiritual site (place of importance). Additionally there is a snow machine trail present. Please update this listing and evaluation. Further, additional engagement with the NWOMC and Region 2 on these sites is required.	While no work will occur within Lola Lake Provincial Park for this Project, Section 7.1 of the Final EA will be updated to acknowledge the information provided by NWOMC and Region 2 in the Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project.
127.	7.1 Non-Indigenous Land and Resource Use, 7.1.7.1.1.4 Quetico Provincial Park, Page 7.1-29 (PDF Page 36)	Cultural Features: Cultural heritage values identified include pictographs, archaeological encampment sites, burial sites, abandoned logging camps and old ranger cabins (MECP 2021j).	The NWOMC and Region 2 have identified cultural features within Quetico Provincial Park which were collected as part of the Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project, including: a sacred/spiritual site (place of importance), a historic occupation/camp/cabin, a historic trading route, important land scape features, contemporary gathering sites, and historic trails. Additionally there are canoe routes, and snow machine trails present. Please update this listing and evaluation. Further, additional engagement with the NWOMC and Region 2 on these sites is required.	Section 7.1 of the Final EA will be updated to acknowledge the information provided by NWOMC and Region 2 in the Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project.

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128.	7.1 Non-Indigenous Land and Resource Use, 7.1.7.1.1.5 Turtle River-White Otter Lake Provincial Park, Page 7.1-31 (PDF Page 38)	“Cultural Features: The park has documented 39 archaeological sites, 37 pictograph sites and numerous logging remnants dating back to the early 20th century have been documented (MECP 2021n). Located on White Otter Lake is a three-storey castle structure (White Otter Castle) that was built in 1914 (MECP 2021n). The castle is constructed of red pine logs, some of which are 30 to 40 m in length and 50 cm in diameter, weighing up to one ton each (MECP 2021n).”	The NWOMC and Region 2 have identified cultural features within Quetico Provincial Park which were collected as part of the Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project, including: a historic event site, historic trails, a sacred/spiritual site, historic sites, and contemporary gathering. Additionally there are canoe routes, and snow machine trails present. Please update this listing and evaluation. Further, additional engagement with the NWOMC and Region 2 on these sites is required.	Section 7.1 of the Final EA will be updated to acknowledge the information provided by NWOMC and Region 2 in the Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project.
129.	7.1 Non-Indigenous Land and Resource Use, 7.1.7.1.1.6 Adair Lake Conservation Reserve, Page 7.1-32 (PDF Page 39)	“Cultural Features: No known cultural value is contained within this conservation reserve (MECP 2021b).”	The NWOMC and Region 2 have identified a cultural feature within Adair Lake Conservation Reserve which were collected as part of the Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project: a historic occupation/camp/cabin. Additional there is snow machine trails present. Please update this listing and evaluation. Further, additional engagement with the NWOMC and Region 2 on these sites is required.	While no work will occur within Adair Provincial Park for this Project, Section 7.1 of the Final EA will be updated to acknowledge the information provided by NWOMC and Region 2 in the Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project.
130.	7.1 Non-Indigenous Land and Resource Use, 7.1.7.1.1.7 Airport Road Conservation Reserve, Page 7.1-33 (PDF Page 40)	“Cultural Features: Airport Road Conservation Reserve has no documented cultural heritage features to date (MECP 2021c).”	The NWOMC and Region 2 have identified a cultural feature within Airport Road Conservation Reserve which were collected as part of the Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project: including, a historic occupation/camp/cabin, and a sacred/spiritual site. Additional there is snow machine trails, and a canoe route present. Please update this listing and evaluation. Further, additional engagement with the NWOMC and Region 2 on these sites is required.	While no work will occur within Airport Road Conservation Reserve for this Project, the Section 7.1 of the Final EA will be updated to acknowledge the information provided by NWOMC and Region 2 in the Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project.
131.	7.1 Non-Indigenous Land and Resource Use, 7.1.7.1.1.8 Campus Lake Conservation Reserve, Page 7.1-34 (PDF Page 41)	“Cultural Features: It has been noted that there is minimal historical documentation that exists specific to the conservation reserve area (MECP 2021d). Therefore, the history of the area has been understood from sources that provide an overview of the history the surrounding areas or the region and some of this can be substantiated in part by physical evidence that remains of past human activities (MECP 2021d). The locations of some cultural heritage sites that have been identified within the conservation	The NWOMC and Region 2 have identified a cultural feature within Campus Lake Conservation Reserve which were collected as part of the Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project: including, a historic event site, historic trail, historic sites, a sacred/spiritual site, and	Section 7.1 of the Final EA will be updated to acknowledge the information provided by NWOMC and Region 2 in the Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project.

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		reserve are kept confidential owing to the sensitivity of such sites to disturbance (MECP 2021d).”	contemporary gathering area. Additional there is snow machine trails, canoe routes present. Please update this listing and evaluation. Further, additional engagement with the NWOMC and Region 2 on these sites is required.	
132.	7.1 Non-Indigenous Land and Resource Use, 7.1.7.1.1.9 East Wabigoon Conservation Reserve, Page 7.1-35 (PDF Page 42)	“Cultural Features: Presently, no known cultural values exist within the conservation reserve (MECP 2021e).”	The NWOMC and Region 2 have identified a cultural feature within East Wabigoon Conservation Reserve which were collected as part of the Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project: including, a historic occupation/camp/cabin, a sacred/spiritual site, and a historic trail. Additional there is a snow machine trail, and a motor boat route present. Please update this listing and evaluation. Further, additional engagement with the NWOMC and Region 2 on these sites is required.	While no work will occur within East Wabigoon Conservation Reserve for this Project, Section 7.1 of the Final EA will be updated to acknowledge the information provided by NWOMC and Region 2 in the Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project.
133.	7.1 Non-Indigenous Land and Resource Use, 7.1.7.1.1.10 Melgund Lake Conservation Reserve, Page 7.1-36 (PDF Page 43)	“Cultural Features: Cultural features at the conservation reserve include fire pits, wood pole framework, table and benches, and outhouses (MECP 2021h).”	The NWOMC and Region 2 have identified a cultural feature within Melgund Lake Conservation Reserve which was collected as part of the Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project: a historic occupation/camp/cabin site. Additional there is a snow machine trail present. Please update this listing and evaluation. Further, additional engagement with the NWOMC and Region 2 on these sites is required.	While no work will occur within Melgund Lake Conservation Reserve for this Project, Section 7.1 of the Final EA will be updated to acknowledge the information provided by NWOMC and Region 2 in the Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project.
134.	7.1 Non-Indigenous Land and Resource Use, 7.1.7.1.1.11 Pyatt Lake Conservation Reserve, Page 7.1-37 (PDF Page 44)	“Cultural Features: No known cultural features have been identified within this conservation reserve (MECP 2021i).”	The NWOMC and Region 2 have identified a cultural feature within Pyatt Lake Conservation Reserve which was collected as part of the Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project: a historic occupation/camp/cabin site. Additional there is a snow machine trail present. Please update this listing and evaluation. Further, additional engagement with the NWOMC and Region 2 on these sites is required.	While no work will occur within Pyatt Lake Conservation Reserve for this Project, Section 7.1 of the Final EA will be updated to acknowledge the information provided by NWOMC and Region 2 in the Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project.

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135.	7.1 Non-Indigenous Land and Resource Use, Table 7.1-36: Potential Effects, Mitigation Measures, and Predicted Net Effects for Non-Indigenous Land and Resource Use Criteria, Page 7.1-182 (PDF Page 189)	“To support ongoing park use, signs will be installed on the ROW indicating park boundaries and alternate access points to park users. Construction routes will be designed to avoid key access roads / entrances to parks and protected areas to the extent practicable, in engagement with parks and protected area administrators. Signage will be utilized to notify road users of closures and other disturbances to local roadways, trail systems and other recreational routes.”	In some cases, mitigation measures can result in unanticipated impacts to Métis harvesters and land users. In the case of signs installed, these can increase Métis avoidance of an area by varying distances. NWOMC and Region 2 citizen avoidance distances from signs should be explored and mitigated, where required.	See response to comment #89.
136.	7.1 Non-Indigenous Land and Resource Use, Table 7.1-36: Potential Effects, Mitigation Measures, and Predicted Net Effects for Non-Indigenous Land and Resource Use Criteria, Page 7.1-183 (PDF Page 190)	“Additionally, the Project will continue to consult with the MNRF and/or trail and canoe route operators to develop appropriate strategies to facilitate continued, uninterrupted use and access to natural, cultural, and recreational values. Potentially affected stakeholders will be engaged about the placement of permanent fencing and gates as applicable.”	In addition to ongoing consultation with the MNRF and trail/canoe route operators, the NWOMC and Region 2 must also be consulted to ensure continued access to cultural values as well as recreational values such as navigational routes. This includes consultation on placement of permanent fencing and gates as these can result in unanticipated impacts to Métis harvesters and land users. In the case of fences or gates, these can increase Métis avoidance of an area by varying distances. NWOMC and Region 2 citizen avoidance distances from fences and gates should be explored and mitigated, where required.	Hydro One commits to engaging with the NWOMC and Region 2 on potential refinements to the Project footprint and incorporation of site-specific mitigation in order to avoid or minimize impacts to NWOMC and Region 2.
137.	7.1 Non-Indigenous Land and Resource Use, Table 7.1-36: Potential Effects, Mitigation Measures, and Predicted Net Effects for Non-Indigenous Land and Resource Use Criteria, Page 7.1-184 (PDF Page 191)	“Hydro One will work with regulatory agencies to update the relevant provincial park management plans and conservation reserve management statements to allow for the Project, where required.”	The NWOMC and Region 2 requires ongoing consultation and engagement with regards to any updates to provincial park management plans and conservation reserve management statements. This is important as there are identified cultural values noted as well as keen interest in the amendment of management plans as they are written as such to allow for environmental protection and enhancement.	Hydro One commits to further engagement with the NWOMC and Region 2 on the effects related to provincial parks and conservation reserves, including on any required modifications to their Management Plans and Statements.
138.	7.1 Non-Indigenous Land and Resource Use, Table 7.1-36: Potential Effects, Mitigation Measures, and Predicted Net Effects for Non-Indigenous Land and Resource Use Criteria, Page 7.1-191 (PDF Page 198)	“Indigenous communities, landowners, guided outfitters, administrators, registered trappers, the Ontario Federation of Anglers and Hunters (OFAH), registered licence holders, within the Project footprint will be notified of Project activities before the start of construction, as the Project will implement a Communications Plan.”	The NWOMC and Region 2 require involvement in the development of the communications plan referenced to ensure appropriate communication on Project Activities in relation to navigation.	These plans will be included as part of the EPP that will be provided to affected Indigenous communities for review and input at least 90 days in advance of construction.

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139.	7.1 Non-Indigenous Land and Resource Use, Table 7.1-36[sic]: Magnitude Effect Levels for Land and Resource Use Indicators, Page 7.1-193 (PDF Page 200)	High – The effect is expected to substantially interfere with or enhance people's land use at the individual and community level and is not within the current system's capacity to respond.	Within this characterization, moderate magnitude is defined as a "potentially negative or beneficial change to people's land use", however, high is a 'substantial interference'. The use of the qualifier 'substantial' increases the scale of magnitude and should be re- evaluated to allow for fair consideration of net effects.	Section 7.1 of the Final EA has been updated for the definitions of magnitude effect level description for moderate magnitude and high magnitude. This includes removing the word "potentially" from the definition of moderate magnitude and "substantially" from the definition of high magnitude.
140.	7.1 Non-Indigenous Land and Resource Use, Table 7.1-37, Page 7.1-195 (PDF Page 202)	Magnitude for Criteria – Provincial Parks, Conservation Reserves	Impact to this criteria's magnitude must be re-evaluated with the additional considerations noted by the NWOMC and Region 2 as per this review. The effect to cultural sites within the provincial parks and conservation reserves are discernable at a local level; and the project itself, as well as mitigation measures proposed (e.g., signs, gates), will directly impact Métis land use. Further, the alteration of the management objectives for these areas will impact Métis stewardship and commitments to biodiversity – impacting NWOMC and Region 2 governance rights. These impacts are negative. Additional engagement is required to understand if these impacts are beyond the system's current capacity to respond. However, even if the system can withstand these impacts, the magnitude of effect should be adjusted to "moderate".	Section 7.1 of the Final EA has been updated to reflect input shared by NWOMC and Region 2 related to Provincial Parks and Conservation Reserves. The assessment narrative for potential effects to provincial parks and conservation reserves including adjustment of magnitude to "low to moderate", reflecting effects during the construction phase.
141.	7.2 Community Well-Being and Infrastructure, 7.2.1 Input from Engagement, Page 7.2-1 (PDF Page 6)	Indigenous Community or Stakeholder	Please update reference to Métis Nation of Ontario to display the Northwestern Ontario Métis Community or NWOMC and Region 2.	Comment noted. The final EA will be updated accordingly.
142.	7.2 Community Well-Being and Infrastructure, 7.2.5.1.2 Population in Indigenous Communities, Page 7.2-23 (PDF Page 32)	"Population information is presented for the Indigenous communities located within the Population and Demographics LSA including Couchiching First Nation, Migisi Sahgaigan (Eagle Lake First Nation), Fort William First Nation, Mitaanjigamiing First Nation, Nigigoonsiminikaaning First Nation, Ojibway Nation of Saugeen, Lac des Mille Lacs First Nation, Lac La Croix First Nation, Lac Seul First Nation, Seine River First Nation, and Wabigoon Lake Ojibway Nation."	There is no population information referenced for the NWOMC and Region 2. This must be updated in the Final EA. Instead, there is reliance on self-identifying data from Statistics Canada. Hydro One must identify population data needs and engagement with the NWOMC and Region 2 to include specific Métis population data, where available.	A request was shared by Hydro One to MNO in January 2023 for population data to be included in the EA. No information was received; therefore, the draft EA only included data that was publicly available. If NWOMC and Region 2 has information to share, Hydro One will integrate it into the final EA.

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		“Métis Nations do not have geographical communities surveyed by CIRNAC or Statistics Canada; thus, do not appear separately in the geographic community data provided. Data provided by Statistics Canada indicates that the Thunder Bay Metropolitan Area has the greatest number of individuals who identify as Métis (3,700 individuals) within the Population and Demographics LSA in comparison to those who identify as First Nations (12,815 individuals), or Inuit (20 individuals).”		
143.	7.2 Community Well-Being and Infrastructure, 7.2.5.2 Quality of Life, Page 7.2-29 (PDF Page 38)	Other potential influences on quality of life are also assessed in other sections of this EA. Specifically, potential effects to land-based human receptors (such as persons engaged in outdoor recreation and tourism, hunting, trapping, guided outfitting, and Indigenous traditional land and resource users) are described in the Land and Resource Use assessment (Section 7.1), the First Nations Rights, Interests and Use of Land and Resources assessment (Section 7.7), and the Métis Rights, Interests and Use of Land and Resources (Section 7.8).	There is no consideration of sensitive human receptors within the Métis Rights, Interests and Use of Land and Resources volume and no consideration of Quality of Life using similar methodology as is outlined in Section 7.2, Further, there is no discussion in volume 7.8 of how information from the NWOMC and Region 2 Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project contributed to consideration of Quality of Life. Further engagement is required to ensure an understanding of how changes to air quality and noise can contribute to impacts to Métis Quality of Life are understood and integrated into the Final EA.	Section 7.2 of the Final EA has been updated in the input from engagement section to recognize this feedback shared by NWOMC and Region 2 related to the contribution from changes to air quality and noise on impacts to Métis Quality of Life. Additional context has also been added to the assessment of effects to the indicator of Sense of Place in Section 7.8 to reflect these comments.
144.	7.2 Community Well-Being and Infrastructure, 7.2.5.2.4.3, Page 7.2-38 (PDF Page 47)	“Information on social challenges in LSA communities is based on secondary sources only and is presented here in order to provide background information on current social challenges and issues in the wider area found through literature reviews.”	While secondary sources are generally appropriate for describing community well-being, participatory research may be more valuable in the case of social challenges in Indigenous communities. Particularly, as secondary sources may have imbedded structural barriers or colonial lens’. Further engagement with the NWOMC and Region 2 is recommended to ensure data related to social challenges can be updated within the Final EA. This will also allow for greater consideration of impact inequity.	Additional emphasis on the role resource camps play in relation to gender-based issues and social challenges within the LSA communities will be added to the final EA. Additional mitigation measures will also be added based on feedback from Indigenous communities. Hydro One commits to further engaging on social challenges and issues in the area to support incorporation of site-specific mitigation in order to avoid or minimize impacts to NWOMC and Region 2.

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145.	7.2 Community Well-Being and Infrastructure, 7.2.7.2.1 Change in Nuisance Effects due to Changes in Noise and Vibration, Page 7.2-78 (PDF Page 87)	“A qualitative assessment of noise effects was conducted (Section 6.9) and potential effects, mitigation measures, and net effects are discussed in Section 6.9.8.”	Information from the NWOMC and Region 2 Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project in relation to noise were not sufficiently integrated in Section 6.9 and, therefore, reliance on this section for conclusions related to community well-being will result in deficiencies. Additionally, engagement with the NWOMC and Region 2 is required to ensure adequate consideration and integration for the Final EA.	See response to comment #143.
146.	7.3 Economy, 7.3.1 Input from Engagement, Page 7.3-1 (PDF Page 5)	Indigenous Community or Stakeholder	Please update reference to Métis Nation of Ontario to display the Northwestern Ontario Métis Community or NWOMC and Region 2.	Comment noted. The final EA will be updated accordingly.
147.	7.3 Economy, 7.3.1 Input from Engagement, Page 7.3-2 (PDF Page 6)	“In this phase of the Project, Hydro One will not be offering equity to the MNO. Hydro One is continuing to engage in discussion with MNO leadership for potential opportunities for economic benefits associated with the Project.”	Please provide a tentative timeline and milestones for continued discussion with the NWOMC and Region 2 to ensure continued dialogue accountability.	Discussions with the NWOMC and Region 2 regarding potential opportunities for economic benefits are occurring and are ongoing.
148.	7.3 Economy 7.3.4.3 Data Limitations, Page 7.3-18 (PDF Page 22)	“As the Métis Nations and Councils included in Table 7.3-3 do not have geographic communities surveyed by Statistics Canada, statistical data is limited for these Indigenous Groups.”	Economic data sources must be updated in the Final EA. Currently, there is reliance on data from Statistics Canada. However, Hydro One must identify economic data needs and engage with the NWOMC and Region 2 to include specific Métis economic data, where available.	A request was shared by Hydro One to MNO in January 2023 for population data to be included in the EA. No information was received; therefore, the draft EA only included data that was publicly available. If NWOMC and Region 2 has information to share, Hydro One will integrate it into the final EA.
149.	7.3 Economy 7.3.5.1.1.2 Indigenous Population, Page 7.3-23 (PDF Page 27)	“As mentioned, to protect the confidentiality of Indigenous community members, many of the employment statistics have been rounded by Statistics Canada, making it difficult to compare rates accurately across communities. Hydro One is also working with Indigenous communities to prepare community profiles that will include population information and will be attached as Appendix 7.3-A in the final EA.”	Please confirm that Hydro One will work with the NWOMC and Region 2 to prepare a community profile containing population information within the Final EA.	Hydro One has requested information, including population information not publicly available, from NWOMC and Region 2 to feed into a community profile.
150.	7.4 Visual Aesthetics	All	The connection to land, elements of locationality, and ‘Sense of Place’ are all contributing factors to the NWOMC and Region 2’s cultural identity. ‘Sense of Place’ is based on personal perception of NWOMC and Region 2’s citizens, it can be unconscious and can sometimes not conform to systematic	Section 7.4 of the Final EA has been updated in the input from engagement section to recognize this feedback shared by NWOMC and Region 2. Additional context has also been added to the assessment of effects to the indicator of Sense of Place in Section 7.8 to reflect these comments.

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			categorizations of environmental valuation (Kaplan 1985). Aesthetics contribute to the perceptions NWOMC and Region 2's citizens have on the places where Métis practices are conducted. Hydro One does not articulate how the perceptions NWOMC and Region 2's citizens could change during the construction and operational project phases, or how the rights and interests of NWOMC and Region 2's could be impacted. This must be explored for the Final EA.	
151.	7.4 Visual Aesthetics, 7.4.1 Input from Engagement, Page 7.4-1 (PDF Page 6)	Indigenous Community or Indigenous Group/Stakeholder	Please update reference to Métis Nation of Ontario to display the Northwestern Ontario Métis Community or NWOMC and Region 2.	Comment noted. The final EA will be updated accordingly.
152.	7.4 Visual Aesthetics, 7.4.5.1.3 Photographic Field Survey, Page 7.4-11 (PDF Page 16)	"Given the large number of potential viewing locations within the RSA (366,232 ha), it was not feasible to visit all potential viewing locations that may be affected by the Project. Considering this, it was necessary to select a subset of representative viewpoint locations to characterize the baseline landscape. The selection of the representative viewpoints to conduct photographic field surveys was based on the following visual aesthetics criteria (LI/IEMA 2013, USDI BLM 1986a): Proximity to features that provide publicly accessible viewing, including roads, trails, waterbodies, parks, and recreation amenities near residential areas; Ease of access and use by a range of viewers and user groups, including recreational users, tourists, motorists, and residents; Representation of a range of viewing angles and distances; and 4. The potential for unobstructed views of the Project."	The selection of representative viewpoints was not based on any criteria related to the NWOMC and Region 2, nor was engagement undertaken by Hydro One to identify any relevant criteria. Further, within the 'Range of Viewers' noted, Métis users are not specified. Further engagement is required to ensure Métis perspectives can be integrated into the Final EA.	Section 7.4 of the Final EA has been updated to reflect Indigenous land users within the categories of viewers assessed. Additional context has also been added to the assessment of effects to the indicator of Sense of Place in Section 7.8 to reflect these comments.
153.	7.4 Visual Aesthetics, 7.4.5.1.4.1 Scenic Quality Rating, Page 7.4-12 (PDF Page 17)	"The analysis of scenic quality is based on established research in perceptual psychology and the premise that all landscapes have some scenic value, but those with visual diversity, with harmonious composition, and/or that contain distinct features have the greatest potential for high scenic quality (USDI BLM 1986a).The dimension of scenic quality of the landscape was described and classified based on factors related to landscape features and visual design elements by reviewing topographic, landcover, cultural feature spatial data, results from the landscape unit character analysis, and available orthographic and photographic images for each of the seven key viewpoints."	Métis specific scenic quality is different from that of the public as connection to land, elements of locationality, and 'Sense of Place' are all contributing factors to the NWOMC and Region 2's cultural identity. This distinct perspective must be discussed through additional engagement and incorporated into the Final EA.	Section 7.4 of the Final EA has been updated in the input from engagement section to recognize this feedback shared by NWOMC and Region 2. Additional context has also been added to the assessment of effects to the indicator of Sense of Place in Section 7.8 to reflect these comments.

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154.	7.4 Visual Aesthetics, 7.4.5.2.3 Visibility Analysis and Viewpoint Identification, Page 7.4-16 (PDF Page 21)	Based on the results of Table 7.4-4, three general types of viewing locations were identified in the RSA and LSA that will potentially be affected by the Project. These consist of the following: 1.Permanent and Seasonal Residential Viewers: Residential viewers can be owners or renters of a residential property or settlement area. Residential viewers generally have a higher sense of ownership of views and a desire to maintain the existing landscape as it contributes to their quality of life. Residential viewers tend to experience frequent and continual viewing opportunities. Within the RSA, permanent residential viewers include numerous rural residential properties in communities such as Thunder Bay, Shuniah, Dinorwic, Atikokan, Shebandowan, Kaministiquia and Dryden. Seasonal residential viewers include the many cottages or camps, predominantly located on the shores of the numerous lakes within the RSA. Recreational Viewers: Tourists and recreational viewers provide or participate in recreational uses such as boating, canoeing, hiking, camping, or wildlife viewing. Recreational viewers are often focused on their activity and tend to be sensitive to the visual disturbances that would adversely affect the setting of their activity. Recreational visitors are transitory and tend to experience somewhat frequent and sustained viewing opportunities relative to the type and popularity of the activity. Ski hills and resorts within the RSA include Lappe Ski Centre, Mount Baldy Ski Area, and Mount Fairweather Ski Hill. Major parks with recreational opportunities within the RSA include Turtle River – White Otter Lake Provincial Park, Kashabowie Provincial Park, Quetico Provincial Park, and Arrow Lake Provincial Park. Motorists: Motorists experience views from the roadway. By necessity, the driver of a motor vehicle focuses less on the view outside the vehicle and more on the roadway while passengers are free to view the adjacent landscape from a variety of viewing angles. Motorists move at higher speeds than other groups and have temporary and/or intermittent viewing opportunities. Within the RSA, this includes local motorists and travelers passing through the region. Local motorists will experience more frequent viewing than travelers, although travelers may be more aware of the landscape if they take a particular route for its scenic qualities. Major transportation routes include the Hwy 11, Hwy 17 and Hwy 72.	No viewing location types were identified by Indigenous use. As Indigenous use differs from permanent and seasonal residential views, recreational viewers, and motorists, there must be consideration of this in the Final EA.	As noted in Comment #152, Section 7.4 of the Final EA has been updated to reflect Indigenous land users within the categories of viewers assessed. Viewpoints assessed offer context for changes in the visual landscape observed from public locations and road crossings; a number of which are located in areas of land use or access by Indigenous communities. The visibility analysis using RFI data was updated to include more current RFI data within the western portion of the Project. The visibility analysis demonstrates that in forested areas, there is limited visibility of the project through the trees. Additional context has also been added to the assessment of effects to the indicator of Sense of Place in Section 7.8 to reflect these comments.

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155.	7.4 Visual Aesthetics, Table7.4-4 Viewing Locations Within the Local and Regional Study Areas, Page 7.4-15 (PDF Page 20)	“Additional areas may be added upon receipt of Indigenous knowledge studies from Indigenous communities.”	The NWOMC and Region 2 provided a copy of the Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project to Hydro One in April 2023. This is not reflected in this table. Please update this table cell and all related sections to include information from the NWOMC and Region 2 Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project for the Final EA.	While the NWOMC and Region 2 Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project was not received in time to be integrated into the draft EA, the final EA will be updated to integrate information provided in this study.
156.	Archaeology Resources, Input from Engagement, Page 7.5-1 (PDF Page 5)	Indigenous Community or Stakeholder	Please update reference to Métis Nation of Ontario to display the Northwestern Ontario Métis Community or NWOMC and Region 2.	Comment noted. The final EA will be updated accordingly.
157.	Archaeology Resources, Input from Engagement, Page 7.5-1 (PDF Page 5)	How Addressed in the Environmental Assessment “The Stage 1 Archaeological Assessment, prepared in 2022 and circulated to Indigenous communities in draft for review and comment, will help to inform the Stage 2 field component that will be undertaken along the preferred route starting in 2023. This is acknowledged in this section of the EA.”	In addition to the Stage 1 Archaeological Assessment and comments informing the Stage 2 Archaeological Assessment, the Stage 2 Assessment must also be informed through additional engagement with the NWOMC Regional Consultation Committee and the Region 2 Regional Consultation Committee which have extensive knowledge about Métis historical context.	Hydro One commits to continuing to engage with the NWOMC Regional Consultation Committee and the Region 2 Regional Consultation Committee on the Stage 2 Archaeological Assessment and providing opportunities for involvement in the assessment.
158.	7.5 Archaeology Resources, 7.5.3 Criteria and Indicators, Page 7.5-3 (PDF Page 7)	“No concerns have been raised during the EA process regarding the preliminary criteria and indicators proposed in the Amended ToR. Areas of marine archaeological potential was identified as an indicator following the Amended ToR, as the LSA contains numerous navigable waterways that have been used by Indigenous and non- Indigenous peoples. No marine archaeological desktop assessment has been completed on the LSA thus far. This assessment will be addressed as part of planning for the Stage 2 Archaeological Assessment.”	Please indicate whether the Stage 2 Archaeological Assessment will be complete for integration in the Final EA (noted for completion in 2023 in the draft EA). Further, additional engagement is required with the NWOMC and Region 2 in relation to completion of a marine archaeological desktop assessment and the need for a field assessment of the same. Many portages and water travel routes were identified by the NWOMC and Region 2 as part of the Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project and this knowledge can enhance activities undertaken.	The Stage 2 Archaeological Assessment will not be completed and integrated into the final EA. Hydro One commits to continuing to engage with the NWOMC Regional Consultation Committee and the Region 2 Regional Consultation Committee on the Stage 2 Archaeological Assessment and providing opportunities for involvement in the assessment.

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159.	7.5 Archaeology Resources, 7.5.5.2.8 Potential Archaeological Resources in the Local Study Area, 7.5-31 (PDF Page 35)	“Indigenous-recognized archaeological resources are those formally or informally recognized by Indigenous communities, which may include sites registered in the OASD or unregistered sites. Indigenous communities will be engaged to prior to the Stage 2 Archaeological Assessment.”	Additional details are required on the level of engagement and timeline for engagement on the Stage 2 Archaeological Assessment so the NWOMC and Region 2 can consider availability and capacity to participate.	Hydro One commits to continuing to engage with the NWOMC Regional Consultation Committee and the Region 2 Regional Consultation Committee on the Stage 2 Archaeological Assessment and providing opportunities for involvement in the assessment.
160.	7.5 Archaeology Resources, 7.5.7.1 Loss of, or Damage to, an Archaeological Resource from Construction Activities, Page 7.5-35 (PDF Page 39)	“The Project footprint will require a Stage 2 Archaeological Assessment prior to construction for the areas identified as having archaeological potential and recommended for further archaeological work. The results of the Stage 2 Archaeological Assessment will be used to develop strategies to mitigate potential direct effects of the Project on any archaeological resources identified within or adjacent to the Project.”	Without completion of the Stage 2 Archaeological Assessment (and subsequent Stage 3 and Stage 4 assessments) the draft EA is missing crucial information to contribute to mitigation for potential direct effects on archaeological resources. This must be completed prior to issuance of the Final EA.	Comment noted. The Stage 2 Archaeological Assessment will not be completed and integrated into the final EA. Hydro One commits to continuing to engage with the NWOMC Regional Consultation Committee and the Region 2 Regional Consultation Committee on the Stage 2 Archaeological Assessment and providing opportunities for involvement in the assessment.
161.	7.6 Built Heritage Resources and Cultural Heritage Landscapes. 7.6.2 Information Sources, Page 7.6-4 (PDF Page 8)	“Indigenous Knowledge information, once received, will be reviewed to understand the connection between the cultural history and traditional land and resource use. The locations of cultural heritage landscapes are tied in some respect to areas of past and current traditional land and resource use, these can include, how/where communities use land and water for hunting, trapping, fishing, plant gathering, camping, and other important activities. Additionally, cultural heritage landscapes can be located in areas of spiritual and cultural significance, and there may not be any physical remains left in place at these locations. Once received and reviewed, data will be incorporated into the EA, where relevant and permitted. It is acknowledged that some Indigenous communities may not want sites of cultural significance recorded in the EA. In those cases, Hydro One will work with each Indigenous community to understand the site/feature and to identify mitigation measures where required.”	This section is written with a future tense for incorporation of IK information into the EA. Please confirm this will be completed prior to submission of the Final EA.	Hydro One will integrate IK information received into the final EA. The final EA tense will be updated accordingly.
162.	7.8 Métis Rights, Interests and Use of Land and Resources, Page 7.8-1 (PDF Page 6)	The rights, interests, and use of lands and resources of the following Métis communities participating in the Project are considered in this section: Northwestern Ontario Métis Community (Métis Nation Ontario [MNO] Region 1) represented by MNO Sunset Country Métis Council, MNO Kenora Métis Council, MNO Atikokan Métis Council, and MNO Northwest Métis Council; Northern Lake Superior Métis Community (MNO Region 2) represented by MNO Thunder Bay Métis Council, MNO Greenstone Métis Council, and MNO Superior North Shore Métis Council; and Red Sky Métis Independent Nation.	In this Section Hydro One discusses the “rights, interests, and use of lands and resources” of NWOMC and Region 2, as well as the Red Sky Métis Independent Nation. Each of the communities is described distinctly, however, descriptions of potential effects, mitigation measures, and net effects are improperly amalgamated. This makes it difficult to identify effects with respect to NWOMC and Region 2 specifically and distinct mitigation measures cannot be properly developed. In order for NWOMC and Region 2 to understand the assessment of impacts to their rights and interests, discussion of effects, mitigation	Comment noted. Hydro One will separate the assessment of effects in Section 7.8 in the Final EA Report to distinguish between the NWOMC and Region 2, and Red Sky Métis Independent Nation. Specific information from the TKLUS was not shared with Red Sky Métis Independent Nation.

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			measures, and net effects in Section 7.8 must be separated and resubmitted to NWOMC and Region 2. Furthermore, by sharing Section 7.8 with Red Sky Métis Independent Nation, Hydro One violated NWOMC and Region 2's right to control their own data and information. The contents of the TKLUS were not intended to be shared by Hydro One.	
163.	7.8 Métis Rights, Interests and Use of Land and Resources, 7.8.1.1 United Nations Declaration on the Rights of Indigenous People, Page 7.8-2 (PDF Page 7)	There are several articles of UNDRIP that are particularly relevant to conducting environmental assessments in Canada (United Nations 2017) (UNDRIP 2019). Below is a list of the most relevant articles considered in this environmental assessment (EA) and in Project planning: Article 11 (1) Indigenous peoples have the right to practice and revitalize their cultural traditions and customs. This includes the right to maintain, protect, and develop the past, present, and future manifestations of their cultures, such as archaeological and historical sites, artefacts, designs, ceremonies, technologies, and visual and performing arts and literature. Article 12 (1) Indigenous peoples have the right to manifest, practice, develop, and teach their spiritual and religious traditions, customs, and ceremonies; the right to maintain, protect, and have access in privacy to their religious and cultural sites; the right to the use and control of their ceremonial objects; and the right to the repatriation of their human remains. Article 26 (1) Peoples have the right to the lands, territories, and resources which they have traditionally owned, occupied or otherwise used or acquired. Article 31 (1) Indigenous peoples have the right to maintain, control, protect, and develop their cultural heritage, traditional knowledge, and traditional cultural expressions, as well as the manifestations of their sciences, technologies, and cultures, including human and genetic resources, seeds, medicines, knowledge of the properties of fauna and flora, oral traditions, literatures, designs, sports, and traditional games and visual and performing arts. They also have the right to maintain, control, protect, and develop their intellectual property over such cultural heritage, traditional knowledge, and traditional cultural expressions (United Nations 2017).	In addition to the noted UNDRIP Articles, this section should also note Article 3 which discusses the Indigenous right to self-determination. This can be interpreted to include the right to have information collected by and controlled by Indigenous groups in the pursuit of self-determined economic, social and cultural development.[2] NWOMC and Region 2 data sovereignty was impeded by the issuance of NWOMC and Region 2 information to the Red Sky Métis Independent Nation without prior review and confirmation by the NWOMC and Region 2. Indeed, the amalgamation of NWOMC and Region 2 collected information with this other group is problematic and must be addressed through continued engagement.	Comment noted. As noted in Comment #162, Specific information from the TKLUS was not shared with Red Sky Métis Independent Nation. Hydro One will separate the assessment of effects in Section 7.8 in the Final EA to distinguish between the NWOMC and Region 2, and Red Sky Métis Independent Nation.

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164.	7.8 Métis Rights, Interests and Use of Land and Resources, 7.8.1.2.1 Treaties, Page 7.8-2 (PDF Page 7)	"There are nine MNO regions in Ontario, and Métis citizens are represented at the local level through MNO Chartered Community Councils. Northwestern Ontario Métis Community (also referred to as MNO Region 1) asserts they are signatory to the Treaty # 3 Adhesion of 1875."	Please update this Section to be reflective of information provided within the Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project: *The existence of the NWOMC was recognized by the Crown in 1875 with the signing of an Adhesion to Treaty 3 with the 'Halfbreeds of Rainy Lake and River'. The Métis descendants of this 'Halfbreed' collectivity form a part of the NWOMC today. In 2017, Canada signed the Agreement on Advancing Reconciliation with the NWOMC (the "NWOMC Agreement") to begin to address outstanding issues with respect to the Halfbreed Adhesion to Treaty 3, and other rights and claims related matters specific to this Métis community.*[3]	Comment noted. The final EA will be updated accordingly.
165.	7.8 Métis Rights, Interests and Use of Land and Resources, Table 7.8-1 Summary of Comments Raised During Engagement Related to Métis Communities, Page 7.8-6 (PDF Page 11)	Indigenous Community/Group	Please update reference to Métis Nation of Ontario to display the Northwestern Ontario Métis Community or NWOMC and Region 2.	Comment noted. The final EA will be updated accordingly.
166.	7.8 Métis Rights, Interests and Use of Land and Resources, Table 7.8-1 Summary of Comments Raised During Engagement Related to Métis Communities, Page 7.8-6 (PDF Page 11)	"Hydro One has been working with Indigenous communities, including MNO, since 2020 to support community-led Indigenous Knowledge (IK) studies. As available, and as appropriate, input shared, including planning for these studies or through engagement, have been incorporated into this EA. The provision of culturally sensitive information has been considered by the Project team but maintained as confidential and excluded from EA reporting as directed through information sharing protocols.: Hydro One will incorporate traditional land and resource use information and IK information that the community chooses to provide to inform the Project. As IK studies are completed and shared, Hydro One is committed to incorporating shared IK information into the relevant Project milestone. Broad use of the Project area by Métis citizens is understood and reflected in this assessment."	The NWOMC and Region 2 provided a copy of the Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project to Hydro One in April 2023. This is not reflected in this table. Please update this table cell and all related sections to include information from the NWOMC and Region 2 Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project.	While the NWOMC and Region 2 Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project was not received in time to be integrated into the draft EA, the final EA will be updated to integrate information provided in this study.

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167.	7.8 Métis Rights, Interests and Use of Land and Resources, 7.8.4 Information Sources, Page 7.8-9 (PDF Page 14)	"Information for this baseline was obtained from the following sources: Community-led and Project-specific IK studies and planning (see Section 7.8.7); Results of Hydro One's engagement and consultation activities with Indigenous communities (see Section 4 and Section 7.8.3); Knowledge shared by Indigenous field monitors and crew members during field studies; Cultural awareness training provided by communities to Project team members; Publicly available data related to Métis land and resource use, including through forest management plans and provincial parks and protected area management plans; Previous EAs in the region, reviewed for publicly IK relevant to potentially affected Indigenous communities, including; Treasury Metals Inc. Goliath Gold Project Environmental Assessment (Treasury Metals Inc 2018) and NextBridge East- West Tie Transmission Line Environmental Assessment (NextBridge 2018); Métis community websites; and Results of the effects assessments for all other elements of the environment. Where community-led Project-specific IK studies continue to advance that could not be shared at the time of preparing this assessment, this information will be considered in the next applicable Project decision-making milestone as the Project progresses. This commitment is reflected through the characterization of baseline information and in the consideration of effects in this section."	In the Final EA, the NWOMC and Region 2 require a disaggregated version of this volume. Within this disaggregated version, information sources not applicable to the NWOMC and Region 2 must be removed. Additionally, information sources are noted as including the results of the effects assessment for all other elements of the environment. As these volumes do not include consideration of information from the Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project, this must be reconsidered unless data integration and assessment is completed by Hydro One for the Final EA.	Comment noted. The final EA will be updated accordingly.
168.	7.8 Métis Rights, Interests and Use of Land and Resources, 7.8-2 Métis Rights, Interests and Use of Land and Resources Criteria and Indicators, Page 7.8-11 (PDF Page 16)	"Qualitative assessment of seasonal change to hunting, trapping, and fishing."	The disruption to harvesting timing windows can result in seasonal changes, but it also may result in cessation of harvesting practices in the project area. It is recommended that Hydro One reflect this in the assessment of potential effect	Section 7.8 and Section 5.0 in the Final EA has been updated to reflect the following adjustments to the *measurement of potential effects* language applicable for the indicator of *changes to harvesting practices considering disruption to harvesting timing windows*: "- Quantitative **and qualitative** assessment of seasonal change to wildlife and wildlife habitat, fish and fish habitat, and vegetation. - Qualitative assessment of change to hunting, trapping, and fishing **considering seasonal change to wildlife and wildlife habitat, fish and fish habitat, and vegetation**."

169.	7.8 Métis Rights, Interests and Use of Land and Resources, Table 7.8-3: Spatial Boundaries for Métis Rights, Interests and Use of Land and Resources, Page 7.8-15 (PDF Page 20)	N/A	The spatial boundaries vary from those selected for the NWOMC and Region 2 Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project which were identified using the information available at time of writing from the Hydro One Amended ToR. Expansion of the Local Study Area beyond what was identified in the Study means that the NWOMC and Region 2 did not prepare or provide specific data for all areas of the LSA. While this information does exist, it was not included in the Study in order to constrain to Hydro One's identified Study Areas in the Amended TOR. Further engagement is required to either reduce the Study Areas to align with those used by the NWOMC and Region 2, or recalculate the data to conform to thealtered Study Areas identified by Hydro One.	Within the Amended ToR, it states, "*In a general sense, it is anticipated that the study areas to be used during the EA would include the following: Local Study Area – lands within approximately 500 metres (m) on each side of the Project Footprint to be used for background data collection and identifying direct and indirect environmental effects; Regional Study Area – lands generally up to approximately 5 km or more from the Project Footprint to be used for determining more generalized baseline data collection (e.g., watershed information, socio-economics, etc.) and for the prediction of indirect environmental effects.* *The study areas considered in the EA for baseline data collection, alternative route evaluation and preferred route assessment will be refined and confirmed during the EA based on continued input from Indigenous communities, government officials and agencies, and interested persons and organizations and predicted Project-related environmental effects. In some cases, study areas may need to be adjusted to allow for a more comprehensive description of baseline conditions, potential Project effects and/or development of mitigation measures*." Within the Draft EA, the LSA for the assessment of Métis Rights and Interests is intended to capture local direct and indirect effects of the Project that may extend beyond the Project footprint, and align with the study areas identified for air quality and noise, which have the largest LSA's for biophysical inputs that may result in indirect effects, representing an up to 2 km buffer from Project footprint features. The NWOMC and Region 2 Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project, section describing existing conditions characterizes TKLUS sites, including for harvest or cultural sites within a 500 m around the Project as the LSA. Within the section describing Project impacts, sites are characterized within the LSA plus a 1.5 km 'avoidance zone', which aligns with the LSA identified in Section 7.8. When interpreting information shared in the NWOMC and Region 2 TKLUS as part of the Final EA, information is shared

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				within the context provided, for example, “The NWOMC and Region 2 Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project reported 9 areas indicating trapping sites within 500 m of the preferred route. The same number of site areas were intersected within approximately 2 km of the preferred route, considering the defined avoidance zone”.
170.	7.8 Métis Rights Interests and Use of Land and Resources, 7.8.7.1 Engagement and Indigenous Knowledge Studies, Page 7.8-18 (PDF Page 23)	“An IK study by the MNO was shared in April 2023. This study and its findings are considered in this assessment. Hydro One will work with MNO during the draft EA review period to validate inclusion of information from this assessment for submission of the final EA Report. Additionally, in 2021, a baseline data collection survey was completed by the MNO and provided to Hydro One. The MNO indicated that the results of the survey were used to inform their IK study. This survey provides a summary of the opinions and behaviours of Métis citizens in the Waasigan Transmission Line Project Area based on the Métis-specific criteria that was provided to Hydro One (MNP 2021). The questions asked in the survey were framed to characterize and quantify avoidance behaviours of Métis community members during a variety of land use and harvesting activities. The results of this survey, as well as available generalized mapped areas of sensitive land uses shared in 2019 (including features between Kashabowie and Dryden), were incorporated into the Project assessment process.”	The purpose of the information provided by the NWOMC and Region 2 including the Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project and baseline survey was to contextualize and characterize potential impacts to NWOMC and Region 2 citizens rights and interests. Within this information, NWOMC and Region 2 characterize avoidance behaviours (e.g., avoidance of transmission lines) to inform potential Project impacts, however, it is not the entirety of information within the Study nor within the Baseline Survey. Please update this section to reflect this.	Section 7.8.7.1 of the Final EA has been updated to reflect that “NWOMC and Region 2 shared a Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project and baseline survey to contextualize and characterize potential impacts to NWOMC and Region 2 citizens rights and interests.”
171.	7.8 Métis Rights Interests and Use of Land and Resources, 7.8.7.1 Engagement and Indigenous Knowledge Studies, Page 7.8-18 (PDF Page 23)	“The following steps are followed when IK information is received: Review the information for site-specific interactions with the Project footprint.”	While there is an element of locationality to certain Métis harvesting and land use activities which can help contribute to the contextualization of Métis rights, this aspect cannot be considered in isolation from the preferred conditions of those sites. Further, site specific information implies harvesting and land use sites are static, when, in fact, harvesting and land use are dynamic and can include site movement within geographic extents depending on species availability and/or preferences. Further engagement is required with the NWOMC and Region 2 to understand harvesting and land use and why site specific locales may or may not be applicable, depending on the activity.	The referenced text within Section 7.8.7.1 is provided in relation to how continued engagement and consultation provides opportunity for communities to identify additional land and resource use sites that have the potential to be affected by the Project. It is anticipated that where communities may be identifying concern to Hydro One that there may be a specific location or activity that has prompted the discussion. Recognizing that could relate to the condition of an area, the referenced text is updated in Section 7.8 of the Final EA to: “Review the information to understand potential for site-specific interactions with the Project footprint and/**or Project activities**”, with the next step continuing to be “Engage the contributing Métis community to discuss the importance of identified information or sites to the community, and potential mitigation measures”.

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172.	7.8 Métis Rights Interests and Use of Land and Resources, 7.8.7.1 Engagement and Indigenous Knowledge Studies, Page 7.8-18 (PDF Page 23)	"The following steps are followed when IK information is received: Review the information for site-specific interactions with the Project footprint. Engage the contributing Métis community to discuss the importance of identified information or sites to the community, and potential mitigation measures. Develop appropriate mitigation measures that respond to the proximity of the identified information or site(s) in relation the Project footprint and the nature of the site (e.g., hunting location versus camping site)."	The development of mitigation measures must be done collaboratively with the NWOMC and Region 2. Mitigation developed in isolation cannot fully address impacts to Métis-specific criteria. Additional engagement is required.	Hydro One commits to engaging with the NWOMC and Region 2 on potential refinements to the Project footprint and incorporation of site-specific mitigation in order to avoid or minimize impacts to NWOMC and Region 2.
173.	7.8 Métis Rights Interests and Use of Land and Resources, 7.8.8 Description of the Existing Environment, Page 7.8-20 (PDF Page 25)	"This section summarizes the available information regarding Métis rights, interests, and land use in relation to the study areas defined in Section 7.7.6."	Please confirm whether Section 7.7.6 is referred to in error in this Section as that references the First Nations rights volume rather than the study areas defined for the Métis Rights, Interests and Use of Lands and Resources volume.	Section 7.8 of the Final EA has been updated to revise this incorrect section cross reference to the appropriate section in Section 7.8.
174.	7.8 Métis Rights Interests and Use of Land and Resources, 7.8.8.1 Access to Resources/Lands Available for Practice of Rights, Page 7.8-21 (PDF Page 26)	"In MNO's TKLUS report to Hydro One which was undertaken on behalf of MNO Regions 1 and 2, MNO citizens expressed that they are concerned with the Project route crossing through and near the Turtle River-White Otter Lake Provincial Park and Campus Lake Conservation Reserve, and the proximity of the Preferred Route to relatively undisturbed waterbodies in this area (MNP 2023b)."	Please update all references to Region 1 to be the Northwestern Ontario Métis Community or NWOMC. Similarly, please update all references to 'MNO' to refer to NWOMC and Region 2.	Comment noted. The final EA will be updated accordingly.
175.	7.8 Métis Rights, Interests and Use of Land and Resources, 7.8.10.1, Page 7.8-32 and 7.8-33 (PDF Page 37 and 38)	"The Project will change the quantity of unoccupied Crown land available for use as the Project footprint overlaps many parcels of Crown land. Changes to land use designations are anticipated to be required for the construction of the Project, and it is anticipated that 2,661.5 ha of land will be converted from unoccupied to occupied as a result of the Project." **Mitigation Measures** Hydro One will continue to engage with the Indigenous communities to develop appropriate strategies to minimize potential effects, will confine Project construction activities to surveyed and marked areas, and will provide notice to affected Indigenous communities prior to the start of construction. As described in Section 2.0, temporary construction access roads and areas that are being used on a temporary basis during construction, such as laydown areas, pull sites, and helipads, that are located on previously undisturbed lands will be restored following construction.	It is important to note that the Project will result in the conversion of 2,661.5 ha of unoccupied Crown land to occupied Crown lands. The Project will convey priority rights to Hydro One to construct, place, operate, and maintain the right-of-way and allow Hydro One unimpeded ingress and egress from the right-of-way. This means that Hydro One will be authorized to prohibit access to the Project area during construction and maintenance of the Project. Further, it could become dangerous for Métis citizens to exercise select rights in proximity to the Project during construction and maintenance activities (e.g., hunting). As a result, Métis harvesters and land users will lose the guarantee of consistently available Unoccupied Crown Land that they currently have. Citizens can be prohibited from accessing the Project area through construction and, at select times at Hydro One's discretion, for operations and maintenance activities.	The assessment in section 7.8.10.1 Changes in Land Available for Métis Use of the Draft EA states that "On Crown land, a Land Use Permit is required to provide occupational authority for the permanent footprint (i.e., the ROW) and access roads. This land would become occupied Crown land. This change to available Crown land may affect other indicators, such as access to harvesting areas". It also recognizes that "Métis citizens have also expressed concern about potential restrictions Métis harvesters and land users may face on Crown land, particularly if the easement and establishment of the transmission line ROW could result in increased firearm restrictions in relation to hunting due to safety concerns (MNP 2023b)." As noted in Comment #189, based on input shared by NWOMC and Region 2, the magnitude rating for this effect described in the net effects characterization has been revised to moderate.

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			Further, this potential effect could extend into the LSA as perception based avoidance behaviors could result in Métis harvesters refraining from using the area surrounding the Project as evidenced by the Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project.	The criteria measure in Table 7.8-2 for this indicator is the change in area of Crown land. Potential effects as a result of change in perception of place or sense of place are assessed though their receptive indicators.
176.	7.8 Métis Rights, Interests and Use of Land and Resources, 7.8.10.2 Changes to Harvesting of Culturally Critical Species, Page 7.8-33 (PDF Page 38)	"Based on the information provided so far, it is understood that the harvesting of wildlife and fish takes place in portions of the LSA, and the harvesting of plants may take place within the LSA. It is difficult to quantity the extent of harvesting within the LSA boundaries; thus the assessment of effects is qualitative. As more IK related to harvested resources and culturally important species becomes available it will supplement the understanding of the effects of the Project and the effectiveness of mitigation."	As Hydro One acknowledged, the NWOMC and Region 2 provided Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project that contains quantitative and qualitative information on harvesting of harvested species within the LSA. It is not certain as to what information is missing to quantify the extent of harvesting within the LSA. If Hydro One additional data, this can be requested and evaluated. Please inform the NWOMC and Region 2 what further IK is needed to supplement this assessment.	We appreciate the provision of full resolution PDF mapping shared to support the Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project by NWOMC and Region 2 and their consultants in August 2023 to support further characterization of harvesting areas in relation to the Project. Section 7.8 of the Final EA has been updated to provide further context on the presence and location of these areas relative to the Project.
177.	7.8 Métis Rights, Interests and Use of Land and Resources, 7.8.10.2 Changes to Harvesting of Culturally Critical Species, Page 7.8-35 (PDF Page 40)	"The evaluation of potential effects on resource availability and harvesting levels for hunting and trapping is based on the net effects assessments developed by the biophysical disciplines. Specifically, moose and furbearing animals have been addressed in the wildlife assessment (Section 6.5) as criteria species. Where net effects are identified for species considered to be representative of and important to hunting and trapping, that net effect will also impact the availability of harvested resources."	In relation to Traditional Land and Resource Use, biophysical components are used to represent impacts to rights (e.g., change to hunting and trapping areas or hunting and trapping opportunities rather than a change to the ability to exercise hunting and trapping rights). This approach was struck down in Clyde River (Hamlet) v Petroleum Geo-Services Inc. 2017 SCC 40 at para 45 which states " the consultative inquiry is not properly into environmental effects per se. Rather, it inquires into the impact on the right. No consideration was given in the NEB's environmental assessment to the source – in a treaty – of the appellants' rights to harvest marine mammals, nor to the impact of the proposed testing on those rights." Therefore, assessment of NWOMC and Region 2 rights, specifically, must be attempted in partnership with the NWOMC and Region 2 to allow for a collaborative approach and shared learnings about Métis rights. We recommend that the NWOMC and Region 2 and Hydro One	In *Clyde River,* the court confirms that assessment of impact on Indigenous rights must be considered in addition to assessment of environmental effects. The EA provides a biophysical assessment, as quoted. However, a separate assessment on the impact of the project on the exercise of rights is also provided; therefore, the requirements of *Clyde River* are met. Moreover, *Clyde River* does not impose a requirement conduct an assessment in partnership with the rights holders. Hydro One commits to engaging with the NWOMC and Region 2 on the incorporation of site-specific mitigation in order to avoid or minimize impacts to NWOMC and Region 2.

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			work together to collaboratively assess potential impacts to those rights identified using Métis-specific criteria (e.g., harvesting rights). This process will allow for comprehensive, direct mitigation development, and improve the Project assessment overall.	
178.	7.8 Métis Rights, Interests and Use of Land and Resources, 7.8.10.2 Changes to Harvesting of Culturally Critical Species, Page 7.8-35 (PDF Page 40)	"It was also noted in the wildlife assessment (Section 6.5) that corona noise from the transmission line is not anticipated to cause wildlife, including bird species, to avoid the ROW and so is not anticipated to reduce habitat availability. Additionally, individuals with home ranges that overlap the Project footprint may currently be habituated to corona noise due to the presence of existing ROW. Similar conclusions were reached for furbearers and marsh birds as populations are expected to remain self sustaining and ecologically effective relative to the baseline, and effects from the Project are predicted to be not significant."	Hydro One has stated that the effects of corona noise on wildlife is not anticipated to reduce habitat availability. However, NWOMC and Region 2 members have reported concerns with corona noise and general line hum causing disturbance to wildlife and Métis harvesters/land users. Therefore, the NWOMC and Region 2 recommends considering the results represented in the Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project and further engaging with NWOMC and Region 2 to ensure these results are accounted in the Final EA.	Section 7.8 will be updated to recognize the experience shared by NWOMC and Region 2 members. See also Comment #92 related to gray wolf. This inclusion is not anticipated to alter the outcomes of the assessment of effects for wildlife criteria species that populations are expected to remain self-sustaining and ecologically effective relative to the baseline. Hydro One commits to continuing to engage with the MNO on the information provided in the NWOMC and Region 2 Traditional Knowledge and Land Use Study for the Project.
179.	7.8 Métis Rights, Interests and Use of Land and Resources, 7.8.10.2 Changes to Harvesting of Culturally Critical Species, Page 7.8-37 (PDF Page 42)	"Efforts will be made to minimize direct effects and disturbance to wildlife, fish, plants and their habitats through project construction, operations and maintenance, such as staging construction to avoid or minimize potential effects on environmentally sensitive areas or wildlife breeding cycles. A detailed list of mitigation measures to reduce impacts to wildlife and wildlife habitat is provided in Section 6.5, measures to reduce impacts to fish and fish habitat are provided in Section 6.6, and measure to reduce effects to plants (vegetation) are provided in Section 6.4. There may be other resources that are important to local communities for harvesting and that may be identified through on-going discussion of IK studies. Hydro One will work with Métis communities to identify other harvested resources, and through engagement develop appropriate mitigation or avoidance measures."	The mitigation specified for Change to Harvesting of Culturally Critical Species is biophysically focused and does not address impacts to rights and interest specifically. Additional engagement is required with the NWOMC and Region 2 to develop specific mitigation.	We appreciate the provision of full resolution PDF mapping shared to support the Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project by NWOMC and Region 2 and their consultants in August 2023 to support further characterization of harvesting areas in relation to the Project. Section 7.8 of the Final EA has been updated to provide further context on the presence and location of these areas relative to the Project. Hydro One commits to engaging with the NWOMC and Region 2 on potential refinements to the Project footprint and incorporation of site-specific mitigation in order to avoid or minimize impacts to NWOMC and Region 2.
180.	7.8 Métis Rights, Interests and Use of Land and Resources, 7.8.10.2 Changes to Harvesting of Culturally Critical Species, Page 7.8-37 (PDF Page 42)	"The use of herbicides and pesticides on the Waasigan Transmission Line is currently under review by Hydro One. Hydro One is committed to further discussion with Métis communities on its use."	There is a consistent discrepancy in commitment related to herbicide and pesticide use between First Nations and Métis. The NWOMC and Region 2 have provided detailed information within their Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project in relation to their rights and interests which Hydro One can result in similar commitments from Hydro One to not	Through engagement during the draft EA process, Hydro One heard feedback from Indigenous communities and stakeholders regarding concerns with the use of herbicides to remove and manage vegetation on the Project. After extensive consideration of this feedback, herbicides will not be used during construction of the Project or for future maintenance of this transmission line.

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			apply herbicide and pesticide. Additional explanation is required.	
181.	7.8 Métis Rights, Interests and Use of Land and Resources, 7.8.10.2 Changes to Harvesting of Culturally Critical Species, Page 7.8-38 (PDF Page 43)	"Notice will be provided to affected Indigenous communities prior to the start of construction. Signage will be posted along public roadways in proximity to areas of construction and maintenance activities as appropriate to alert other land users that workers are in the area."	The implementation of signage identifying workers in the area may result in NWOMC and Region 2 harvesters avoiding the area due to increased negative perceptions or safety concerns. Hydro One has not considered the impact that this mitigation measure may have on NWOMC and Region 2 harvesters or land users. Further engagement is required.	During active construction activities, signage is intended to inform people about areas that should be avoided. Where notice is provided to affected Indigenous communities prior to the start of construction, concerns related to potential placement of signs could be raised for discussion to determine appropriate locations that most appropriately inform land users of active work. Additional context guided by this comment, can be included in Section 7.8.10.7 which describes the change in Perception of Place related to harvesting sites.
182.	7.8 Métis Rights, Interests and Use of Land and Resources, 7.8.10.3 Changes to Physical Attributes, Page 7.8-38 (PDF Page 43)	"Preferred harvesting areas support the harvesting activities above, and are important for the current and traditional exercise of Indigenous harvesting rights and interests. Based on the information provided so far, it is understood that there may be preferred harvesting areas in portions of the LSA, though it is difficult to quantity the extent of these areas within the LSA boundaries; thus, the assessment of effects is qualitative."	As Hydro One acknowledged, the NWOMC and Region 2 provided Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project that contains quantitative and qualitative information on preferred harvesting areas supporting the harvesting activities (including conditions and locations of use). It is not certain as to what information is missing to quantify this criteria. If Hydro One requires additional data this can be requested and evaluated. Please inform the NWOMC and Region 2 what further IK is needed to supplement this assessment.	As noted in comment #176, we appreciate the provision of full resolution PDF mapping shared to support the Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project by NWOMC and Region 2 and their consultants in August 2023 to support further characterization of harvesting areas in relation to the Project. Section 7.8 of the Final EA has been updated to provide further context on the presence and location of these areas relative to the Project.
183.	7.8 Métis Rights, Interests and Use of Land and Resources, 7.8.10.3 Changes to Physical Attributes, Page 7.8-40 (PDF Page 45)	"The use of herbicides and pesticides on the Waasigan Transmission Line is currently under review by Hydro One. Hydro One is committed to further discussion with Métis communities on its use."	There is a consistent discrepancy in commitment related to herbicide and pesticide use between First Nations and Métis. The NWOMC and Region 2 have provided detailed information within their Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project in relation to their rights and interests which Hydro One can similarly inform the commitment to not applying herbicide and pesticide. Additional explanation is required.	Through engagement during the draft EA process, Hydro One heard feedback from Indigenous communities and stakeholders regarding concerns with the use of herbicides to remove and manage vegetation on the Project. After extensive consideration of this feedback, herbicides will not be used during construction of the Project or for future maintenance of this transmission line.

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184.	7.8 Métis Rights, Interests and Use of Land and Resources, 7.8.10.4 Change to Harvesting Practices (Timing Windows), Page 7.8-40 (PDF Page 45)	“Based on the information currently available regarding the species patterns, harvesting locations and times, it is not possible to quantitatively assess seasonal changes in wildlife and wildlife habitat, fish and fish habitat, and vegetation; thus, the assessment of potential effects to hunting, trapping, and fishing is qualitative.”	Within the Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project, there was specific reference to seasonality of harvesting activities. Please continue engagement to allow for understanding of what further information is required to allow for quantitative assessment of seasonality.	Section 7.8 of the Final EA has been updated to provide further context corelating timing and location of harvesting areas relative to the Project. As noted in Comment #176, we appreciate the provision of full resolution PDF mapping shared in August 2023 to support further characterization of harvesting areas in relation to the Project. This statement in Section 7.8 will be updated to reflect that the qualitative nature of this discussion may remain given that exact timing of Project activities has not been confirmed due to the stage of Project development and on-going nature of engagement with Indigenous communities.
185.	7.8 Métis Rights, Interests and Use of Land and Resources, 7.8.10.5 Changes to Access to Harvesting Areas, Page 7.8- 41 (PDF Page 46)	“Based on the information provided so far, it is understood that there may be preferred harvesting areas in portions of the LSA. Métis citizens expressed concern about accessing areas for harvesting along the Project footprint during the construction period of the Project (e.g., temporary blocking of roads). More information about construction access control is required, and Métis citizens expressed that any decrease in income or harvesting must be properly compensated by Hydro One (MNP 2023b). As site-specific information about known harvesting areas is not yet available to complete a quantitative assessment of change in access to known harvesting areas within the LSA, this assessment provides a qualitative assessment of change in access to potential harvesting areas by Métis and non-Métis land users.”	As Hydro One acknowledged, the NWOMC and Region 2 provided Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project that contains information on access to harvesting areas within the LSA. It is not certain as to what information is missing to quantify this criteria. If Hydro One requires additional data this can be requested and evaluated. Please inform the NWOMC and Region 2 what further IK is needed to supplement this assessment.	See Comment #176
186.	7.8 Métis Rights, Interests and Use of Land and Resources, 7.8.10.5 Changes to Access to Harvesting Areas, Page 7.8-42 (PDF Page 47)	“Moreover, there are areas that are productive adjacent to the LSA that provide users with other means of accessing the same or similar opportunities for fishing, hunting, and trapping. Once further IK is available, additional analysis will be undertaken to confirm.”	The presence of productive adjacent areas which could support fishing, hunting and trapping does not account for Métis locations which represent the preferred conditions supporting the exercise of Métis rights and interests. Further engagement is required to ensure Hydro One’s understanding.	Section 7.8 of the Final EA has been updated to remove this statement, based on the comment shared. Section 7.8.10.5 identifies potential net effects to the indicator of Changes to Access to Harvesting Areas recognizing that Métis harvesters and land users have expressed concerns about this potential restriction in access and the extent to which Métis harvesting would be affected. Mitigation measures include a commitment to continue to work with NWOMC and Region 2 to identify access to preferred harvesting areas, and through engagement develop appropriate specific mitigation or avoidance measures.

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187.	7.8 Métis Rights, Interests and Use of Land and Resources, 7.8.11 Net Effects Characterization, Page 7.8-55 (PDF Page 59)	"Changes to Métis Rights, Interests and Use of Land and Resources are measured against the magnitude levels identified in **Error! Reference source not found.**."	There is an error in connecting the reference in this section. Please correct.	Comment noted. The final EA will be updated accordingly.
188.	7.8 Métis Rights, Interests and Use of Land and Resources, Table 7.8-6 Magnitude Effects Levels for Métis Rights, Interests and Use of Land and Resources, Page 7.8-56 (PDF Page 61)		Within this table the low magnitude, moderate magnitude and high magnitude all reference "…the current system's capacity to respond". Further information is require on what 'system' is referenced. As the Indicators listed are representative of Métis rights and interests, it can be assumed that the 'system' referenced is related to the same. Particularly, as biophysical components cannot be used as a proxy for assessment to rights and characterization of impacts to rights. If this does reference the biophysical environmental system, this is inappropriate. If it references Indigenous rights and interests as a system, it is also problematic as there have been no established thresholds defined or applied to Indigenous rights to identify exceedances of the systems capacity to respond. This must be removed from the magnitude characterization.	Suggested changes in language defining the magnitude of effects for Métis Rights, Interests and Use of Land and Resources are proposed for inclusion in Section 7.8 of the Final EA as follows, in an effort to better reflect the input shared by NWOMC and Region 2 in the TKLUS and through these comments: Low magnitude: An effect that is measurable and expected to be outside the range of baseline or of natural variability, but not expected to change opportunity for use of land and resources for the current and traditional exercise of Indigenous rights. Moderate magnitude: An effect that may result in a negative (or beneficial) change to opportunity for use of land and resources for the current and traditional exercise of Indigenous rights, but where communities may be able maintain practice in a similar or modified state. High magnitude: An effect expected to substantially interfere with (or enhance) opportunity for use of land and resources for the current and traditional exercise of Indigenous rights that could resulting in lasting alteration to the maintenance of Métis way of life or land and resource use opportunities.
189.	7.8 Métis Rights, Interests and Use of Land and Resources, 7.8.11.2.1 Net Change to Land Available for Métis Use, Page 7.8-57 (PDF Page 62)	"Based on the area of other unoccupied land available, this impact is expected to be of low magnitude (i.e., the effect is discernible but is not expected to materially change people's land use)."	This impact should be deemed a moderate magnitude as low magnitude refers to impacts which do not materially change land use, moderate is a material change, and high is a substantial change. There is a material change to unoccupied Crown land.	Section 7.8 of the Final EA has been updated to revise the magnitude rating to moderate for potential effects to the indicator of Net Change to Land Available for Métis Use for NWOMC and Region 2, reflecting this input.
190.	7.8 Métis Rights, Interests and Use of Land and Resources, 7.8.11.2.1 Net Change	"Crown land used for the permanent footprint (i.e., the ROW) and access roads would be considered occupied Crown land for the life of the Project (long-term)."	Please confirm that the permanent footprint referenced includes tower locations. The NWOMC and Region 2 require ongoing engagement in relation to the tower locations	Hydro One commits to engaging with the NWOMC and Region 2 on potential refinements to the Project footprint and incorporation of site-specific mitigation

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	to Land Available for Métis Use, Page 7.8-57 (PDF Page 62)		and footprint. This must include ongoing dialogue about the amount of Crown land that will be permanently lost through the construction of towers and their footprint as well as other aspects of the ROW. Tower locations can represent a permanent loss of Crown lands available for the exercise of Métis rights. In previous regulatory processes, this permanent loss was offset/compensated for through a Crown Land Offset Plan. Therefore, additional dialogue is required.	in order to avoid or minimize impacts to NWOMC and Region 2.
191.	7.8 Métis Rights, Interests and Use of Land and Resources, 7.8.11.2.3 Net Changes to Physical Attributes, Page 7.8-58 (PDF Page 63)	“The geographic extent will be local and given the opportunity to harvest in many other areas and mobility of the wildlife and fish species, it is predicted that the magnitude of the effects will be negligible (i.e., a small measurable change).”	There is an element of locationality to Métis harvesting which cannot be readily transplanted to other locales just because species may be available there. This disconnects the activity from spiritual and cultural elements, including intergenerational learning and teaching. Further, based on this and the above noted considerations regarding magnitude, the magnitude of effects must be considered moderate as there is a material change.	Section 7.8 of the Final EA has been updated to revise the magnitude rating to moderate for potential effects to the indicator of changes in physical attributes – harvesting sites for NWOMC and Region 2, reflecting this input.
192.	7.8 Métis Rights, Interests and Use of Land and Resources, 7.8.11.2.6, Page 7.8-60 (PDF Page 65)	“The magnitude of the effect is predicted to be negligible to low (small or discernible measurable change that is predicted to be within the range of baseline or guideline values); however, this will be confirmed through further engagement to ensure understanding of the loss of Intergenerational Learnings that will result from the construction and operation of the Project.”	As per the above noted considerations regarding magnitude, the magnitude of effect must be considered moderate as there is a material change to teaching/transmittal of knowledge.	Section 7.8 of the Final EA has been updated to revise the magnitude rating to moderate for potential effects to the indicator of change to teaching/transmittal of knowledge for NWOMC and Region 2, reflecting this input.
193.	7.8 Métis Rights, Interests and Use of Land and Resources, 7.8.11.2.7 Net Changes in Perception of “Place” – Harvesting Sites, Page 7.8-60 (PDF Page 65)	“The magnitude of the effect is predicted to be negligible (small measurable change), based on the input that many Métis citizens are comfortable with hunting and fishing in proximity to a transmission line, but fewer were comfortable with trapping and harvesting plants or berries on or near a transmission line (MNP 2023b). The magnitude and probability of the effect will be confirmed through further engagement.”	As reported in the Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project, many NWOMC and Region 2 citizens reported that they would avoid the Project area due to the change in perception of harvesting sites. As per the above noted considerations regarding magnitude, the magnitude of effect must be considered moderate as there is a material change to perception of place.	Section 7.8 of the Final EA has been updated to revise the magnitude rating to moderate for potential effects to the indicator of change to perception of place for NWOMC and Region 2, reflecting this input.

#	Document, Section and Page Number	Details	Comment	Hydro One Response
194.	7.8 Métis Rights, Interests and Use of Land and Resources, 7.8-6 (Table) Characterization of Predicted Net Effects for Métis Rights, Interests and Use of Land and Resources, Page 7.8-62 (PDF Page 67)	Table	There is no discussion or identification of how the significance rating was determined for the Criteria and Indicators in absence of engagement with the NWOMC and Region 2 Based on Hydro One's requirements for an effect to be considered significant (page 7.8-63), and the results of the Traditional Knowledge and Land Use Study for the Waasigan Transmission Line Project, the NWOMC and Region 2 do not agree that the impacts will be Not Significant. Further engagement with Hydro One is required to revisit this determination, and provide more information where required.	Section 5.6.5 of the Draft EA outlines the approach used across the EA to characterize the significance of effects, which considers significance factors in current provincial practice through Class EA processes. An effect considered to be potentially significant was defined for Métis Rights, Interests and Use of Land and Resources to be of: *high magnitude; medium-term to permanent in duration; occurring at any geographic extent; and representing a management concern*. This type of effect was stated to: *represent a substantial interference in the continued opportunity for Métis communities to be able to undertake use of land and resources for the current and traditional exercise of Indigenous rights.* The Draft EA Section 7.8 was shared for review and input only to the Métis communities being engaged in the Project to seek input and allow for updates and improvements in the Final EA. As noted in Comments #189, and #191 to #193, the review comments shared by NWOMC or Region 2 on evaluation of magnitude of effects have been revised in the Final EA, and the definitions of magnitude thresholds have been adjusted in an effort to better represent the potential for effects (Comment #188). As well, the significance factor "representing a management concern" is proposed to be removed where revised definitions of magnitude create redundancy with its inclusion. Section 7.8 of the Final EA has been updated to recognize that each Indigenous community is best placed to provide context on how opportunities to undertake use of land and resources for the current and traditional exercise of Indigenous rights are taken, and that the characterization of net effects is an interpretation by Hydro One and their consultants, with input by communities shared through comment on the Draft EA. The statement included in Section 7.8.11.3 of the Draft EA *"Based on this assessment, the net effects to Métis Rights, Interests and Use of Land and Resources are not predicted to result in a significant net effect."* as well as the significance rating in Table 7.8-6 are removed in the Final EA, respecting feedback shared.

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				Hydro One commits to engaging with the NWOMC and Region 2 on potential refinements to the Project footprint and incorporation of site-specific mitigation in order to avoid or minimize impacts to NWOMC and Region 2. Set in the context described above, narrative in section 7.8.11.3 Assessment of Significance in the Final EA will state that considering input shared by NWOMC and Region 2 on the Draft EA, further integrating the TKLUS report findings and considering Hydro One's commitments for on-going engagement with NWOMC and Region 2 (including for site-specific mitigation to avoid or minimize impacts) effects are predicted but that: "With the implementation of mitigation measures, the net effects of high magnitude were not defined that would represent a substantial interference in the continued opportunity for Métis citizens to be able to undertake use of land and resources for the current and traditional exercise of Indigenous rights".
195.	7.8 Métis Rights, Interests and Use of Land and Resources, 7.8.11.3 Assessment of Significance, Page 7.8-63 (PDF Page 68)	"As set out in Section 5.6.5, a predicted net effect Métis Rights, Interests and Use of Land and Resources criteria would be considered significant if it is assessed as: • High magnitude; • Medium-term to permanent in duration; • Occurring at any geographic extent; and • Representing a management concern. To be considered significant, the effects are expected to result in interference in the use of affected lands and resources by Métis communities/citizens for the current and traditional exercise of their Indigenous rights and interests."	Assessment parameters used to define impacts as significant were developed in isolation without input from the NWOMC and Region 2. This is inappropriate as the NWOMC and Region 2 are best placed to provide the necessary context for their rights and interests. This must be revisited in collaboration with the NWOMC and Region 2.	As noted in Comment #194, Section 7.8 of the Final EA has been updated to recognize that each Indigenous community is best placed to provide context on how opportunities to undertake use of land and resources for the current and traditional exercise of Indigenous rights are taken, and that the characterization of net effects is an interpretation by Hydro One and their consultants, with input by communities shared through comment on the Draft EA. Hydro One commits to engaging with the NWOMC and Region 2 on potential refinements to the Project footprint and incorporation of site-specific mitigation in order to avoid or minimize impacts to NWOMC and Region 2.
196.	7.8 Métis Rights, Interests and Use of Land and Resources, 7.8.13 Monitoring, Page 7.8-72 (PDF Page 77)	"One is also committed to employing Indigenous Environmental Monitors and/or Guardians and will collaborate with communities in implementing monitoring of Project-related effects and compliance monitoring throughout all Project stages."	The NWOMC and Region 2 are interested in monitoring activities, subject to capacity and availability.	Hydro One commits to providing opportunities for NWOMC and Region 2 involvement in monitoring programs.

#	Document, Section and Page Number	Details	Comment	Hydro One Response
197.	8.0 Net Effects Assessment Summary, Table 8.0-1: Summary of Net Effects Assessment	N/A	The Criteria of Métis Rights, Interests and Use of Lands and Resources must be developed in collaboration with the NWOMC and Region 2 for display in the Final EA.	Criteria and indicators used in the assessment of effects are those identified in Appendix D of the Amended ToR, reflecting feedback shared by NWOMC and Region 2. The assessment of magnitude for effects to Métis Rights, Interests and Use of Lands and Resources have been revised in Table 8.0-1 based the comments provided by NWOMC and Region 2 on the Draft EA, in particular Comments #188 to #195 above.
198.	10.1 Monitoring and Commitments, 10.1 Indigenous and Stakeholder Engagement, Page 10.1-2 (PDF Page 5)	“As the planning for the Project proceeds, Hydro One will continue to exercise due diligence in carrying out consultation with Indigenous communities and with Project stakeholders. Ongoing engagement related to the Project will include consideration of monitoring and follow-up programs that will be implemented for the Project, once approved.”	The NWOMC and Region 2 should be involved in the development and implementation of a monitoring program to verify the accuracy of predicted effects. This includes involvement in the planning, management, and treatment either through active participation with a NWOMC and Region 2 monitor, or through ongoing information review, depending on the NWOMC and Region 2 internal capacity.	Hydro One commits to providing opportunities for NWOMC and Region 2 involvement in monitoring programs, including engagement on the development and implementation of the plan for monitoring.
199.	10.1 Monitoring and Commitments, 10.2.2 Contingency Plans, Management Plans, and Construction Execution Plans, Page 10.1-4 (PDF Page 7)	N/A	Subject to capacity and availability, the NWOMC and Region 2 require involvement in the development and execution of the listed contingency and management plans.	These plans will be included as part of the EPP that will be provided to affected Indigenous communities for review and input at least 90 days in advance of construction.
200.	11.0 Conclusion, 11.3 EA Amendment Procedure, Page 11.3-4 (PDF Page 7)	“Detailed design and engagement for the Project are ongoing and will continue through the permitting phase and into construction.”	It is important that the assessment of critical design elements that could impact the NWOMC and Region 2’s rights is concluded prior to the construction of the Project.	Hydro One is committed to ongoing engagement with the NWOMC and Region 2 through the permitting phase of the Project and into construction.

Table 4: Lac des Mille Lacs First Nation – August 15, 2023

#	Document, Section and Page Number	Comment (Futura Font is language that can be quoted in EA)	Request / Recommendation	Hydro One Response
1.	**Page ES – 7**	In response to the statement, “Progressive reclamation of disturbed areas will be practiced. Natural recovery is the preferred method over seeding of reclamation on level terrain where erosion is not expected. If seeding is required, erosion-prone areas will be seeded with a native cover crop and certified seed mix approved by the applicable regulatory agency, as soon as feasible after construction.”	• The First Nation would like to be consulted on the seed species used for reclamation. • Why is natural recovery preferred to planting and seeding? It is concerning because areas should be regenerated to similar or better conditions. Natural recovery in areas with a high level of disturbance (such as construction camps, laydown areas and access roads) will not regenerate to the same or better conditions without active regeneration methods. Areas with high levels of disturbance naturally regenerate with pioneer species, not with the same species.	The executive summary includes information from all sections of the EA. The Final EA, including the assessment of effects to Vegetation and Wetlands in Section 6.4, has been updated to clarify that “Enhanced vegetation recovery methods (e.g., seeding, planting seedlings) will be implemented where these enhanced methods are appropriate. For example, Hydro One will plant seedlings along new off-ROW access roads in conservation reserves and provincial parks. Further, areas that are subject to erosion, and waterbody crossing locations that have been removed after construction will be seeded with an approved forestry seed mix.” Section 3.0 of the Final EA has been revised to include further detail on progressive reclamation, including the following, related to: **Access roads:** “*Prior to reclamation activities, a reclamation plan will be developed and submitted to the MNRF for approval. The plan will consist of a map depicting the level of reclamation for each segment of road and a corresponding description of the reclamation activities to be undertaken for each level of reclamation. Unless directed otherwise by the MNRF, new access roads will be recontoured and stored topsoil and organic material will be spread across the disturbed road width. Natural drainage will be restored. Existing access roads may be stabilized and left in place depending on feedback from the MNRF and other road users*.” **Equipment/material/laydown areas:** “*Previously disturbed sites will be reclaimed once they are no longer required; they will be returned to a similar land capacity to that of the pre-construction condition. While areas with minimal disturbance (e.g., tension puller sites) will be left to naturally regenerate, large disturbed areas (i.e., camps/laydowns) will be subject to decompaction and recontouring as necessary and replanted with appropriate tree species in accordance with Overlapping License Agreements with the SFLs as appropriate*".

#	Document, Section and Page Number	Comment (Futura Font is language that can be quoted in EA)	Request / Recommendation	Hydro One Response
				Hydro One commits to further engagement on the plan for restoration, including on seed mixes to be used. A process for monitoring will be developed in collaboration with affected First Nation communities and included as part of the Indigenous Monitoring Plan.
2.	**Page ES – 8**	Can we add species to this list? How will access roads be reclaimed?	N/A	The executive summary includes information from all sections of the EA. As the Final EA has been updated to reflect other plant, wildlife and fish species of importance shared in later comments, updates are reflected in the discipline sections (e.g., Vegetation) and in some cases in the executive summary in the Final EA. Section 3.0 describes the Project, including input on reclamation, with mitigation related to vegetation and wetlands described in Section 6.4. See also response to Comment #1.
3.	**Page ES – 11**	What are the methods for dust control? Which chemicals are being used? How will waterbodies adjacent to roads be protected from salt runoff?	N/A	Construction will implement effective dust suppression techniques, such as on-site watering, as necessary to minimize fugitive dust at worksites and access roads as required. Calcium chloride may be used along municipal roads near residences to reduce dust and improve safety where there is increased Project traffic interface with public road users. Application of calcium chloride will be completed in consultation with road authorities. A Dust Control/Air Quality Plan will also be included as part of the EPP that will be provided to affected Indigenous communities for review and input at least 90 days in advance of construction. A process for monitoring will be developed in collaboration with affected First Nation communities and included as part of the Indigenous Monitoring Plan. Mitigation noted in the EA includes a commitment to: “Avoid the use of chemical dust suppressants or other chemical applications within 30 m of waterbodies and wetlands”.

#	Document, Section and Page Number	Comment (Futura Font is language that can be quoted in EA)	Request / Recommendation	Hydro One Response
4.	**Page ES – 14**	What is a directly impacted property owner? How are they being compensated? Are nearby property owners being compensated as well? Are road improvements being used as forms of compensation for impacted property owners?	N/A	Directly impacted property owners own lands where permanent project infrastructure is planned and are compensated directly. Compensation follows Hydro One's standard process that follow a set of guiding principles including property owner choice (between easement or purchase), incentivized offers and independent valuation. Other nearby owners may be affected by temporary works, such as access roads and temporary workspace, these owners may be compensated directly by Hydro One's construction contractor.
5.	**Page ES – 20**	The First Nation would like more information about biodiversity initiatives as it becomes available.	N/A	Hydro One has committed to undertaking a biodiversity initiative specific to this project to offset habitat loss or transition (long-term change) that may occur as a result of the Project. The scope of the biodiversity initiative is expected to be determined post-EA completion; however, typically such initiatives involve the funding of third-party opportunities or projects, such as wetland and wildlife habitat creation and enhancement (e.g., wild rice habitat creation), aquatic habitat restoration and enhancement activities, or invasive species inventory or removal, among others. Following completion of the EA process, Hydro One will engage with Indigenous communities, local communities and interested parties to discuss the implementation of the biodiversity initiative for the Project.
6.	**Page 2.2 – 19**	In response to the statement, "Hydro One will continue to refine the construction and access plan as Project development continues and will continue to consult with Indigenous communities and stakeholders".	LDMLFN has a concern about the placement of the line in one area which overlaps with a known burial ground.	Hydro One commits to engaging with Lac des Mille Lacs First Nation on potential refinements to the Project footprint and incorporation of site-specific mitigation in order to avoid or minimize impacts to Lac des Mille Lacs First Nation.
7.	**Page 2.2 – 32**	Where is the revised project footprint in the Shebandowan area?	N/A	Section 2.0 Project Purpose and Alternatives, including Appendix 2.0A Alternative Route Evaluation of the Final EA presents and explains revisions to the Project footprint since release of the Draft EA, including in the Shebandowan area.

#	Document, Section and Page Number	Comment (Futura Font is language that can be quoted in EA)	Request / Recommendation	Hydro One Response
8.	**Page 3.3 – 10**	If culverts are in good shape when they are removed, can they be given to residents or communities if someone is in need of them?	N/A	Hydro One commits to engaging with affected First Nation communities on infrastructure that will be left in place to support operations and maintenance (such as watercourse crossings and culverts). This engagement opportunity provides opportunity to discuss materials from removal of temporary infrastructure.
9.	**Page 3.4 – 18**	Can the First Nation have access to the LiDAR imagery?	N/A	Yes, Hydro One can share LiDAR imagery with Lac des Mille Lacs First Nation.
10.	**Page 3.4 – 25**	Is water alone used for dust suppression? Are there any other chemical formulations used?	N/A	See Comment #3
11.	**Page 4.5 – 54**	Typo “are not further”.	N/A	Comment noted. The final EA will be updated accordingly.
12.	**Page 4.5 – 56**	Date: May 27, 2022 – Add “while ensuring the protection of personal information” or something similar.	N/A	Comment noted. The Final EA will be updated accordingly.
13.	**Page 4.5 – 89**	Replace “listing” with “including” in the statement, “Input about the importance of listing traditional use plants or species at risk, and the plans for conservation/mitigation”.	N/A	Comment noted. The Final EA will be updated accordingly.
14.	**Page 6.2-2**	Can we add that there is a concern from LDMLFN regarding water quality downstream of water crossings due to salt runoff from dust suppression applications as well as the timing of the placement or replacement of culverts during spawning season. There is also a concern regarding the water quality downstream of gravel pits. Lac des Mille Lacs is spelled wrong.	N/A	Section 6.2 related to surface water and Section 6.4 related to fish and fish habitat of the Final EA have been updated to recognize these concerns shared by Lac des Mille Lacs First Nation and spelling of the community name corrected. See Comment #3 related to dust suppressant. Mitigation measures applicable to aggregate resource development are described in Section 6.2.7.8 including that “All aggregate pits will be located a minimum of 120 m away from the ordinary high-water mark of a waterbody, where possible. The aggregate pits will follow the guidelines and associated conditions/ requirements of the approved permits, including development of a rehabilitation plan, outlined in the Aggregate Permits on Crown Lands for Pits and Quarries above Water (MNRF 2014) and the Forest Management Planning Manual (OMNRF 2017).”
15.	**Page 6.2-60**	Add language to describe proper ways in which merchantable wood should be stored (accessible location and by species). Merchantable timber should be pilled by species in an area accessible for the trucks taking it to the mill. Add that Hydro One and contractors will work with Resolute or the license holder to coordinate the appropriate actions for merchantable timber.	N/A	Section 6.2.7.8 notes that “Salvaged merchantable timber will be de-limbed, and decked along the edge of the ROW for short-term storage. Hydro One with their contractor(s) will work with applicable Forest Resource Licence or Sustainable Forest Licence holders to manage merchantable timber cleared by the Project. Timber, chips and other organic debris will be stored outside the buffer zone and above the high-water mark of any nearby waterbody.”

#	Document, Section and Page Number	Comment (Futura Font is language that can be quoted in EA)	Request / Recommendation	Hydro One Response
		Hydro One and contractors should ensure straw bales are locally sourced and monitor the areas where straw bales are used for invasive species in subsequent years.		This text in Section 6.2.7.8 of the Final EA, this has been updated to reflect additional mitigation language in Section 7.1 that “Trees of merchantable value will be felled, de-limbed, mulched, or piled at the edge of the ROW according to clearing contract requirements”. Section 10.0 notes that an EPP will be prepared prior to construction. The EPP will also include a Timber Salvage Plan, Sediment and Erosion Control Plan and Invasive and Biosecurity Management Plan. These plans will include requirements related to inspections and monitoring of fuel areas and will be provided to affected Indigenous communities for review and input at least 90 days in advance of construction. Development and review of these plans provide an opportunity to define additional specific details including how merchantable wood should be stored, guidance on sources and monitoring of straw bales used to management stormwater.
16.	**Page 6.2 - 85**	Include language about monitoring all water crossings, not just where water crossings were newly constructed or updated. Include language about monitoring water downstream of aggregate pits where pits are within 200 m of waterways.	N/A	Section 6.2.11 Monitoring of the Draft EA includes the following commitment that is understood to be the one referenced in the comment: “Monitoring/inspections of all new permanent water crossing structures and roadside drainage features for physical function and condition.” A further identified monitoring measure includes “Monitoring of water quality and streamflow conditions at waterbodies that include greater sensitivity or implication to change from the standpoint of fish habitat, species at risk, channel stability, drainage pattern, or other environmental considerations. The specific monitoring locations will be determined during the permitting and design stages of the Project; however, it is expected that waterbodies of varying size (small, medium, large) would be captured, recognizing that this would allow the performance/effectiveness of mitigation measures to be evaluated at a range of scales.” The EPP will be provided for affected Indigenous communities review at least 90 days in advance of construction. A process for monitoring will be developed in collaboration with affected First Nation

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				communities and included as part of the Indigenous Monitoring Plan. Development and review of these plans provide an opportunity to define additional specific details such as inspection of crossing structures or water quality monitoring in proximity to aggregate extraction areas.
17.	**Page 6.3 - 33**	There should be regular monitoring of fueling stations, and gas and oil storage areas.	N/A	Table 6.3-7 notes that an EPP and Spill and Emergency Preparedness and Response Plan will be prepared prior to construction. The EPP will also include a Vehicle and Equipment Operation, Maintenance and Refueling Plan. These plans will include requirements related to inspections and monitoring of fuel areas and will be provided to affected Indigenous communities for review and input at least 90 days in advance of construction.
18.	**6.4-44**	Add “and for medicinal purposes” under statement from Lac des Mille Lacs field monitor regarding wild rose.	N/A	Comment noted. The Final EA will be updated accordingly.
19.	**6.4-64**	The statement on herbicides needs to be discussed (as is noted in the EA) LDMLFN would like to know what herbicides Hydro One currently used to suppress vegetation. How does table 6.4-20 show mitigation measures?	N/A	Through engagement during the draft EA process, Hydro One heard feedback from Indigenous communities and stakeholders regarding concerns with the use of herbicides to remove and manage vegetation on the Project. After extensive consideration of this feedback, herbicides will not be used during construction of the Project or for future maintenance of this transmission line.
20.	**6.4-68**	What types of dust suppressants will be used? Dust suppressants should not be applied in areas where there is potential for runoff into wetlands or waterbodies. How will this be avoided? Do shut off valves in the application vehicles allow for this?	N/A	See response to Comment #3. Applicator equipment uses shut-off valves to ensure only designated areas receive intended treatment.
21.	**6.4-69**	There is also a risk of invasives depending on seed sources as well as straw sources. Who/what is the appropriate regulatory agency who approves seed mixes? Can the First Nation be consulted on this? How does table 6.4-20 show mitigation measures?	N/A	See response to Comment #1. The column titled “mitigation measures” in Table 6.4-20 Potential Effects, Mitigation Measures, and Predicted Net Effects for Vegetation and Wetlands summarizes commitments described in the discussion of potential effects throughout Section 6.4.7 to help avoid and minimize potential adverse effects.
22.	**6.4-81**	Black ash should be burned on site as a disposal method. If emerald ash borer is encountered, it should be reported.	N/A	Where Black Ash wood is encountered, it will be piled and burned on site to reduce the potential for Emerald Ash Borer spread. Where Emerald Ash Borer is identified, it will be reported to MNRF. Section 10.2.2 commits that a Rare Plant Management Plan and an Invasive Species and

#	Document, Section and Page Number	Comment (Futura Font is language that can be quoted in EA)	Request / Recommendation	Hydro One Response
				Biosecurity Management Plan will be included in the Environmental Protection Plan (EPP) for the Project. The EPP will be provided for affected Indigenous communities review at least 90 days in advance of construction. A process for monitoring will be developed in collaboration with affected First Nation communities and included as part of the Indigenous Monitoring Plan. Development and review of these plans provide an opportunity to define additional specific details for handling of black ash.
23.	**Table 6.4-98**	What is Hydro One's definition of Natural regeneration? Natural regeneration (the term as used in forest management plans) is not a preferable method of reclamation for many reasons, which should be discussed with LDMLFN.	N/A	See response to Comment #1.
24.	**Table 6.4-104**	The statement, "Allow for natural regeneration or use certified native seed in engagement with the MNRF and local foresters", should be amended be adding First Nations as those who should also be engaged with on the types of seed used.	N/A	Section 6.4 of the Final EA has been updated as follows: "Allow for natural regeneration or use certified native seed as required by the MNRF." Interested Indigenous communities will be engaged on the seed selection.
25.	**6.4-144**	Laydown areas and construction camps should be actively regenerated rather than left to naturalize as this results in loss of productive forest. Active regeneration also improves carbon sequestration over a shorter period of time.	N/A	See response to Comment #1.
26.	**6.4-188**	Allowing areas to naturalize does not result in reversing the habitat to pre-disturbance or similar conditions, especially in the boreal forest, which is a fire dependent ecosystem. Active regeneration is needed, in most cases, to bring back forests to their former state. Highly disturbed areas are difficult to regenerate without active regeneration for many reasons, which can be further discussed as necessary.	N/A	See response to Comment #1.
27.	**6.4-167**	Add species preciously mentioned in this assessment to the list of traditional use plants.	N/A	Traditional use plant information obtained since completion of the Draft EA, has been incorporated into the Final EA. Species which were identified as a traditionally important species by more than one Indigenous Community has been highlighted in Section 6.4.5.2.6. From this list, representative species were carried forward as part of the assessment and include representative of species occurring in each of the three ecosystem types (i.e., upland, wetland and riparian).

#	Document, Section and Page Number	Comment (Futura Font is language that can be quoted in EA)	Request / Recommendation	Hydro One Response
28.	**6.4-173**	What are the appropriate vegetation management procedures in an event that a sensitive feature is identified?	N/A	The EPP will be provided for affected Indigenous communities review at least 90 days in advance of construction. A process for monitoring will be developed in collaboration with affected First Nation communities and included as part of the Indigenous Monitoring Plan. Development and review of these plans provide an opportunity to define additional specific details for rare plant species identified such as avoidance flagging.
29.	**6.5-5**	Typo in the last comment of the page “interest to First Nations” I though the First Nation had also had a comment regarding adding cougar to the list of criterion species.	N/A	Comment noted. Table 6.5-1 of the Final EA will be updated to correct the spelling error and acknowledge the comment regarding cougar. As stated in the Terrestrial Field Work Plan cougar (*Puma concolor*) have not been proposed as a criterion for this Project. The following text provides background context of the cougars recorded in northern Ontario, as well as rationale for not targeting this species during our assessment. The population status of cougar in Ontario is unknown. 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 absence of an established population, detection is unlikely due to the large range and elusiveness of this species; despite 17,000 camera-nights of monitoring at locations across Ontario by the Ministry of Natural Resources (MNR) between 2008 and 2010, no confirmed observations of cougar were made (Rosatte 2011). In the unlikely event of an incidental sighting during field investigations, details will be recorded.
30.	**6.5-6**	Was the report given to Hydro One by LDMLFN used as an Information source? Should it be listed as one?	N/A	The report Traditional Land Use Studies / Geospatial Development / and Values and Rights Impact Assessment (“Studies”) Interim Report was used to inform Section 6.5 and will be referenced in the Final EA.
31.	**6.5-30**	LDMLFN hunters have been reporting unhealthy livers in moose in more recent (the last 30) years, which is believed to be due to the herbicide applications according to hunters and elders. When moose eat the vegetation that has been sprayed, they get sick, which is a threat to the future of the population.	N/A	Comment noted. See response to Comment #19 confirming that herbicides will not be used on this Project.

#	Document, Section and Page Number	Comment (Futura Font is language that can be quoted in EA)	Request / Recommendation	Hydro One Response
32.	**6.5-92,93**	LDMLFN should be consulted on any and all uses of herbicide applications on the ROW. First Nations should be provided with the type and label of the herbicides Hydro One uses. Herbicide applications, in no circumstance, should be applied within 100 m of a waterway. Why is the net change in habitat availability from herbicide application now carried forward to the net effects characterization? Will there be regular monitoring for invasive species?	N/A	See response to comment #19. As indicated in section 6.5.7.1.4, the introduction and spread of noxious and invasive plant species will be prevented or minimized through the implementation of an Invasive Species and Biosecurity Management Plan. Hydro One commits to developing an Indigenous Monitoring Plan in collaboration with affected Indigenous communities.
33.	**6.5-102**	There is at least 1 area where a helipad overlaps and is adjacent to a moose aquatic feeding area that also used as a moose travel corridor. The sound of the helicopter, construction, and other associated noises will most likely scare the moose and could cause them to run across the highway (part of the travel corridor). A mitigation measure could be to move the location of helipads that are adjacent to moose travel corridors to reduce moose road fatalities.	N/A	Hydro One commits to further discussion with affected Indigenous communities on priority hunting areas and helicopter activity within these areas. Helicopter use in these priority hunting areas will be limited to the extent reasonably possible. This may include adjusting flight paths around sensitive features or altering start and end times during the day for specific areas. Hydro One commits to engaging with Lac des Mille Lacs First Nation on potential refinements to the Project footprint and incorporation of site-specific mitigation in order to avoid or minimize impacts.
34.	**6.5-137**	Please inform LDMLFN when turtle nesting sites are identified within the Traditional Territory Workers should be trained in how to identify a turtle on the road as well as how to safely help a turtle cross the road if/when the need arises. Turtles are often seen crossing highway 11 as well as bush roads in various locations. Increased traffic during construction will lead to increased turtle mortality. It may be necessary to avoid certain locations during nesting season.	N/A	Comment noted. Section 6.5.7.8 Herpetofauna lists mitigation including: “Environmental training for workers, including information on turtle nest identification and procedures to follow if an active nest is identified. Installation of temporary reptile and amphibian exclusion fencing for 20 m around wetlands with potential habitat for reptiles and amphibians prior to emergence from hibernation in areas of active construction. In areas with a high degree of wetland habitat, exclusion fencing will consider eco-passages in order to maintain habitat connectivity. If evidence of an active turtle nest is identified during active construction, including vegetation removal, work will stop and MECP and other appropriate agencies will be contacted immediately to discuss mitigation measures. Appropriate Indigenous communities will be notified, where requested.”

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35.	**6.5 -202**	Please consult with LDMLFN on regeneration plans.	N/A	Hydro One commits to further engagement on the plan for restoration. A process for monitoring will be developed in collaboration with affected Indigenous communities and included as part of the Indigenous Monitoring Plan.
36.	**6.5-207**	Herbicides should not be used within 100 m of a waterbody, ever.	N/A	See response to Comment #19.
37.	**Table 6.6-5**	Lac des Mille Lacs spelled wrong.	N/A	Comment noted. The final EA will be updated accordingly.
38.	**Table 6.6-1**	Comment from LDMLFN – Amend the comment to say, “Will baseline information be shared publicly or with other organizations to help with the advancement of science? Will this impact First Nation Values?”	N/A	Comment noted. The Final EA will be updated accordingly.
39.	**Page 6.6 – 14**	Was any information regarding fish and fish habitat used from the “Traditional Land Use Studies/Geospatial Development/ and Values and Rights Impact Assessment (“Studies”) Interim Report” that LDML provided? If so, should this be referenced?	N/A	Section 6.6 of the Final EA has been updated to reference the “Traditional Land Use Studies/Geospatial Development/ and Values and Rights Impact Assessment (“Studies”) Interim Report” shared by Lac des Mille Lacs First Nation, along with the input shared.
40.	**Page 6.6 – 39**	Sturgeon are caught in the Kam yearly anywhere down from Kekabeka Falls. Sturgeon have also been documented by LDMLFN as being caught in Quetico Park by community members.	N/A	Section 6.6.5.2.3.1 of the Final EA has been updated to reflect the knowledge shared in this comment related to Lake Sturgeon.
41.	**Page 6.6 – 57**	“There is a pike spawning area within the LSA that is adjacent to an access road being used for the project. This area is important to some community members and special care should be taken at this crossing to avoid harming the fish during the spring spawn”.	N/A	Section 6.6.5.2.5.3 of the Final EA has been updated to reflect the knowledge shared in this comment related to pike spawning.
42.	**Page 6.6 – 89**	There is concern about an aggregate pit that is less than 120 m away from the HWM of a waterbody as well as concerns about proper culvert installation and water quality downstream of this location.	N/A	Comment noted. Table 6.6-1 of the Final EA will be updated to acknowledge these concerns. Hydro One commits to developing an Indigenous Monitoring Plan in collaboration with affected Indigenous communities.
43.	**Page 6.6 – 93**	LDMLFN should be consulted regarding any type of seed mix used in relation to the project.	N/A	Hydro One commits to further engagement on the plan for restoration, including on seed mixes to be used. A process for monitoring will be developed in collaboration with affected Indigenous communities and included as part of the Indigenous Monitoring Plan.

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44.	**Page 6.6 – 94**	How will the use of chemical dust suppressants or other chemical applications be avoided within 30 m of waterbodies and wetlands? What does this entail? Does this include herbicides?	N/A	See Comment #3. Also as noted in Comment #19, the Final EA has been updated to confirm that "Through engagement during the draft EA process, we heard feedback from Indigenous communities and stakeholders regarding concerns with the use of herbicides to remove and manage vegetation on the Project. After extensive consideration of this feedback, herbicides will not be used during construction of the Project or for future maintenance of this transmission line."
45.	**Page 6.6 – 95**	In response to the statement, "most areas will be left to naturally rejuvenate following grading and stabilizing activities". What is meant by naturally rejuvenate? These areas should be actively regenerated in most cases.	N/A	See Comment #1.
46.	**Page 6.6 – 105**	How will temporary access roads, construction camps, water crossings, and laydown areas be reclaimed at the end of construction?	N/A	See Comment #1.
47.	**Page 6.6 – 109**	In response to the statement "Prohibit the use of herbicides within the 30 m waterbody buffer unless application is conducted by ground application equipment or otherwise approved by the relevant regulatory agency." No chemical applications should be within 30 m or 100 m of a waterbody. Mechanical equipment should be used to control vegetation in these areas instead, including the use of planting "cover crop" species. LDMLFN is waiting to know what the names and chemicals of herbicides that are currently used in vegetation management on Hydro One's lines. We still have not had a response to this previously asked question.	N/A	See response to Comment #19.
48.	**Page 6.8 – 15**	The regeneration plan for disturbed sites should include planting and seeding as a preferred method of regeneration rather than natural regeneration, especially in highly disturbed areas as these areas are very unlikely to regenerate themselves to the same or better conditions. Hydro should work with First Nations as well as the SFLH to come up with a better regeneration plan for disturbed areas.	N/A	Comment noted. Hydro One commits to further engagement on the plan for restoration, including on seed mixes to be used. A process for monitoring will be developed in collaboration with affected First Nation communities and included as part of the Indigenous Monitoring Plan.
49.	**Page 7. 1 – 198**	What are they doing for land and homeowners adjacent to the project? Is there a potential for road Improvements?	N/A	See Comment #4.
50.	**Page 7.2 – 40**	Sistonen's corner is dangerous, many accidents and deaths there. Use caution in the area. Reduced speed limits near the junction would be ideal to help prevent accidents.	N/A	Comment noted.

#	Document, Section and Page Number	Comment (Futura Font is language that can be quoted in EA)	Request / Recommendation	Hydro One Response
51.	**Page 7.5 – 28**	Is it possible to get some of the background information on some of these sites for the First Nation's records? Some of these sites are ones have associations with LDML First Nation and it would be nice to have more information and reclaim some information that was lost.	N/A	The Project team can support Lac des Mille Lacs First Nation in acquiring information related to archaeological sites with community associations from the MCM.
52.	**Page 7.5-45**	What is progressive reclamation?	N/A	See response to Comment #1. Section 3.0 of the Final EA has been updated to include further information regarding plans for reclamation of areas disturbed for temporary infrastructure; progressing through reclamation as each area is taken out of use (rather than all at the end of project construction).
53.	**Page 7.7-5 Lac des Mille Lacs First Nation(Nezaadiikaang) Reserves 22A1 and 22A2**	Can text and images provided by the community be included in Section 7.7 to provide a more complete snapshot of the community?	N/A	Following submission of comments on the Draft EA, Hydro One and Indigenous communities being engaged by the Project developed community profile descriptions included in Appendix 7.2-A. These profiles are referenced in Section 7.7 and include some of the information shared by Lac des Mille Lacs First Nation. Accordingly, a subset of the content shared for inclusion has been added to community descriptions in Section 7.7.
54.	**Page 7.7 - 21**	Lac des Mille Lacs First Nation (Spelling)	N/A	Comment noted. The final EA will be updated accordingly.
55.	**Page 7.7 – 22**	Reference the "Traditional Land Use Studies/Geospatial Development/ and Values and Rights Impact Assessment ("Studies") Interim Report. The 60-page summary was provided to Hydro One describing the impacts and potential impacts to LDMLFN values in the local and regional study area."	The text in quotations are the suggested additions for the EA in section 7.7.	Comment noted. Section 7.7 of the Final EA will be updated accordingly.
56.	**Page 7.7-25**	**Access to Resources** "Lac des Mille Lacs First Nation has documented use of the area with community members through interviews with several families who use the area for hunting, fishing, trapping, and harvesting. The First Nation has expressed concern regarding access to lands where traditional activities take place, especially during construction. LDMLFN has recorded several historical (and current) travel routes used by community members throughout the area, some of which cross the project footprint. The First Nation would like travel routs to remain passable, which includes areas that are accessed by watercraft as these areas should not be impeded by culverts or low bridges The ability to access resources as well as the health and populations of those resources can have a significant impact on the livelihoods of community members".	The text in quotations are the suggested additions for the EA in section 7.7. There is a potential that the construction of the Waasigan Transmission Line will impact trapping routes or travel routes that are used to access certain sites depending on how water crossings are constructed	Comment noted. Section 7.7 of the Final EA will be updated accordingly.
57.	**Page 7.7-27**	"Within the RSA, trapping by FN membership has taken place throughout LDML's Traditional Territory. Marten and beaver are the	The text in quotations are the suggested additions for the EA in section 7.7.	Section 7.7 of the Final EA will be updated accordingly.

#	Document, Section and Page Number	Comment (Futura Font is language that can be quoted in EA)	Request / Recommendation	Hydro One Response
		preferred commercial species today amongst LDMLFN community members. Species that are used as food as well as fur include snowshoe hares, muskrat, and beaver. Trapping locations are only location specific while conditions are favorable for the targeted species. Trapping locations can vary from year to year and from decade to decade. A LDMLFN trapper stressed the importance of maintaining a balanced variety of habitats to help animal populations remain at stable levels and that protecting wetlands, riparian areas, and old growth is important. Concerns have been expressed about herbicide runoff affecting water quality. Another LDMLFN trapper has expressed concern that trappers are not compensated when industrial activities impact animal populations on traplines". "Trapping in the RSA amongst members of LDMLFN has declined in the last 20 years in certain areas due to privatization of land, colonization, decline in the fur market, and government regulations. Market price for furs has significantly decreased and has made it virtually impossible to make a living off trapping today, which is unfortunate because fur (when harvested sustainably) is a renewable resource. Government regulations have also had a significant impact on trapping as a way of life for First Nation membership. As an Elder from LDMLFN explained, it is easy to forget that humans too are a part of the ecosystem, and not separate from it. Humans can play a vital role in the balance of the ecosystem. Information that is derived from trappers can be a good tool to measure the health of ecosystems and the species that depend on them". "When Quetico park was first established there was conflict between park wardens and the Indigenous People who used the park for trapping and living. Trapping was outlawed in the park at the time of its establishment. Indigenous people who lived in Quetico park were forced to leave the park at the time of the park's creation. There are many indigenous families (from Lac des Mille Lacs as well as other First Nations) who can trace their history to Quetico Park. The word conflict is an understatement when describing the events that led to Indigenous People leaving Quetico Park, as families were forced to leave the park at gunpoint, in some cases. After some time, Indigenous trappers were once again able to legally trap in the park, however, access to resources in Quetico Park has been difficult since the park's establishment". **Please add to the animas harvested:** • Fox • Flying squirrel • Snowshoe hare		

#	Document, Section and Page Number	Comment (Futura Font is language that can be quoted in EA)	Request / Recommendation	Hydro One Response
		• wolverine **Hunting** “Moose are an important source of sustenance for many LDMLFN families who use the local and regional study area for hunting. LDMLFN community members have identified 3 areas where moose travel corridors cross the project footprint, with one area also overlapping with a planned helipad area. There is concern that construction in these areas may impact moose populations in the local area. Increased traffic during construction will most likely lead to increased moose fatalities on highway 11, as there are quite a few moose travel corridors that cross the highway. There is concern that the increased fragmentation of the landscape will create more opportunities for deer and wolves, further stressing the moose population. LDMLFN would like to see protection of moose travel corridors, (which often coincide with aquatic feeding areas and wintering areas). Protection should include signage, increased awareness of travel corridors, and potentially adjusted speed limits in certain areas of the highway while construction is ongoing. Ideally, laydown areas and new roads should not be constructed to overlap with moose travel corridors. Moose are often confused by certain noises, especially in the fall, which can ultimately lead to fatalities. Community members have expressed a lot of concern about the effects of herbicide spray on small and large mammals and have reported seeing more liver disease in moose in recent years”.		
58.	**Page 7.7-29** **7.7.8.3 Fish Harvesting**	“There are concerns for water quality especially during construction and maintenance of the transmission line. Dust and sediment deposits from vehicle traffic on roadways should be minimized, especially during the spring spawn. However, salt formulations should not be used on the road near water crossings as it has the potential to harm aquatic species especially during spawn and laying season. Mitigation could include slowing down at a certain distance before crossings to reduce dust and not spraying salt on the road near water crossings. Special care should be taken to avoid getting dust or salt into the water especially during the spawn”.	The text in quotations are the suggested additions for the EA in section 7.7. Note that Rainbow smelt is mentioned twice.	Section 7.7 of the Final EA will be updated accordingly.

#	Document, Section and Page Number	Comment (Futura Font is language that can be quoted in EA)	Request / Recommendation	Hydro One Response
59.	**Page 7.7-31** **Plant Harvesting**	It is important to acknowledge that all species are equally important. The plants below are identified as special importance as they are the plants most frequently used by community members at this time. The effects of colonialism had and continue to have a direct impact on the sharing of indigenous knowledge and use of plants. The Lac des Mille Lacs community is working hard to preserve traditional plant use knowledge by documenting plant usage". **Traditional Use Plants in the RSA** • Birch • Cedar • Maple (sugar, or red) • Beaked hazel • Blueberries • Choke cherries • Pin cherries • Highbush cranberries • Bog cranberries • Raspberries • Saskatoons • Thimbleberries • Bearberry • Bunchberry • Creeping snowberry • Great mullein • Canada goldenrod • Labrador tea • Yellow pond lilly • Buffalo berries • Cattails • Wild ginger • Wiike • Sage • Sweetgrass • Wild rice • Lobster mushroom • Chaga	The text in quotations are the suggested additions for the EA in section 7.7.	Section 7.7 of the Final EA will be updated accordingly.

#	Document, Section and Page Number	Comment (Futura Font is language that can be quoted in EA)	Request / Recommendation	Hydro One Response
60.	**Page 7.7-32** **Culturally Important Sites and Cultural Heritage**	“Lac des Mille Lacs First Nation provided a “Traditional Land Use Studies/Geospatial Development/ and Values and Rights Impact Assessment (“Studies”) Interim Report” to HONI to be included in the EA. Some of the information provided is confidential to protect the locations and sensitivity of certain sites and impacts.”	The text in quotations are the suggested additions for the EA in section 7.7.	Section 7.7 of the Final EA will be updated accordingly.
61.	**7.7-46**	What is Hydro One’s definition of citizen science?	N/A	Text in the Final EA has been rephrased to address comment
62.	**Page 7.7-48 and 49**	**Net Effects** “Will be minimal” should be amended because the potential to disturb a burial ground is not minimal.		The net effects assessment in Section 7.7 of the Final EA has been updated to clarify potential for effects related to ground disturbance within the context on the perspective shared by Lac des Mille Lacs First Nation related to burial sites and the relevant mitigations measures being applied to limit potential for these effects.
63.	**Section/Page 7.7-67 and Table 7.7-9**	“There is concern over the water quality around Steep Rock Lake due to past mining activities in the area. There are huge piles of acid leaching rock tailings left over from a former iron mine. There is a series of man-made dams throughout the area around and northwest of Steep Rock Lake. At one point, many fish were killed off after one of the dams broke, releasing tailings into a small lake in the immediate area. The piles of rock tailings are in very close proximity to Route 2C. The acid leaching tailings piles are an environmental concern. The potential for site mitigation during the construction phase should be explored prior to any ground disturbance to assess the impacts of site disturbance or to explore opportunities for site clean up. Further research and exploration into this site/topic should be discussed. LDMLFN would like to be consulted on any remediation plan for Steep Rock Lake as there are medicinal harvests values in the area, as well as water quality concerns”.	The text in quotations are the suggested additions for the EA in section 7.7.	The cumulative effects assessment in Section 7.7 of the Final EA has been updated, including to include further context on the perspective shared by Lac des Mille Lacs First Nation related to the Steep Rock Lake area.
64.	**Section/Page 7.7-68**	“The most prevalent wildlife concern amongst community members who have participated in the LDMLFN Land Use, Occupancy, and Traditional Knowledge Study is in regard to the yearly application of herbicides in current forest management, and vegetation management practices. Elders and community members have expressed concern over chemical applications causing animals to become sick with cancer and cysts, small mammals being killed from herbicide runoff, a decrease in the amount of food and medicinal plants, a decrease in insects, especially bees, concerns for the health of those who harvest from the land, and overall decreased biodiversity”.	The text in quotations are the suggested additions for the EA in section 7.7. Commercial Forestry – Visual effects? Discuss visual effects of forestry with Hydro! i.e. visual effects should be the least of our concerns. There are other, more serious concerns.	The cumulative effects assessment in Section 7.7 of the Final EA has been updated, including to include further context on the perspective shared by Lac des Mille Lacs First Nation related to commercial forestry activities.

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65.	**Not specified**		**Other information that should be included somewhere/other questions**: It is stated in the EA that at the time it was written, there was not time to incorporate information from the indigenous communities studies? Could there be information added somewhere about the presence of cougar in the regional area? There are many sightings, and they are known to exist in the area.	Acknowledgement of Indigenous knowledge shared has been added throughout the Final EA. Section 6.5 and 7.7 have been updated to recognize the input shared by Lac des Mille Lacs First Nation regarding sightings of cougar.

ATTACHMENT 4.0-A-3

Public Comment Responses

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Tables

1.0 Introduction

Table 1-1 lists the public comments on the draft Environmental Assessment Report and Hydro One's responses to those comments. Personal information has been redacted from the associated attachments.

Table 1-1: Public Comment Response and Associated Attachment

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ATTACHMENT 1
PUBLIC COMMENT 1 RESPONSE

[redacted]

[redacted]

June 19, 2023

Dear [redacted]

Re: Preferred Route for Hydro One/Waasigan Line

I am writing in response to the Draft Environmental Assessment on the preferred route for the Hydro One/ Waasigan line. My property is very close to this proposed line.

I purchased my home at [redacted] over thirty years ago, at the age of approximately 28. I knew there was a hydro line nearby, but thought nothing of it, assuming that the government owned Hydro One would not put a line close enough to housing to cause health problems.

Since I moved here, I've been diagnosed with Multiple Sclerosis. I had no symptoms of MS when I moved this close to your power line. There also is no history of MS in my family. And I've been told that MS symptoms usually appear in people younger than me when I was diagnosed. At this point in time, doctors cannot determine the causes of MS, but I have always wondered if it was caused by living in close proximity to your hydro line. And now you want to add even more voltage to the lines running past my house.

Some day researchers will discover the causes of MS. In the event that one of those causes happens to be living close to high voltage power lines, Hydro One will be looking at serious financial repercussions. And this doesn't apply only to diseases like MS. What about other health problems? There is still so much we don't know about the effects of electricity on the human body.

As a result, since you have been provided with an alternate route that would not run near people's homes, I don't understand why you are willing to risk damage to the health of people. Unless you can guarantee that this new line is of NO risk to people's safety, might I suggest that you choose the route that does provide this guarantee.

Sincerely,

[redacted]

[redacted]

November 17, 2023

[redacted]

Hello [redacted]

Thank you for contacting us to provide your feedback as part of the review period for the draft Environmental Assessment (EA) Report for the Waasigan Transmission Line project.

Meaningful and open engagement is integral to the successful development of this critical line in northwestern Ontario. In 2019, we began an environmental assessment for the project under Ontario's *Environmental Assessment Act*. The process is designed to assess the existing environment and mitigate potential effects before decisions are made about proceeding with a proposed project.

Through the environmental assessment process, it was determined that the preferred route for the new line best balances natural environment, socioeconomic, Indigenous culture, values and land use, technical and cost considerations. When considering any potential refinements to this proposed new transmission line route, we must ensure that this balance can still be achieved.

We know that the selection of a route is a key project milestone where additional concerns may emerge. To better understand concerns we heard from community members in Kaministiquia and to find solutions to address them, we held community open houses, property owner information sessions and established a working committee to review and evaluate the route proposed by Neighbours on the Line. We committed to evaluating the route proposed by Neighbours on the Line using the same criteria and criteria weightings used to evaluate the alternative routes. These criteria and weightings were established using stakeholder feedback, including from members of the public and those who live within the study area, and reflect the diversity of interests and items of importance across the Project area. The evaluation concluded the proposed route by Neighbours on the Line, on balance, had less advantages compared to the preferred route. While the proposed route by Neighbours on the Line had more advantages within the socio-economic category as a result of less impact to private land and residential property by maximizing the use of Crown land, there were more disadvantages in the other three categories.

We understand changes to our infrastructure can raise concern about electric and magnetic fields (EMF). With regards to health and safety, Hydro One has a dedicated team that regularly monitors global studies around EMF and ensures that our infrastructure is built and maintained following best practices and industry standards. We look to Health Canada, the World Health Organization and the International Commission on Non-Ionizing Radiation Protection, for guidance on EMF. Based on global studies which have and continue to be regularly monitored, these organizations indicate that members of the public do not need to take precautions to protect from fields produced by extremely low frequencies such as transmission lines. For this project, we retained Exponent Consulting, who are a multidisciplinary independent engineering and science consulting firm, to review and comment on any possible health impacts. Exponent Consulting concluded there is no evidence of adverse health effects caused by EMF at extremely low frequencies for both the existing and planned configuration of the Waasigan Transmission Line. I have attached additional material with more

information about EMF, and you may also be interested in reviewing what has been captured in the final EA Report in section 3.2.2.4.

We remain committed to working closely with landowners to find solutions and ensure residents who want to stay in their homes can. For example, we have been investigating local route refinements and speaking with individual landowners about mitigation measures. While some landowners may choose for Hydro One to purchase their property in its entirety, we are committed to ensuring that property owners who wish to stay in their homes will not be displaced. Our goal is to continue hearing as much local input as possible about the project.

As a next step, your comments have been documented and included as part of the final EA Report that Hydro One has submitted to the Ministry of the Environment, Conservation and Parks (MECP) for review and approval. As part of Ontario's *Environmental Assessment Act*, the MECP is leading a public review and comment period for the final EA Report.

Thank you again, I hope this information has been helpful.

Thank you,

Hydro One Community Relations

 1-877-345-6799

 Community.Relations@HydroOne.com

 HydroOne.com/Waasigan

ATTACHMENT 2
PUBLIC COMMENT 2 RESPONSE

From: [redacted]
Sent: Thursday, May 18, 2023 9:48 AM
To: RELATIONS Community <Community.Relations@HydroOne.com>
Subject: Waasigan Transmission Line - Atikokan / Quetico Park

You don't often get email from [redacted] Learn why this is important

*** Exercise caution. This is an EXTERNAL email. DO NOT open attachments or click links from unknown senders or unexpected email. ***

Dear Hydro One,
RE: Waasigan Transmission Line - Atikokan / Quetico Park area

I live in the area of Atikokan / Quetico Park and realize that there is a need for an upgraded and reliable power supply for the region as we move towards a more sustainable and greener future.

I am concerned about the impacts of your proposed line that will:
- devalue some properties and expropriate others
- compromise sustainable tourism as an major economic driver in our area
- have negative impacts on Quetico Park and its local, provincial, national and international visitors
- impacts on Path of the Paddle - Trans Canada Trail: Maukinak & Quetico Trail segments
- impacts of cultural significance to the Indigenous peoples, communities & businesses including Canada's Historical Waterways

There is a viable, economical and positive alternative using an existing decommissioned line/easement.

We urge you to change your plan and build the Waasigan line along the existing decommissioned line where you already have access and easements. (Between Atikokan and Nydia Lake, it would run north of Plateau and Eva Lakes, parallel and slightly south of the CN rail line).

Please register my comments to be addressed through the consultation process.

[redacted]

Sent from Mail for Windows

From: RELATIONS Community <Community.Relations@HydroOne.com>
Sent: Wednesday, May 24, 2023 9:47 AM
To: [redacted]
Subject: RE: Waasigan Transmission Line - Atikokan / Quetico Park

Hello [redacted]

Thank you for your feedback on Hydro One's preferred route near Quetico Park and utilizing an abandoned corridor east of Atikokan.

We want to assure your feedback is valued, and will be documented as part of the draft Environmental Assessment (EA) Report public review period and will be considered prior to finalizing the EA.

You will note that the route presented in the draft EA report in the Quetico area remains the same. I wanted to flag this and note that the Project team is continuing to investigate the request made by you and members of your community to utilize the abandoned corridor. We will provide you with an update when we have completed our review.

We have also added you to our project mailing list so you will receive project information going forward.

Thanks very much,

[redacted]
Hydro One Community Relations

ATTACHMENT 3
PUBLIC COMMENT 3 RESPONSE

[redacted]

Subject: RE: Waasigan Transmission Cooridor

-----Original Message-----
From: RELATIONS Community
Sent: Friday, May 26, 2023 8:47 AM
To: [redacted]
Subject: RE: Waasigan Transmission Cooridor

Good morning [redacted]

Thank you for sharing your feedback about the Waasigan Transmission Line Project. I have shared this with the project team and we will be in touch with a response.

Thank you,
[redacted]

-----Original Message-----
From: [redacted]
Sent: Thursday, May 18, 2023 8:54 AM
To: RELATIONS Community <Community.Relations@HydroOne.com>
Subject: Re: Waasigan Transmission Cooridor

[You don't often get email from [redacted]. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

*** Exercise caution. This is an EXTERNAL email. DO NOT open attachments or click links from unknown senders or unexpected email. ***

Still waiting to hear from you.

[redacted]

Sent from my iPhone

> On May 14, 2023, at 11:56 PM, [redacted] wrote:
>
> Hello, can you direct me to who i can talk to about the proposed Waasigan transmission line. It was my understanding that the new line was going to use the decommissioned Steep Rock mine corridor but it appears you going to cut a new corridor south of the existing corridor near Lake Shebandowan. Can you put me in touch with someone i can talk to about this?
>
> Sent from my iPhone

Dear [redacted]

Please find my comments to Hydro One's Draft Environmental Assessment for the Waasigan Transmission Line Project. Please help reroute this line to the Steep Rock Mine Corridor. Sorry for getting this to you late, but I did send it in on time to

Thank-You

Community Relations

[redacted]

To who this may concern July 6, 2023

Comments to Waasigan Transmission Line Project's Draft Environmental Assessment

Let me introduce myself; my name is [redacted], my family has had a camp on Lake Shebandowan on Three Mile Bay since 1963. I believe this part of the lake is the only area on the lake that is off grid and pristine as nature intended it. I am representing the owners of the 8 camps on Three Mile Bay that will be drastically impacted by the proposed route of the Waasigan Transmission Line.

I have found this whole process misleading. Over a year ago my family received a notice in the mail that Hydro One was proposing a new transmission line using the old Steep Rock Mine corridor that was decommissioned many years ago after the mine closed, however the the brown field still with small trees, shrubs and grassland remaining. Although not liking the thought of additional towers in the area it made sense to me that Hydro One was going to use an existing corridor that ran from Thunder Bay to Atikokan as there would be less environmental impact using the Steep Rock Corridor. The Steep Rock Corridor is on the North side of the existing two transmission lines. As the snow melted this spring we found Hydro One stakes on the south side of the corridor. I tried contacting Hydro One Community Relations numerous times to try and get some answers, I was eventually forwarded a link to the draft EA information meetings. The link to their Environmental Assessment had showed detailed maps that just showed a wide swath of land use and did not show where the actual transmission line was going to be located, so on June 14, 2023, I attended the information meeting in Atikokan to try to get some answers. At this meeting i found that Hydro One's intention was to contract the new transmission line on the south side of the existing transmission lines. At this meeting i was introduced to [redacted] and [redacted] of Hydro One's corporate communications. When I asked why this route was chosen she called over the Project Manager from Vallard, and his response was that this was the best route, no explanation was provided how this could possibly be a better route. [redacted] then provided me with the Hydro One Environment officer who also couldn't give an answer as to why Hydro One would cut down 200km of forest adjacent to the existing corridor rather than using the Steep Rock Corridor or how this could be environmentally the best option. The Environment contractor for this project could not give me an answer. Through some of my own investigation i had been told that one of the First Nations groups wanted a 100 year guarantee that no pesticides could be used on the Steep Rock corridor, so Hydro One selected an alternate site that didn't require this guarantee. I asked [redacted] and the Environment officer if this was true and they did not confirm this but only said that no decision has been made on pesticide use. If this is in fact true, i find it incomprehensible that Hydro One would cut down 200km of forest to avoid such a guarantee. I then proceeded to layout my additional concerns with the proposed route and how the EA ignored its guiding principals of the EA in the Three Mile Bay area. They are as follows:

-the Hydro One stakes for the proposed transmission line along Three Mile Bay is approximately 35m from the campers property lines The visual affects of this on the campers will be horrendous. The existing transmission line is on a flat area above the bay, but the proposal has the new lines on the slope towards the lake, The sight line form the lake will be horrible. Hydro One has ignored the visual aesthetics this will have on the property owners.
-The proximity of the proposed line will be noisy with the hum of electricity running through the lines especially during rain ice or snowy conditions Although Hydro One claims there will be no adverse affects from the noise, this is clearly a false statement

- As stated previously the proposed corridor in the 3 mile bay area is on the slope towards the lake.There are two wetlands that will be adversely affected as there is little buffer or none at all to these areas. The runoff from the corridor will run directly into the lagoon wetland near the most westerly camp. In this wetland, many species nest including ducks, loons, blue herons, beavers, otters, mud turtles and snapping turtles and numerous other species make there home. The proposed corridor will also run very close or right through the wetland at the end of the bay. This is a much larger wetland where biodiversity is even greater. In subsequent research, Page 94 of 2021 Hydro One Waasigan Transmission Line Amended Terms of Reference, Hydro One has identified the Three Mile Bay as a sensitive area, yet Hydro One has ignored this in their proposed transmission route Further based on a document by Niagara Peninsula Conservation Authority Interim Wetlands Procedure Document, that the hydrologic function of the wetland could be impacted by the adjacent transmission line that is less than 30m from the wet land. The Lakehead Region Conservation Authority also has the similar regulations governing wetlands (Reg180/06). I understand that this is not the jurisdiction of a conservation authority, but the principals of wet lands apply, which Hydro One has ignored
- Upper and Middle Shebandowan land use is governed by CLUPA and the Shebandowan Lake Management Plan due to the at risk Lake Trout population. again Hydro One ignored that the run off into the lake by the proposed transmission corridor would adversely affect the Lake trout population.
- The waters of Three Mile Bay are used by many tourists including those that vacation at Kashabowie River Resort, the proposed transmission route could adversely affect the tourism to this area as no one will want to see this transmission line destroying the natural beauty of this area. Hydro One has ignored this impact
- The proposed transmission line will result in hundreds of kilometres of deforestation, the EA ignores this impact on green house gases and the affect the forest has on clean air.
- I had concerns that based on the survey stakes found this Spring near our property, that Hydro One will begin deforesting of the proposed corridor in the near future. [redacted] of Community Relations stated that no cutting would occur until next year following appropriate approvals. However there has been additional surveys and stakes installed earlier this week. I called community relations and left a message requesting confirmation that deforestation of the proposed transmission line will not occur until the environmental process is complete. I have not yet received this confirmation

Hydro One Community relations promised to get back to me regarding my question and concerns regarding the proposed transmission line and what they could do to alleviate my concerns, [redacted] returned my calls and told that they were still working on it. I asked them to show me how my comments have been incorporated into the EA review and i have not heard back from them in this regard. Clearly the simple solution would be to follow the Steep Rock Mine Corridor at the very least in the area between Kashabowie and Kabigon Bay would eliminate most of my concerns.

I look forward to hearing from Hydro One as to how they will mitigate my concers. I can be reached at [redacted] or email at [redacted]

Sincerely

[redacted]

Meeting with Resident – August 30, 2023

Hydro One and their contractor, Valard, met with a resident to review the results of an investigation into a proposed refinement requested by resident in the Mud Lake area. Hydro One walked the resident through the various constraints relating to the refinement, ultimately indicating the preferred route remains preferred. The resident expressed his disappointment and Hydro One also provided some additional information to answer environment-related questions, such as ensuring wetland buffers are maintained. Hydro One committed to provide a written response to him and reiterated their commitment to continue discussions and identify mitigation measures to address his concerns related to visual impacts.

ATTACHMENT 4
PUBLIC COMMENT 4 RESPONSE

[redacted]

From: [redacted]
Sent: Thursday, July 6, 2023 11:07 AM
To: RELATIONS Community <Community.Relations@HydroOne.com>
Subject: Wassigan power line

You don't often get email from [redacted] Learn why this is important

*** Exercise caution. This is an EXTERNAL email. DO NOT open attachments or click links from unknown senders or unexpected email. ***

Dear Hydro One.
The Wassigan power line proposal.
We do not need this power line, nor do we want it. Electricity is our most environmentally unfriendly energy source of all in present use. This proposed line will only increase carbon emissions by the way of electrical generation, transmission (line losses) and the degradation of our environment by the clear cutting of forests to make room for the transmission line. These are forests that absorb carbon and produce oxygen. These are the lungs of the planet that must be destroyed for the sake of a small amount of dirty electricity.

Building a local power plant would be a better alternative in being more efficient and cheaper over the long term. We also need to reduce our electricity use by replacing electric heat usage by using natural gas which is four times more efficient than electric resistance heat. Given the large amount of gas fired generation in the province electric heat is about the most inefficient means of space heating. Heat pumps are somewhat better, but a modern gas furnace will still out perform a heat pump in cold weather.

There is a lot of opposition from property owners who are being affected by this project, far more than this project is worth. I suggest scrapping this power line. Going electric is not going to have the desired effect on improving the environment, rather its going to do the exact opposite. The electric car being so inefficient and resource intensive, that it is not a solution but rather a bigger problem long term. Very little study has been going into the dire consequences of the so called electric economy, and the truth needs to be made known that electricity is by far our worst form of fuel being used today, and it will remain so until an efficient clean means of electrical generation is found.

[redacted]

[redacted]

From: RELATIONS Community <Community.Relations@hydroone.com>
Sent: July 13, 2023 2:05 PM
To: [redacted]
Subject: RE: Wassigan power line

Hello [redacted]

Thank you for contacting Hydro One Community Relations about the Waasigan Transmission Line Project in late May, and for your additional feedback dated July 6th, which will be included in the final Environmental Assessment report. We appreciate your patience in receiving a response.

Ontario's Independent Electricity System Operator (IESO) is responsible for forecasting and ensuring Ontario's long-term energy needs are being met and confirming what energy solution would best address these needs. In 2018, the IESO identified a need for a new transmission line in northwestern Ontario and directed Hydro One to begin developing the project, known as the Waasigan Transmission Line. You may be interested to review the IESO's West of Thunder Bay webpage for more detailed information, or contact the IESO at IESOCustomerRelations@ieso.ca.

At this time, we are continuing to plan for this new transmission line by completing an environmental assessment, which is a process designed to assess the existing environment and mitigate potential effects before decisions are made about proceeding with a proposed project. As part of the environmental assessment, our goal is to continue hearing as much local input as possible about the preferred route so that we can work towards building a line that community members and property owners can see their feedback reflected in.

With regards to your feedback about forested areas, we understand forests have an important role in maintaining a healthy environment. In our draft Environmental Assessment report we outline the mitigation measures we will take and provide additional information about what we will do to limit changes to the environment, such as to develop and implement a Vegetation Management Plan, including to protect rare vegetation communities, and allow compatible vegetation in the transmission line corridor to grow back. A Timber Clearing/Harvest and Renewal Plan will be also prepared before construction starts, which will outline how cut trees will be handled. Hydro One will also work with applicable Forest Resource Licence or Sustainable Forest Licence holders, and Indigenous communities, for trees cut on Crown land.

In addition, Hydro One has committed to undertaking a biodiversity initiative specific to this project to offset habitat loss or transition (long-term change) that may occur as a result of the Project. Such initiatives involve the funding of third-party opportunities or projects, such as wetland and wildlife habitat creation and enhancement, aquatic habitat restoration and enhancement activities, or invasive species inventory or removal, among others. Additional information on the biodiversity initiative will be available as we progress through the project and Hydro One will engage with Indigenous communities, local communities and interested parties to discuss its implementation.

Finally, we are also committed to continuing to work with property owners who may have concerns about the project. Our goal is to understand their concerns and unique property features and look at whether there are technical solutions that could be explored to minimize these.

I hope this information is helpful. I have also added you to our project mailing list so you will receive project information going forward.

Thanks very much,

Hydro One Community Relations
Phone: [redacted]
Email: [redacted]

ATTACHMENT 5
PUBLIC COMMENT 5 RESPONSE

[redacted]

From: [redacted]
Sent: Monday, May 8, 2023 2:09 PM
To: [redacted]
Subject: Workforce requirements for the Waasigan Transmission Line

You don't often get email from [redacted] Learn why this is important

*** Exercise caution. This is an EXTERNAL email. DO NOT open attachments or click links from unknown senders or unexpected email. ***

Hello [redacted]

My name is [redacted], and I am a research analyst with Northern Policy Institute.

NPI is currently working with the City of Dryden to assess the possible socioeconomic impacts of various potential projects in the surrounding region. The proposed Waasigan Transmission Line is one project of interest.

Is there any information that you could share with me regarding Hydro One's expectations for the project's workforce?

More specifically, what I am interested in is the number of people who will be employed in the construction of the transmission line, and the number of people who will be employed in operations roles post-construction. We at NPI can produce our own estimates using figures from past projects, but we would prefer to get numbers from organizations that are directly involved, if possible.

Thank you in advance for any information that you can provide!

[redacted]
Research Analyst / Analyste de recherche
Northern Policy Institute/Institut des politiques du Nord
[redacted]
Mailing Address: [redacted]

[redacted]
@NorthernPolicy
/NorthernPolicy

Stay informed. Subscribe to our updates. / Restez informé. Abonnez-vous à nos nouvelles.
English/**Français**

Northern Policy Institute is Northern Ontario's independent, evidence-driven think tank. We perform research, analyze data, and disseminate ideas. Our permanent offices are in Thunder Bay, Sudbury, and Kirkland Lake. Our mission is to enhance Northern Ontario's capacity to take the lead position on socio-economic policy that impacts our communities, our province, our country, and our world.

L'Institut des politiques du Nord est le groupe de réflexion indépendant et fondé sur des preuves du Nord de l'Ontario. Nous effectuons des recherches, analysons des données et diffusons des idées. Nos bureaux permanents sont situés à Thunder Bay, Sudbury et Kirkland Lake. Notre mission est d'améliorer la capacité du Nord de l'Ontario à prendre la tête des politiques socio-économiques qui ont un impact sur nos communautés, notre province, notre pays et notre monde.

[redacted]

From: RELATIONS Community <Community.Relations@hydroone.com>
Sent: July 13, 2023 2:08 PM
To: [redacted]
Subject: RE: Workforce requirements for the Waasigan Transmission Line

Hello [redacted]

Thank you for contacting Hydro One Community Relations about the Waasigan Transmission Line Project and I apologize for the delay in providing a response.

We appreciate your interest in the project and would be happy to share information with you relating to socioeconomic impacts of the project, including our anticipated workforce.

Hydro One is committed to supporting growth in the northwest by building Waasigan. As you may have heard, Waasigan will bring an additional 350 megawatts of power to the west of Thunder Bay region, which is enough to power about 11 average sized mines. This will lead to spin-off opportunities and means communities and businesses can grow.

Valard Construction is selected to be our engineering, procurement and construction contractor for the new line. Aligned with Hydro One's procurement policy for Indigenous sourcing, a large portion of the Waasigan transmission line will include the purchase of goods and services from qualified Indigenous businesses as subcontractors to Valard. This builds on our overall commitment to source five per cent of all of Hydro One's purchases of materials and services from Indigenous businesses by 2026. Valard's experience in Indigenous engagement will help us meet that goal.

With regards to jobs, there will be up to 220 direct jobs during construction of the line, extending across a variety of positions, such as general labourers, equipment operators, truck drivers and office personnel. Many positions will be through other localized businesses working as subcontractors. Construction of transmission lines also requires specialized training and, in many cases, includes union membership.

With regards to employment, it’s our priority to support the local economy by sourcing materials locally when we can. By tapping into local resources Hydro One is committed to supporting the future infrastructure needs in northwestern Ontario, while supporting local economic growth. This could include, for example, catering, accommodations, facilities services, aggregate, and other services required to build the line.

I hope this information is helpful. Please don’t hesitate to reach out should you have any further questions.

Thank you,

[redacted]
Hydro One Community Relations
Phone: [redacted]
Email: Community.Relations@HydroOne.com

ATTACHMENT 6
PUBLIC COMMENT 6 RESPONSE

[redacted]

Subject: FW: Intent re: construction of Waasigan Transmission Line.

-----Original Message-----
From: [redacted]
Sent: Thursday, June 1, 2023 1:30 PM
To: RELATIONS Community <Community.Relations@HydroOne.com>
Subject: Intent re: construction of Waasigan Transmission Line.

[You don't often get email from [redacted] Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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Hello,

I would like to know specifically, if this new transmission line is intended to enable the construction and running of the proposed deep geologic repository for nuclear waste near Ignace. And are there other projects related to this one that will have increased power and transmission requirements?

I have heard that the power requirements of Northwestern Ontario are currently not supplied via the grid from southern Ontario. Is that true? Is that the purpose of this new transmission line?

And specifically, is Ontario Power Generation considering a future spent nuclear reprocessing plant at the Ignace site and possibly an associated reactor? I realize this is looking ahead, but I'm sure OPG is already considering future initiatives.

Thank you,
[redacted]

[redacted]

From: RELATIONS Community <Community.Relations@hydroone.com>
Sent: July 13, 2023 2:23 PM
To: [redacted]
Subject: RE: Intent re: construction of Waasigan Transmission Line.

Hello [redacted]

Thank you again for contacting Hydro One Community Relations about the Waasigan Transmission Line Project, and for your questions about northwestern Ontario's energy needs, how the project will support the region, and power generation interest. We apologize for the delay in providing a response.

Hydro One's role is to maintain the electricity transmission and distribution facilities that bring power to homes and businesses. The power that travels through our infrastructure comes from generation resources across the province, alongside local generation resources. At times, generated power may be exported to other parts of the province if there is a surplus in local generation. We've provided additional information below regarding transmission system forecasting and power generation.

In Ontario, the Independent Electricity System Operator (IESO) is responsible for forecasting and ensuring Ontario's long-term energy needs are being met. In 2018, the IESO identified a need for a new transmission line in northwestern Ontario and directed Hydro One to begin developing the project, known as the Waasigan Transmission Line. Once built, Waasigan will deliver enough energy to power a city double the size of Thunder Bay, which means communities and businesses can grow. The Nuclear Waste Management Organization proposed site in Ignace was not included in the IESO's demand forecast. You may be interested to review the IESO's West of Thunder Bay webpage (https://www.ieso.ca/en/Get-Involved/Regional-Planning/Northwest-Ontario/West-of-Thunder-Bay) for more detailed information.

Ontario Power Generation (OPG) as well as private generators produce electricity for the province. With regards to OPG's business plans and operations, you may be interested in visiting the OPG website (https://www.opg.com) for more information related to generation.

Thank you,

[redacted]
Hydro One Community Relations
Phone: [redacted]
Email: Community.Relations@HydroOne.com

-

ATTACHMENT 7
PUBLIC COMMENT 7 RESPONSE

[redacted]

Subject: FW: Waasigan transmission line

-----Original Message-----
From: [redacted]
Sent: Sunday, June 4, 2023 10:13 AM
To: RELATIONS Community <Community.Relations@HydroOne.com>
Subject: Waasigan transmission line

[You don't often get email from [redacted] Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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Hydro one needs to listen to the affected homeowners. Which one among your executives is facing losing their home, land, safe drinking water? Imagine being forced to change your life when there is a better alternative that is being ignored by a huge corporation. Hydro must take humans into consideration instead of just dollars.
Sent from my iPhone

[redacted]

From: RELATIONS Community <Community.Relations@hydroone.com>
Sent: July 13, 2023 2:30 PM
To: [redacted]
Subject: RE: Waasigan transmission line

Hello [redacted]

Thank you for sharing your concerns about the Waasigan Transmission Line Project and for your patience in receiving a response. We appreciate your engagement in the project, alongside other community members throughout the project area.

When selecting a route for a new transmission line, it is important for the natural and socio-economic environments, technical and cost considerations, and Indigenous community values to be considered, and for the preferred route to balance these criteria. Following an evaluation process of alternative routes, the preferred route for Waasigan was selected because it best balances these considerations.

We do understand that residents may continue to have concerns. Hydro One remains committed to working with residents and landowners in a meaningful way. We have committed to finding solutions to ensure residents who want to stay in their homes can. For example, we have been investigating local route refinements and speaking with individual landowners about site-specific mitigation measures, reducing the effects from a socio-economic perspective. Our goal is to continue hearing as much local input as possible about the preferred route so that we can work towards building a line that community members and property owners can see their feedback reflected in.

As part of the draft Environmental Assessment report, you may be interested to review additional information about groundwater (Section 6.3), which can be accessed here.

Thank you,

[redacted]
Hydro One Community Relations
Phone: [redacted]
Email: Community.Relations@HydroOne.com

ATTACHMENT 8
PUBLIC COMMENT 8 RESPONSE

Subject: Fwd: You're Invited: Waasigan Transmission Line Draft EA Community Open Houses
From: [redacted]
Date: 6/14/2023, 8:59 PM
To: [redacted]

Sent from my iPad mail setup

Begin forwarded message:

From: [redacted]
Date: June 5, 2023 at 9:51:48 PM EDT
To: Community Relations Inbox <community.relations@hydroone.com>
Subject: Re: You're Invited: Waasigan Transmission Line Draft EA Community Open Houses

As a resident of Ware township for 55 years I would like to know who signed off on our rights from the start, I under stand someone on the local MTO office was to do this as a community I think we should be given an opportunity at the beginning not to get in on the end run when you are tying up the loose end before the project goes to the MOE. This EA process began 3 years ago yet we were only apprised of it in January 2023. Why wasn't our community involved from the start. This is a mega project that will affect the community forever with no benefits . Property values could be affected by anyone near the line,lost tax base with homes too close, loss of potential future building lot sites. Will any of the be addressed in the EA report.

Sent from my iPad mail setup

On Jun 1, 2023, at 2:06 PM, Community Relations Inbox <community.relations@hydroone.com> wrote:

Good afternoon,

At Hydro One, we are committed to ongoing engagement with residents and communities. We recently reached an important milestone in the Waasigan Transmission Line project with the release of our Draft Environmental Assessment (EA) Report. We invite you to drop-in at our upcoming open houses to learn more, speak with our project team and provide feedback on the Draft EA report.

As a reminder, the draft EA Report is available for public review and comment until July 7, 2023 at 4 p.m. (EDT) and can be accessed on the project website at www.HydroOne.com/Waasigan. The EA captures the process to identify a preferred route, predicts and assesses potential natural environment and socio-economic effects and identifies the actions Hydro One will take to minimize and avoid them.

November 17, 2023

[redacted]
Sent via email: [redacted]

Hello [redacted]

Thank you for your continued engagement on the Waasigan project, and for providing your feedback as part of the review period for the draft Environmental Assessment (EA) Report.

Meaningful and open engagement is integral to the successful development of this critical line in northwestern Ontario. Since Spring 2019, we have sought to engage with residents by advertising the project through newspaper and radio ads, targeted social media ads, Canada Post neighborhood mail and hosting in-person and virtual open houses. We also have a project contact list, that I appreciate you joined in November 2020. I recall at this time we spoke about potentially advertising in the Kam Lander. This is something we remain interested if the paper still runs and you are able to share any contact leads.

We have also engaged with the Ministry of Transportation of Ontario since the beginning of the project and have since met with the Ware Local Roads Boards so that we can incorporate feedback into the project and address concerns regarding potential effects to roads and construction activities.

We know that this new line will be a change, and we are committed to working with local agencies, residents and landowners in a meaningful way. For example, we have been investigating local route refinements and speaking with individual landowners about mitigation measures. Our goal is to continue hearing as much local input as possible about the project.

As a next step, your comments have been documented and included as part of the final EA Report that Hydro One has submitted to the Ministry of the Environment, Conservation and Parks (MECP) for review and approval. As part of Ontario's Environmental Assessment Act, the MECP is leading a public review and comment period for the final EA Report.

Thank you,

Hydro One Community Relations

1-877-345-6799

Community.Relations@HydroOne.com

HydroOne.com/Waasigan

ATTACHMENT 9
PUBLIC COMMENT 9 RESPONSE

[redacted]

From: [redacted]
Sent: Tuesday, June 6, 2023 9:45 PM
To: RELATIONS Community <Community.Relations@HydroOne.com>
Subject: Draft EA Report Attention: [redacted]

You don't often get email from [redacted] Learn why this is important

Dear [redacted]

I was trying to examine the draft EA Report on your website, checking out all the maps and information provided.

I was looking for a more detailed map that would show where the proposed line would be in the Kaministiquia and Shebandowan areas to see how the route would be affecting landowners, especially where the proposed route would be in relation to their properties.

I thought you'd have such a map available, especially since the Kam-area has brought up a lot of stress, worry, and controversy for these residents, and rightly so.

According to media reports over the past month or so, a spokesperson for Hydro One kept reassuring Kam residents that Hydro One would work with them and promised that no one would be displaced from their homes.

A TBnewswatch.com article from April 18 reported...

"Hydro One said it continues working with Kam-area residents to find route refinements "and ensure those landowners who have displacement concerns can remain in their homes."

Sonny Karunakaran, director of project delivery for the utility, said that under the current proposal, wires would go over the tops of half a dozen homes, potentially forcing them to move.

"What we're saying is we've got solutions through a mixture of minor adjustments to the route and technical adjustments to make sure that goes to zero. So nobody will be asked to move from their property."

https://www.tbnewswatch.com/local-news/hydro-one-finds-problems-with-alternate-route-for-waasigan-transmission-line-6870396

But May 25, this still has not been resolved...

See: https://www.youtube.com/watch?v=kQhNqt63p_c

I am very concerned for these residents, and I see nothing in the report that helps to alleviate my concern for them. There needs to be a proper distance from any residential areas, especially for health concerns. I can't imagine having to be forced out of your family home in order to make room for this project.

I understand that there are so many other things to consider when planning a route like this, but there has to be a way to help these people so that they can stay in their homes.

Thank you for your consideration.

Sincerely,

[redacted]
Thunder Bay, ON
[redacted]

[redacted]

From: RELATIONS Community <Community.Relations@hydroone.com>
Sent: July 13, 2023 2:35 PM
To: [redacted]
Subject: RE: Draft EA Report Attention: [redacted]

Hello [redacted]

Thank you for connecting with us about the Waasigan Transmission Line project, for your questions and feedback about additional mapping information, health concerns and engagement with landowners.

To answer your question about mapping, you may be interested to visit our project website where interactive mapping is available that you can search for addresses and "zoom in", similar to Google maps. Here is a link to the project mapping webpage: https://www.hydroone.com/about/corporate-information/major-projects/waasigan/maps.

We know that this new line will be a change, and we are committed to working with residents and landowners in a meaningful way. Collaboratively, we have committed to finding solutions to ensure residents who want to stay in their homes can and have been working with homeowners on this. For example, we have been investigating local route refinements and speaking with individual landowners about site-specific mitigation measures, reducing the effects from a socio-economic perspective. This includes the Shebandowan area around Amp Lake, where we were able to find a solution reflective of feedback we heard from community members. Our goal is to continue hearing as much local input as possible about the preferred route so that we can work towards building a line that community members and property owners can see their feedback reflected in.

With regard to health, we understand changes to our infrastructure can raise interest about electric and magnetic fields (EMF). Hydro One has a dedicated team that regularly monitors global studies around EMF and ensures that our infrastructure is built and maintained following best practices and industry standards. We look to Health Canada, the World Health Organization and the International Commission on Non-Ionizing Radiation Protection, for guidance on electrical and magnetic fields. Based on global studies which have and continue to be regularly monitored, these organizations indicate that members of the public do not need to take precautions to protect from fields produced by extremely low frequencies such as transmission lines. Hydro One operates transmission lines across the province and in many cases, there are two corridors side by side. EMF levels are strongest when you are right beside the source, and then diminish with distance. When you are standing at the edge of the right of way, levels have already reduced significantly.

Thank you again for reaching out. I hope this information has been helpful.

[redacted]
Hydro One Community Relations
Phone: [redacted]
Email: Community.Relations@HydroOne.com

ATTACHMENT 10
PUBLIC COMMENT 10 RESPONSE

This letter is in response to the issues and limitation of Hydro Ones recent announcement of its preferred preliminary route. Clearly this announcement was made without a clear professional and scientific assessment of the environmental, cultural and socioeconomic factors being brought into clear consideration. This report will highlight all the issues at stake which have not been considered in this plan. We will highlight what needs to be reworked or cancelled on this project in relation to the specific territories of lot 18 east and west of Hill road in Ware Township, Kaministiquia.

Environmental-

1. Due to the unique land formations in this area there are numerous rare bird nesting sites and habitat in the territory Hydro One wants to use for this project. On the south side of the current hydro line the mountain chain located in this area is used for nesting by Bald Eagles in the spring. Rare Pileated woodpecker nesting sites are located in the extreme east and west of this same lot.
2. On the east side of Hill Road is a unique waterfall with a speckle trout spawning habitat which Blue Herons rely upon for nesting and feeding. The watershed immediately south of the current line will be irredeemably degraded if this project was allowed to remove the fauna that protects it.

Cultural

1. There is a homesteading settlement that predates confederation which is currently receiving designation as a national historical site that lies directly in the path of this poorly thought out line. This site as well as the attached indigenous settlements would presumably have many historical artifacts as well as possible human remains. A historical dig in this area will be carried out in the future to secure these historical gifts for the benefit of future generations. The historical value of this site far exceeds any dubious economic benefit this project would have to the Thunder Bay Community and Canadian Society at large both indigenous and non-indigenous. These factors alone would necessitate a blocking order in the provincial court system if Hydro One took the ill-advised step of desiring an expropriation process of which in the Hearing of necessity will be called and all these issues will be properly weighed in the public media and court system.

Socio Economic

1. Currently, a permaculture Eco farm is being developed on the property encompassing all the methods and technologies currently available to enhance the green economy. Using off gird wind and solar power and the topographical features of the property we have invented a method unique in agriculture to supply food to the local community. This self-sustaining closed loop agricultural system has proven resilient in ways gird based systems cannot. The degradation of the water table and runoff this system relies on would be irrevocably damaged by a Hydro one attempt to remove Fauna essential to the biodiversity this system supports.

2. We have currently invested a large sum of money for an off gird B& B of which the preferred route would directly go over. This project would not be able to be completed with a real loss to the community in jobs and spin off industries as well as the large sums of money invested by shareholders and other stakeholders.

I hope the preceding issues are dealt with in a logical and timely manner and that you change the route accordingly. As we have clearly highlighted in the issues previously raised, the current route you have desired to take must be changed to accommodate the welfare of the local community and greater good of Canadian society at large.

Best Regards

[redacted]
Kaministiquia
June 12, 2023

November 17, 2023

[redacted]

Hello [redacted]

Thank you for contacting us to provide your feedback as part of the review period for the draft Environmental Assessment (EA) Report for the Waasigan Transmission Line project and for sharing your local intel.

In 2019, we began an environmental assessment for the project under Ontario's *Environmental Assessment Act*. The process is designed to assess the existing environment and mitigate potential effects before decisions are made about proceeding with a proposed project. When selecting a route for a new transmission line, it is important that the natural and socio-economic environments, technical and cost considerations, and Indigenous community values are considered. The preferred route best balances these criteria.

We remain committed to working closely with landowners, like yourself, to discuss mitigation measures. We would like to extend an invitation to meet with you to continue this important discussion so we can learn more about the B&B business you referenced and make efforts to identify solutions to mitigate your concerns. Your dedicated land agent, [redacted], remains available to speak with you at any time, at [redacted]

We appreciate you providing additional information about the history of your property. We have added an additional recommendation to the final EA Report as part of the Cultural Heritage Existing Conditions and Preliminary Heritage Impact Assessment (Appendix 7.6-A) to carry out a Cultural Heritage Evaluation Report (CHER) to further review the cultural heritage value of this area and potential for additional mitigation measures. The CHER would require a field visit by a cultural heritage specialist, which we would like to coordinate with you.

We also appreciate you noting the potential for archaeological resources to be present on your property and have updated the area to indicate it requires Stage 2 Archaeology Assessment, which includes a field study component. We are hopeful we can coordinate the completion of this field assessment with you in Spring 2024.

We appreciate the important role birds, and their nesting sites, have in an ecosystem and will implement measures to mitigate and protect nesting sites for species at risk. These measures include managing vegetation removal activities so that removal occurs outside nesting periods. Surveys will also be completed before construction to ensure no active nests are present, as well as ongoing nest monitoring for active nests to document their use and abandonment.

We will also take steps to minimize potential effects to the watershed located south of the existing transmission line in this area, such as: minimizing the number of water crossings, re-stabilizing waterbody beds, banks and slopes and natural areas disturbed during construction, allowing compatible vegetation to grow back within the corridor, including riparian areas, and utilizing environmental monitors to ensure mitigation measures work effectively.

We have also committed to undertaking a biodiversity initiative specific to this project, which can help enhance communities around transmission line corridors. Examples include wetland and wildlife habitat creation and enhancement, aquatic habitat restoration and enhancement activities, or invasive species inventory or removal. Additional information on the biodiversity initiative will be available as we progress through the project and Hydro One will engage with Indigenous communities, local communities and interested parties to discuss its implementation.

As a next step, your comments have been documented and included as part of the final EA Report that Hydro One has submitted to the Ministry of the Environment, Conservation and Parks (MECP) for review and approval. As part of Ontario's *Environmental Assessment Act*, the MECP is leading a public review and comment period for the final EA Report.

Thank you,

Hydro One Community Relations

 1-877-345-6799

 Community.Relations@HydroOne.com

 HydroOne.com/Waasigan

ATTACHMENT 11
PUBLIC COMMENT 11 RESPONSE

[redacted]

From: [redacted]
Sent: June 19, 2023 9:25 AM
To: Waasigan Project Folder Borealis [redacted]
Subject: FW: Waasigan power line [redacted]
Attachments: EA response June 15, 2023.docx

From: [redacted]
Sent: Saturday, June 17, 2023 9:52 AM
To: RELATIONS Community <Community.Relations@HydroOne.com>
Subject: Waasigan power line [redacted]

> You don't often get email from [redacted] Learn why this is important

*** Exercise caution. This is an EXTERNAL email. DO NOT open attachments or click links from unknown senders or unexpected email. ***

I have concerns. Please read this

June 15, 2023

[redacted]

I am writing to you to express my concerns regarding the Waasigan transmission line that Hydro One is planning to route from Atikokan to Shuniah.

Hydro One states “that the EA predicts and assesses potential natural environment and socio-economic effects and identifies actions that hydro One will take.”

I live in the Kaministiquia area of this line. There is no concern for the residents of the area, our health and well being. We are an established community and growing . We are omitted with only a suggestion that Locals will be hired for the duration of building the line.

Doubling the current hydro corridor through our township create many concerns not noted in the draft.

1/ This wide area remains barren land , that land owners can not use for gardens, for recreation areas, to build more homes. Still the landowner pays taxes on this land and have liability if someone gets injured using the land illegally.

2/ Hydro one will use defoliants on this area which can spread to their own gardens, affect small animals and birds. Already Hydro One is using these chemicals but this use will at least double with the increased width

3/ Home owners who are unfortunate to live near this planned power line will at least suffer a huge decrease in property value, at worst find their homes feel unsafe , might be unsaleable. This is a huge financial hit to the homeowner. It is

unbelievable that a corporation can create this disruption and financial drain legally. Some of these home owners will receive no compensation because the line crosses the neighbor's property close to the property line and very close to their home!

4/ I recognize that EMFs have not been proven to be a real risk to our health. Everyone has a story of a friend who lived near these lines and died young usually from cancer. Fearing the danger can be as harmful to health as facing a danger.

I don't know how this can be compensated for. I feel this risk should be recognized and dealt with in the EA. The easiest way is to put the lines in remote areas, let everyone can have a clear conscience and not fear being found out in the future that their actions contributed to another "love Canal" environmental disaster.;

5/ For some of us it is more basic, our view will be lost, our cozy surroundings. We live here to enjoy nature -trees, birds, animals wandering through. Removing trees, creating a barren landscape with towers in our front yards, might seem a small inconvenience but it is a big sacrifice. Where would this be addressed in the EA?

6/Where is the level of stress and anxiety, and mental health issues being created in the community with this proposed doubling of power line being addressed?

Thank you for reading my concerns; I trust that changes can be made to make this powerline a positive experience for Hydro One and the residents of our community.

Sincerely,

[redacted]

[redacted]

November 17, 2023

[redacted]

Hello [redacted]

Thank you for contacting us to provide your feedback as part of the review period for the draft Environmental Assessment (EA) Report for the Waasigan Transmission Line project.

As you mention, we are currently undertaking an environmental assessment for the project under Ontario's *Environmental Assessment Act*. The process is designed to assess the existing environment and mitigate potential effects before decisions are made about proceeding with a proposed project.

When selecting a route for a new transmission line, it is important that the natural and socio-economic environments, technical and cost considerations, and Indigenous community values are considered. The preferred route best balances these criteria.
We understand that community members may continue to have concerns, and we are committed to working with residents and landowners in a meaningful way. For example, we have been investigating local route refinements and speaking with landowners about mitigation measures. We have also committed to undertaking a biodiversity initiative specific to this project, which can help enhance communities around transmission line corridors. Examples include wetland and wildlife habitat creation and enhancement, aquatic habitat restoration and enhancement activities, or invasive species inventory or removal. Additional information on the biodiversity initiative will be available as we progress through the project and Hydro One will engage with Indigenous communities, local communities and interested parties to discuss its implementation.

With regards to your concern about herbicide use, through engagement during the EA process, we heard feedback from Indigenous communities and stakeholders like yourselves, regarding concerns with the use of herbicides to remove and manage vegetation for the Project. After consideration of this feedback, herbicides will not be used during construction of the Project or for future maintenance of this new transmission line. The final EA Report has been updated to reflect this.

Hydro One understands some landowners have concerns related to trespassing and the potential for increased unauthorized access to their property as a result of the Project. We are committed to working to mitigate these concerns to the extent possible upon completion of the project and are currently exploring options, while still ensuring the transmission line can be operated and maintained safely. This commitment has also been reflected in the final EA Report.

We understand changes to our infrastructure can raise concern about electric and magnetic fields (EMF). With regards to health and safety, Hydro One has a dedicated team that regularly monitors global studies around EMF and ensures that our infrastructure is built and maintained following best practices and industry standards. We look to Health Canada, the World Health Organization and the International Commission on Non-Ionizing Radiation Protection, for guidance on EMF. Based on global studies which have and continue to be regularly monitored, these organizations indicate that members of the public do not need to take precautions to protect from fields produced by extremely low frequencies such as transmission lines. For this project, we retained Exponent Consulting, who are a multidisciplinary independent engineering and science consulting firm, to review and comment on any possible health impacts. Exponent Consulting concluded there is no evidence of adverse

health effects caused by EMF at extremely low frequencies for both the existing and planned configuration of the Waasigan Transmission Line. I have attached additional material with more information about EMF, and you may also be interested in reviewing what has been captured in the final EA Report in section 3.2.2.4.

As a next step, your comments have been documented and included as part of the final EA Report that Hydro One has submitted to the Ministry of the Environment, Conservation and Parks (MECP) for review and approval. As part of Ontario's *Environmental Assessment Act*, the MECP is leading a public review and comment period for the final EA Report.

Thank you again for reaching out, I hope this information has been helpful.

Thank you,

Hydro One Community Relations

 1-877-345-6799

 Community.Relations@HydroOne.com

 HydroOne.com/Waasigan

ATTACHMENT 12
PUBLIC COMMENT 12 RESPONSE

June 16, 2023

[redacted]

[redacted]

This letter serves a response to the Draft Environmental Assessment that is now available on the preferred route for the Hydro One/Waasigan line. I am from Kaministiquia, a member of Neighbours on the Line and I am NOT a person who will have a line or tower on my land, but I will have one much closer to me, in fact at the end of my driveway. This is also the case of other families on my road (Salmi Road) some towers closer, dangerously closer, but not quite on the property. When I expressed my concern over the proximity to my home, a Hydro One employee suggested I talk to the construction people and maybe they would move it around for me. Really? Hydro One contractors follow Hydro One's orders, certainly not mine and where would they move it to? I am not considered a stakeholder and therefore have no rights to negotiate as far as I understand.

Hydro One, states that they will meet with 'individual' families and try to mitigate damage to their land and, as one landowner stated, create a 'divide and conquer situation' which could create long lasting community divisions. Mitigation offers and/or possibilities should be made public, in writing for all to be aware of. If mitigation possibilities are not public knowledge, then Hydro One/Waasigan Line risks being seen as not trustworthy. Are they trustworthy?

So, for all of us who are not considered 'directly impacted' we strongly disagree with that assessment. We are all impacted by this line being imposed on a whole community of people, forty houses on my road. We are impacted by the chemical sprays used to keep vegetation down under and around the lines, our wells, our gardens, our animals, our children, and there is absolutely no mention of this in your assessment. Many of the wells on people's properties were never registered, some of them over 100 years old and not included in the assessment. I know for sure our shallow well dug some 50 years ago by ourselves, was never registered. Some people built their homes or purchased their homes just a few years ago with no knowledge of this line going through. They feel duped. They feel the value of their land will be significantly affected, not to mention the aesthetics of their chosen acreage and their health and well-being including the electro-magnetic fields, their impact not fully understood yet in the scientific community. For Hydro One to state otherwise is incorrect. How could such an error in judgement have happened?

We have had five months to absorb Hydro One's choice to use our community as its preferred route to construct their line through regardless of the negative impact it is having. Hydro One tries to say four years of consultation, I/we say, not. Their first consultation in our community was on January 16 2023, and that was in response to a neighbour getting wind of their plans at the Oliver Road Community Center. Our community was shocked to hear about this line and gathered for the first time to discuss Hydro One's plan and prepare an appropriate response.

Our community was now being swarmed by strangers calling themselves 'real estate' agents phoning or simply showing up in people's driveways with forms to be signed with cheques in hand to perform 'environmental' assessments and surveys on their land. For many residents, this was their introduction to the Hydro One/Waasigan Line going through their community and in many cases, their land, and homes. Neighbours on the Line, the name of our community group, has been always clear that our goal was not to stop the line, especially if it was considered an important addition to energy transmission, but why were they choosing the most impacted community to put it through we asked ourselves? Then, we quickly realized that Hydro One wanted to 'twin' the line with the existing Hydro Line that had gone through our community 50 years ago when there were only three (3) houses on our road and in fact, our road did not even have a name yet, it was simply called Concession Three. I believe that Hydro One/Waasigan choosing this route is clearly a time and money saving choice.

Our community worked hard to research an alternate route and it disappointing that it was given minimal consideration by using their rating method geared totally in favour of the Hydro One/Waasigan line preference. We had retired professionals in our community including map makers, natural resources management, legal support, and dedicated elders. We were careful in researching this alternate route by considering people's homes (there was none) Indigenous Communities (one community no longer inhabited and at a five-kilometre distance, access roadways, etc. This route was well researched. However, the decision to 'twin' the lines was probably made a several years ago and it appears any actual proof that other routes were 'seriously' considered is not available.

Hydro One has stepped into our community, uninvited, without proper time for consultation, with a tight timeline and we are being forced to accept this. We do not. Neighbours on the line whose homes are impacted are not accepting this line. Perhaps there are those where the tower is far enough away and/or the need for money greater, or even the lack of understanding the whole impact on the community, who have agreed but know this, there are families of four generations, others living here for 50 plus years, and they are not going to sell parts of their land for Hydro One to offload towers or lines. There will be legal battles, and this will take up a significant amount of time. Hydro One can move the line, this makes absolute sense.

If this is truly and 'environmental assessment' I suggest you walk down the road with me. Let's visit the neighbours together. You listen to their passion and fear and tears and anger and frustration with this so called 'consultation' process and then let's have a real conversation.

Your truly

[redacted]

November 17, 2023

[redacted]

Hello [redacted]

Thank you for your continued interest in the Waasigan Transmission Line project and for providing your feedback as part of the review period for the draft Environmental Assessment (EA) Report. I would also like to acknowledge the comments you resubmitted from earlier this year and have included our response.

Our project team members appreciated meeting with you at your property in June to better understand your concerns regarding the nearby trail and meet with neighbours. Following the on-site meeting with you, we understand that the new towers and corridor may be visible when driving along the municipal road, but are not anticipated to be visible from your residence. The team also acknowledged you may experience temporary construction-related disruption and confirmed that the location of the berry picking site you are interested in is located under the existing transmission line.

Meaningful and open engagement is integral to the successful development of this critical line in northwestern Ontario. Since 2019, we have sought to engage and seek feedback from residents in the project area by advertising the project through newspaper and radio ads, targeted social media ads, Canada Post neighborhood mail and in-person and virtual open houses. We have also engaged with the Ministry of Transportation since the beginning of the project and have since met with Local Roads Boards to understand concerns regarding potential effects to roads and construction activities.

We know that the selection of a route is a key project milestone where additional concerns may emerge. To better understand concerns heard from community members in Kaministiquia, and to find solutions to address them, we held community open houses, property owner information sessions and established a working committee to review and evaluate the route proposed by Neighbours on the Line. We committed to evaluating the route proposed by Neighbours on the Line with the same criteria and criteria weightings used to evaluate the alternative routes. These criteria and criteria weightings were established using stakeholder feedback, including from members of the public and those who live within the study area, and reflect the diversity of interests and items of importance across the Project area. These categories included: natural environment, socio-economic environment, Indigenous community culture, values and land use, and technical and cost.

The evaluation concluded the route proposed by Neighbours on the Line, on balance, had less advantages compared to the preferred route. While the proposed route by Neighbours on the Line had more advantages within the socio-economic category as a result of less impact to private land and residential property by maximizing the use of Crown land, there were more disadvantages in the other three categories. More information about the evaluation, can be found in Section 2.2.4 of the final EA Report.

We remain committed to working closely with landowners, including those in Kaministiquia, to find solutions and ensure residents who want to stay in their homes can. For example, we have been investigating local route refinements and speaking with individual landowners about mitigation measures. Our goal is to continue hearing as much local input as possible about the project.

With regards to herbicide use, through engagement during the EA process, we heard feedback from Indigenous communities and stakeholders like yourself, regarding concerns with the use of herbicides to remove and manage vegetation for the Project. After consideration of this feedback, herbicides will not be used during construction of the Project or for future maintenance of this new transmission line. The final EA Report has been updated to reflect this.

With respect to your concern about the impact of the project on groundwater, Section 6.3 of the EA Report summarizes our evaluation of potential and net effects on groundwater in the Project area, including: assessing potential changes to groundwater quality and/or levels and flows due to spills, construction excavations and dewatering, blasting, vegetation clearing and construction of Project components, among other activities. Mitigation measures we've identified to protect groundwater as captured in the EA report include: spill prevention through preventative maintenance and inspection of equipment; implementing procedures for emergency response, containment, clean-up, disposal, and reporting; use of designated refueling areas; providing secondary containment for all bulk fuel storage; and, equipping work areas and equipment with spill kits for spill response. Groundwater drinking water supply will be protected by avoiding construction below the groundwater table where practicable and regularly monitoring environmentally sensitive features, such as waterbodies and springs, during construction. For water supply wells located near the Project footprint, Hydro One and their contractor will work with private landowners where requested to identify wells with the potential to be affected by the Project, and recommend mitigation techniques to avoid or reduce those effects.

We understand changes to our infrastructure can raise concern about electric and magnetic fields (EMF). With regards to health and safety, Hydro One has a dedicated team that regularly monitors global studies around EMF and ensures that our infrastructure is built and maintained following best practices and industry standards. We look to Health Canada, the World Health Organization and the International Commission on Non-Ionizing Radiation Protection, for guidance on EMF. Based on global studies which have and continue to be regularly monitored, these organizations indicate that members of the public do not need to take precautions to protect from fields produced by extremely low frequencies such as transmission lines. For this project, we retained Exponent Consulting, who are a multidisciplinary independent engineering and science consulting firm, to review and comment on any possible health impacts. Exponent Consulting concluded there is no evidence of adverse health effects caused by EMF at extremely low frequencies for both the existing and planned configuration of the Waasigan Transmission Line. I have attached additional material with more information about EMF, and you may also be interested in reviewing what has been captured in the final EA Report in section 3.2.2.4.

As a next step, your comments have been documented and included as part of the final EA Report that Hydro One has submitted to the Ministry of the Environment, Conservation and Parks (MECP) for review and approval. As part of Ontario's *Environmental Assessment Act*, the MECP is leading a public review and comment period for the final EA Report.

Thank you again for reaching out, I hope this information was helpful.

Thank you,

Hydro One Community Relations


1-877-345-6799


Community.Relations@HydroOne.com


HydroOne.com/Waasigan

ATTACHMENT 13
PUBLIC COMMENT 13 RESPONSE

June 14, 2023

[redacted]

Dear [redacted]

We have lived in Kaministiquia, ON for the past 44 years, it is a very strong, supportive and close knit community. Our farm is over a 100 years old, one of the first dairy farms in this area. We have spent many years, and a good amount of money to restore the original home, heritage barn, and pasture land. The hydro line that was put in 1967 made the pasture in that area not suitable for our horses, as they will not graze under the power lines due to the noise. We had to install fencing in the area close to the front of the property by the road for new pasture. This is also noticeable with the deer, migrating birds and other wild life which we have an abundance of.

We have a pond area that is a natural environment for fish, frogs, birds, deer, wolves, fox, bears, and so many other species. Trees were planted many years ago to create a buffer on the north side of the pond, which is also the head waters for the watershed which feeds our pond, well, and three other properties before it drains into the Matawan River. Hydro One wants to cut down this plantation of forest which will affect the watershed, impact our well which is close to the pond and destroy the beauty that we have worked hard on for so many years. If they go on either side of the existing power line they will destroy a plantation of trees that is a current buffer from the current high voltage line. 40 years of work by us and another 60 years by the original owners will be wiped out in a matter of one year by Hydro One Networks Inc. In this day and age where the environment is such a big issue to preserve and protect, how can this be approved for Hydro One Networks to come in, take away and destroy our home, property and lifestyle!?

Last summer in 2022, we were approached to have an Environmental Assessment (EA) done on our property. We agreed to this only because we wanted Hydro One Networks to see how destructive this would be. Our farm is already cut in half with the existing line, to have another beside it is unimaginable. When the two people who did the EA finished at end of day, they said to me that 'yes all the water was on the South side of the existing power line and the watershed was being protected by the forested area.' We have NEVER received a report of our EA from Hydro One, even after we requested it. Now we find out that our farm, our watershed and pond are not even included in their EA Draft. It has been a very emotional upsetting and very difficult time for our family since we found out in January 2023 what Hydro One Networks was attempting to do to our farm and community.
Upon research we have found out that the Terms of Reference which Hydro One did in June 24-26, 2019 did not include any unincorporated townships and property owners that the line crosses from Atikokan to Shuniah. This being said this Environmental Assessment is invalid and is not legal. Hydro One Networks has demonstrated no concern for human impact, the health and well-being of those living in our community, the seniors that have lived here all their lives and the young generation that will be passed down the homes and properties of their families.

All our written letters, meetings and phone calls expressing our concerns and personal impacts seem to be meaningless. Hydro One Networks had no other alternate route even considered between the Silver Falls Road and Atikokan. This corporation only wants to go the cheapest and shortest route with no consideration for property owners. They do have another alternate route, which we presented to them and it would be all on crown land with no human impact. We do hope you will take all of the above into consideration and respect our objections and fears of what will happen if you approve Hydro One Networks to go ahead with such a monstrous and horrific project in our community.

We would also very much appreciate to hear back from you directly, to let us know your thoughts and concerns and what you will do, if anything, to address our situation with Hydro One.

Sincerely,

[redacted]

November 17, 2023

[redacted]

Hello [redacted]

Thank you for contacting us to provide your feedback as part of the review period for the draft Environmental Assessment (EA) Report for the Waasigan Transmission Line project.

Meaningful and open engagement is integral to the successful development of this critical line in northwestern Ontario. We appreciate your family's engagement over the past several months to continue important discussions about concerns relating to the new transmission line on your property.

We remain committed to working closely with you to discuss mitigation measures. I would like to reiterate our open offer to schedule a meeting with your family, myself and key members of our Project team on your property, to continue this important discussion so we can make efforts to identify solutions to mitigate your concerns. With respect to your comment about being displaced, our commitment to ensure that property owners who wish to stay in their homes will not be displaced, extends to ensuring landowners have meaningful mitigation options available to make a decision that is best for them. In some cases, landowners who qualify may opt for a full property buyout, and in other instances we have been working with property owners to identify mitigation measures. We remain committed to working with you so that we may develop mitigation solutions.

With regards to voluntary early access agreements we entered into with landowners, like yourselves, this allowed us to complete environmental field studies to support the EA. Field studies are completed to help characterize the Project study area and supplement available desktop information. During field studies completed in Summer 2022, we identified two locations on your property which had grassland bird species, as shown as GBS-29 and GBS-30 in the Terrestrial Baseline Report (Appendix 6.4-A, Figure 3.2-7). The results in the Terrestrial Baseline Report noted 19 and 18 grassland bird species identified at GBS-29 and GBS-30, respectively, which is similar to the average number of species identified at field study locations across the project. We also confirmed your property is part of the Kaministiquia River watershed, which was assessed and included in Section 6.2 of the EA Report, identified as WC1032.01 and WC3188.01 (one number for the right-of-way and one number for the access road). Additional field studies were also completed in the broader study area, and these are reflected in the baseline reporting for the EA Report, including the Terrestrial Baseline Report (Appendix 6.4-A), Surface Water Baseline Report (Appendix 6.2-A) and Fish Baseline Report (Appendix 6.6-A).

We would also like to acknowledge the additional information you shared with us regarding the historical qualities of your property at 154 Wilf's Road. We have added an additional recommendation into the final EA Report as part of the Cultural Heritage Existing Conditions and Preliminary Heritage Impact Assessment (Appendix 7.6-A) to carry out a Cultural Heritage Evaluation Report (CHER) to further review the cultural heritage value of this area and potential for additional mitigation measures. The CHER would require a field visit by a cultural heritage specialist, which we would like to coordinate with you.

We know that the selection of a route is a key project milestone where additional concerns may emerge. To better understand concerns we heard from community members in Kaministiquia, and to find solutions to address them, we held community open houses, property owner information sessions and established a working committee which we appreciate you were a part of, to review and evaluate the route proposed by Neighbours on the Line. We committed to evaluating the proposed route using the same criteria and criteria weightings used to evaluate the alternative routes. These criteria and weightings were established using stakeholder feedback, including from members of the public and those who live within the study area, and reflect the diversity of interests and items of importance across the Project area. These categories included: natural environment, socio-economic environment, Indigenous community culture, values and land use, and technical and cost. As noted in Section 2.3.3 of Appendix 2.0-A of the EA Report, the residence indicators under the land use criterion were given the highest weight and the land use criterion was given the highest weight in the socio-economic criteria category.

The evaluation concluded the route proposed by Neighbours on the Line, on balance, had less advantages compared to the preferred route. While the proposed route by Neighbours on the Line had more advantages within the socio-economic category as a result of less impact to private land and residential property by maximizing the use of Crown land, there were more disadvantages in the other three categories. Further details about this can be found in Section 2.0 of the EA Report. We appreciate you have lived and come to enjoy the property over many years, and value the trees located near the existing power line. To ensure there is enough space for the new transmission line, we have to create a new corridor that is approximately 46 metres wide and remove incompatible vegetation within the corridor. We recognize the importance of the trees in this area to you and as we continue our construction planning, we are committed to looking at opportunities to minimize the extent of removal and selectively cut or retain compatible species that will not encroach on the electrical clearances or safe operation and maintenance of the transmission line. We would be happy to review this in the context of your property.

Additional environmental concerns raised:
To address additional concerns you raised related to potential impacts to the environment, we have provided more detail about the information included in the EA Report and the mitigation measures we will be implementing.

Erosion and Vegetation Removal
Vegetation removal refers to essential work to prevent unnecessary service interruptions, allow easy and safe access for our crews to perform emergency repairs, and to keep the corridor safe. With regards to your concern for erosion due to vegetation removal, as outlined in Section 6.4 of the EA Report, we will incorporate the following measures during and after construction to minimize potential effects: retaining low vegetation along the right-of-way where feasible; restricting stumping and grading to work areas and avoid on slopes; revegetating cleared areas following construction where necessary; minimizing grading near waterbodies, slopes and sensitive receptors; recontouring work areas following construction to restore drainage patterns and prevent erosion; monitoring soil conditions during construction and adapting work plans to avoid soil damage; replacing and regrading any removed soil in workspaces; protecting exposed soil from contamination, loss, mixing, or erosion; and, implementing post-construction monitoring and inspection to ensure that drainage and erosion control, and restoration efforts are effective.

Watershed
Your family’s property is part of the Kaministiquia River watershed, which was assessed and included in Section 6.2 of the EA Report. Potential impacts to waterbodies were evaluated and the following mitigation measures will be used to minimize impacts:

- Buffer zones of 30 m will be maintained around waterbodies, and clearing of riparian vegetation will be limited to the extent practicable and to the requirement of the access road and alignment clearing width only. Clearing or disturbed areas within the 30 m buffer will be provided with maintained erosion and sediment controls.
- Refueling, service, and maintenance of vehicles and equipment will be carried out in designated areas at temporary construction camps and temporary laydown areas located a minimum of 120 m from waterbodies to the extent possible. These areas will be designed and constructed to collect and contain minor leaks and spills. If refueling within 120 m of a waterbody cannot be avoided, enhanced spill containment measures will be used. In the event that refueling, servicing and maintenance is required in the field, 120 m buffer will be respected to the extent possible.
- Water crossing structures will be designed and constructed in accordance with permits and approvals through regulatory bodies. Hydro One with their contractor will carefully design and construct water crossings to minimize potential adverse environmental effects resulting from changes to cross section hydraulics. Infrastructure will be designed to pass peak flows and maintain sufficient flow conveyance.
- Waterbody crossings will be minimized to the extent possible, by appropriate alignment of the right-of-way and access roads, and the use of existing roads and trails as much as possible.

In addition to the measures described above, Hydro One has committed to undertaking a biodiversity initiative specific to this project to offset habitat loss or change that may occur as a result of the Project. Such initiatives involve the funding of third-party opportunities or projects, such as wetland and wildlife habitat creation and enhancement, aquatic habitat restoration and enhancement activities, or invasive species inventory or removal, among others. Additional information on the biodiversity initiative will be available as we progress through the project and Hydro One will engage with Indigenous communities, local communities and interested parties to discuss its implementation.

As a next step, your comments have been documented and included as part of the final EA Report that Hydro One has submitted to the Ministry of the Environment, Conservation and Parks (MECP) for review and approval. As part of Ontario's *Environmental Assessment Act*, the MECP is leading a public review and comment period for the final EA Report.

As mentioned above, we would welcome the opportunity to meet with you to continue discussing the project and your property.

Thank you,

Bruce Hopper
Manager, Major Projects – Hydro One


1-877-345-6799


Community.Relations@HydroOne.com


HydroOne.com/Waasigan

ATTACHMENT 14
PUBLIC COMMENT 14 RESPONSE

[redacted]

[redacted]

Hydro One Networks Inc.
483 Bay Street, 14th Floor, North Tower
Toronto, ON M5G 2P5

June 16, 2023

Dear [redacted]

As per your invitation to consider the draft Environmental Assessment of the Waasigan Transmission Line project, I am writing to provide you with my feedback after reading this document.

At all Hydro One's Open Houses and in all the reports I have read, including the draft Environmental Assessment, you seem to have overlooked the non-indigenous **PEOPLE** living along the proposed route for the Waasigan Transmission Line project.

Your assessment categories are:

1. Natural Environment
2. Indigenous Values
3. Socio-Economic Environment
4. Technical and Cost

You have omitted a very important category:

5. **People/Inhabitants Living Along the Proposed Route**

"**Community Well-Being and Aesthetics**" are discussed in Section 7.0.

I studied this Section carefully. You only discuss Community Well-Being as it pertains to the construction phase.

- Quality of Life – Noise
- Quality of Life – Vibration
- Quality of Life – Air Quality
- Quality of Life – Public Safety
- Quality of Life – Community Interactions

These categories will affect us temporarily as you state but you have completely ignored the long-term effects on the residents living along the present hydro corridor, from Shuniah to Dryden.

Many people will be affected in one way or another if you twin the transmission lines.

The present hydro transmission line is located on my property. The easement was used as a property line when the homestead farm was subdivided into three lots.
My husband and I will be greatly affected by the Waasigan project but will see no financial compensation. Instead, our property value will drop.

The proposed line would really affect our neighbours to the south. You want 9 acres of their beautifully treed property.

The residents of this rural part of Northwestern Ontario chose to live here, away from cities and towns, because we love the **Natural Environment** in Shuniah, Gorham Township, Ware Township, and Kaministiquia and west to Atikokan and Dryden.

We treasure the peace and quiet living in the natural environment which surrounds us. We take care of Mother Nature out here.

Twinning the line will destroy our peaceful and natural environment.

On Page 7.1-89 you refer to our townships as "**Unorganized**". We are **unincorporated** but not **unorganized**!! We have structure:

- Our Local Services Boards manage Fire Protection, Recreation and Library Services, in some cases.
- Our Roads Boards work with the Ministry of Transportation to keep our roads maintained.

On Page 7.2-34, Section 7.2.5.2.4.2 Community Fire Services are discussed under the heading "Fire Services".

In the list of available Fire Services the Volunteer Fire Departments of East Gorham, Lappe, Kaministiquia and Shebandowan were not included.

As far as Visual Aesthetics, Page 7.4-16, you have neglected to include Lappe.

My neighbours and my family on [redacted] **experience extremely "frequent and continual" viewing opportunities** of the present unsightly transmission line. Twinning the line will double the negative effect on the visual aesthetic that we would have to live with.

On Page 7.1-176 **Increased Access** is discussed. It is stated that "Recreational activities including snowmobiling, are not permitted on Hydro One ROW's unless it is agreed to by the property owner...".

Twinning the lines will create a superhighway for the snowmobilers and ATV operators who already trespass on my property presently.
The noise level will increase disturbing our peace and quiet. The damage to vegetation will increase.

What does Hydro One have planned to help patrol my property to ensure these recreational vehicles do not trespass?

What will Hydro One do to help us if there is an accident on my portion of the right of way and we are held liable?

In the tables in Section 8 the net effects of the Waasigan TLP are discussed. There will be direct affects to:

- The surface water
- The groundwater
- Wetlands
- The vegetation
- The birds and animals
- Species at risk

But in most cases you feel these effects will not be significant.

So, if you are comfortable disturbing the natural surroundings, the homes of wildlife and human beings with your preferred route, why will you not consider the alternate route proposed by the Neighbours on the Line, (NOTL)?

The natural surroundings and homes of wildlife would be disturbed along that route, but our homes and quality of life would not be.

In the table on Page 7.1-48 the Campus Lake Conservation Reserve is mentioned. A utility corridor is permitted through this Reserve if there is no 'reasonable alternative'.

- There is a reasonable alternative: The NOTL proposed route.
- Why would you disturb this nature reserve further by adding a second line through it?

Community Well Being (Section 7.2) states there will be 'negligible net effects'. I do not agree.

In Section 7 in the table on Page 7.2-5, it is stated that you would avoid or minimize effects to populated areas. This could be accomplished if you consider the NOTL alternate route.

Throughout this whole planning, preparing, and evaluating of the Wassigan Transmission Line Project It appears that we non-indigenous human beings do not count and really have no say in how we are treated.

Based on the above points, I feel that it is imperative that Hydro One review the alternate route proposed by NOTL again and reassess this route in a fairer, more inclusive manner.

Then do the right thing:

Build the Waasigan Power Transmission line along the NOTL proposed route.

You want to provide power to the north, build the line in the north!!

Thank you.

Yours truly,

[redacted]

P.S. I am curious. What does the construction of the new Thunder Bay Correctional Complex have to do with your Environmental Assessment?

Also on Page 8.0-10 there are several typos. Every mention of the Trumpeter Swan, swan is spelled "Swam".

November 17, 2023

[redacted]

Hello [redacted],

Thank you for contacting us to provide your feedback as part of the review period for the draft Environmental Assessment (EA) Report for the Waasigan Transmission Line.

We know that the selection of a route is a key project milestone where additional concerns may emerge. To better understand concerns we heard from community members in Kaministiquia, like yourself, and to find solutions to address them, we held community open houses, property owner information sessions and established a working committee to review and evaluate the route proposed by community members in Kaministiquia. We committed to evaluating the proposed route with the same criteria and criteria weightings used to evaluate the alternative routes. These categories included: natural environment, socio-economic environment, Indigenous community culture, values and land use, and technical and cost. These criteria and weightings were established using stakeholder feedback, including from members of the public and those who live within the study area, and reflect the diversity of interests and items of importance across the Project area. As noted in Section 2.3.3 of Appendix 2.0-A of the EA Report, the residence indicators under the land use criterion were given the highest weight and the land use criterion was given the highest weight in the socio-economic criteria category.

The evaluation concluded the route proposed by Neighbours on the Line, on balance, had less advantages compared to the preferred route. While the proposed route by Neighbours on the Line had more advantages within the socio-economic category as a result of less impact to private land and residential property by maximizing the use of Crown land, there were more disadvantages in the other three categories.

We recognize there will be a visual change as a result of the new transmission line. Our goal is to continue hearing as much local input as possible about the project. We appreciate your feedback related to rural settlement areas located within the Project study areas, including your feedback about the Lappe, East Gorham, Shebandowan, Kaministiquia volunteer fire services. Section 7.2.5.2.4.2 – Community Fire Services of the final EA Report has been revised to include a list of available fire services within rural areas.

With regards to Campus Lake Conservation Reserve, it is located within Phase 2 of the Project (Atikokan to Dryden), while the Neighbours on the Line proposed route is located within Phase 1 of the Project (Thunder Bay to Atikokan). As a result, the route proposed by Neighbours on the Line does not affect whether Campus Lake Conservation Reserve would be crossed. The preferred route is located in an area where an existing transmission crosses the conservation reserve, so the right-of-way has been proposed to run adjacent to it to minimize disturbance to the surrounding environment. More information about routing in the Campus Lake Conservation Reserve and mitigation measures that will be used to limit adverse effects within parks and protected areas can be found in Appendix 2.0-B of the EA Report.

We appreciate your feedback about language used within the EA Report to describe “unorganized” and “unincorporated” townships. These terms are used in the EA Report based upon the provincial definition of lands. For example, lands defined by the Province of Ontario as unorganized may

receive assistance from MNRF and MTO, who help residents to set up local service boards to deliver basic services under the *Northern Services Boards Act*. Additional legislation, including the *Local Roads Board Act* and the *District Social Services Administration Board Act* (O.Reg. 278/98), also work to support the delivery of basic services within these areas. We have also engaged with the Ministry of Transportation of Ontario since the beginning of the project and have since met with the Ware Local Roads Boards so that we can incorporate feedback into the project and address concerns regarding potential effects to roads and construction activities.

Effects to quality of life are considered for both the construction and operations stages in Section 7.2 (Community Well-Being) of the EA Report. Regarding your concern about negligible net effects, the rating for net effects in Section 7.2 varies depending on the criteria and indicator. For example, for nuisance effects due to changes in noise emissions during construction, it notes that net effects will have a magnitude of negligible, low, moderate, or high depending on the distance between the point of reception and the construction activities. However, the increased noise levels are expected to be local (i.e., limited to the local study area) and short-term in duration at a given location relative to the entire construction schedule.

With regards to noise, the level of static noise emitted by transmission lines relates to a number of different factors, such as weather conditions. For example, during regular weather, our lines are typically almost silent, but during a hot, humid day, or a storm as you mention, the noise levels can be raised.

With respect to the Thunder Bay Correctional Complex, it was identified as a “reasonably foreseeable development” in the region. These projects are identified to determine if the net effects of our Project could overlap with the net effects of these other future projects. This is completed as part of the cumulative effects assessment portion of the EA.

Lastly, Hydro One understands some landowners have concerns related to trespassing and the potential for increased unauthorized access to their property as a result of the Project. We are committed to working to mitigate these concerns to the extent possible upon completion of the project and are currently exploring options, while still ensuring the transmission line can be operated and maintained safely. This commitment has also been reflected in the final EA Report.

As a next step, your comments have been documented and included as part of the final EA Report that Hydro One has submitted to the Ministry of the Environment, Conservation and Parks (MECP) for review and approval. As part of Ontario’s *Environmental Assessment Act*, the MECP is leading a public review and comment period for the final EA Report.

Thank you,

Hydro One Community Relations

 1-877-345-6799

 Community.Relations@HydroOne.com

 HydroOne.com/Waasigan

ATTACHMENT 15
PUBLIC COMMENT 15 RESPONSE

[redacted]

From: [redacted]
Sent: June 21, 2023 8:39 AM
To: [redacted]
Subject: FW: Waasigan Project
Attachments: image004.emz

From: [redacted]
Sent: Wednesday, June 21, 2023 12:15 AM
To: RELATIONS Community <Community.Relations@HydroOne.com>
Subject: RE: Waasigan Project

June 20, 2023

Hello. Sorry I missed your call, and thanks for the effort to ensure I am able to give my feedback.
I have owned 7.95 acres of land on the north side Nickleby Lake since about 1981, and thus am very familiar with the bush surrounding the Lake, as I've hunted, fished, and gathered medicinal plants there over the years. I'm older now, so don't get out in the bush like I used to. My younger relatives will acquire the land from me, and already use it.

As I've reported in the past, your last hydro line development took out all the large trees on my property.
due to the high winds funnelled through the new line. It also also destroyed the moose calving area on my property where they would calve and graze securely the along shore line of egress from the lake. The tangled timber in that area left them no option but to move.

There were at times moose along the west side of the point where my property is located, but there was not much room for them there, as it is only a small area.

As you may know, the lake is only one portage over from Nym Lake, from which canoeists enter Quetico Wilderness Park. The park, in combination with the adjoining American park , forms a vast natural environment for wildlife. The moose thrive there, and as the population increases, moose move into surrounding areas.

Both sides of Nickleby were used by them as they moved north or stayed in the area, though the east side was preferred until a cottage development and access road became an issue. Then they used the west more, but lumbering operations with attendant clear cuts pose definite hazards to them.

The southerly route is, of course, preferable to opening more area to the north, as has been proven.
The road on the west that is marked Nickleby Lake road is certainly for further lumbering purposes. They contact me as cutting areas are proposed.

I see another road on the easterly side. Is that your road or another lumber access road. The road, and a meandering trail, appears to wander off and on to the power line as it heads east, until it joins the new

Nickleby road. What is the purpose of that trail on the south?

The prevailing winds in the summer are very strong at times, crossing Nym Lake from the south west, and gathering speed as it travels up the 3 mile long lake and comes directly through the narrow portion, and on to my place. The lake is so roiled up at times that little silver fish who live out in deep waters are found tossed up on the beach by the wind driven waves.

So now you have a better sense of what takes place at ground/lake level.

1. I am concerned about increased wind speeds when areas are opened up by your line, as the lumber companies will also inevitably open up more areas.

2. I need to know how wide the power line will be, and what is width on each side for buffer zones of trees that are of ample width to prevent damage to standing timber, provide cover from hunters for moose forced to cross the new open areas and roads, as they will face increased hunting pressure in this new open area, and to minimize increased wind force from the south which will effect my property.

3. If one of the roads is yours, you should instead share the Nickleby road with the lumbering operation. The Wildlife need safe areas to live too.
I think that is all, until I get your response. I will ask my nephews if one or more of them is available to attend the consultation session so they can provide their feedback.
Yours truly,
[redacted]

Sent from Proton Mail for iOS

On Tue, Jun 20, 2023 at 9:27 AM, RELATIONS Community <Community.Relations@HydroOne.com> wrote:

> Hello [redacted]
>
> I tried giving you a callback, however I wasn't able to leave a voicemail, so I thought I would try emailing you as well. I'm sorry we haven't been able to connect on the phone and would like to provide you with my cellphone in case we have better luck that way: [redacted].
>
> Thank you,
>
> [redacted]
>
> Hydro One Community Relations
>
> Phone: [redacted]

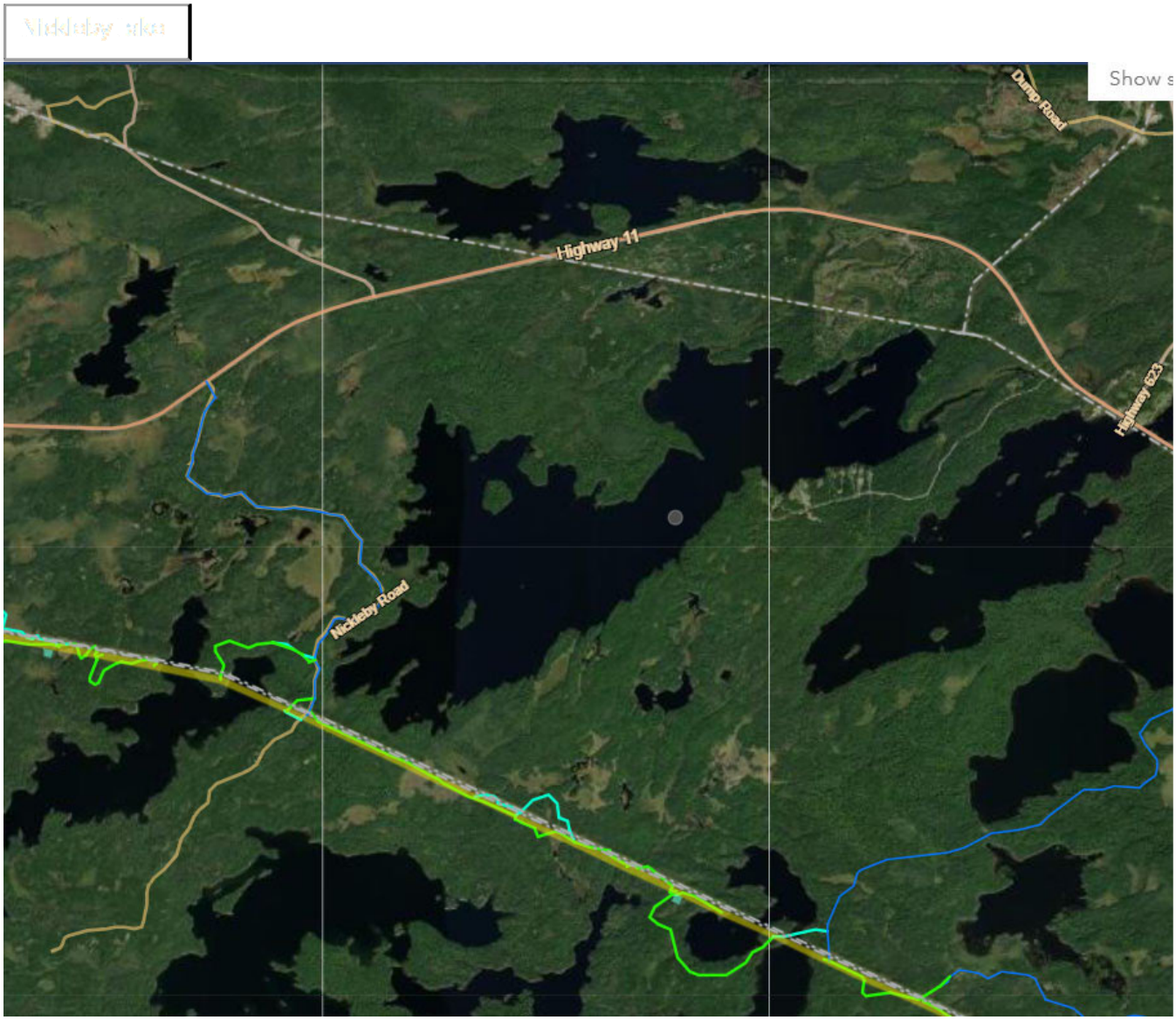
Email: Community.Relations@HydroOne.com

From: RELATIONS Community
Sent: Wednesday, June 14, 2023 10:50 AM
To: [redacted]
Subject: RE: Waasigan Project

Good morning [redacted],

Thank you for connecting about the Waasigan Transmission Line Project. I'd firstly like to apologize for the delayed response.

The preferred route for the proposed new line follows south of Nickleby Lake. Our project website has an interactive map available, click here to accessi, where you may be interested to search for Nickleby Lake and zoom in/out to see additional details. I've pasted a screenshot of the interactive map below as well. In short, the preferred route is represented by the yellow line along the bottom of the image, the blue lines represent existing access roads with potential improvements identified, the green lines represent preferred new access roads, and the purple/pink lines represent existing access roads where no additional improvements would be needed.



I hope this information helps and we look forward to receiving your feedback o the draft Environmental Assessment Report. If you are planning to drop-in to tonight's open house at the Atikokan Legion (5-8pm), members of the project team will be able to speak with you further about the Nickleby Lake area. I will be there as well and would be happy to meet you.

Thank you,

[redacted]

Hydro One Community Relations

Phone: [redacted]

Email: Community.Relations@HydroOne.com

From: [redacted]
Sent: Tuesday, June 13, 2023 4:36 AM

To: RELATIONS Community <Community.Relations@HydroOne.com>
Subject: Waasigan Project

*** Exercise caution. This is an EXTERNAL email. DO NOT open attachments or click links from unknown senders or unexpected email. ***

Dear Sir/ Madam:

In the interest of time, I am definitely opposed to a transmission line directly North of Nickleby Lake.

I await your closeup view of that area for further comment on the project.

Yours truly, [redacted]

Sent from Proton Mail for iOS

[redacted]

From: RELATIONS Community <Community.Relations@hydroone.com>
Sent: July 14, 2023 12:51 PM
To: [redacted]
Subject: RE: Waasigan Project

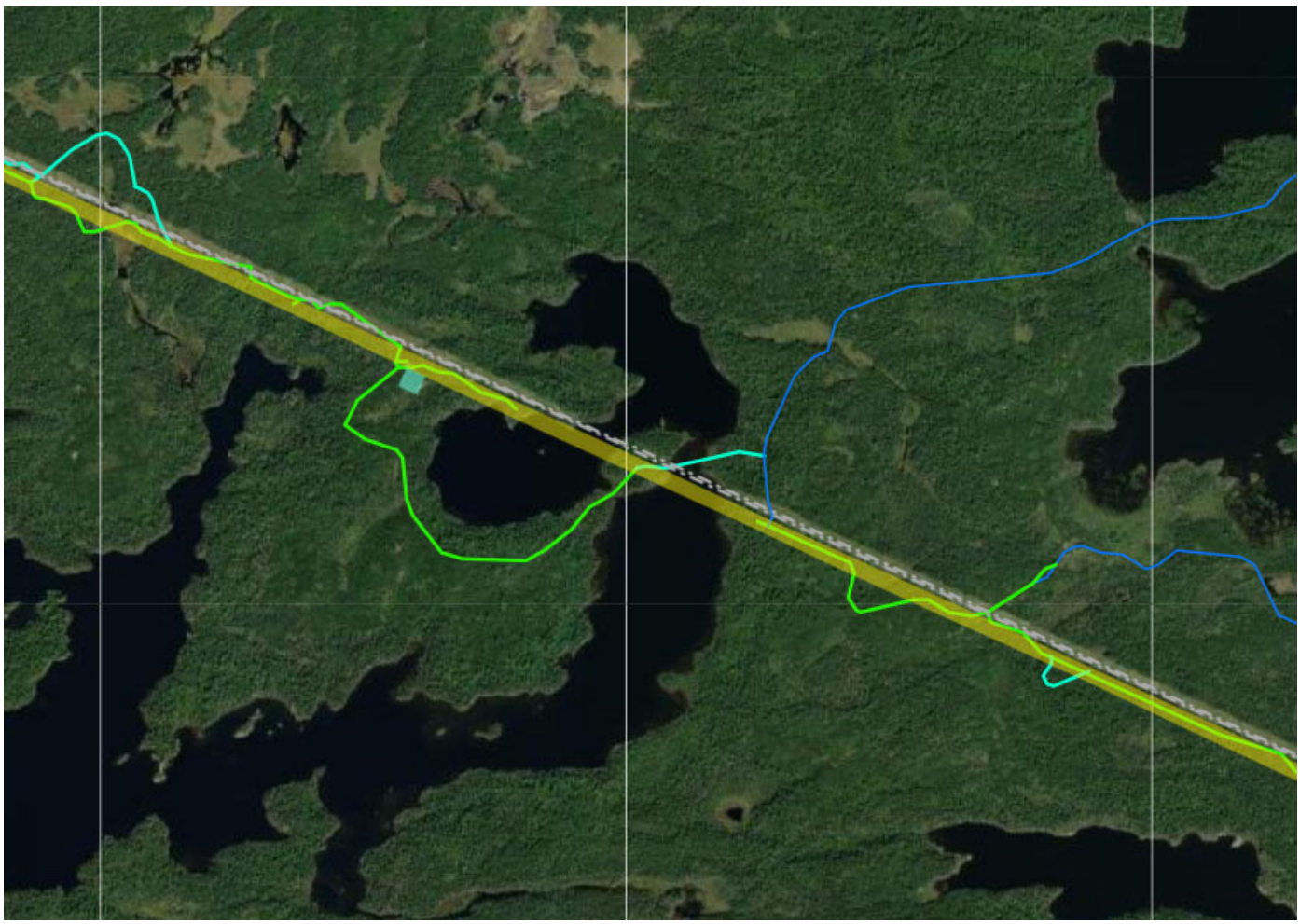
Hello [redacted],

Thank you for your continued engagement on the Waasigan Transmission Line project. Local knowledge about the environment is an important aspect in planning for this new line, which can help us identify potential environmental effects and ways to avoid, minimize or restore project effects.

We understand wildlife, like moose, are important to protect and Hydro One will take actions so that project activities, such as vegetation removal, do not result in significant negative effects. For example, this includes:
- Using existing access roads or trails as much as possible to limit disturbance from construction
- Developing and implement a Vegetation Management Plan, including measures to protect rare plants and rare vegetation communities
- Reclaiming temporary access roads, construction camps, waterbody crossings and temporary equipment storage areas
- Limiting the construction of temporary (e.g., access roads) and permanent (tower foundations) structures in wetlands or within 30 m setback from a wetland
- Avoiding vegetation removal activities within wildlife restricted activity periods, to the extent practicable
-Implementing suitable vegetation management procedures to avoid and minimize the introduction and spread of noxious and invasive plants
-Allowing compatible vegetation in the transmission line corridor to grow back to provide cover and reduce line of sight for predators

In addition, Hydro One has committed to undertaking a biodiversity initiative specific to this project to offset habitat loss or transition (long-term change) that may occur as a result of the Project. Such initiatives involve contributing to the funding of third-party opportunities or projects, such as wetland and wildlife habitat creation and enhancement, aquatic habitat restoration and enhancement activities, or invasive species inventory or removal, among others. Additional information on the biodiversity initiative will be available as we progress through the project and Hydro One will engage with Indigenous communities, local communities and interested parties to discuss its implementation.

With regards to your questions about access roads, the access roads associated with the Project extend to what is identified on the interactive map online located here. There is potential new access identified for the project in this area, along the preferred route, which would connect to an existing access road to the east, by Nym Lake, and connect on the west to Nickleby Road. I have pasted a photo of possible access roads identified for this project from our interactive map below for easy reference. The preferred route is represented by the yellow line along the bottom of the image, the royal blue line represents existing access roads with potential improvements identified, the green lines represent preferred new access roads, and the light blue lines represent alternative access roads. As we get closer to construction, more details around which access roads are required will determined.



Thank you,

[redacted]
Hydro One Community Relations
Phone: [redacted]
Email: Community.Relations@HydroOne.com

From: [redacted]
Sent: Wednesday, June 21, 2023 12:19 AM
To: RELATIONS Community <Community.Relations@HydroOne.com>
Subject: RE: Waasigan Project

*** Exercise caution. This is an EXTERNAL email. DO NOT open attachments or click links from unknown senders or unexpected email. ***

June 20, 2023
Another thought, - there appear to be a number of different access points to Nym that are brand new. Why so many? Are these yours? Thanks, [redacted]

Sent from Proton Mail for iOS

On Tue, Jun 20, 2023 at 9:27 AM, RELATIONS Community <Community.Relations@HydroOne.com> wrote:

Hello [redacted]

I tried giving you a callback, however I wasn't able to leave a voicemail, so I thought I would try emailing you as well. I'm sorry we haven't been able to connect on the phone and would like to provide you with my cellphone in case we have better luck that way: [redacted].

Thank you,

[redacted]

Hydro One Community Relations

Phone: 1-877-345-6799

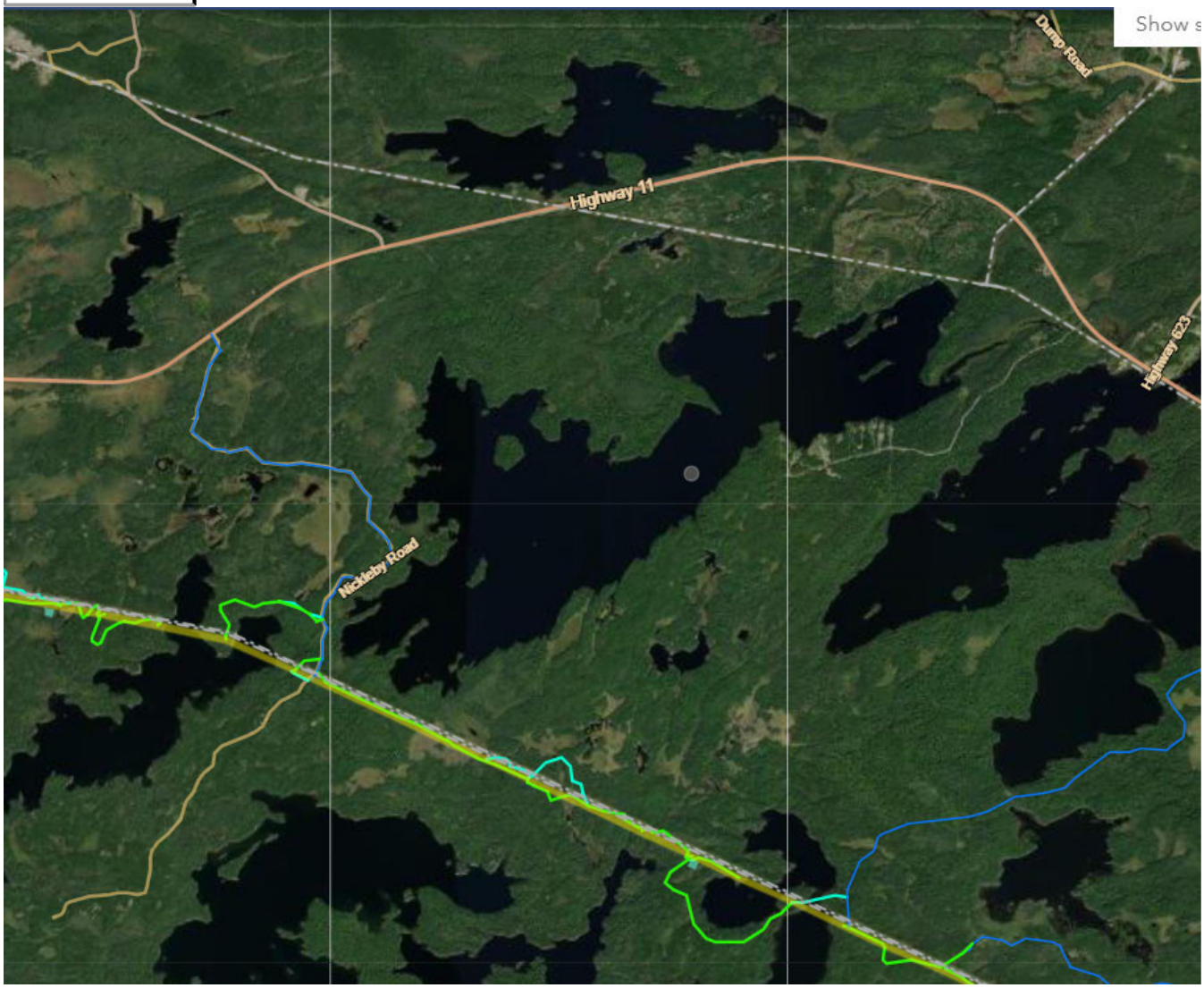
Email: Community.Relations@HydroOne.com

From: RELATIONS Community
Sent: Wednesday, June 14, 2023 10:50 AM
To: [redacted]
Subject: RE: Waasigan Project

Good morning [redacted],

Thank you for connecting about the Waasigan Transmission Line Project. I'd firstly like to apologize for the delayed response.

The preferred route for the proposed new line follows south of Nickleby Lake. Our project website has an interactive map available, click here to access, where you may be interested to search for Nickleby Lake and zoom in/out to see additional details. I've pasted a screenshot of the interactive map below as well. In short, the preferred route is represented by the yellow line along the bottom of the image, the blue lines represent existing access roads with potential improvements identified, the green lines represent preferred new access roads, and the purple/pink lines represent existing access roads where no additional improvements would be needed.



I hope this information helps and we look forward to receiving your feedback o the draft Environmental Assessment Report. If you are planning to drop-in to tonight's open house at the Atikokan Legion (5-8pm), members of the project team will be able to speak with you further about the Nickleby Lake area. I will be there as well and would be happy to meet you.

Thank you,

[redacted]

Hydro One Community Relations

Phone: [redacted]

Email: Community.Relations@HydroOne.com

From: Ellen Bruce <northernsnowbird@protonmail.com>
Sent: Tuesday, June 13, 2023 4:36 AM

To: RELATIONS Community <Community.Relations@HydroOne.com>
Subject: Waasigan Project

*** Exercise caution. This is an EXTERNAL email. DO NOT open attachments or click links from unknown senders or unexpected email. ***

Dear Sir/ Madam:

In the interest of time, I am definitely opposed to a transmission line directly North of Nickleby Lake.

I await your closeup view of that area for further comment on the project.

Yours truly, [redacted]

Sent from Proton Mail for iOS

ATTACHMENT 16
PUBLIC COMMENT 16 RESPONSE

[redacted]

Date: June 21, 2023 at 3:20:28 PM EDT
To: community.relations@hydroone.com

In my attempt to review the WTLP Draft EA document in the time alloted, I was unable to find where it addressed my concerns regarding my property. I did find it to be very favourable for Hydro One and their indigenous partners in the Wassigan Transmission Project. They will gain substantial financial benefit in the future!!

As a private land owner over who's land the project will be constructed,I will be subjected to continuous pain and suffering in the future for the following reasons.

1.The project will leave me with a deforested depressing scar across the front of my property measuring 92m wide by 866m long containing two high voltage power lines with 5 very unsightly steel towers. VERY DEPRESSING!!!

2.This whole process has been very stressful and disturbing, as I am still concerned about the negative health effects due to radiation and the overall environmental damage. I spend a lot of time on my driveway maintaining proper drainage, cutting grass, removing snow, traveling to and from my home. This will place me directly under the new line in some places and in close proximity in other places!
My well is situated just 24m south of new proposed easement!

3.This project will lower the value of my property for which I pay taxes that keep increasing. A LOSE LOSE SITUATION!!

4. Based on my experiences with the existing power line, I am worried about the increase in trespassing occurrences. A large portion of the general public believe that the hydro line right of ways are public property and they can play on them with their snow machines ATV'S etc. I have had to clean up beer cans and garbage left by these trespassers! I have had people use the right of way as a shooting range to sight in their rifles. There is no enforcement and I'm liable!!

5.The deforesting of my property including many trees we planted will cause increased exposure to the east, west, and north winds. This causes problems with snow removal, home heating, and maintaining access to my home!! VERY DEMORALLIZING!!

In the spring of 1972 my family and I moved on to our property. In the following two years we deliberately built our home 137m south of the existing high voltage power line to provide a substantial green belt of trees and to reduce some of the negative effects associated with high
Voltage power lines. The proposed location of the Waasigan Line would remove a large portion of the green belt and bring me 46m closer to the negative effects of a high voltage power line!!

I am the 4th generation in the [redacted] family to own property in this area, dating back to my great grandfather [redacted] who owned land in the settlement of " Intola" back in 1910 !
There does not seem to be much consideration for my traditional rights to OWN AND ENJOW MY PROPRTY !!

Would you please tell me where my concerns regarding my property as a result of this project were addressed in the Draft Environmental Assessment ?

[redacted]

November 17, 2023

[redacted]
Sent via email: [redacted]

Hello [redacted]

Thank you for contacting us to provide your feedback as part of the review period for the draft Environmental Assessment (EA) Report for the Waasigan Transmission Line project.

Meaningful and open engagement is integral to the successful development of this critical line in northwestern Ontario. We have appreciated your participation and feedback over the past several months as part of the EA process. The feedback we hear from community members like yourself is captured in Appendix G of the Record of Consultation, and changes to current land use, including effects to landowners, can be found in Section 7.1.9.2.2 of the draft EA Report.

I would like to extend an open offer to schedule a meeting on your property to further discuss the concerns you have expressed with key members of our Project team and so we can make efforts to identify solutions to mitigate your concerns. Your dedicated land agent, [redacted], also continues to be available to speak with you at any time, at [redacted].

We appreciate that you built your and have enjoyed this property since 1972, including the surrounding vegetation. To ensure there is enough space for the new transmission line, as you have noted, we have to create a new corridor that is approximately 46 metres wide, and to accommodate this removing incompatible vegetation will be required. Vegetation removal refers to both clearing required to construct the transmission line and essential work to prevent unnecessary service interruptions once the transmission line is in-service to allow easy and safe access for our crews to perform emergency repairs, and to keep the corridor safe. We recognize the importance of the trees in this area from a visual aesthetic perspective and also the barrier it may provide for wind. As we continue our construction planning, we are committed to looking at opportunities to minimize the extent of removal and selectively cut or retain compatible species that will not encroach on the electrical clearances or safe operation and maintenance of the transmission line. We would be happy to review this in the context of your property.

With regards to corridor use, Hydro One understands some landowners have concerns related to trespassing and the potential for increased unauthorized access to their property as a result of the Project. We are committed to working to mitigate these concerns to the extent possible upon completion of the project and are currently exploring options, while still ensuring the transmission line can be operated and maintained safely. This commitment has also been reflected in the final EA Report.

With respect to your concern about the impact of the project on groundwater, Section 6.3 of the EA Report summarizes our evaluation of potential and net effects on groundwater in the Project area, as well as mitigation measures we've identified to protect groundwater. Groundwater drinking water supply will be protected by avoiding construction below the groundwater table where practicable and regularly monitoring environmentally sensitive features, such as waterbodies and springs, during construction. For water supply wells located near the Project footprint, Hydro One and their contractor will work with private landowners where requested, to identify wells with the potential to be affected by the Project, and recommend mitigation techniques to avoid or reduce those effects.

We understand changes to our infrastructure can raise concern about electric and magnetic fields (EMF). With regards to health and safety, Hydro One has a dedicated team that regularly monitors global studies around EMF and ensures that our infrastructure is built and maintained following best practices and industry standards. We look to Health Canada, the World Health Organization and the International Commission on Non-Ionizing Radiation Protection, for guidance on EMF. Based on global studies which have and continue to be regularly monitored, these organizations indicate that members of the public do not need to take precautions to protect from fields produced by extremely low frequencies such as transmission lines. For this project, we retained Exponent Consulting, who are a multidisciplinary independent engineering and science consulting firm, to review and comment on any possible health impacts. Exponent Consulting concluded there is no evidence of adverse health effects caused by EMF at extremely low frequencies for both the existing and planned configuration of the Waasigan Transmission Line. I have attached additional material with more information about EMF, and you may also be interested in reviewing what has been captured in the final EA Report in section 3.2.2.4. We would also be happy to connect you with one of our health and safety managers to discuss this further.

As a next step, your comments have been documented and included as part of the final EA Report that Hydro One has submitted to the Ministry of the Environment, Conservation and Parks (MECP) for review and approval. As part of Ontario's *Environmental Assessment Act*, the MECP is leading a public review and comment period for the final EA Report.

Thank you,

Hydro One Community Relations

1-877-345-6799

Community.Relations@HydroOne.com

HydroOne.com/Waasigan

ATTACHMENT 17
PUBLIC COMMENT 17 RESPONSE

[redacted]

From: [redacted]
Sent: June 27, 2023 8:36 AM
To: [redacted]
Subject: FW: Hydro One Waasigan Transmission Line

From: [redacted]
Sent: Monday, June 26, 2023 2:12 PM
To: RELATIONS Community <Community.Relations@HydroOne.com>
Cc: [redacted]
Subject: Hydro One Waasigan Transmission Line

You don't often get email from [redacted] Learn why this is important

*** Exercise caution. This is an EXTERNAL email. DO NOT open attachments or click links from unknown senders or unexpected email. ***

I am sending this email to express my disappointment over the routing of Waasigan transmission line as stated in the draft Environmental Assessment and the socioeconomic impacts it will have. I support the alternate route plan as laid out by the Neighbours on the Line.
Specifically, two areas of concern are.

1. The proposed routing of the line will make a significant negative impact on the already established land uses by residents, businesses, and the general public.
2. The proposed routing of the line will limit the ability for growth along the route for future residents, businesses, and the general public.

While the proposed route may give Hydro One the ease of access to construct the line, we must remember that construction is a one-time activity of limited duration while the socioeconomic impact of routing the line as described in the EA will endure beyond the construction period and will continuously limit the public's ability to use the land for their residential, business, and recreational purposes. We are all to familiar with seeing powerlines run through residential areas and parks as communities grow around them. And with the ongoing public concern to health and safety regarding living and working under high voltage lines. With proper foresight this can be avoided. The alternate route proposed by the Neighbours on the Line plan supports growth in NWO while also supporting the ongoing use of land by the public which is already accessed by existing roadways that were built by the public themselves for their own use.

I ask that you look at the near- and long-term impacts to established land use along the routing proposed in the draft EA and with future growth and development in mind, adopt the alternative routing laid out by the Neighbours on the Line.

Sincerely,

[redacted]
Thunder Bay, Ontario
[redacted]

Meeting with Resident – June 29, 2023

Hydro One and met with Environment North, including a resident who had written concerns with the draft EA. The purpose of the meeting was to address the concerns documented in their email.

ATTACHMENT 18
PUBLIC COMMENT 18 RESPONSE

[redacted]

From: [redacted]
Sent: June 30, 2023 12:29 PM
To: [redacted]
Subject: FW: Waasigan transmission line project

-----Original Message-----
From: [redacted]
Sent: Wednesday, June 28, 2023 1:28 PM
To: RELATIONS Community <Community.Relations@HydroOne.com>
Subject: Waasigan transmission line project

[You don't often get email from [redacted]. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

*** Exercise caution. This is an EXTERNAL email. DO NOT open attachments or click links from unknown senders or unexpected email. ***

Hi, I was able to attend the open house held in June for this project. Everyone there was helpful, but overall unable to answer most of the questions that myself and a few of the other residents that I talked with had. I run a tourist business, which includes a bearhunt, canoeing and fly-in outpost cabins in atikokan, have a family cabin near the project, and the transmission line runs through a large section of my trap line. Some of my concerns are, interruption of business due to road work, landing areas etc. interruption of trapping due to construction, unusual activity, loss of habitat for pine marten etc. One of the roads marked as an access road is a road that my family uses to access our cabin on Chrystal lk. Not sure on how this will impact us or not. Basically more questions than answers at the open house. I would like to be in contact with someone who could give feedback, maybe explain some options for some of the interruptions that our businesses, trapping values, and personal cabins will experience through the construction of the transmission line.

Regards
[redacted]
Canoe Canada Outfitters
Quetico Country Hunts
[redacted]
Sent from my iPhone

November 17, 2023

[redacted]
Sent via email: [redacted]

Hello [redacted]

Thank you for joining us at the community open house in Atikokan and contacting us to provide your feedback as part of the review period for the draft Environmental Assessment (EA) Report for the Waasigan Transmission Line project, including identification of your trapline.

As part of the project we are committed to consulting with trappers associations, individual councils and the Ministry of Natural Resources and Forestry to confirm how the Project may affect individual trappers and what mitigation measures can be put in place. Mitigation could include providing compensation if impacted by the construction of the Project (e.g., due to damage to trapper assets, general disturbance, adverse effects, and impacts to trapping operations). As we continue our construction planning, we will progress these conversations to better understand potential effects and allow for trappers the opportunity to relocate traplines in advance of construction. In the interim, it would be helpful if you could share some mapping of your trapline as it traverses the project area.

Thank you again for submitting your comments. As a next step, your comments have been documented and included as part of the final EA Report that Hydro One has submitted to the Ministry of the Environment, Conservation and Parks (MECP) for review and approval. As part of Ontario's *Environmental Assessment Act*, the MECP is leading a public review and comment period for the final EA Report.

Thank you,

Hydro One Community Relations

1-877-345-6799

Community.Relations@HydroOne.com

HydroOne.com/Waasigan

ATTACHMENT 19
PUBLIC COMMENT 19 RESPONSE

[redacted]

From: [redacted]
Sent: Friday, July 7, 2023 2:07 PM
To: RELATIONS Community <Community.Relations@HydroOne.com>
Subject: Waasigan Transmission Line between Quetico - Nym Lake - Atikokan

To whom it may concern,

Once again I submit extensive concerns over the location of the proposed Waasigan Transmission line which will have a negative impact on my Indigenous Tourism Business.
I have submitted my concerns at many of the public consultations verbally and in writing several times and have yet to receive meaningful engagement to address my concerns in this regard. Furthermore, with the deadline is today, July 7, 2023 and that the public consultations have not provided answers nor been"meaningful" engagements and I feel it has been a process that is "just a formality".

My concerns:

Hydro One's initial proposed route will:

- impacts homeowners and cottage property owners including expropriation and devalued properties,

- environmental impacts including clear cutting a swath double wide on the proposed route, herbicide spraying, overall construction, to name a few.

- compromise the experience of tourists and ability for sustainable tourism & economic growth

- Impacts to Quetico Park including "viewscapes", environmental, and international travellers on wilderness canoeing – a park of international acclaim which is under protection.

- Impacts on Path of the Paddle – Trans Canada Trail --Maukinak and Quetico Trails including Canada's historical waterways

- Impacts of cultural significance to Indigenous peoples, communities & businesses

Further we reside at [redacted], Rainy River District outside of the town of Atikokan and have grave concerns of the location of the line that will impact our cultural practices, being out on the land, disturbances of wildlife, flora and fauna and our way of life.

Please advise me accordingly as to the options of moving the line further north and not impacting my Indigenous Tourism Business on Nym Lake and Quetico Provincial Park.

Respectfully,
[redacted]
Voyageur Wilderness

[redacted]
Atikokan, ON [redacted] Canada
[redacted]

[redacted]

From: RELATIONS Community <Community.Relations@hydroone.com>
Sent: July 14, 2023 12:45 PM
To: [redacted]
Subject: RE: Waasigan Transmission Line between Quetico - Nym Lake - Atikokan
Attachments: FW_ Waasigan Line Concerns_ Atikokan-Nym-Quetico.eml (29.6 KB)

Hello [redacted],

We hope you are doing well and would like to thank you again for raising your concerns in relation to the Waasigan Transmission Line Project. Your comments were incorporated into the draft EA Report and your follow-up will be incorporated into our final EA submission.

As outlined in our email to you on June 13, 2023 we noted that following discussions and investigation, we determined that the preferred route identified in the draft Environmental Assessment Report remains preferred; however, we want to continue working with you to determine solutions to mitigate your concerns. We understand this new line will be a change and we are committed to working with you on ways to minimize effects, such as tower location, construction methods and plantings in strategic locations.

We remain interested to meet with you to discuss the project further. Would you have any availability the first week of August?

Thank you,

[redacted]
Hydro One Community Relations
Phone: [redacted]
Email: Community.Relations@HydroOne.com

ATTACHMENT 20
PUBLIC COMMENT 20 RESPONSE

July 7, 2023

[redacted]

This letter serves as a response to the Draft Environmental Assessment of the preliminary preferred route for the proposed Hydro One/Waasigan line.

As a resident in Kaministiquia, though not one whose property is directly affected by the proposed route, I have several concerns regarding DEA, not the least of which is the lack of rationale for the building of the line to Atikokan. The implication has been that the line is necessary to supply the future needs of the local communities due to expected development and growth. Given the lack of growth generally in this region for the last 50 years, the requirement for more capacity is suspect. This leaves a dubious expectation of the need to supply *future* mining interests. It is entirely unclear what mining developments are expected, and where they might be. It does not appear that the line will provide hydro connections for First Nations communities that currently rely on fossil fuels for electric power. The decision process for building of hydro lines is completely opaque.

In addition, the process of conducting the environmental assessment, the interpretation of the results, and the presentation of the findings to the community were, at the best, inadequate, and, at the worst, self-serving of Hydro One's desire to follow their preferred route through the community of Kaministiquia.

Firstly, communication regarding the proposed line was spotty, leaving the residents of Kaministiquia and other unorganized townships uninformed and responsible for demanding local consultation from Hydro One. Residents in affected areas along the proposed route were not consulted. Hydro One seems to have mistaken the term "unorganized township" as meaning a place where people do not care about where they live. Local service boards were not consulted, proximity to the local Gorham and Ware school was not considered. While proximity to resorts was purportedly considered, there were resorts within the local study areas that were not taken into consideration. The proposed route would cause grievous harm to those whose homes are in its direct line and considerable harm to the well-being of many other residents of Kaministiquia (an area already traversed by three hydro corridors and a pipeline) whose properties are in close proximity to the proposed line and whose lives are closely connected to the land, waters, and people of the community. Due to these concerns, local experts proposed an excellent alternative route that would serve the purposes of Hydro One while meeting the requirements for hydro rights of way: using existing corridors, avoiding close proximity to First Nations' reserve lands, separating lines for grid security

and minimizing disruptions the cultural, social, and economic lives of residents and property owners.

The interpretation of the results of the DEA of the Neighbours on the Line Alternate route *vs* Hydro One preliminary preferred route showed extreme bias. Scoring of the items resulted in an all-or-nothing grade, which varied from the previous EAs carried out by Hydro One for other projects and totally misrepresented the relative value of the two options. Once our local group was given the results and scoring criteria, and assigned scores appropriately, the difference between the two options was virtually non-existent. Regarding specific items in the DEA, there were some dubious interpretations of results. For example, bat habitats seem to have been specifically mentioned as being of importance—the types of habitats preferred by bats were slightly more numerous on the NOTL alternate route and thus contributed to the unfavourable score on the Environmental portion of the study. Though bats can certainly be affected by power generation, it is windmills, not transmission corridors that are the problem. Transmission corridors are not mentioned at all by wildlife biologists as a threat to bat populations. White nose disease is by far the major threat followed by windmills. Including this item in the assessment was unnecessary; emphasizing in a public meeting was disingenuous, at best—deliberately misleading, I would say.
Proximity to First Nations reserves was a concern for both Hydro One and NOTL. The alternate route was modified to avoid the uninhabited reserve of the Lac de Mille Lac band. The diversion put it well outside the 2.5 km limit that was communicated to the NOTL as being the acceptable limit considered by Hydro On/Waasigan. However, the DEA assessed the proximity of the NOTL to be 100% worse than the preliminary preferred route: 4.6 km distant from an uninhabited reserve was 100% worse than the 6.5 km distance the preferred route is from the Fort William FN reserve, whose border is contiguous with the City of Thunder Bay. Such a blatant inconsistency of criteria used to assess the NOTL route and other Hydro One corridors is hard to credit. At the public meeting at the Kaministiquia Community Centre where Hydro One presented its DEA, its representative refused to say what the actual standard was for proximity to a First Nation. He just repeated that further is better, and that the Lac de Mille Lac FN knew ahead of time what the criteria were, and were “okay with it”, though he could not confirm that they had been consulted as to whether 4.6 km away from an uninhabited reserve was comparable to 6.5 km away from a reserve next to Thunder Bay.

The presentation of the results in the form of uninformative, positive-looking posters stating that the preferred route is the best while the actual information is in dense 5-inch thick binders that may not leave the Kam Community Centre, certainly made it difficult to challenge any results of the DEA. However, there was one more problem that the presentation highlighted: that the connection to community, culture and environment of the residents of Kaministiquia was not really very important. The DEA pointed out that, regarding the question of maintaining the line by used of herbicide, First Nations, Metis, and the general public expressed concern. First Nations had already reached an agreement for the right to refuse; Metis were in the process of

consultation. There was no plan for addressing the concerns of the general public. Individual property owners would have the right to refuse spraying on their land. As a property owner whose previous refusal of herbicide use on a power line on my property was recorded and subsequently ignored, I have no great confidence that the environmental concerns of the general public matter. Hydro should address the obvious concern of everyone that herbicides are a risk to the health of amphibians and likely other creatures, do little to reduce the sprouting of aspen colonies in hydro corridors, and should not be a part of their maintenance plan.

Posters in the Kaministiquia Community Centre stated that the disruption to the aesthetics, environmental health, and enjoyment of the land and waters would be limited just to the building of the line. Having a giant hydro corridor where there used to be woods, trails, houses, farms seemed to not count as a disruption. The vacating of neighbours' homes is not a disruption to a community? People who wanted to stay in their homes "would be accommodated". How? Shall they be helped to get used to a giant hydro corridor overhead? Will the residents who have a hydro corridor out their front door, but not on their property just have to be resigned to their property values plummeting? Shall the residents of the community of Kaministiquia have to acknowledge that while the cultural, social, and economic significance of the land to First Nations and Metis people of Ontario is of paramount importance, the historic settlement in the beautiful valley in which they live has no cultural or social significance, and its economic value is that it saves Hydro One some money as a convenient corridor for lines of questionable value to anyone else?

Yours truly,

November 17, 2023

[redacted]
Sent via email: [redacted]

Hello [redacted]

Thank you for contacting us to provide your feedback as part of the review period for the draft Environmental Assessment (EA) Report for the Waasigan Transmission Line project.

I would firstly like to provide some information to help answer your question about the need for this new transmission line in northwestern Ontario. Ontario's Independent Electricity System Operator (IESO) is responsible for forecasting and ensuring Ontario's long-term energy needs are being met and confirming what energy solution would best address these needs. In 2018, the IESO identified a need for a new transmission line in northwestern Ontario and directed Hydro One to begin developing the project, known as the Waasigan Transmission Line. You may be interested to review the IESO's West of Thunder Bay webpage for more detailed information (https://www.ieso.ca/en/Get-Involved/Regional-Planning/Northwest-Ontario/West-of-Thunder-Bay), or we can help direct you to the appropriate contact at the IESO.

Since 2019, we have sought to engage and seek feedback from residents in the project area by advertising the project through newspaper and radio ads, targeted social media ads, and Canada Post neighborhood mail and hosting virtual and in-person open houses. We have engaged with the Ministry of Transportation since the beginning of the project and have since met with Local Roads Boards to understand concerns regarding potential effects to roads and construction activities.

We know that the selection of a route is a key project milestone where additional concerns may emerge. To better understand concerns, we heard from community members in Kaministiquia, and to find solutions to address them, we held community open houses, property owner information sessions and established a working committee to review and evaluate the route proposed by community members in Kaministiquia, which we have appreciated your participation in. As you noted, we committed to evaluating the proposed route by yourself and other members of Neighbours on the Line (NOTL) with the same criteria and criteria weightings used to evaluate the alternative routes. These criteria and weightings were established using stakeholder feedback, including from members of the public and those who live within the study area, and reflect the diversity of interests and items of importance across the Project area.

The evaluation concluded the route proposed by NOTL, on balance, had less advantages compared to the preferred route. While the proposed route had more advantages within the socio-economic category as a result of less impact to private land and residential property by maximizing the use of Crown land, there were more disadvantages in the other three categories.

Two Species at Risk (SAR) bats, Little Brown Myotis and Northern Myotis, are designated as endangered under the *Endangered Species Act* (ESA), in large part due to the white nose syndrome you noted in your letter. As such, these bat species are sensitive to further disturbance. Hydro One has been closely engaging the Ministry of the Environment, Conservation and Parks (MECP) Species at Risk Branch throughout the EA process on avoidance and mitigation measures to protect bat habitat. Bats can use forested areas as maternity roost habitat and this habitat could be removed for the development of a transmission line. This habitat is protected under the ESA and

crossing less area of this habitat is preferred, which is why it was used as an important criterion in the assessment and weighted accordingly.
With regards to your comments about proximity to reserve lands, at Hydro One, we are committed to working proactively with Indigenous peoples to build relationships based on understanding, respect and mutual trust. We will respect the rights of Indigenous peoples, including Aboriginal and Treaty rights as recognized and affirmed in Section 35 of Canada's *Constitution Act, 1982*. Through consultation with Indigenous communities, we included an indicator for the proximity to reserve lands as being representative of potential areas of higher use by communities in the practice of their Section 35 rights. This was included as an indicator of importance in both the alternative route evaluation for the selection of the preferred route and the NOTL route evaluation.

More details on the evaluation of the route put forward by community members can be found in Appendix 2.0-C of the EA report.

With regards to herbicide use, through engagement during the EA process, we heard feedback from Indigenous communities and stakeholders regarding concerns with the use of herbicides to remove and manage vegetation for the Project. After consideration of this feedback, herbicides will not be used during construction of the Project or for future maintenance of this new transmission line. The final EA Report has been updated to reflect this and we would like to thank you for your feedback.

We know that this new line will be a change, and we are committed to working with local agencies, residents and landowners in a meaningful way. For example, we have been investigating local route refinements and speaking with individual landowners about mitigation measures. Our goal is to continue hearing as much local input as possible about the project as we continue our planning.
As a next step, your comments have been documented and included as part of the final EA Report that Hydro One has submitted to the MECP for review and approval. As part of Ontario's *Environmental Assessment Act*, the MECP is leading a public review and comment period for the final EA Report.

Thank you,

Hydro One Community Relations

 1-877-345-6799

 Community.Relations@HydroOne.com

 HydroOne.com/Waasigan

ATTACHMENT 21
PUBLIC COMMENT 21 RESPONSE

From: [redacted]
To: "Community Relations" <Community.Relations@HydroOne.com>
Sent: Thursday, July 6, 2023 1:50:38 AM
Subject: comment re Waasigan Transmission Line

Hello [redacted],

I am **a** frequent recreational user of the region impacted by this transmission line.

At the Executive Summary, p. 4 it says:

Considering these changes in demand and the connection of remote communities previously
reliant on diesel generation to the electricity grid, the IESO forecasts a need for ***new supply to***
meet future demand in northwestern Ontario.

My Comment:

This transmission line will transmit the new supply referred to in the preceding quoted excerpt.

I suggest it is impossible for we the public to evaluate the economic and environmental impacts of this transmission line without also knowing what will be the source(s) of new supply of electricity that will be transmitted.

Why do you not tell us what will be the source(s) of new supply of electricity?

Can you please direct to me details of what will be the source(s) of that new supply of electricity?

Please add my to email notifications related to these matters.

My thanks for any assistance you can provide.

Sincerely,

[redacted]

Hello [redacted]

Thank you for contacting Hydro One Community Relations about the Waasigan Transmission Line Project, specifically your question about power generation. We appreciate your patience in receiving a response.

The Independent Electricity System Operator (IESO) is responsible for forecasting and ensuring Ontario's long-term energy needs are being met, including managing power generation. In 2018, the IESO identified a need for a new transmission line in northwestern Ontario and directed Hydro One to begin developing the project, known as the Waasigan Transmission Line.

Hydro One's role is to maintain the electricity transmission and distribution facilities that bring power to homes and businesses. The power that travels through our infrastructure comes from generation resources across the province, alongside local generation resources. Ontario Power Generation (OPG), as well as private generators, who produce electricity for the province, as managed by the IESO. You may be interested to contact the IESO at IESOCustomerRelations@ieso.ca for further discussion.

I hope this information about Ontario's electricity landscape is helpful. I also want to confirm I have added you to the project contact list, so that moving forward you will receive project updates from Community.Relations@HydroOne.com.

Thank you,

[redacted]

links from unknown senders or unexpected email. ***

Sorry, I **correct below** my miss-wording in the first sentence.

From: [redacted]
To: "Community Relations" <Community.Relations@HydroOne.com>
Sent: Thursday, July 6, 2023 1:50:38 AM
Subject: comment re Waasigan Transmission Line

Hello [redacted]

I am **a** frequent recreational user of the region impacted by this transmission line.

At the Executive Summary, p. 4 it says:

Considering these changes in demand and the connection of remote communities previously
reliant on diesel generation to the electricity grid, the IESO forecasts a need for ***new supply to***
meet future demand in northwestern Ontario.

My Comment:

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Why do you not tell us what will be the source(s) of new supply of electricity?

Can you please direct to me details of what will be the source(s) of that new supply of electricity?

Please add my to email notifications related to these matters.

My thanks for any assistance you can provide.

Sincerely,

[redacted]

disclosure, or other dissemination is strictly prohibited. If you have received this email in error, please notify the sender immediately by reply email and delete the transmission received by you. This statement applies to the initial email as well as any and all copies (replies and/or forwards) of the initial email

ATTACHMENT 22
PUBLIC COMMENT 22 RESPONSE

[redacted]

From: [redacted]
Sent: July 10, 2023 8:21 AM
To: Waasigan Project Folder Borealis [redacted]
Subject: FW: Draft EA proposed transmission line

From: [redacted]
Sent: Wednesday, July 5, 2023 2:20 PM
To: RELATIONS Community <Community.Relations@HydroOne.com>
Subject: Draft EA proposed transmission line

You don't often get email from [redacted] Learn why this is important

*** Exercise caution. This is an EXTERNAL email. DO NOT open attachments or click links from unknown senders or unexpected email. ***

I have serious difficulty in comprehending the creation of an entity giving an indigenous name as a fete complete. This seems more like a birth announcement.
The term "Indigenous Knowledge" draws a line between the people.
At the dawn of the fifth world this proposal indicates a serious lack of traditional knowledge.

[redacted]

November 17, 2023

[redacted]
Sent via email: [redacted]

Hello [redacted]

Thank you for contacting us to provide your feedback as part of the review period for the draft Environmental Assessment (EA) Report for the Waasigan Transmission Line project.

Hydro One is committed to developing the Waasigan Transmission Line on a foundation of respect, collaboration, and meaningful engagement with Indigenous communities.
We are taking the necessary time to understand Indigenous interests in the Waasigan Transmission Line to ensure that development is conducted in a way that respects and maintains Indigenous rights and self-determination. Our engagement process is designed to provide relevant information to Indigenous communities that are proximate to the Project in a timely manner, and to obtain community input. Waasigan presents a unique opportunity for Hydro One to collaborate with Indigenous communities and advance reconciliation.

As a next step, your comments have been documented and included as part of the final EA Report that Hydro One has submitted to the Ministry of the Environment, Conservation and Parks (MECP) for review and approval. As part of Ontario's *Environmental Assessment Act*, the MECP is leading a public review and comment period for the final EA Report.

I hope this information is helpful.

Thank you,

Hydro One Community Relations

1-877-345-6799

Community.Relations@HydroOne.com

HydroOne.com/Waasigan

ATTACHMENT 23
PUBLIC COMMENT 23 RESPONSE

[redacted]

From: [redacted]
Sent: Wednesday, July 5, 2023 11:27 AM
To: RELATIONS Community <Community.Relations@HydroOne.com>
Subject: Waasigan EA

Hello. I have to type this on a cellphone so it will be briefer than I would like.

1. There is not enough consideration given to the impact on residents, particularly those who are very close to the proposed ROW but not considered "directly" impacted.

Our summer camp is on Nym Lake, [redacted] with the Niobe Lake Fire Department, and specifically at [redacted].

The existing line is about 120m from the cabin. The new line, if built as planned, will be 70m of less from my kitchen window. This will have a significant negative impact on both our property value and our enjoyment of our cottage.

I find it interesting that figure 7.4-B-14, Structure Visibility Mapping shows residences and seasonal cottages on Nym Lake but ours is conspicuously absent, as well as two others in the northernmost bay which are also closest to the project. All of these cabins have been in place for at least 50 years and are listed on the tax rolls. Ours is clearly visible using the interactive mapping tool from the project website.

Also I don't understand the Visibility Mapping as it seems to show the new line as more visible from the middle of the lake than from right underneath it.

2. This project will involve clear cutting hundreds of not thousands of hectares of mature forest and yet there is hardly a mention of utilization of merchantable timber; most often the clearing is euphemistically referred to as "vegetation removal" as though it involves clearing a few ferns with a whippersnipper.

Also there is scant information about logging slash. Page 6.4-92 says it will be chipped or burned. That will be a lot of chipping. It also says the project will "minimize burning within 100m of waterways, where practicable" suggesting that it often won't be practicable, particularly in situations like the stretch behind our cabin which crosses a point about 300m wide.

And I don't recall the burning of logging slash and other waste being mentioned in relation to GHG emissions. Pages 6.4-65 to 68 devote two and a half pages to dust emissions and 4 lines to slash burning.

These are my main concerns. I'd best send this before I accidentally delete it.

[redacted]
Regina SK
[redacted]

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November 17, 2023

[redacted]
Sent via email: [redacted]

Hello [redacted]

Thank you for contacting us to provide your feedback as part of the review period for the draft Environmental Assessment (EA) Report for the Waasigan Transmission Line project. Meaningful and open engagement is integral to the successful development of this critical line in northwestern Ontario. Since 2019, we have sought to engage and seek feedback from residents in the project area by advertising the project through newspaper and radio ads, targeted social media ads, Canada Post neighborhood mail and hosting in-person and virtual open houses. Through the EA process, it was determined that the preferred route best balances Indigenous, natural environment, socioeconomic, technical and cost considerations.

We understand that community members may continue to have concerns, and we are committed to working with residents and landowners in a meaningful way. Our goal is to continue hearing as much local input as possible about the project, including from residents living close to the proposed new line.

With that said, we appreciate your feedback about figure 7.4-B-14 Structure Visibility Mapping, which includes cottages, camps and cabins based on available MNRF data. The mapping shows the Project may be visible from your property. The higher visibility shown within the lake in Figure 7.4-B-14, Structure Visibility Mapping, means there is more than one tower visible from a particular location and more towers will be visible from the middle of the lake. We recognize there will be a visual change as a result of the new transmission line, and we want to work with you on ways to minimize those effects. We would be happy to set up time to further discuss this.

We understand forests have an important role in maintaining a healthy environment. Vegetation removal refers to both clearing required to construct the transmission line and essential work to prevent unnecessary service interruptions once the transmission line is in-service to allow easy and safe access for our crews to perform emergency repairs, and to keep the corridor safe. The EA Report outlines mitigation measures we will implement and provides additional information about what we will do to limit changes to the environment, such as to develop and implement a Vegetation Management Plan, including to protect rare vegetation communities, and allow compatible vegetation in the transmission line corridor to grow back.

With regards to merchantable timber, a Clearing and Timber Salvage Plan will be also prepared before construction starts, which will outline how cut trees will be handled. Hydro One will also work with applicable Forest Resource Licence or Sustainable Forest Licence holders, and Indigenous communities, for trees cut on Crown land.

As outlined in Section 6.8.8.1.1 of the EA Report, it is conservatively assumed that all cleared vegetation (including all timber and logging slash) will be burned when estimating the GHG emissions for the project. However, despite this not likely being the case, it is standard practice in an EA to develop an emission estimate for the maximum potential emissions so as not to underestimate the potential impacts. As outlined above, a plan will be developed prior to construction outlining the procedures for handling cut trees, including providing merchantable timber to local forest companies. Merchantable timber would not be burned, and therefore, would

have no associated emissions. More information on how cleared vegetation (including all wood) is provided in Section 6.8.8.1.1 of the EA report. Even with this conservative estimate, the predicted net effects on GHG emissions from the Project are assessed as not significant.

As a next step, your comments have been documented and included as part of the final EA Report that Hydro One has submitted to the Ministry of the Environment, Conservation and Parks (MECP) for review and approval. As part of Ontario's *Environmental Assessment Act*, the MECP is leading a public review and comment period for the final EA Report.

Thank you again for reaching out, I hope this information has been helpful.

Thank you,

Hydro One Community Relations

1-877-345-6799

Community.Relations@HydroOne.com

HydroOne.com/Waasigan

ATTACHMENT 24
PUBLIC COMMENT 24 RESPONSE

[redacted]

From: [redacted]
Sent: July 10, 2023 9:27 AM
To: Waasigan Project Folder Borealis [redacted]
Subject: FW: Hiring, and when does this begin?

From: [redacted]
Sent: Saturday, July 1, 2023 1:20 PM
To: RELATIONS Community <Community.Relations@HydroOne.com>
Subject: Hiring, and when does this begin?

> You don't often get email from [redacted] Learn why this is important

*** Exercise caution. This is an EXTERNAL email. DO NOT open attachments or click links from unknown senders or unexpected email. ***

Hello. I saw ur ad while, I browsing the internet waasian transmission power line, when does this line begin to open for employment and hiring to work in this field? Would that be hydro one, who's hiring and preparing for beginning of this project. I am looking for information on where to submit resumes, to whom is hiring. [redacted]

[redacted]

[redacted]

From: RELATIONS Community <Community.Relations@hydroone.com>
Sent: August 2, 2023 11:40 AM
To: [redacted]
Subject: RE: Hiring, and when does this begin?

Hello,

Thank you for contacting Hydro One Community Relations about jobs opportunities related to the Waasigan Transmission Line Project. We apologize for the delay in responding.

Hydro One is committed to supporting growth in the northwest by building Waasigan. As you may have heard, Waasigan will bring an additional 350 megawatts of power to the west of Thunder Bay region, which is enough to power about 11 average sized mines. This will lead to spin-off opportunities and means communities and businesses can grow.

Valard Construction has been selected to be our engineering, procurement and construction contractor for the new line. With regards to jobs, we anticipate there will be up to 220 direct jobs during construction of the line, extending across a variety of positions, such as general labourers, equipment operators, truck drivers and office personnel. Many positions will be through other localized businesses working as subcontractors. Construction of transmission lines also requires specialized training and, in many cases, includes union membership. Direct employment opportunities with Valard will be made available at www.valard.com/jobs for anyone interested in applying.

I hope this information is helpful. Please don't hesitate to reach out should you have any further questions.

Thank you,

[redacted]
Hydro One Community Relations
Phone: [redacted]
Email: Community.Relations@HydroOne.com

From: RELATIONS Community <Community.Relations@hydroone.com>
Sent: Tuesday, July 11, 2023 12:36 PM
To: [redacted]
Subject: RE: Hiring, and when does this begin?

Hello,

Thank you for your interest on the Waasigan Transmission Line Project. I wanted to send a quick note to confirm that your feedback has been shared with the project team and we will be in touch with a response.

Thank you,

[redacted]
Hydro One Community Relations

Phone: [redacted]
Email: Community.Relations@HydroOne.com

ATTACHMENT 25
PUBLIC COMMENT 25 RESPONSE

[redacted]

From: [redacted]
Sent: July 10, 2023 9:29 AM
To: Waasigan Project Folder Borealis (hydroone+PJ-00133@mh.boreal-is.com)
Subject: FW: EA response Waasigan Line
Attachments: EAresponse.pdf

From: [redacted]
Sent: Monday, July 3, 2023 9:13 AM
To: RELATIONS Community <Community.Relations@HydroOne.com>
Cc: notlcommunityrelations@gmail.com
Subject: EA response Waasigan Line

See attached my response to the EA. Thank you.

[redacted]

[redacted]

[redacted]

[redacted]

Gorham ON

[redacted]

June 28, 2023

[redacted]

Dear [redacted]

I write you today in response to the Environmental Assessment conducted by Hydro One for the Waasigan Transmission Line. I am on the line. Although my property is not affected it's running right through my community and close enough I will see the lines from my house.

Neighbours on the Line have outlined an alternative route. A route which would not go through any community, a route which would allow for you to develop more if you needed to without infringing on even more homes. I went to the unveiling of your assessment of this alternative line. What I found was that the only category our new line outweighed the proposed line was in the community aspect. My question then was why was this category was evaluated the same as all the other categories. After looking at the EA I have the same question. Why is the human impact and residential homes negligible in development impact giving it only 1.6% value out of an overall 100% criteria evaluation.

You would think that the human impact of this line would be forefront. It should weigh heavy in the evaluation. I am left to wonder if Hydro One is not considering community and human impact because they know the impact is great and they are trying to gloss over a key issue with his proposed line. And why? Because it's easy and less money to use the proposed route. Hydro One will only profit from this transmission line, and can afford a longer costlier route so that community and human impact can be valued.

Sincerely yours,

[redacted]

November 17, 2023

[redacted]
Sent via email: [redacted]

Hello [redacted]

Thank you for contacting us to provide your feedback as part of the review period for the draft Environmental Assessment (EA) Report for the Waasigan Transmission Line project. Meaningful and open engagement is integral to the successful development of this critical line in northwestern Ontario.

We know that the selection of a route is a key project milestone where additional concerns may emerge. To better understand concerns we heard from community members in Kaministiquia and to find solutions to address them, we held community open houses, property owner information sessions and established a working committee to review and evaluate the route proposed by community members in Kaministiquia, as you have noted. We committed to evaluating the proposed route with the same criteria and criteria weightings used to evaluate the alternative routes. These criteria and weightings were established using stakeholder feedback, including from members of the public and those who live within the study area, and reflect the diversity of interests and items of importance across the Project area. As noted in Section 2.3.3 of Appendix 2.0-A of the EA Report, the residence indicators under the land use criterion were given the highest weight and the land use criterion was given the highest weight in the socio-economic criteria category.

The evaluation concluded the route proposed by Neighbours on the Line, on balance, had less advantages compared to the preferred route. While the proposed route by Neighbours on the Line had more advantages within the socio-economic category as a result of less impact to private land and residential property by maximizing the use of Crown land, there were more disadvantages in the other three categories.

We remain committed to working closely with landowners, including those in Kaministiquia, to find solutions and ensure residents who want to stay in their homes can. For example, we have been investigating local route refinements and speaking with individual landowners about mitigation measures. Our goal is to continue hearing as much local input as possible about the project.

As a next step, your comments have been documented and included as part of the final EA Report that Hydro One has submitted to the Ministry of the Environment, Conservation and Parks (MECP) for review and approval. As part of Ontario's *Environmental Assessment Act*, the MECP is leading a public review and comment period for the final EA Report.

I hope this information has been helpful, and thank you again for reaching out.

Thank you,

Hydro One Community Relations

1-877-345-6799

Community.Relations@HydroOne.com

HydroOne.com/Waasigan

ATTACHMENT 26
PUBLIC COMMENT 26 RESPONSE

June 14, 2022

I object to Hydro going through my wood lots. I was not contacted personally at any time ~~since~~ since 2019

[redacted]

ATTACHMENT 27
PUBLIC COMMENT 27 RESPONSE

June 14, 2023

[redacted]

[redacted]

Here are our comments and questions for Hydro One Waasigan Line.

The effects of the Electro Magnetic Fields on humans and the safe distance one needs to be safe. What is the safest distance for a home owner from the line/tower.? I do not see this in addressed In the EA and when it is, it appears that negative effects are minimized without actual scientific research proof.

As well, there are the chemical sprays and as organic gardeners, we are very very concerned about the chemical sprays used to control the growth under and around the hydro towers and lines. Of course these chemicals leak into the water systems and into peoples drinking water from the wells. I understand that you leave the decision up to each individual family but if myt neighbour gives permission to the spray, we are totally affected.

This line is damaging our community, our homes and our families. This ecological disturbance Is also dangerous in terms of fire from lightening strikes and because these lines are used by recreational vehicles through all seasons the chance of reckless behaviour in terms of fires Increases.

In your EA it seems that so much is actually missing for the actual people who will be living by them. Our lives have been disrupted; we do not feel safe in our homes anymore. We look forward to your response to our concerns.

Sincerely

[redacted]

November 17, 2023

[redacted]

Hello [redacted]

Thank you for contacting us to provide your feedback as part of the review period for the draft Environmental Assessment (EA) Report for the Waasigan Transmission Line project.

We understand changes to our infrastructure can raise concern about electric and magnetic fields (EMF). With regards to health and safety, Hydro One has a dedicated team that regularly monitors global studies around EMF and ensures that our infrastructure is built and maintained following best practices and industry standards. We look to Health Canada, the World Health Organization and the International Commission on Non-Ionizing Radiation Protection, for guidance on EMF. Based on global studies which have and continue to be regularly monitored, these organizations indicate that members of the public do not need to take precautions to protect from fields produced by extremely low frequencies such as transmission lines. For this project, we retained Exponent Consulting, who are a multidisciplinary independent engineering and science consulting firm, to review and comment on any possible health impacts. Exponent Consulting concluded there is no evidence of adverse health effects caused by EMF at extremely low frequencies for both the existing and planned configuration of the Waasigan Transmission Line. I have attached additional material with more information about EMF, and you may also be interested in reviewing what has been captured in the final EA Report in section 3.2.2.4.

With regards to herbicide use, through engagement during the environmental assessment process, we heard feedback from Indigenous communities and stakeholders like yourselves, regarding concerns with the use of herbicides to remove and manage vegetation for the Project. After consideration of this feedback, herbicides will not be used during construction of the Project or for future maintenance of this new transmission line. The final EA Report has been updated to reflect this.

With respect to your comment about fire, safety is a top priority at Hydro One. The transmission line will be designed, constructed, and maintained in accordance with the Ontario *Occupational Health and Safety Act* and other relevant regulations, codes, and standards. The particular Act establishes clearances we must maintain from other man-made and natural structures as well as tree-trimming requirements to reduce or avoid fire hazards and associated accidents. Hydro One will maintain the transmission line right-of-way and immediate area in accordance with existing regulations and accepted industry practices that will include identification and abatement of any fire hazards. For instance, a protective grounding wire will be installed at the highest position of the transmission line to protect against lightning strikes. This means that electricity and lightning strikes are neutralized, protecting both the transmission line and surrounding areas.

In addition to ensuring the line is built in accordance with existing regulations, a Fire Prevention Plan will also be developed to address fire prevention, preparedness and emergency response procedures.
More information on prevention and mitigation measures that will be included in this plan can be found in Section 3.7.3 of the final EA Report.

With regards to corridor use, Hydro One understands some landowners have expressed concerns related to trespassing and the potential for increased unauthorized access to their property as a result of the Project. We are committed to working to mitigate these concerns to the extent possible upon completion of the project and are currently exploring options, while still ensuring the transmission line can be operated and maintained safely. This commitment has also been reflected in the final EA Report.

As a next step, your comments have been documented and included as part of the final EA Report that Hydro One has submitted to the Ministry of the Environment, Conservation and Parks (MECP) for review and approval. As part of Ontario's *Environmental Assessment Act*, the MECP is leading a public review and comment period for the final EA Report.

Thank you,

Hydro One Community Relations


1-877-345-6799


Community.Relations@HydroOne.com


HydroOne.com/Waasigan

ATTACHMENT 28
PUBLIC COMMENT 28 RESPONSE

Neighbours on the Line Response to the Hydro One Waasigan Draft EA

NOTL Alternate Route

We contend that Hydro One's evaluation of the NOTL Alternate route was unfairly evaluated. The evaluation should have shown that the NOTL Alternate Route to Hydro One's Preferred Route was much, much closer than what was presented to the Kaministiquia and Lappe Communities. Since the Draft EA was published we have been able to discover the weighting and scoring methodology that was used to evaluate the alternate routes. This information was withheld from members of the community since being requested on Jan. 16, 2023. The criteria information should have been available in the ToR, as it was supposedly used to determine Hydro One's Preferred Route. With this information and Hydro One's own numbers in their evaluation, we compared NOTL's Alternate Route with Hydro One's Preferred Route using a simple proportional comparison. We then applied a score for each indicator based on Hydro One's weight factors. This method, as opposed to Hydro One's dubious method, an all or nothing scoring, resulted in a score of 48.9 to 51.1 in favor of Hydro One's Preferred Route (see evaluation sheet 1, attached). The NOTL's evaluation is much closer than Hydro One's evaluation of 30.125 to 69.875.

Upon review of the Hydro One evaluation, there was one was one indicator that should not have been applied to the NOTL alternate route evaluation. That indicator was the proximity to an Indigenous Reserve. The proximity to the Lac des Mille Lac Reserve was 4.6 Km from the NOTL Alternate Route footprint. This indicator should be considered neutral as no other criteria outside of the 2.5Km study area either side of the proposed footprint was included in the route evaluation. With this criteria considered neutral, the evaluation results in a score of 50 to 50 (see evaluation sheet 2, attached).

With the preliminary evaluation of NOLT Alternate route and Hydro One's Preferred route being equal and the huge impact on the local communities, the NOTL Alternate must be given an Environmental Assessment on par with Hydro One's Preferred route. Since there were no route refinements made to the NOTL Alternate Route, we believe that with improvements for constructability and location, the NOTL proposal would score higher.

Route Evaluation Shortfalls

Proximity to Indigenous Reserve Lands

The inclusion of an indicator that gives preferred value to a community based on ethnicity invalidates the evaluation criteria. This is a Human Rights violation and is most likely illegal in Canada. This is particularly harmful where it causes a decision to be made that discriminates against the Rights of other citizens. For Example, treating one community differently than another based on heredity. We accept that legitimate Indigenous interests and concerns are part of the EA. That Spiritual and Special sites are avoided. We cannot accept that non Indigenous communities are treated differently based solely on their heritage.

Lack of Consideration to Community

A review of other recent Hydro One EA's indicates the Waasigan criteria values homes as only 1.6% of the total evaluation as opposed to 10% of the Chatham-Lakeshore criteria. How did the Waasigan TL project put so little consideration for homes and private property in the evaluation?

Huge Emphasis on Twinning Transmission Lines

A review of other recent Hydro One EA's indicates that the Waasigan TL criteria places 12% of the total evaluation on twinning the TL as opposed to only 4.8% of the Chatham-Lakeshore TL project criteria. This makes any proposal that varies from the twinning of an existing line virtually impossible to succeed.

No Explanation as to how the Criteria Weights were Determined

There is no description of how the alternate route evaluation criteria was derived at in either the ToR or the Draft Environmental Assessment documents. There is also no description of how the criteria weighting numbers were determined. This should be available, otherwise the only conclusion that can be derived at is that Hydro One fabricated the numbers to suit their desired outcomes.

Preferred Route Selection Options

Quetico Park to Silver Falls Road

There was only one route proposed for the TL from Quetico Park to Silver Falls Road. We could not find any rational in the ToR or EA to explain why there was only one option in this area. There should have been more than options in this area, given the numerous encumbrances, such as cottages, mining claims, resorts etc., in this area that could be avoided if there was an attempt made to investigate alternate options.

Unanswered Questions

Why is there no acknowledgement anywhere in the EA that NOTL submitted a second alternate route proposal that was received by Hydro One via email and then dismissed via email without a review? This route was submitted in response to the first NOTL Alternate route being turned down and based on the criteria values learned on the first submission. It would definitely score higher than Hydro One's Preferred Route if evaluated fairly.

Why must the Transmission Line go to Dryden via Atikokan rather than directly to Dryden? It would be very easy to include a more detailed rational, if there is one, rather than the simple statement that the IESO directed Hydro One to do so.

If the transmission line was located along the first part of the NOTL Alternate Route and then from the Upsula area continue westward paralleling Highway 17 to Ignace and on to Dryden, the total length of the project would be 30Km shorter. The security of the electrical grid would be better served by the separation of the transmission lines in lieu of increasing weather related disruptions due to climate change. Ie. Forest fires, ice storms, tornadoes etc. The Power would be closer to where it is most likely to be needed. ie. new mines, northern reserves etc. This route would avoid the majority of the community disruption and the impacts to the numerous Provincial Parks and Conservation Reserves that the Waasigan Preferred Route would produce.

Prepared by

[redacted]

Kaministiquia, Ontario

Analysis of Hydro One NOTL Route Evaluation 1

				Hydro One Score			Proportional Score	
	Weight in Cat.	Weight overall		NOTL	Hydro One		NOTL	Hydro One
Natural Environment								
Wildlife &Wildlife Habitat	12	3		0	12		5	7
Vegetation & Wetlands	12	3		0	12		4.5	7.5
Surface Water	11	2.75		0	11		4.8	6.2
Fish & Fish Habitat	12	3		0	12		5.3	6.7
Groundwater	8	2		4	4		4	4
Little Brown Bats & Northern Bats	10	2.5		0	10		4.75	5.25
Eastern whip-poor-will	1	0.25		1	0		0.5	0.5
Barn swallow	1	0.25		0.5	0.5		0.5	0.5
Bank swallow	1	0.25		1	0		0.9	0.1
Bobolink	1	0.25		1	0		1	0
Chimney swift	1	0.25		1	0		0.6	0.4
American white pelican	1	0.25		0.5	0.5		0.5	0.5
Least Bittern	1	0.25		0.5	0.5		0.5	0.5
American Badger	1	0.25		0.5	0.5		0.5	0.5
Gray Fox	2	0.5		2	0		2	0
Lake Sturgeon (great lakes pop.)	2	0.5		1	1		1	1
Lake Sturgeon (Sask.-Nelson pop)	2	0.5		1	1		1	1
American Eel	2	0.5		1	1		1	1
Physiography, Geology, Soils	5	1.25		5	0		3.8	1.2
Provincial Parks, Cons. Res. Etc.	14	3.5		14	0		14	0
	100	25		34	66		56.15	43.85
Socio-economic Environment								
Archaeology	10	2.5		0	10		3.5	6.5
Land Use	25	6.25		25	0		23.6	1.4
Infrastructure &Community Ser.	16	4		8	8		8	8
Recreation &Tourism	20	5		20	0		18.2	1.8
Visual Landscape (Aesthetics)	21	5.25		21	0		13.7	7.3
Built Heritage Res. & Cultural Hert.	8	2		4	4		4	4
	100	25		78	22		71	29
Indigenous Values								
Ind. Use of land for traditional pur.	40	10		0	40		10.8	29.2
Cultural & Spiritual Sites	30	7.5		0	30		10.4	19.6
Other Criteria Identified by Ind. Com.	30	7.5		0	30		10.6	19.4
	100	25		0	100		31.8	68.2
Technical and Cost								
Project Size	16	4		0	16		7.2	8.8
Existing Community Infrastructure	17	4.25		8.5	8.5		8.5	8.5
Constructability	20	5		0	20		7.9	12.1
Existing Right-of-ways	25	6.25		0	25		3.7	21.5
Cost	22	5.5		0	22		9.5	12.5
	100	25		8.5	91.5		36.8	63.4
Overall Score				30.125	69.875		48.9	51.1

Analysis of Hydro One NOTL Route Evaluation 2

				Hydro One Score			Proportional Score	
	Weight in Cat.	Weight overall		NOTL	Hydro One		NOTL	Hydro One
Natural Environment								
Wildlife &Wildlife Habitat	12	3		0	12		5	7
Vegetation & Wetlands	12	3		0	12		4.5	7.5
Surface Water	11	2.75		0	11		4.8	6.2
Fish & Fish Habitat	12	3		0	12		5.3	6.7
Groundwater	8	2		4	4		4	4
Little Brown Bats & Northern Bats	10	2.5		0	10		4.75	5.25
Eastern whip-poor-will	1	0.25		1	0		0.5	0.5
Barn swallow	1	0.25		0.5	0.5		0.5	0.5
Bank swallow	1	0.25		1	0		0.9	0.1
Bobolink	1	0.25		1	0		1	0
Chimney swift	1	0.25		1	0		0.6	0.4
American white pelican	1	0.25		0.5	0.5		0.5	0.5
Least Bittern	1	0.25		0.5	0.5		0.5	0.5
American Badger	1	0.25		0.5	0.5		0.5	0.5
Gray Fox	2	0.5		2	0		2	0
Lake Sturgeon (great lakes pop.)	2	0.5		1	1		1	1
Lake Sturgeon (Sask.-Nelson pop)	2	0.5		1	1		1	1
American Eel	2	0.5		1	1		1	1
Physiography, Geology, Soils	5	1.25		5	0		3.8	1.2
Provincial Parks, Cons. Res. Etc.	14	3.5		14	0		14	0
	100	25		34	66		56.15	43.85
Socio-economic Environment								
Archaeology	10	2.5		0	10		3.5	6.5
Land Use	25	6.25		25	0		23.6	1.4
Infrastructure &Community Ser.	16	4		8	8		8	8
Recreation &Tourism	20	5		20	0		18.2	1.8
Visual Landscape (Aesthetics)	21	5.25		21	0		13.7	7.3
Built Heritage Res. & Cultural Hert.	8	2		4	4		4	4
	100	25		78	22		71	29
Indigenous Values								
Ind. Use of land for traditional pur.	40	10		0	40		10.8	29.2
Cultural & Spiritual Sites	30	7.5		0	30		10.4	19.6
Other Criteria Identified by Ind. Com.	30	7.5		0	30		15	15
	100	25		0	100		36.2	63.8
Technical and Cost								
Project Size	16	4		0	16		7.2	8.8
Existing Community Infrastructure	17	4.25		8.5	8.5		8.5	8.5
Constructability	20	5		0	20		7.9	12.1
Existing Right-of-ways	25	6.25		0	25		3.7	21.5
Cost	22	5.5		0	22		9.5	12.5
	100	25		8.5	91.5		36.8	63.4
Overall Score				30.125	69.875		50	50

November 17, 2023

[redacted]
Sent via email: [redacted]

Hello [redacted]

Thank you for your comments and your continued involvement on the Waasigan project, and for contacting us to provide your feedback as part of the review period for the draft Environmental Assessment (EA) Report.

We know that the selection of a route is a key project milestone where additional concerns may emerge. To better understand concerns we heard from community members in Kaministiquia, like yourself, and to find solutions to address them, we held community open houses, property owner information sessions and established a working committee to review and evaluate the route proposed by yourself and members of Neighbours on the Line (NOTL). We committed to evaluating the proposed route with the same criteria and criteria weightings used to evaluate the alternative routes. These criteria and weightings were established using stakeholder feedback, including from members of the public and those who live within the study area, and reflect the diversity of interests and items of importance across the Project area. Section 2.3.3 of Appendix 2.0-A of the EA Report includes information about the criteria weighting considered by Hydro One.

As you discuss, locating the new transmission line close to existing linear infrastructure, such as existing transmission lines and highways, is one example of criteria that was considered. Its higher weighting is a result of the feedback we heard throughout the Terms of Reference and Environmental Assessment. Co-locating with existing linear facilities has the potential to offer several advantages, such as minimizing disturbance to natural areas and sensitive habitats by maximizing existing access, reducing wildlife habitat fragmentation and typically lower cost. Co-locating with linear facilities has additional environmental advantages by reducing the overall project footprint, for example less watercourse crossings due to reduced off right-of-way access road requirements.

We also heard about the importance of land use, including residences, water, species at risk, parks and protected areas, visual landscapes, recreation and tourism, archaeology, amongst other criteria, which influenced their weightings in the evaluation to identify a preferred route that best balances all criteria from the approved Amended Terms of Reference.

With regards to your comments about proximity to reserve lands, at Hydro One, we are committed to working proactively with Indigenous peoples to build relationships based on understanding, respect and mutual trust. We will respect the rights of Indigenous peoples, including Aboriginal and Treaty rights as recognized and affirmed in Section 35 of Canada's Constitution Act, 1982. Through consultation with Indigenous communities, we included an indicator for the proximity to reserve lands as being representative of potential areas of higher use by communities in the practice of their Section 35 rights. This was included as an indicator of importance in both the alternative route evaluation for the selection of the preferred route and the NOTL route evaluation.

Landowners, including those in Kaministiquia, also indicated the importance of minimizing effects on the environment, which are included as other criteria in the evaluation (e.g., surface water, vegetation and wetlands, wildlife and wildlife habitat). As noted in Section 2.3.3 of Appendix 2.0-A of the draft EA Report, the residence indicators under the land use criterion were given the highest

weight and the land use criterion was given the highest weight in the socio-economic criteria category, which means they had greater effect on the identification of a preferred route. In the NOTL evaluation, the full weight of the land use criterion resulted in an advantage to the NOTL route compared to the preferred route, as a result of less impact to private land and residential property by maximizing the use of Crown land.

Within the natural environment category of criteria, your evaluation method ranks surface water as 4.8 (NOTL) versus 6.2 (Hydro One Preliminary Preferred Route). In the process used by Hydro One for the NOTL evaluation, which is consistent with the alternative route evaluation method used for the identification of the preferred route, the result reflects the substantial difference between the two routes with respect to surface water. The number of watercourse crossings are an important differential when considering overall Project effects. The NOTL route crosses significantly more watercourses, which is where most surface water potential effects will occur through temporary watercourse crossings (e.g., culverts and fording).

Similarly, the NOTL evaluation ranks wildlife and wildlife habitat as 5 (NOTL) versus 7 (Hydro One Preliminary Preferred Route) based on the increased area of significant wildlife habitat crossed by the NOTL route. The approach used by Hydro One also considers the degree of paralleling or crossing existing linear infrastructure where it crosses habitat, to consider the potential for increased wildlife habitat fragmentation. The NOTL route immediately parallels or crosses existing linear infrastructure for 10%, compared to 98% for the preliminary preferred route assessed. This significant difference is reflected in our evaluation of the proposed NOTL route.

The evaluation concluded the proposed NOTL route, on balance, had less advantages compared to the preferred route. While the proposed route had more advantages within the socio-economic category, there were more disadvantages in the other three categories. More information about this evaluation, along with information about why the second proposal was not considered further, can be found in Section 2.2.4 of the final EA Report.

With regards to why the line cannot bypass its connection point at Mackenzie Transformer Station (TS) in Atikokan, the Independent Electricity System Operator (IESO) directed Hydro One to develop a proposed new double-circuit 230 kilovolt (kV) transmission line between Lakehead TS in the Municipality of Shuniah and Mackenzie TS in the Town of Atikokan, and a new single-circuit 230 kV transmission line between Mackenzie TS and Dryden TS in the City of Dryden. You may be interested to review the IESO's West of Thunder Bay webpage (https://www.ieso.ca/en/Get-Involved/Regional-Planning/Northwest-Ontario/West-of-Thunder-Bay) for more information.

During the development of the Terms of Reference, alternative routes were identified to be evaluated in the EA. Section 6.2 of the approved Amended Terms of Reference describes the alternative route identification process, including reasoning for a single route being identified between Eva Lake to the Kaministiquia River which was due to the prevalence of sensitive features, presence of large waterbodies, and requirement of additional length to avoid these features, limiting the feasibility of additional alternatives in this area.

We look forward to continuing to work with you through the next phase of the Project, including in your capacity on the Local Roads Board. As a next step, your comments have been documented and included as part of the final EA Report that Hydro One has submitted to the Ministry of the Environment, Conservation and Parks (MECP) for review and approval. As part of Ontario's Environmental Assessment Act, the MECP is leading a public review and comment period for the final EA Report.

Thank you,

Hydro One Community Relations

 1-877-345-6799

 Community.Relations@HydroOne.com

 HydroOne.com/Waasigan

ATTACHMENT 29
PUBLIC COMMENT 29 RESPONSE

[redacted]

Hello Waasigan Transmission Line Project First Nation Groups:

My name is [redacted], and my mother is [redacted], and my grandparents are [redacted] We are one of the families in the Kaministiquia area that is severely impacted by this current proposed WTLP route. I cannot express my disappointment in the apparent hypocrisy of this situation.

I am a third year Lakehead University Computer Science student, and I am also a Treaty 3 Status Indian of the Couchiching Band. When I found out it was these First Nation Bands that would play a part in the destruction of this land, along with the displacement of my Grandparents, my mother, and my siblings it angered me in such a way that I realized I need to write to your groups to let them know my feelings.

Firstly, I am holding Hydro One and the Waasigan First Nation groups personally responsible for harming my Grandparents. My Papa and Grandma are not sleeping at night, while my Papa is pacing the floor trying to understand how they are going to manage this. They will have nowhere to go, and no one should be doing this to seniors at this age. They have worked hard their whole lives, to now have what they have worked for threatened to be stolen by you.

My Grandparents have always been there for me. I have lived on this farm as a child for several years. I have also lived on the Couchiching Reserve, in Toronto, and in Thunder Bay but the one thing our whole family has been able to count on was to have the farm to return to for a break, and as a constant foundation. When I lived with my father on the Couchiching Reserve, he had requested a four-bedroom house over ten times during the years I spent there with no success. It is very ironic that now these First Nation Groups are involved in taking my Grandparents' home that is their retirement and my second home, my mother's current home and inheritance, and subsequently my own inheritance, especially when my father was not able to acquire a suitable home when I was child.

Secondly, the current transmission line that was put in during the 60s through this valley should have never been allowed in the first place based on the historical nature of this area. It has always been a cradle of biodiversity and an important part of the history of the land far beyond the last 400 years. I thought First Nations are all about land management and care for history. This is not proper stewardship of human communities or land.

These groups must do better. If you want to reach out to me, I would be happy to talk to anyone about this. My cell phone number is [redacted].

Respectfully,

[redacted]

[redacted]

November 17, 2023

[redacted]

Hello [redacted]

Thank you for your continued involvement on the Waasigan Transmission Line project and for contacting us to provide your feedback as part of the review period for the draft Environmental Assessment (EA) Report.

We are taking the necessary time to understand Indigenous interests in the Waasigan Transmission Line to ensure that development is conducted in a way that respects and maintains Indigenous rights and self-determination. Our engagement process is designed to provide relevant information to Indigenous communities that are proximate to the Project in a timely manner, and to obtain community input. Waasigan presents a unique opportunity for Hydro One to collaborate with Indigenous communities and advance reconciliation.

We appreciate the importance of your Grandparent's property for you and your family and remain committed to working with landowners, like your Grandparents, to discuss mitigation measures. We have also committed to ensuring that property owners who wish to stay in their homes will not be displaced. Our goal is to continue hearing as much local input as possible about the project. For example, through engagement during the EA process, we heard feedback from Indigenous communities and stakeholders like yourself, regarding concerns with the use of herbicides to remove and manage vegetation. After consideration of this feedback, herbicides will not be used during construction of the Project or for future maintenance of this new transmission line. The final EA Report has been updated to reflect this.

We are committed to working with your family to identify potential solutions to mitigate your concerns, such as with tower placements and plantings in strategic locations.
With regards to environmental stewardship, we began the EA process for the project under Ontario's Environmental Assessment Act in Spring 2019. The process is designed to assess the existing environment and mitigate potential effects before decisions are made about proceeding with a proposed project. This includes seeking feedback from residents by advertising the project through newspaper and radio ads, targeted social media ads, Canada Post neighborhood mail and in-person and virtual open houses. We appreciate the feedback and input you've provided as part of this process. Also, Hydro One has committed to undertaking a biodiversity initiative specific to this project to offset habitat loss or change that may occur because of the Project. Such initiatives involve the funding of third-party opportunities or projects, such as wetland and wildlife habitat creation and enhancement, aquatic habitat restoration and enhancement activities, or invasive species inventory or removal, among others. Additional information on the biodiversity initiative will be available as we progress through the project and Hydro One will engage with Indigenous communities, local communities and interested parties to discuss its implementation.

As a next step, your comments have been documented and included as part of the final EA Report that Hydro One has submitted to the Ministry of the Environment, Conservation and Parks (MECP) for review and approval. As part of Ontario's Environmental Assessment Act, the MECP is leading a public review and comment period for the final EA Report.

We would welcome the opportunity to meet with you to continue discussing the project and your Grandparent's property.

Thank you,

Bruce Hopper
Manager, Major Projects – Hydro One

 1-877-345-6799

 Community.Relations@HydroOne.com

 HydroOne.com/Waasigan

ATTACHMENT 30
PUBLIC COMMENT 30 RESPONSE

[redacted]

RE: Environmental Assessment Waasigan Transmission Line

Dear [redacted]

We write this letter in response to the Environmental Assessment for the Waasigan Transmission Line. We are directly impacted by Hydro One Networks Inc Waasigan Transmission Line, our property is a total loss. The draft EA seems to be missing one glaringly obvious category for measurement....the human component is missing. No where in this report does it discuss the effect to the immediate property owners. We submitted our Human Impact statement February 4, 2023 to Hydro One Networks and to this date we have not received any acknowledgement from Hydro One as to how they have destroyed our lives. Please see attached for a copy of the impact statement submitted.

Update to my human impact statement: I have continued to travel to London every 2-4 weeks for procedures and medical care. On July 4, 2023 I will be having a major reconstructive surgery in an attempt to save my kidney. We were expecting to have our retirement home finished in order to recover there as it was to be set up with home dialysis, but instead we still only have the foundation of our home sitting there, because [redacted] at Hydro One "STRONGLY ADVISED" us not to build. Hydro has forced us to put our life on hold, we sit here day after day not able to build or carry on with our lives.

Prior to January 23,2023 we had no information or notification (we had never heard of) the Waasigan Transmission Line. We were not invited to the June 2019 workshop regarding the line even though we are directly impacted and should have been informed. The following is a list of the events that have happened since we received the letter from Hydro indicating they were taking our property.

*January 23, 2023 received letter from Hydro One signed by [redacted] indicating expropriation intentions

*January 23, 2023 [redacted] called [redacted] at the number on the letter. [redacted] highly encouraged us to get legal advice and that he would be here to help us through this process.

*We then chose to appy for our Hydro hook up for the property as we intented to continue with our build on March 1. We received notification from Hyrdo One that they sent an engineer out to our property and they will do our main hook up March 1, 2023 for an approximate cost of $4000.

February 4, 2023 submitted Human Impact Statement to Hydro One

February 27, 2023 [redacted] attempted to call [redacted] but was notified that he had been replaced by [redacted]. [redacted] spoke with [redacted] in an attempt to figure out was happening and get some questions answered. At this time [redacted] "highly suggested we not build" putting our lives completely on hold.

We received a registered letter from Hydro regarding a meeting May 15, 2023. Within an hour of receiving the letter we received a phone call from [redacted] indicating he was in town and wanted to meet.

We met with [redacted] at our property, where he showed no empathy for our loss however did present three options as follows: 1. Moving the line south effecting our young neighbours significantly 2. Moving our foundation to the swamp area of our property or 3. A complete buyout. Although none of the options are ideal we did indicate that we would not put our neighbours in the situation we are in. We did agree to have [redacted] attend our property to complete an appraisal with no commitment to sell. We agreed that time is an issue and the appraisal would be completed within 14 days. At this time we also asked for the terms of reference for the type of appraisal in order for us to have an independent appraisal completed by The Appraisal Group in Thunder Bay.

[redacted] attended the meeting May 15, [redacted] was not well enough to attend. [redacted] was greeted by [redacted] who proceeded to offer him $7500 for "reimbursement costs". [redacted] indicated to [redacted] that we had contacted a lawyer and would be obtaining an independent appraisal. [redacted] strongly encouraged us not to obtain our own appraisal as it would lower the payout we would receive. He also suggested that we make sure our lawyer is experienced in expropriation. After listening to the presentation [redacted] asked which of the five person Realty Team for Hydro One is a licenced Real Estate Agent. [redacted] indicated that none of them had a license, at this point [redacted] left the meeting.

June 2 [redacted] called regarding the status of the appraisal and [redacted] stated that engineering firms would have to be brought in as the appraiser was unable to assess the value of our property and he needed two more weeks

June 19 [redacted] called regarding the status of the appraisal. [redacted] indicated that this was now a multi month process and denied the two week commitment on June 2. [redacted] at that point called [redacted] a liar and hung up the phone.

Now we have received an email from [redacted] indicating we should communicate via lawyers only, please see attached email.

We have been lied to from Hydro employees and executives. Our life has been completely put on hold. [redacted] is gravely ill and time is very important, how much more/longer are you going to make us suffer.

Sincerely

[redacted]

February 4,2023

Please accept this document as our impact statement regarding the Hydro One Waasigan Tranmission Line.

Our story is long, I will try to make it brief.....

I have been struggling with Chronic Kidney Disease since 2013, since then my husband and I have travelled to London for surgery well over 30 times with no improvement. In 2019 the decision was made to take my left kidney. During this time I've been incredibly sick, missing years of work, missing significant events and family functions as well as missed opportunities for travel, in general too sick to enjoy life.

In 2019 my husband and I found a small piece of property that was perfect for us to plan our retirement home, we had been looking for awhile and our current tiny house doesn't meet my medical needs. It is a small manageable piece of property that is only an eight minute drive to town and an important twelve minute drive to Thunder Bay Regional Hospital. Our intent was to start building spring of 2020. We spent the winter preparing, buying materials and making plans. My husband was so excited he made me a 3D model of what our retirement home would eventually look like. It gave us hope while dealing with my constant illness. In the spring of 2020 we were hit by COVID. My husband worked tirelessly clearing and working on the property getting it ready for building. We were eventually not able to build due to the high cost and high demand of a lot of building materials. Our goal now was building in 2021, not what we want but we made progress. 2021 finally came we were hoping for better but it was more of the same....delays, frustrations with my health and high costs of materials. We decided sadly to delay again until 2022 however we did get the foundation in and the drilled well. In 2022 we were advised by my doctors that dialysis would be an eventuality for me. I went through all of the dialysis education and made a decision of which dialysis option was best for me. We altered our building plans so I would be able to eventually receive my treatments from the comfort of my own home not a clinical environment. We made our final plans for the house, bought the wood package, ordered the trusses and windows, we were ready to start March 2023 as the foundation is in we did not need wait for the ground to thaw.

On January 23 we received the letter from Hydro One stating they are taking all of our dreams away. The transmission line is planned to go right through the foundation and well of our new home. Hydro One's "form letter" made our world come crashing down. We have been putting one foot in front of the other since 2013, the property gave us a goal and hope, something to look forward to when our life seemed to be filed with medical appointments, travelling for surgery and feeling like crap. We've used our property since the day we bought it. We've planted a garden every summer, our RV is there to sleep in or hang out, we've had BBQ's and bonfires with family and friends, our dog has made her own paths to run through the bush, this is our home, our future that Hydro One is taking away. They indicate they will give us market value for our property however our property is irreplaceable to us. Where do you find a small mangeable piece of property semi rural but that's still only 12 minutes to the hospital, already cleared and leveled with the well drilled and the foundation poured!!!!!!

The only communication we have had from Hydro One is their initial letter and nothing since. So now we sit here day after day wondering what to do next feeling defeated.....how do we keep putting one foot in front of the other???????

Please help us!

November 17, 2023

[redacted]

Hello [redacted]

Thank you for contacting us to provide your feedback as part of the review period for the draft Environmental Assessment (EA) Report for the Waasigan Transmission Line project and for re-sharing your impact letter/statement. We appreciate the time you have taken over the last several months to speak with various representatives.

We understand in the last month you have further engaged with your real estate representative and that conversation progressed into a voluntary settlement on October 24th, 2023.

We would like to acknowledge your comments have been documented and included as part of the final EA Report that Hydro One has submitted to the Ministry of the Environment, Conservation and Parks (MECP) for review and approval. As part of Ontario's Environmental Assessment Act, the MECP is leading a public review and comment period for the final EA Report.

Thank you,

Hydro One Community Relations

1-877-345-6799

Community.Relations@HydroOne.com

HydroOne.com/Waasigan

ATTACHMENT 31
PUBLIC COMMENT 31 RESPONSE

[redacted]

June 14, 2023

To whom it may concern,

My name is [redacted] and I am a property owner who is directly impacted by this current Waasigan Transmission Line route. I do not want this line crossing my property. I have stated multiple times to Hydro One Networks representatives that I am not in agreement, and I am very concerned about the loss of land, the decrease in value of this land, the concerns around fire and having two HV lines in tandem, along with more required maintenance to these lines and the destruction due to development. This is a severe concern for the whole area.

No where in this Draft EA does it appear that my concerns have been addressed, they appear to be omitted completely and I will be challenging the legitimacy of this project. It is very badly done, and no community has been considered.

Best regards,

[redacted]

[redacted]

November 17, 2023

[redacted]

Hello [redacted]

Thank you for contacting us to provide your feedback as part of the review period for the draft Environmental Assessment (EA) Report for the Waasigan Transmission Line project.

Meaningful and open engagement is integral to the successful development of this critical line in northwestern Ontario. We have appreciated your participation and feedback over the past several months as part of the EA process. The feedback we hear from community members like yourself is captured in Appendix G of the Record of Consultation, and changes to current land use, including effects to landowners, can be found in Section 7.1.9.2.2 of the draft EA Report.

We recognize there will be a visual change as a result of the new transmission line. We remain committed to working closely with landowners to discuss mitigation measures. I understand at this point in the project you have elected not to engage with our land representatives; however, I would like to extend an open offer to schedule a meeting with key members of our Project team to continue this important discussion so we can make efforts to identify mitigation solutions to your concerns. Your dedicated land agent, [redacted] remains available to speak with you at any time, at [redacted]

With respect to your comment about fire, safety is a top priority at Hydro One. The transmission line will be designed, constructed, and maintained in accordance with the Ontario *Occupational Health and Safety Act* and other relevant regulations, codes, and standards. The particular Act establishes clearances we must maintain from other man-made and natural structures as well as tree-trimming requirements to reduce or avoid fire hazards and associated accidents. Hydro One will maintain the transmission line right-of-way and immediate area in accordance with existing regulations and accepted industry practices that will include identification and abatement of any fire hazards. For instance, a protective grounding wire will be installed at the highest position of the transmission line to protect against lightning strikes. This means that electricity and lightning strikes are neutralized, protecting both the transmission line and surrounding areas.

In addition to ensuring the line is built in accordance with existing regulations, a Fire Prevention Plan will also be developed to address fire prevention, preparedness and emergency response procedures.

More information on prevention and mitigation measures that will be included in this plan can be found in Section 3.7.3 of the final EA Report.

As a next step, your comments have been documented and included as part of the final EA Report that Hydro One has submitted to the Ministry of the Environment, Conservation and Parks (MECP) for review and approval. As part of Ontario's *Environmental Assessment Act*, the MECP is leading a public review and comment period for the final EA Report.

Thank you,

Hydro One Community Relations


1-877-345-6799


Community.Relations@HydroOne.com


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ATTACHMENT 32
PUBLIC COMMENT 32 RESPONSE

[redacted]
[redacted]
Gorham ON [redacted]

[redacted]
[redacted]
[redacted]
[redacted]
[redacted]

To Whom It May Concern

In addition all the concerns illustrated by our neighbours we would like to highlight the bullying tactics and lack of due diligence on the part of Hydro One's EA and land representatives. We have been at every Hydro One meeting and open house available to us as private citizens of Canada. At no time have any of our written and verbal comments resulted in any positive response from Hydro One.

We have requested through the Hydro One representatives, several mitigations measures related to trespassing, spraying of herbicides, environmental damage, loss of use for hunting and gathering, tower and land rental, legal liability of trespassers, and increased fire risks.

We have requested reasonable mitigation measures to address the above. Hydro One has not made any effort besides providing the reoccurring narrative "No"

Hydro One's negotiation method utilized at open houses and utilized by their representatives is that the landowner should just agree to Hydro Ones terms and conditions or your property will be expropriated. This is not consultation and mitigation in good faith, nor does it meet the requirements of the EA Process. This is not how project development in a democracy is performed.

The EA process requires that comments are catalogued and replied to and where possible and reasonable the concerns of the affected stakeholders are mitigated.

Hydro One has not met its requirements under the EA process. They have only dictated the terms under threat of expropriation of our land. This is not consultation in good faith, nor is it up holding the Honor of the Crown.

We look forward to meaningful and respectful dialogue with Hydro One in the future to discuss appropriate mitigation measures to address our concerns.

Sincerely

[redacted]

November 17, 2023

[redacted]

Hello [redacted]

Thank you for contacting us to provide your feedback as part of the review period for the draft Environmental Assessment (EA) Report for the Waasigan Transmission Line project. We remain committed to working closely with you to discuss the new line in relation to concerns about your property, and hear more details around the mitigation measures you have in mind. Your dedicated land agent, [redacted], remains available to speak with you at any time, at [redacted].

With regards to your concern about herbicide use, through engagement during the EA process, we heard feedback from Indigenous communities and stakeholders like yourselves, regarding concerns with the use of herbicides to remove and manage vegetation for the Project. After consideration of this feedback, herbicides will not be used during construction of the Project or for future maintenance of this new transmission line. The final EA Report has been updated to reflect this.

Hydro One understands some landowners have expressed concerns related to trespassing and the potential for increased unauthorized access to their property as a result of the Project. We are committed to working to mitigate these concerns to the extent possible upon completion of the project and are currently exploring options, while still ensuring the transmission line can be operated and maintained safely. This commitment has been reflected in the final EA Report and we hope to continue these conversations with community members.

With respect to your comment about fire, safety is a top priority at Hydro One. The transmission line will be designed, constructed, and maintained in accordance with the Ontario *Occupational Health and Safety Act* and other relevant regulations, codes, and standards. The particular Act establishes clearances we must maintain from other man-made and natural structures as well as tree-trimming requirements to reduce or avoid fire hazards and associated accidents. Hydro One will maintain the transmission line right-of-way and immediate area in accordance with existing regulations and accepted industry practices that will include identification and abatement of any fire hazards. For instance, a protective grounding wire will be installed at the highest position of the transmission line to protect against lightning strikes. This means that electricity and lightning strikes are neutralized, protecting both the transmission line and surrounding areas.

In addition to ensuring the line is built in accordance with existing regulations, a Fire Prevention Plan will also be developed to address fire prevention, preparedness and emergency response procedures.

More information on prevention and mitigation measures that will be included in this plan can be found in Section 3.7.3 of the final EA Report.

With respect to hunting, trapping, fishing and associated activities, we acknowledge that construction activities may temporarily reduce and restrict access to lands used for these activities. Section 7.1.9.6 of the final EA Report outlines the efforts we will make to limit adverse affects to these activities, such as using existing roads and trails where possible, development of a Communications Plan that will include notification requirements during construction and limiting

vegetation removal to the extent necessary for construction and the safe operation of the transmission line. In additional, as part of the project we are committed to consulting with trappers associations, individual councils and the Ministry of Natural Resources and Forestry to confirm how the Project may affect individual trappers and what mitigation measures can be put in place. Mitigation could include providing compensation if impacted by the construction of the Project (e.g., due to damage to trapper assets, general disturbance, adverse effects, and impacts to trapping operations). As we continue our construction planning, we will progress these conversations to better understand potential effects and allow for trappers the opportunity to relocate traplines in advance of construction.

As a next step, your comments have been documented and included as part of the final EA Report that Hydro One has submitted to the Ministry of the Environment, Conservation and Parks (MECP) for review and approval. As part of Ontario's *Environmental Assessment Act*, the MECP is leading a public review and comment period for the final EA Report.

Thank you,

Hydro One Community Relations

 1-877-345-6799

 Community.Relations@HydroOne.com

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ATTACHMENT 33
PUBLIC COMMENT 33 RESPONSE

June 14, 2023

[redacted]

Dear [redacted]

Nobody has been displaced according to Hydro One yet we hear that some properties were purchased by Hydro One. Does that not mean residents were displaced?

With respect to the environmental assessment draft, how and what did Hydro One staff do To present in their report that less than one percent (1%) of residents will be affected?

[redacted]

November 17, 2023

[redacted]

Hello Marcia,

Thank you for contacting us to provide your feedback as part of the review period for the draft Environmental Assessment (EA) Report for the Waasigan Transmission Line project.

We remain committed to working closely with landowners, to find solutions and ensure residents who want to stay in their homes can. For example, we have been investigating local route refinements and speaking with individual landowners about mitigation measures. While some landowners may choose for Hydro One to purchase their property in its entirety, we are committed to ensuring that property owners who wish to stay in their homes, will not be displaced. Our goal is to continue hearing as much local input as possible about the project.

With regards to your question about criteria weightings, it is important that the natural and socio-economic environments, technical and cost considerations, and Indigenous community values are considered when selecting a route for a new transmission line. The criteria used to assess and evaluate the alternative routes, were identified during the Terms of Reference. The Terms of Reference is a document which provides the framework for how the environmental assessment will be completed, including outlining studies and consultation activities. The criteria were presented in the Terms of Reference and based on initial feedback and baseline information about the region. Hydro One received approval from the Ministry of the Environment, Conservation and Parks for the amended Terms of Reference in February 2022.

With this approval, Hydro One began the environmental assessment in March 2022, as outlined in the approved Terms of Reference. We continued to collect feedback and complete field studies on the alternative routes to inform the alternative route evaluation. The preferred route best balances these criteria. Further details about the criteria and how they were weighted as part of the evaluation process, can be found in Section 2.3.2 and Section 2.3.3 of Appendix 2.0-A of the EA Report.

As a next step, your comments have been documented and included as part of the final EA Report that Hydro One has submitted to the Ministry of the Environment, Conservation and Parks (MECP) for review and approval. As part of Ontario's *Environmental Assessment Act*, the MECP is leading a public review and comment period for the final EA Report.

I hope this information has been helpful and thank you again for reaching out.

Thank you,

Hydro One Community Relations


1-877-345-6799


Community.Relations@HydroOne.com


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ATTACHMENT 34
PUBLIC COMMENT 34 RESPONSE

June 14, 2023

ATTN: Ministry of the ENVIRONMENT

RE: HYDRO ONE / WAASIGAN TRANSMISSION LINE

ENVIRONMENT - MEANING

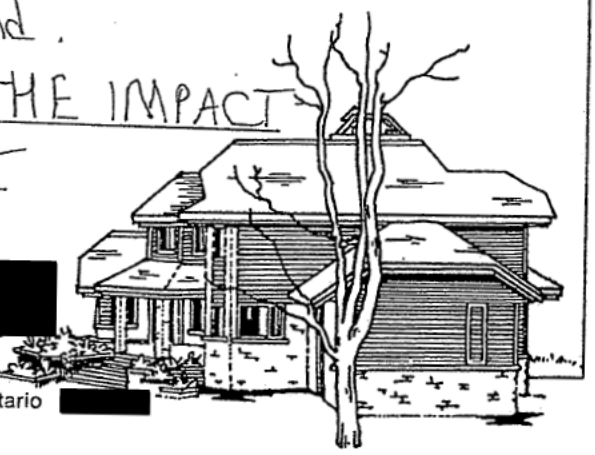
The surrounding or conditions in which a PERSON, ANIMAL or PLANT LIVES or OPERATES.

Our ENVIRONMENT is going to be impacted by this Line!!

- Groundwater will be affected. (In rural areas we rely on the water that flows in streams underground.)
- Loss of homes
- with change in the environment our neighbours mental and physical health will be affected. It is now-WORRY!!
- 10% of Land in Northwestern Ontario is Privately owned.
- 90% is CROWN Land.

MOVE THE LINE WHERE THE IMPACT IS NOT FELT

[redacted]



[redacted] Kaministiquia, Ontario [redacted]

November 17, 2023

[redacted]

Hello [redacted]

Thank you for contacting us to provide your feedback as part of the review period for the draft Environmental Assessment (EA) Report for the Waasigan Transmission Line project.

Meaningful and open engagement is integral to the successful development of this critical line in northwestern Ontario. In 2019, we began an environmental assessment for the project under Ontario's *Environmental Assessment Act*. The process is designed to assess the existing environment and mitigate potential effects before decisions are made about proceeding with a proposed project.

Through the environmental assessment process, it was determined that the preferred route for the new line best balances natural environment, socioeconomic, Indigenous culture, values and land use, technical and cost considerations. When considering any potential refinements to this proposed new transmission line route, we must ensure that this balance can still be achieved. The project team has investigated a proposed route by Neighbours on the Line (NOTL), which concluded the proposed route, on balance, had less advantages compared to the preferred route. While the proposed route had more advantages within the socio-economic category as a result of less impact to private land and residential property by maximizing the use of Crown land, there were more disadvantages in the other three categories.

We remain committed to working closely with landowners to find solutions and ensure residents who want to stay in their homes can. For example, we have been investigating local route refinements and speaking with individual landowners about mitigation measures. While some landowners may choose for Hydro One to purchase their property in its entirety, we are committed to ensuring that property owners who wish to stay in their homes will not be displaced. Our goal is to continue hearing as much local input as possible about the project.

With respect to your concern about the impact of the project on groundwater, Section 6.3 of the EA Report summarizes our evaluation of potential and net effects on groundwater in the Project area, including: assessing potential changes to groundwater quality and/or levels and flows due to spills, construction excavations and dewatering, blasting, vegetation clearing and construction of Project components, among other activities. Mitigation measures we've identified to protect groundwater as captured in the EA report include: spill prevention through preventative maintenance and inspection of equipment; implementing procedures for emergency response, containment, clean-up, disposal, and reporting; use of designated refueling areas; providing secondary containment for all bulk fuel storage; and, equipping work areas and equipment with spill kits for spill response. Groundwater drinking water supply will be protected by avoiding construction below the groundwater table where practicable and regularly monitoring environmentally sensitive features, such as waterbodies and springs, during construction. For water supply wells located near the Project footprint, Hydro One and their contractor will work with private landowners where requested to identify wells with the potential to be affected by the Project, and recommend mitigation techniques to avoid or reduce those effects.

As a next step, your comments have been documented and included as part of the final EA Report that Hydro One has submitted to the Ministry of the Environment, Conservation and Parks (MECP) for review and approval. As part of Ontario's *Environmental Assessment Act*, the MECP is leading a public review and comment period for the final EA Report.

Thank you again for your comments.

Thank you,

Hydro One Community Relations

 1-877-345-6799

 Community.Relations@HydroOne.com

 HydroOne.com/Waasigan

ATTACHMENT 35
PUBLIC COMMENT 35 RESPONSE

Response by [redacted] Township of Forbes of Thunder Bay to Waasigan Transmission Line Project EA Draft

Document prepared by [redacted]
2023-06-25

Dear [redacted]

Re: In response to the Waasigan Transmission Line Project Environmental Assessment Draft

The Hyrdo One Networks Inc. WTLP EA Draft fails to represent the true impact of harm, liability, and injustices of the WTLP preferred route by not including documented information and/or omitting known factors. None of our family's objections to this development since my mother, [redacted] and I attended the Hydro One Networks' Open House at the Oliver Community Recreation Centre on January 16, 2023, are included. January 16, 2023, would be the first time anyone in our home would be informed by a Hydro One Networks Representative, namely Project Manager [redacted], that the preliminary preferred route of the Waasigan Transmission Line Project would be placed on this property. It is placed in an area that will cause severe undue hardship and irreversible damage in all aspects of life for that of which no monetary compensation will be reasonable. The Hydro One Networks' letter threatening expropriation arrived on January 21, 2023, essentially suggesting seniors could be displaced from their homes in mere months to come without immediate cooperation.

This preferred WTLP route leaves three generations currently living on one of the oldest original homesteads in the Kaministiquia area with no ability to recover, as to buy or rebuild what is currently on this property is not possible given the current economic climate and history of the land. The farmhouse was kept with original exposed beams intact while internal rooms were fully renovated with an add on, along with exterior wood finishing in preparation for my parent's retirement years. A secondary residence was due to be constructed in spring of 2023 for myself and children, in preparation of care for my parents. The barn that has been upkept yearly with maintenance is over 100 years old. The lack of humanity, disregard to the impact of community and property owners not directly impacted by the line immediately on their property, the lack of informed consent regarding EMRs, the lack of commitment to no defoliant use for maintenance, and oversites or omissions to the environmental assessments done on properties by Hydro One Networks Inc. can really be represented by the 1.6% value out of the 100% evaluation criteria given to residences impacted by the WTLP route.

There has to date not been any written commitments in this Draft EA or otherwise, as to how Hydro One Networks will not 'displace' any homeowners as per the announcement on TBT News. When pushed to answer, there are no answers given by any Hydro One Networks representatives. This corporation is not able to reasonably provide a fair exchange, or have they proven sufficiently that there is evidence of a beneficial trade-off for this community to experience damage of property, displacement, or suffer loss of enjoyment or use of land, therefore this would appear to be theft of private property.

In the case of our home, this will represent the loss of a lifetime of work. The landowners have no collective benefit from the proposed Waasigan Transmission Line Project. The act of putting in a second power line where already land was assumed for a similar line is merely Hydro One Networks and the WTLP Partners taking all of what they need for either economic benefit, or benefits that have not been disclosed in this EA Draft, while leaving the impacted communities in the wayside of destruction, harming property values, losing a tax base, along with the risk of health complications. Neither are the very clearly communicated concerns over devastating use of defoliants for maintenance on these lines discussed in completion. The chemical defoliants seep into ground soil and water sheds contaminating entire areas. Regardless as to whether one owner agrees or disagrees to use, these chemicals spread everywhere once sprayed. Hydro One Networks shows no regard for family, well-being of community, health of the human, or environmental impact on the fields that are still used to produce hay and/or crops, of wildlife or the surrounding area and the homestead.

Contamination of Watershed

This WTLP Environmental Draft EA is invalid, as it either via premeditation or a lack of proper due process, fails to recognize any of the water sheds, sources, wells, or otherwise on this property in the Draft EA. When any of the Hydro One Networks representatives from Community Relations to the Environmental Specialists were asked to provide our Environmental Assessment it was not. There had in fact been an Environmental Assessment completed on our property. When we asked at the Oliver Road Recreation Centre, I was told that the EA was in fact completed on our property and would be available for us to look at in the coming weeks. We have been asking for it since with no reply. This is the general failing of much of the Draft EA on this WTLP preferred route, wherein massive

amounts of detrimental information within the 500 m EA are omitted and/or incomplete. This would seem to be a major liability to anyone that chooses to sign off on this EA Draft, as it has now been made known in the public forum and to suggest ignorance is no longer an option.

It is most likely that there will be adverse effects on the quality of water due to this preliminary preferred route contaminating the surface and ground water that serves as drinking water for humans, livestock, and wildlife, as it sits at the drainage basin opening into a spring water fed pond measuring 60 meters by 122 meters draining into a creek flowing out of the property. The well that acts as the water source for the property is positioned at the bottom of the slope of the area in question for the current line shown on the map, which would require the deforestation of the tree line originally planted well over 40 years ago to protect the property. The deforestation of these tree lines irrevocably hurts the enjoyment of the land as trails have been constructed throughout, cosmetically damages the property, removes a necessary wind barrier to protect the land, along with a buffer to current EMRs, and most importantly will remove the root structure along the slope that keeps the soil intact ensuring the health of the pond and water supply. Any construction within such a proximity to the drainage basin will create extremely high potentialities to contaminate the surface and ground water. And yet it is NOT included in this EA Draft. It would appear Hydro One Networks Inc. is hiding pertinent information about the amount of destruction this line will cause to have it approved.

The Health Risks Hydro One is Not Acknowledging

While other countries have adopted safety regulations regarding EMR exposure, Canada has not. It does follow the international guidelines which are solely based on the protection from acute (short term) effects of EMRs, and not such as long-term living by two high voltage Hydro Towers in one corridor. More strict guidelines (2-10 mG) adopted in some countries, as sited in the following Toronto Staff Report would greatly restrict the use of hydro corridors for parks and recreational activities and the feeling was that although there is acknowledged risks to health, the health benefits may outweigh the risk. The Toronto City Staff Report Action Required brief titled Reducing Electromagnetic Field Exposure from Hydro Corridors states, 'The International Agency for Research on Cancer (IARC) classifies the magnetic component of EMF as a possible carcinogen because of the association between

exposures to EMF magnetic fields in the home and childhood leukemia. Given the possible link between the exposure to EMF and an increase in the risk of leukemia in children, taking practical low or no-cost actions to reduce exposures to young children is prudent."

This report continues on to say, "when new high-voltage transmission lines or increases in the capacity of existing transmission lines are proposed within the City of Toronto, the Chief Planner, in consultation with the Medical Officer of Health, request the proponent to undertake a health impact assessment to evaluate options available to minimise any increase to the yearly average exposure to EMF in Toronto; and the Board of Health forward this report to Health Canada, the Ontario Ministry of the Environment, Ministry of Health and Long-Term Care, other Boards of Health in Ontario, Toronto District School Board, Toronto Catholic District School Board, Conseil scolaire de district du Centre-Sud-Ouest, Conseil scolaire de district catholique Centre-Sud, Waterfront Secretariat, Toronto Hydro, Hydro One, Canadian Electricity Association, Canadian Standards Association, Ontario College of Family Physicians, and the Ontario Medical Association."

EMR levels in hydro corridors are found to be higher than levels found in the general environment in the city, as "In February and March 2005, Toronto Public Health measured levels of EMF in 36 parks (18 parks inside hydro corridors and 18 parks outside of hydro corridors). Levels of magnetic fields taken in parks located in hydro corridors varied widely. Levels were usually highest directly underneath the high-voltage lines at midspan and decreased with increased distance from the lines (Table 1)." Further discussed is the necessity of land-use planning measures, with right-of-way widths for power lines next to residential areas. We are requesting to see the health impact assessment and an EMR management plan that outlines the measures that Hydro One Networks has taken to ensure the health of our community and environment in the Kaministiquia area.

In another report it is noted that a strong EMR field from high voltage power lines extends for about a ¼ of a mile, stating that within 50 meters of a power line there is increased cancer, stunted growth, and increased triglycerides. Within 507 meters abnormal EEGs are reported, while health complications are found right out to the distance of 2000 meters. This report notes that people who live within 299.92 meters of a power line at any point of age to 15

years were three times more likely to develop cancer as an adult. The California Department of Health concluded that EMRs were responsible for an increase in childhood leukemia, adult brain cancer, Lou Gehrig's disease and miscarriage in the 2002 report, an Evaluation of the Possible Risks From Electric and Magnetic Fields (EMFs) from Power Lines, Internal Wiring, Electrical Occupations, and Appliances. The study cited dozens of other epidemiological studies specifically linked to high voltage power lines including brain tumors, leukemia, birth defects, and lymphoma. As is, the property home is already in a high-risk zone, possibly and most hopefully buffered by the landscape. This is the same landscape and forestation that Hydro One Networks seeks to destroy. Adding a whole other High Voltage Transmission line in this current corridor approximately, and this is being generous, within 300 meters from the residential home doubles the exposure to not only this residence but to all households, wildlife and the environment. Hydro One has not provided the necessary 'Informed Consent' to residential owners regarding the dangers of the current power line corridor or what it means to add another power line in the same corridor to the health of the community, and those that live alongside power lines.

Socioeconomic Harm

The Hydro One preliminary preferred route of the Waasigan Transmission Line Project causes financial harm and undue hardship to our family, as this current property allows for multi-generational family living. This is once again omitted from the WTLP Draft EA. This means that a family can share in responsibilities of daily life, and my parents would have the benefit of living longer in their own home upon later years. My Grandmother spent a good portion of her life on the homestead, while our Great Aunt spent her last moments of life in the farmhouse choosing to pass with family. Furthermore, I moved back to the homestead in May of 2022 to provide future support to elderly parents with the plan to build a much-needed manufacturing space for my current established business of over 15 years. The basis of the business is natural plant medicine. As I am a Clinical Herbalism, wildcrafting from this parcel of land along with growing herbs in the field settings for tinctures, teas and topicals for retail is the basis of the business plan. Not only does Hydro One Networks' preliminary preferred route severely harm a current established business, but it completely disrupts all future aspiration of expansion. Amenities such as the equine training ring made to regulatory standard size was to be used this spring for an outreach activity for children with disabilities, equine training, and work shops. These types of facilities come at great cost and are not easily found or

replicated due to space and now cost of materials. The ignorance of the damage that this WTLP preferred route will cause, along with the proposal to add a second power line to the current corridor, is criminal especially given the complete lack of consultation with the community and impacted property owners.

Environmental Harm

The preferred WTLP route destroys trails that are enjoyed year-round that are maintained for equine sleigh rides, sledding, cross country skiing, snowmobiling, hiking, horseback riding, and more. It will entirely change the nature of the land and spoil the enjoyment of the property that has been used since 1987. The trees will not be replenishable and there is no stumpage fee that will replace them as a necessary environmental buffer for weather, noise, visual pollution and EMRs caused currently by the power line corridor. The cabin and pond that are used year-round for swimming, fishing, rowing, and skating all within a less than 100 meters from the proposed line will be damaged absolutely.

The Kaministiquia area is also rich and abundant with wildlife and vegetation. This farm, as has been seen and recorded, is a known habitat for several species of Woodpeckers, including the Pileated Woodpecker. There are edible wild raspberries, saskatoons, and strawberries. More specifically, there are regionally rare plants such as Bur Oak, Blue Cohosh, Indian Hemp, Wood Nettle, Turtlehead, and Carrion Flower that are all within the scope of sustainable usage found in the field and woodland areas of this property. Extending the amount of property damaged during construction of this second line not only reduces the area from which to harvest, but the width of the corridor negatively impacts wildlife by 4%.

Seemingly trivial to all other items listed is the sound pollution from not only one set of buzzing wires but two which cannot be overlooked. The amount of disruption to life that Hydro One Networks states is 'interim' is long lasting and while the developmental destruction will take decades to restore.

The documented lack of consultation and behaviour by Hydro One Networks Inc. with impacted communities, property owners, and our own family currently appears almost unlawful. In Northwestern Ontario there is the space

to go around communities and private property. This is the precedent that has be set with several well known and recent Transmission line projects. The Draft EA should be rejected. Failure to do so will call into question the entire legitimacy of this process and individuals with signing approval, as the lack of true representation of impact, the complete disregard for proper consultation and inclusion of property owners and communities that have already and will continue to be negatively harmed by this WTLP route is documented in the public domain and cannot go ignored.

Sincerely,

[redacted]

Signed:

[redacted]

November 17, 2023

[redacted]

Hello [redacted]

Thank you for contacting us to provide your feedback as part of the review period for the draft Environmental Assessment (EA) Report for the Waasigan Transmission Line project.

Meaningful and open engagement is integral to the successful development of this critical line in northwestern Ontario. We have appreciated your participation and feedback over the past several months at each event, as part of the EA process. The feedback we have heard from community members like yourself throughout the EA and during the review period, including letters received, and meetings and correspondence with Neighbours on the Line, are captured in Appendix G of the Record of Consultation.

We remain committed to working closely with landowners to discuss mitigation measures. I would like to reiterate our open offer to schedule a meeting with your family, myself and key members of our Project team on your family property, to continue this important discussion so we can make efforts to identify solutions to mitigate your concerns. With respect to your comment about being displaced, our commitment to ensure that property owners who wish to stay in their homes will not be displaced, extends to ensuring landowners have meaningful mitigation options available to make a decision that is best for them. In some cases, landowners who qualify may opt for a full property buyout, and in other instances we have been working with property owners to identify mitigation measures. We remain committed to working with you and your family so that we may develop mitigation solutions.

With regards to herbicide use, through engagement during the EA process, we heard feedback from Indigenous communities and stakeholders like yourself, regarding concerns with the use of herbicides to remove and manage vegetation for the Project. After consideration of this feedback, herbicides will not be used during construction or for future maintenance of this new transmission line. The final EA Report has been updated to reflect this.

We appreciate your family's property has been and continues to be used and enjoyed by multi-generations, including for activities like horseback riding near the existing and proposed new line. To ensure there is enough space for the new transmission line, we have to create a new corridor that is approximately 46 metres wide, and this includes removing incompatible vegetation. We recognize the importance of the trees in this area from a visual aesthetic perspective and also the barrier it may provide for both wind and noise. As we continue our construction planning, we are committed to looking at opportunities to minimize the extent of removal and selectively cut or retain compatible species that will not encroach on the electrical clearances or safe operation and maintenance of the transmission line. We would be happy to review this in the context of your parents' property.
We appreciate you providing additional information about the historical qualities of your parents' property at 154 Wilf's Road. We have added an additional recommendation to the final EA Report as part of the Cultural Heritage Existing Conditions and Preliminary Heritage Impact Assessment (Appendix 7.6-A) to carry out a Cultural Heritage Evaluation Report (CHER) to further review cultural heritage value of this area and potential for additional mitigation measures. The CHER

would require a field visit by a cultural heritage specialist, which we would like to coordinate with your family.

We understand your parents have requested information about the environmental field studies completed on their property as part of a signed early-access agreement. Field studies are completed to help characterize the Project study area and supplement available desktop information. We have shared details of studies completed on your parents' property at that time in our response to them.

Additional environmental concerns raised:
To address additional concerns you raised related to potential impacts to the environment, we have provided more detail about the information included in the EA Report and the mitigation measures we will be implementing.

Erosion and Vegetation Removal
Vegetation removal refers to essential work to prevent unnecessary service interruptions, allow easy and safe access for our crews to perform emergency repairs, and to keep the corridor safe. With regards to your concern for erosion due to vegetation removal, as outlined in Section 6.4 of the EA Report, we will incorporate the following measures during and after construction to minimize potential effects: retaining low vegetation along the right-of-way where feasible; restricting stumping and grading to work areas and avoid on slopes; revegetating cleared areas following construction where necessary; minimizing grading near waterbodies, slopes and sensitive receptors; recontouring work areas following construction to restore drainage patterns and prevent erosion; monitoring soil conditions during construction and adapting work plans to avoid soil damage; replacing and regrading any removed soil in workspaces; protecting exposed soil from contamination, loss, mixing, or erosion; and, implementing post-construction monitoring and inspection to ensure that drainage and erosion control, and restoration efforts are effective.

Groundwater
With respect to your concern about the impact of the project on groundwater, Section 6.3 of the EA Report summarizes our evaluation of potential and net effects on groundwater in the Project area, including: assessing potential changes to groundwater quality and/or levels and flows due to spills, construction excavations and dewatering, blasting, vegetation clearing and construction of Project components, among other activities.
Mitigation measures we've identified to protect groundwater as captured in the EA report include: spill prevention through preventative maintenance and inspection of equipment; implementing procedures for emergency response, containment, clean-up, disposal, and reporting; use of designated refueling areas; providing secondary containment for all bulk fuel storage; and, equipping work areas and equipment with spill kits for spill response. Groundwater drinking water supply will be protected by avoiding construction below the groundwater table where practicable and regularly monitoring environmentally sensitive features, such as waterbodies and springs, during construction. For water supply wells located near the Project footprint, Hydro One and their contractor will work with private landowners, where requested, to identify wells with the potential to be affected by the Project, and recommend mitigation techniques to avoid or reduce those effects.

Watershed
Your family's property is part of the Kaministiquia River watershed, which was assessed and included in Section 6.2 of the EA Report. Potential impacts to waterbodies were evaluated and the following mitigation measures will be used to minimize impacts:

- Buffer zones of 30 m will be maintained around waterbodies, and clearing of riparian vegetation will be limited to the extent practicable and to the requirement of the access road

and alignment clearing width only. Clearing or disturbed areas within the 30 m buffer will be provided with maintained erosion and sediment controls.

- Refueling, service, and maintenance of vehicles and equipment will be carried out in designated areas at temporary construction camps and temporary laydown areas located a minimum of 120 m from waterbodies to the extent possible. These areas will be designed and constructed to collect and contain minor leaks and spills. If refueling within 120 m of a waterbody cannot be avoided, enhanced spill containment measures will be used. In the event that refueling, servicing and maintenance is required in the field, 120 m buffer will be respected to the extent possible.
- Water crossing structures will be designed and constructed in accordance with permits and approvals through regulatory bodies. Hydro One with their contractor will carefully design and construct water crossings to minimize potential adverse environmental effects resulting from changes to cross section hydraulics. Infrastructure will be designed to pass peak flows and maintain sufficient flow conveyance.
- Waterbody crossings will be minimized to the extent possible, by appropriate alignment of the right-of-way and access roads, and the use of existing roads and trails as much as possible.

Vegetation and Wildlife

Section 6.4 Vegetation and Wetlands and Section 6.5 Wildlife and Wildlife Habitat of the EA Report provide information on the Project study area about potential effects and recommended mitigation measures to limit adverse effects on the vegetation and wildlife. We appreciate that some of the plants noted in your letter, while regionally rare to the Thunder Bay area, are not plant species at risk or plant species of conservation concern. As such, these plant species are commonly found in upland and wetland ecosites, and they were assessed as part of the broader vegetation and wetlands assessment including the upland ecosystem, wetland ecosystem and riparian ecosystem. Potential effects and recommended mitigation measures are included in the EA Report to limit adverse effects on these ecosystems, including the plant species you noted. With regards to pileated woodpecker, this species has similar habitat needs as bat species, which were species included in the wildlife and wildlife habitat assessment. The assessment included potential effects and recommended mitigation measures for little brown myotis and northern myotis species, which also apply to pileated woodpecker. For example, if a pileated woodpecker nest cavity is encountered during construction, work will stop immediately and Environment and Climate Change Canada will be contacted to discuss next steps.

Route Selection Criteria

As previously discussed, the EA process is designed to assess the existing environment and mitigate potential effects before decisions are made about proceeding with a proposed project. As part of this process, we must ensure the selected route best balances all the criteria identified in the amended Terms of Reference, which sets out how route options are assessed and evaluated as part of the EA. These criteria and weightings were established using stakeholder feedback, including from members of the public and those who live in the study area, and reflect the diversity of interests and items of importance across the Project area. As noted in Section 2.3.3 of Appendix 2.0-A of the EA Report, the residence indicators under the land use criterion were given the highest weight and the land use criterion was given the highest weight in the socio-economic criteria category. Our assessment also included criteria that you have identified as important to you and your property (e.g., wildlife and wildlife habitat, vegetation and wetlands, surface water, groundwater, and recreation and tourism).

Electric Magnetic Fields (EMF)
With respect to EMF, recognized public health authorities such as Health Canada update their positions based on current science, while some existing historical local requirements remain in place in different municipalities. For instance, the City of Toronto requests a calculation for potential field exposure increases and have not aligned with updated Health Canada references. Historically, the City of Toronto uses a process called the EMF Management Plan, to calculate increased average exposures in relation to proximity of electrical services. Hydro One does not provide management plans, including for infrastructure in the City of Toronto, as Health Canada recommends there is no risk and all transmission lines are strictly installed to public safety standards. As previously discussed, for this Project, we retained Exponent Consulting, who are a multidisciplinary independent engineering and science consulting firm, to review and comment on any possible health impacts. Exponent Consulting concluded there is no evidence of adverse health effects caused by EMF at extremely low frequencies for both the existing and planned configuration of the Waasigan Transmission Line.

We would like to acknowledge your comments have been documented and included as part of the final EA Report that Hydro One has submitted to the Ministry of the Environment, Conservation and Parks (MECP) for review and approval. As part of Ontario's *Environmental Assessment Act*, the MECP is leading a public review and comment period for the final EA Report.

Thank you,

Bruce Hopper
Manager, Major Projects – Hydro One


1-877-345-6799


Community.Relations@HydroOne.com


HydroOne.com/Waasigan

ATTACHMENT 36
PUBLIC COMMENT 36 RESPONSE

[redacted]

June 14, 2023

To Whom it may Concern,

We are community members and property owners in the Kaministiquia Community, and we have been considered not impacted because the preferred Waasigan Transmission Line route is not directly crossing our property. We feel this is not true or a proper representation of the situation. One of our major concerns that we feel has not been addressed nor properly rectified by any type of written statement by Hydro One Networks Inc. is the concern about contamination of water outside of the 500 metre Environmental Assessment. We do not believe it is a fair or true presentation of how water veins work and the potential contamination to community water sources at large due to such impactful development. The maintenance chemicals will contaminate land, vegetation and wildlife along the current and potential new High Voltage Line.

We regularly forage for wild berries, mushrooms, wild onions, and herbs. This line drastically impacts the ability to use our land and community natural resources to practice my holistic lifestyle and care for our family. We moved here to this area to live off the land and sustain our health as a family and this directly affects this. When these lines are sprayed with chemical contaminants Hydro One cannot ensure where the wind takes these toxins, or where the surface and ground water drains, and they cannot control whether animals and wildlife consume these toxins. This in turn could contaminate our family if we hunt on our property which is our right to do so. This Waasigan TLP is of great cost to the entire community, and no where in this Draft EA is this recognized. The fact that communities and the wellbeing of our family is not considered in this EA appears to have serious complications with the legitimacy of the criteria used to develop and choose the WTLP route.

We will be challenging this Environmental Assessment Draft for what has been omitted and not satisfactorily addressed or rectified. [redacted]

[redacted]

November 17, 2023

[redacted]

Hello [redacted]

Thank you for contacting us to provide your feedback as part of the review period for the draft Environmental Assessment (EA) Report for the Waasigan Transmission Line project.

In 2019, we began an EA for the project under Ontario's *Environmental Assessment Act*. The process is designed to assess the existing environment and mitigate potential effects before decisions are made about proceeding with a proposed project.

When selecting a route for a new transmission line, it is important that the natural and socio-economic environments, technical and cost considerations, and Indigenous community values are considered. The preferred route best balances these criteria. We understand that community members may continue to have concerns, and we are committed to working with residents and landowners in a meaningful way.

For instance, we have committed to undertaking a biodiversity initiative specific to this project, which can help enhance communities around transmission line corridors. Examples include wetland and wildlife habitat creation and enhancement, aquatic habitat restoration and enhancement activities, or invasive species inventory or removal. Additional information on the biodiversity initiative will be available as we progress through the project and Hydro One will engage with Indigenous communities, local communities and interested parties to discuss its implementation.

Regarding your concern about the impact of herbicide use on groundwater, vegetation, wildlife and land use, through engagement during the EA process, we heard feedback from Indigenous communities and stakeholders, like yourselves, regarding the use of herbicides to remove and manage vegetation for the Project. After consideration of this feedback, herbicides will not be used during construction of the Project or for future maintenance of this new transmission line. The final Report has been updated to reflect this.

With respect to your concern about the impact of the project on groundwater, Section 6.3 of the EA Report summarizes our evaluation of potential and net effects on groundwater in the Project area, including: assessing potential changes to groundwater quality and/or levels and flows due to spills, construction excavations and dewatering, blasting, vegetation clearing and construction of Project components, among other activities. As noted in Section 6.3, the predicted radius of influence on groundwater from construction activities in not anticipated to extend beyond 500 m. The local study area is therefore considered to be large enough to encompass any measurable effects on groundwater.

Mitigation measures we've identified to protect groundwater as captured in the EA report include: spill prevention through preventative maintenance and inspection of equipment; implementing procedures for emergency response, containment, clean-up, disposal, and reporting; use of designated refueling areas; providing secondary containment for all bulk fuel storage; and, equipping work areas and equipment with spill kits for spill response. Groundwater drinking water supply will be protected by avoiding construction below the groundwater table where practicable

and regularly monitoring environmentally sensitive features, such as waterbodies and springs, during construction. For water supply wells located near the Project footprint, Hydro One and their contractor will work with private landowners where requested to identify wells with the potential to be affected by the Project, and recommend mitigation techniques to avoid or reduce those effects.

As a next step, your comments have been documented and included as part of the final EA Report that Hydro One has submitted to the Ministry of the Environment, Conservation and Parks (MECP) for review and approval. As part of Ontario's *Environmental Assessment Act*, the MECP is leading a public review and comment period for the final EA Report.

Thank you again for reaching out, I hope this information has been helpful.

Thank you,

Hydro One Community Relations

 1-877-345-6799

 Community.Relations@HydroOne.com

 HydroOne.com/Waasigan

ATTACHMENT 37
PUBLIC COMMENT 37 RESPONSE

June 14, 2023

[redacted]

[redacted]

As a 50 year resident of Kaministiquia I am very concerned about your choice of lies going directly though my community.

All together 750 homes are impacted either directly or indirectly. Directly by having our homes destroyed as the worst case or having our homes directly in the path of the lines and towers. Which is also destroying our health and well being. We feel dismissed as a community having not received fair notification i.e. first contact with Hydro One Wassigan in January, 2023 which is five months ago. This is poor treatment of our families, especially our elders and children.

It seems that only people with homes on the properties your wish to use are being contacted but that is not true. All of our community is affected. You are breaking a historical community into fragments of families who are being isolated from each other as you go door to door making offers that affect ALL of our lives.

We are concerned about the spraying of chemicals and the emissions (we all know there is danger but we do not yet know just how much) and the impact on our flora and fauna and of course the water sheds that keep our land nurtured.

Volunteer professions gave their time to research and propose an alternate route. You threw it out. Why? No families were impacted and yet you used your biased method to rate it unusable.

I want to hear back from you regarding my comments and concerns.

[redacted]

November 17, 2023

[redacted]

Hello [redacted]

Thank you for contacting us to provide your feedback as part of the review period for the draft Environmental Assessment (EA) Report for the Waasigan Transmission Line project.

Meaningful and open engagement is integral to the successful development of this critical line in northwestern Ontario. Since 2019, we have sought to engage and seek feedback from residents in the project area by advertising the project through newspaper and radio ads, targeted social media ads, Canada Post neighborhood mail and hosting in-person and virtual open houses. We have also engaged with the Ministry of Transportation since the beginning of the project and have since met with Local Roads Boards to understand concerns regarding potential effects to roads and construction activities.

We know that the selection of a route is a key project milestone where additional concerns may emerge. To better understand concerns we heard from community members in Kaministiquia and to find solutions to address them, we held community open houses, property owner information sessions and established a working committee to review and evaluate the route proposed by Neighbours on the Line. We committed to evaluating the route proposed by Neighbours on the Line using the same criteria and criteria weightings used to evaluate the alternative routes. These criteria and weightings were established using stakeholder feedback, including from members of the public and those who live within the study area, and reflect the diversity of interests and items of importance across the Project area. These categories included: natural environment, socio-economic environment, Indigenous community culture, values and land use, and technical and cost.

The evaluation concluded the route proposed by Neighbours on the Line, on balance, had less advantages compared to the preferred route. While the proposed route by Neighbours on the Line had more advantages within the socio-economic category as a result of less impact to private land and residential property by maximizing the use of Crown land, there were more disadvantages in the other three categories.

With regards to herbicide use, through engagement during the environmental assessment process, we heard feedback from Indigenous communities and stakeholders like yourselves, regarding concerns with the use of herbicides to remove and manage vegetation for the Project. After consideration of this feedback, herbicides will not be used during construction or for future maintenance of this new transmission line. The final EA Report has been updated to reflect this.

Lastly, we understand changes to our infrastructure can raise concern about electric and magnetic fields (EMF). With regards to health and safety, Hydro One has a dedicated team that regularly monitors global studies around EMF and ensures that our infrastructure is built and maintained following best practices and industry standards. We look to Health Canada, the World Health Organization and the International Commission on Non-Ionizing Radiation Protection, for guidance on EMF. Based on global studies which have and continue to be regularly monitored, these organizations indicate that members of the public do not need to take precautions to protect from

fields produced by extremely low frequencies such as transmission lines. For this project, we retained Exponent Consulting, who are a multidisciplinary independent engineering and science consulting firm, to review and comment on any possible health impacts. Exponent Consulting concluded there is no evidence of adverse health effects caused by EMF at extremely low frequencies for both the existing and planned configuration of the Waasigan Transmission Line. I have attached additional material with more information about EMF, and you may also be interested in reviewing what has been captured in the final EA Report in section 3.2.2.4. Regarding your comments about watersheds, you may be interested to review additional information about groundwater in Section 6.3 of the report.

As a next step, your comments have been documented and included as part of the final EA Report that Hydro One has submitted to the Ministry of the Environment, Conservation and Parks (MECP) for review and approval. As part of Ontario's *Environmental Assessment Act*, the MECP is leading a public review and comment period for the final EA Report.

Thank you again for providing your comments, I hope this information was helpful.

Thank you,

Hydro One Community Relations

 1-877-345-6799

 Community.Relations@HydroOne.com

 HydroOne.com/Waasigan

ATTACHMENT 38
PUBLIC COMMENT 38 RESPONSE

[redacted]

From: RELATIONS Community <Community.Relations@hydroone.com>
Sent: July 10, 2023 2:22 PM
To: Waasigan Project Folder Borealis [redacted]
Subject: FW: Waasigan Transmission Line Draft Environmental Assessment Comments
Attachments: Waasigan Draft EA comments.pdf

From: [redacted]
Sent: Monday, July 10, 2023 12:09 PM
To: [redacted]
Cc: RELATIONS Community <Community.Relations@HydroOne.com>
Subject: Waasigan Transmission Line Draft Environmental Assessment Comments

You don't often get email from [redacted] Learn why this is important

*** Exercise caution. This is an EXTERNAL email. DO NOT open attachments or click links from unknown senders or unexpected email. ***

Hi [redacted] (and Hydro One),

My apologies for the late submission. Hopefully the feedback can still be considered. Please note that I am submitting this feedback as an individual member of the public. Much of this feedback is a critical review of the EA process itself, although I do include some examples drawn from the Waasigan EA. I think the context here is important to consider as I am in a unique position with respect to environmental assessments associated with transmission line projects.

I am a natural resources practitioner (Registered Professional Forester) with environmental assessment knowledge and experience gained through academia and employment. Recent relevant experiences include:

- working on the EA for the Wataynikaneyap transmission line project from 2016 through 2020, as well as contributing to the EA for the East-West Tie transmission line project
- conducting a third-party environmental audit of Manitoba Hydro's Bipole III transmission line to assess the accuracy of the predictions made in the EA and effectiveness of mitigation
- working for a service provider to Wataynikaneyap Power from 2020 to 2023 through the construction of the project and into operations and maintenance. This included bearing witness to the implementation of the aforementioned EA

I think there are roles for all parties to play in improving the environmental assessment process in Ontario. This includes government holding proponents and their consultants accountable for producing rigorous and scientifically defensible EAs. An ancient Canadian EA guidebook written by Beanlands and Duinker in the 80s still has relevance today as a guide for EA. The document includes a commentary on the differing perspectives of the various parties to an EA (administrator, proponent and consultant) and how those play out in the process (see pages 22 &23):

- Administrator - Views EA as a fulfillment of required procedures set out in policy/legislation

- Proponent - Views EA as a hurdle to overcome on the path to project approval/licensing.
- EA Consultant - Views EA as a compromise between maintaining scientific/technical standards, and meeting demands of client (proponent) which are often requests to do the bare minimum required for regulatory approval (at the lowest cost)

I think it is important in particular for the government to be aware of these perspectives and review EAs in that context, keeping in mind the purpose of an EA: to promote environmentally responsible decision-making, including the management of environmental effects. I would argue that in the case of the Waasigan EA there is an additional perspective worthy of consideration - that of the construction contractor who has already been identified and therefore has the opportunity to influence the contents of the EA to better suit what they will ultimately be required to implement.

See attached my comments. Feel free to contact me for clarification or further discussion.

[redacted]

This environmental assessment (EA) - similar to other recent transmission line EAs – is inadequate in my opinion. Following are several key issues which build upon each other, as well as some examples. Note that examples are a small selection as I have not read the entire EA.

1. Criteria and Indicators form the basis of EA. Many of the chosen indicators in this EA are poor and do not meet globally (and cross-jurisdictionally) accepted "characteristics of good indicators" (see "a" below). Not enough specific information is provided on how these indicators are measured (see example at the end of this file). This is important so they can be re-measured in the future using the same methods to see if the project has had an effect.
    a. Characteristics of good indicators include: relevant (clearly linked to activities/outputs/outcomes), direct (closely measure change), reliable (consistently measured over time and across different data collectors), meaningful (represent important information), adequate (can measure change over time in such a way that it can be attributed to the project), practical (data collection cost, frequency and timelines must be realistic and achievable)
2. Determination of significance is not scientifically defensible. Rigorous assessments of significance should reference tangible and measurable limits for indicators including things like thresholds and ranges of natural variation. In the case of thresholds, arguably of most importance are thresholds of acceptance that have been identified by local stakeholders. In most cases, the "expert knowledge" of the EA practitioners which is used in the determination of significance is premised on (defended by) the fact that they included these same assumptions in successfully approved EAs in the past. There is little supporting evidence to suggest that any of the assumptions that are being made have been tested and proven. In most cases this is because comprehensive monitoring has not been carried out for similar projects in the past.
3. Proposed monitoring is woefully inadequate. While compliance monitoring is important, of equal (or possibly greater) importance is effectiveness monitoring, including for indicators where effects were deemed to be not significant. This is because those assessments of significance are based on assumptions of 100% compliance with mitigation AND 100% effectiveness of mitigation. In the absence of effectiveness monitoring, there is no way of knowing if mitigation is working. Given that comprehensive effectiveness monitoring has not been conducted on any of the other recent transmission line projects in northern Ontario, there is no available proof that these mitigation measures work. This is dangerous and renders the entire environmental assessment process to be a waste of time and money (i.e. cutting and pasting language into documents about what will be done and never checking to see if what you're doing is working). Environmental monitoring provides a great opportunity to incorporate the Indigenous worldview, perspective, and experiences into the EA process while also building capacity in Western scientific approaches to monitoring. These skills are transferable to a myriad of other projects and therefore well worth the investment.
    a. Example of monitoring inadequacy: Most bullets in the Monitoring section in Table 10.6-1 – for the criterion "Wildlife" are compliance monitoring bullets. The exception is the first bullet which is vague and of little value: "Hydro One and its contractor(s) will employ the services of qualified Environmental Inspector(s) to guide implementation, monitor and report on the effectiveness of the construction procedures and mitigation measures for minimizing potential impacts". What are they planning to monitor? How?

What data will they collect? What will they compare it to? How will they determine if there is an impact? None of these details are provided.

b. Another problem with not including comprehensive and specific effectiveness monitoring programs in an EA is that the current framework for funding of these projects is such that if something is not included as a specific "commitment" in an EA – in other words a regulatory requirement – it is difficult to make an argument later for including those costs in a rate application to the OEB which is the mechanism by which project costs get reimbursed. As an example, an EA determines that with all the proposed mitigation, there will be no significant effects to moose populations. Local stakeholder come forward during project construction complaining that there are no longer moose in the areas where they have always harvested moose. They blame the project. The proponent has no answer for them as they did not commit to set up monitoring programs for moose since effects on moose were deemed to not be significant. Since moose monitoring was not a regulatory commitment (there is no specific requirement in the Waasigan EA to monitor moose), it is not an easily approved cost to be added into a rate application. This contributes to never knowing if a project actually had an impact on a value, thereby defeating the purpose of an environmental assessment.

4. I think proponents need to know that it's ok to have some predicted significant impacts or to admit uncertainty. There are ways to account for that in the process – typically through the gathering of more data and/or testing of different mitigation measures, all in combination with comprehensive monitoring.

Here is a more detailed critique using a specific example of an indicator used in the Waasigan EA that is associated with a criterion that is important to many stakeholders including Indigenous and non-Indigenous populations.

Example - Moose

Criterion = Ungulates (Moose) - Sidenote: What about deer? Given that there are relationships between deer and moose, and both are managed differently in Canada and the nearby US, it would seem important to assess both as both reside in the study area. (Data provided in Appendix 6.4A show that there were more incidental deer observations during baseline data collection than there were incidental moose observations).

Indicator: Survival and Reproduction – It is not clear from the indicator title what exactly is being measured here; this is a problem.

Description of Baseline Condition – 6.5-29 – Again totally unclear what is being measured. What is the INDICATOR?!? This section includes minimal data relevant to the area. As stated, population and density estimates were not conducted as part of the EA. It is mentioned only that populations are declining in "the project study areas". Data listed for moose pregnancy rates in Ontario are from a study in Southern Ontario over a decade ago (Murray et al. 2012). There is no data in here that could constitute baseline data from which predictions could be made of the effects of THIS project on the survival and reproduction of moose in THIS area; nor could this data be used to compare with future data to determine if the project had an effect. This is not a good indicator.

Effects Assessment (Page 6.5-98) – The section on Survival and Reproduction does not include anything that links to the baseline data previously described. It speaks only to temporarily removing a bunch of habitat. Again, it is unclear what this indicator is meant to measure, and how the project relates to this.

Mitigation – 6.5-99 – It states that the effectiveness of mitigation will be evaluated but says nothing about how.

Net Effect- Despite having no baseline data, and a one sentence statement about habitat reduction, the assessment concludes that "a small decrease in survival and/or reproductive capacity is possible among affected individual moose with home ranges overlapping the wildlife and wildlife habitat LSA". No idea how they drew this conclusion (based on what?).

Net Effects Characterization and Significance Assessment – Now it is determined (and summarized on page 6.5-218) that a whole pile of things will have no significant effect on moose survival and reproduction despite having no local data on this, unclear methods, no relevant sources of directly relatable evidence, etc.

Happy to discuss further if desired.

[redacted]

November 17, 2023

[redacted]

Hello [redacted]

Thank you for contacting us to provide your feedback as part of the review period for the draft Environmental Assessment (EA) Report for the Waasigan Transmission Line project.

Hydro One takes its responsibility in completing environmental assessments seriously and aims to ensure quality work is produced. We acknowledge your interest in upholding a high standard in scientific rigor and continual improvement in the practice of this planning process.
In completing this assessment, we have been guided by compliance with the requirements and processes defined in the approved Amended Terms of Reference for the Project, where input from the public, agencies and Indigenous communities established the EA requirements for this Project. We continue to evolve and adapt the Project based on feedback from Indigenous communities, regulatory agencies and stakeholders within that process and have engaged our construction contractor in establishing mitigation commitments. As a recent example, through engagement during the EA process, we heard feedback from Indigenous communities and stakeholders regarding concerns with the use of herbicides to remove and manage vegetation for the Project. After consideration of this feedback, herbicides will not be used during construction of the Project or for future maintenance of this new transmission line. The final EA Report has been updated to reflect this.

Similarly, while we strive to avoid or reduce potential effects to the natural and socio-economic environments, Hydro One acknowledges that there may be adverse effects that cannot be avoided, or that occur even when appropriate mitigation and restoration measures are employed. Hydro One has committed to undertaking a biodiversity initiative specific to this project to offset habitat loss or transition (long-term change) that may occur as a result of the Project. This biodiversity initiative is not a mandatory requirement, but it is part of Hydro One's commitment to minimize adverse effects on the environment.

Definitions of indicators and measures for criteria to be used in the assessment of net effects were included in Appendix D of the Amended ToR. These indicators and measures were summarized in Section 5.0 and provided in the assessments for each environmental discipline section included in the EA Report. Through feedback on the draft EA Report relevant to specific criteria or indicators, clarifications have been added on how a number of indicators are represented. For example, the indicators for all wildlife criteria species include:

- Habitat availability (i.e., quantity and quality): changes to the amount of different quality habitats (e.g., hectares [ha]), and animal use of available habitat.
- Habitat distribution (i.e., arrangement and connectivity): changes to spatial configuration and connectivity of habitats (e.g., linear feature density), and the spatial distribution and movement of animals.
- Survival and reproduction: changes to animal abundance/wildlife populations from altering survival and/or recruitment.

Additional text was included in Section 6.5.3.2 of the final EA Report to clarify that moose was assessed with the following measures to inform the indicators: habitat availability uses calculated changes in area of habitat using the Habitat Suitability Index model; habitat distribution is measured using a visual interpretation of the distribution of suitable habitats, including SWH for moose and linear feature density calculations; survival and reproduction uses the measures of population status (MNRF abundance estimates and recruitment demographics; long terms studies of moose populations in northern Minnesota) and what is known about threats to their survival from literature reviews.

The determination of significance undertaken in this assessment is guided by the requirement and process under MNRF's Class EA for Resource Stewardship and Facility Development Projects (2002) and MECP's Class EA for Provincial Parks and Conservation Reserves (2015), which are both applicable to this Project. Criteria defined to characterize significance were summarized in Section 5.0 and provided in the assessments for each environmental discipline section included in the EA Report. It is recognized that criteria are used reflecting quantitative analysis thresholds and qualitative analysis, where a higher degree of professional judgement was applied to classifying outcomes. Within each environmental discipline assessment, a section on prediction confidence is provided that seeks to outline assumptions used in the assessment and how assumptions represent a conservative assessment outcome, with the outcome of potentially over-estimating rather than under-estimating potential effects in the event of uncertainty.

Regarding monitoring, we note that while a number of plans are identified that reflect the commitments made in the EA, ongoing participation and engagement of affected Indigenous communities will continue through the life of the Project. Section 10.0 of the EA Report notes that Hydro One commits to sharing the list of EA commitments defined for the Project and the associated monitoring framework (Sections 10.3 and 10.4) with Indigenous communities. The purpose of sharing and engaging on these proposed plans and commitments will be to provide communities with the opportunity to comment on and participate in the development of the monitoring and follow-up programs and plans. We are also committed to supporting Indigenous Environmental Monitors and/or Guardians and will collaborate with communities in implementing monitoring of Project-related effects and compliance monitoring throughout all Project stages through developing an Indigenous Monitoring Plan in collaboration with affected Indigenous communities.

The plans defined to guide implementation and monitoring for the Project include measures that seek to validate effectiveness of proposed mitigation and allow adjustments to reflect changed circumstances. For example, the wildlife and wildlife habitat assessment notes that vegetation clearing will be completed outside the wildlife restricted activity periods, to the extent practicable. The assessment then includes contingency measures if this clearing is done within those periods, including obtaining appropriate regulatory permitting that can include additional mitigation measures and/or habitat compensation requirements. The monitoring requirements outlined in the EA for the Project are based on the technical assessments completed in the EA and based on feedback from Indigenous communities, regulatory agencies and stakeholders. Monitoring requirements are adapted and even increased based on this feedback. For example, the monitoring requirements for surface water and fish and fish habitat were enhanced based on feedback from regulatory agencies on the draft EA Report. Similarly, the monitoring requirements for archaeological resources and built heritage and cultural heritage landscapes were updated based on regulatory feedback on the draft EA Report.

As a next step, your comments have been documented and included as part of the final EA Report that Hydro One has submitted to the Ministry of the Environment, Conservation and Parks (MECP)

for review and approval. As part of Ontario's *Environmental Assessment Act*, the MECP is leading a public review and comment period for the final EA Report.

Thank you,

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 HydroOne.com/Waasigan