

Lake Superior Link Transmission Project
Terms of Reference Record
of Consultation

Prepared for Hydro One Networks Inc.
August, 2018

Lake Superior Link Transmission Project

Record of Consultation (RoC) for the Terms of Reference

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Acronyms

AMIS	Abandoned Mines Information System
ANSI	Area of Natural and Scientific Interest
ARA	Archaeological Research Associates Ltd.
CAO	Chief Administrative Officer
CEAA 2012	Canadian Environmental Assessment Act 2012
CFA	Consultation Funding Agreement
CIC	Community Information Centre
EA	Environmental Assessment
EDC	Economic Development Corporation
EPP	Environmental Protection Plan
ESA	Environmentally Sensitive Area
EWT	East-West Tie
FAQs	Frequently Asked Questions
HHRA	Human Health Risk Assessment
Hydro One	Hydro One Networks Inc.
IESO	Independent Electricity System Operator
km	Kilometre
kV	Kilovolt
m	Metre
MNR	Ministry of Natural Resources and Forestry
MOECP	Ministry of the Environment, Conservation and Parks
NERC	North American Electric Reliability Corporation
NPCC	Northeast Power Coordinating Council
OEB	Ontario Energy Board
PNP	Pukaskwa National Park
PSW	Provincially Significant Wetland
REDB	Regional Economic Development Branch
RoC	Record of Consultation
ROW	Right-of-way
SLI	SNC-Lavalin
the Project	Lake Superior Link
TK	Traditional Knowledge
TLU	Traditional Land Use
ToR	Terms of Reference
TS	Transformer Station

1 Introduction

A Record of Consultation (RoC) is a component of an Individual Environmental Assessment (EA) Terms of Reference (ToR). This RoC describes the consultation and engagement activities that were conducted by Hydro One and the results of those activities, as required by Section 6(3) of the *Environmental Assessment Act*, during the preparation of the ToR for the Lake Superior Link project (“the Project”, LSL).

The Ministry of the Environment’s Code of Practice: Preparing and Reviewing Terms of Reference for Environmental Assessments in Ontario (2014) states that the RoC will:

- Identify persons consulted during the ToR preparation and how they were identified;
- Describe the consultation activities which took place;
- Describe how interested Indigenous communities were identified and how they were consulted;
- Clearly and accurately summarize the comments made by interested persons during the preparation of the ToR;
- Describe the proponent’s response and how concerns were considered in the development of the ToR;
- Describe outstanding concerns; and
- Document communication/ meetings held with interested persons, including copies of written comments received.

Hydro One conducted two separate consultation and engagement programs for the ToR; one for interested First Nations and Métis (Indigenous communities) and another for agencies, municipalities, interested groups and the general public. Indigenous communities were provided with the information prepared for the program to other stakeholders and were invited to participate in consultation activities under both programs. Details on the consultation programs proposed for the EA are documented in the ToR.

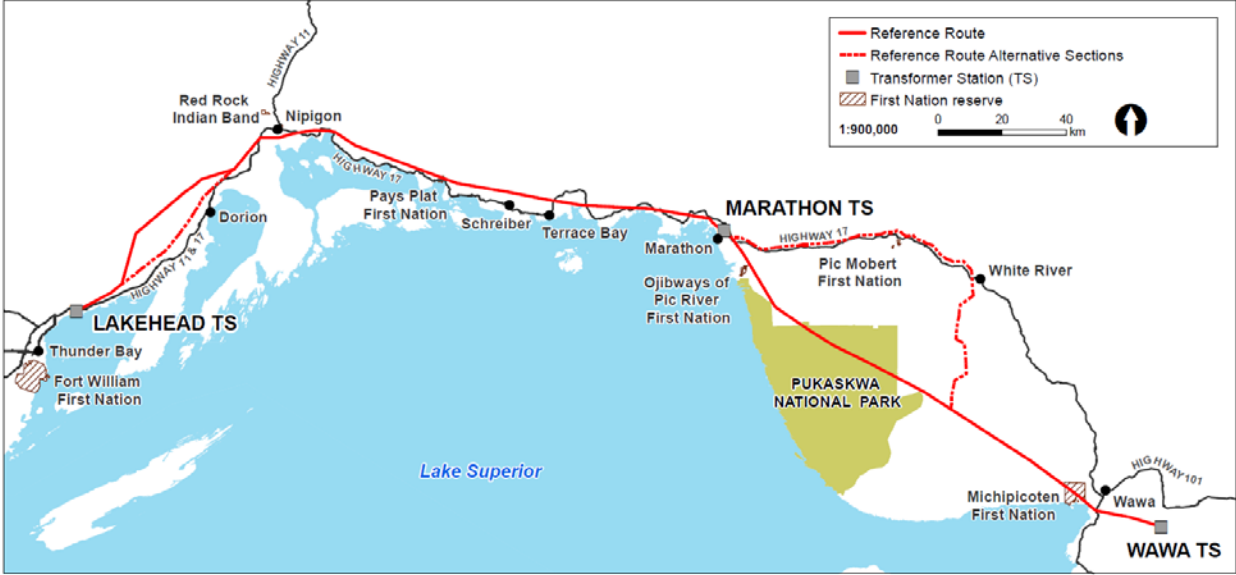
This section (Section 1) of the RoC provides an overview of the LSL project. Section 2 describes the consultation activities for agencies, municipalities and other interested persons/groups. Section 3 describes the activities to engage Indigenous communities. Section 4 provides a summary of the results of the consultation activities with respect to feedback and comments received from agencies, municipalities, general public and other interested persons/groups. Section 5 presents a summary of discussions and feedback received from Indigenous communities.

1.1 Project Overview

On February 15, 2018 Hydro One Networks Inc. (Hydro One) submitted a Section 92 Leave to Construct application to the Ontario Energy Board (OEB) seeking approval to construct, maintain and operate the new 230 kilovolt (kV) East-West Tie transmission line. Hydro One’s proposed project is known as the “Lake Superior Link” (the Project). The Project Reference Route is an approximately 400 kilometre (km) double-circuit 230 kV transmission line which would primarily be built on, or adjacent to, Hydro One’s existing East-West Tie transmission corridor between Lakehead Transformer Station (TS) in the Municipality of Shuniah, outside of Thunder Bay, and Wawa TS, east of Wawa. Within Pukaskwa

National Park (PNP), the existing towers would be renewed and replaced to accommodate four circuits without exceeding the existing corridor agreement. In addition to the Reference Route, two (2) preliminary Reference Route Alternatives are being considered as follows: a route around Pukaskwa National Park (PNP) and a route adjacent to the existing East-West Transmission Line right-of-way for approximately 50 km within the section between Nipigon and the Lakehead TS in Thunder Bay. The Reference Route and Reference Route Alternatives for the Project are shown in Figure 1.

Figure 1: Lake Superior Link Reference Route and Alternative Routes



The Project consists of the following components:

- > a new approximately 400 km long 230 kV transmission line connecting Lakehead TS to Wawa TS (with a connection at Marathon TS);
- > the relocation and replacement of structures on the existing 115 kV T1M and M24L transmission lines to avoid crossing of the existing 115 kV transmission lines and the new 230 kV double-circuit transmission line. The relocation of 115 kV T1M and M24L lines to address preliminary operation and maintenance concerns identified is subject to further analysis and confirmation;
- > temporary and permanent access roads;
- > storage, laydown and fly yards; and
- > construction camps.

Project activities include:

- > site preparation;
- > relocation and replacement of several existing T1M transmission line structures, if required;
- > construction of new access roads and upgrades to existing roads;
- > transportation and delivery of construction equipment and materials along the ROW;

- > construction of tower foundations, tower structure assembly and erection, and conductor stringing and tensioning;
- > tower modification of the existing structures within Pukaskwa National Park;
- > tie-in to existing transformer stations (Lakehead, Marathon and Wawa);
- > construction, demobilization and restoration; and
- > operation and maintenance of the new and modified transmission line.

The Project will comply with North American Electric Reliability Corporation (NERC), Northeast Power Coordinating Council (NPCC), and Independent Electricity System Operator (IESO) reliability standards.

1.2 Project Location

The general location of the Project and certain technical specifications have been determined by the OEB. Specifically, on December 20, 2011, the OEB issued an information package on the East-West Tie Line, Project Definition of Designation for the East-West Tie Line and Minimum Technical Requirements for the Reference Option of the East-West Tie Line, to electricity transmitters that registered to participate in the bid process for the new East-West Tie line. The information package provided a definition of the project for designation purposes, as well as the minimum technical project requirements.

The Project is located in the Province of Ontario and extends from the Municipality of Shuniah, near the City of Thunder Bay, to east of the Municipality of Wawa. The majority of the Project is located on provincial Crown land, with some sections within easements or fee simple rights to be acquired from private landowners.

1.3 Individual Environmental Assessment (EA)

On May 24, 2018 Hydro One issued a Notice of Commencement of Terms of Reference (ToR), signifying the initiation of an Individual EA process under the Ontario Environmental Assessment Act. A draft ToR was prepared and made available for public review and comment on June 11, 2018. A 30-day review period from June 11 to July 10, 2018 was provided to seek stakeholder feedback and input on the draft ToR.

To solicit additional input and comments from the public and stakeholders on the draft ToR and the project, Hydro One held a series of Community Information Centres (CICs) from June 11 to June 14, 2018. A total of nine (9) CICs were held in nine (9) municipalities spanning the project area. Notices advising of the CICs and providing event details were advertised in local area newspapers and radio outlets during the weeks of May 28th and June 4th, 2018. Notices were also emailed to the stakeholder contact list and sent via Canada Post AdMail to residents and businesses in the project area. A brief summary of the CICs and the comments received is described in the sections below.

Alongside the invitation to the public CICs held during the week of June 11 to 14, 2018, Hydro One offered each of the eighteen (18) Indigenous communities notified an opportunity to host a separate CIC

within their respective community to discuss the LSL project and the draft ToR. Four Indigenous communities accepted this offer and CICs were arranged and held within each respective community during the draft ToR review period.

On August 7, 2018, Hydro One issued a revised draft ToR for review and comment. A notice advising of the August 7 to August 21, 2018 review period was distributed to those stakeholders, Indigenous communities and individuals on the contact list. This notice included a link to the electronic version of the document made available on the Project website.

On August 22, 2018, Hydro One issued an email to municipalities, government agencies and Indigenous communities advising that the ToR was in the process of being finalized, and once finalized a copy would be issued to the Ministry of the Environment, Conservation and Parks (MECP) for their review. The email advised that both electronic and hard copies would also be made available for public and agency review and requested confirmation regarding the distribution and number of copies to be made available. The email also outlined the next steps in the process, should the ToR be approved by the MECP.

The ToR was submitted to MECP on August 31, 2018, with the formal 30 day review period beginning on September 7, 2018.

2 Consultation and Engagement Activities

This section provides an overview of the consultation and engagement activities that were completed over the course of development of the ToR with stakeholders and Indigenous communities. Comments and concerns received from stakeholders and Indigenous communities over this period are summarized in Sections 4 and 5. In addition, a summary of Indigenous community engagement activities is provided in Section 3.

A draft ToR was made available for review to the public, stakeholders and Indigenous communities from June 11 to July 10, 2018. During the consultation and engagement process for the draft ToR, Hydro One received a request from Garden River First Nation and Red Sky Métis Independent Nation for an extension to the review period. Hydro One responded to the request by providing an extension to July 26, 2018 for receipt of comments from these communities. Following review of the comments and feedback received from government agencies, Indigenous communities and other stakeholders, a revised draft ToR was issued on August 7, 2018. The review period for the revised draft ToR was August 7 to August 21, 2018. All comments received during these draft ToR review periods are documented in this RoC and will be submitted along with the ToR. Wherever possible, comments received were reviewed and addressed within the ToR.

The ToR will be submitted to MECP, and an additional review period led by MECP will begin on September 7, 2018. All stakeholders, Indigenous communities, and the public will be advised of the review period, as well as where copies of the ToR can be found for viewing.

2.1 Project Notification List

Prior to the issuance of a Notice of Commencement of ToR a contact list was prepared to identify all potentially interested or affected stakeholders and Indigenous communities who may have an interest in the Project. The preliminary contact list was not meant to serve as a complete document, as Hydro One recognizes that the project notification list is an iterative document that will evolve as the Project progresses through the Individual EA process. Identified in the preliminary project notification list are municipalities, provincial agencies, federal agencies, local residents, property owners, provincial/federal members of Parliament, and interested individuals and groups. Any person or group may ask to be added to the project notification list or removed if they no longer wish to receive notices. The stakeholders identified are briefly described below. The Indigenous communities contacted and engaged during the ToR are described in Section 3.

The preliminary project notification list, excluding interested individuals and property owners, is detailed in Appendix A of the RoC.

Provincial and federal agencies

A list of provincial and federal agencies that may have an interest in the Project was identified using the Ministry of the Environment, Conservation and Parks (MECP) Government Review Team list. As the Project progresses, the government contact list will be refined to remove agencies who express no

interest in the project or new agencies may be added who wish to be involved. Some of the key provincial and federal agencies identified in the project notification list include:

Provincial Agency	Federal Agency
Ministry of the Environment, Conservation and Parks	Environment and Climate Change Canada
Ministry of Natural Resources and Forestry	Parks Canada
Ministry of Energy, Northern Development and Mines	Nav Canada
Infrastructure Ontario	Transport Canada
Ministry of Transportation	Crown-Indigenous Relations and Northern Affairs Canada
Ontario Parks	Fisheries and Oceans Canada
Ministry of Tourism, Culture and Sport	

Municipalities

The proposed reference and alternative routes for the Project cross through and/or are located near ten (10) municipalities. Municipalities identified in the project notification list include:

City of Thunder Bay	Township of Schreiber
Municipality of Shuniah	Township of Terrace Bay
Township of Dorion	Town of Marathon
Township of Red Rock	Township of White River
Township of Nipigon	Municipality of Wawa

The contact list for each of the identified municipalities comprises of both elected municipal officials and key municipal staff such as CAOs, clerks, planning officials, economic development officers and public works staff.

In addition to the ten municipalities identified within the project notification list, the unincorporated communities of Rosspoint and Hurkett were also identified as potentially being affected by the Project. As these communities have no formal governance structure, the Local Services Boards were instead listed in the contact list for notification.

At the request of MECP following review of the Government Review Team List on August 23, 2018, the Township of Chapleau, as well as local/regional school boards has also been added to the notification list.

Should any additional municipalities or local services boards wish to be informed of the Project they will be added to the notification list upon request.

Property owners

The preliminary set of property owners anticipated to be directly affected by the Project have been identified and contacted by Hydro One real estate agents. As the project route is subject to possible refinements it is anticipated additional property owners will be identified as the project proceeds forward. In addition, permanent and temporary access routes have not yet been finalized. Once access routes have been confirmed, Hydro One real estate agents will contact property owners to discuss potential access agreements and/or acquisition agreements. Property owners will be added to the notification list upon request or upon identification.

Provincial and Federal members of Parliament

The East-West Tie Project has been identified by the Ministry of Energy, the OEB and the IESO as a priority project, as per an Order-in-Council issued by the Lieutenant Governor in Council on March 4, 2016. Given the importance of this proposed infrastructure to Northwestern Ontario, local provincial and federal members of Parliament have also been included in the contact list to ensure they are informed of the proposed Hydro One Lake Superior Link project.

Interested individuals

Interested individuals are members of the general public who have expressed, or may have, an interest in the Project. This can include, but is not limited to local residents, seasonal cottagers, trappers, or individuals from other jurisdictions. Interested individuals can be added to the notification list by either sending an email to Hydro One, contacting the telephone number for the project or by signing in at any of the public consultation events (e.g. Community Information Centres). As the project progresses, the notification list will be refined to include new contacts who express interest in being notified of project updates.

Interest groups

Interest groups consist of organizations, businesses or entities that may express an interest in the Project or may be affected. The project notification list looked to include a diverse array of interest groups who may have an interest in the Project. This includes, but is not limited to, chambers of commerce, local businesses, construction contractors, community groups, environmental organizations and recreational groups (e.g. fishing). As the project progresses, the notification list will be refined to include new contacts who express interest in being notified of Project updates or remove those with no expressed interest.

2.2 Notifications and Invitations

Notice of Commencement and Community Information Centre Invitation

On May 24, 2018 and during the week of May 28, 2018 Hydro One issued a Notice of Commencement of Terms of Reference and Invitation to Community Information Centres (CICs) for the Project. The notice was to stakeholders and Indigenous communities and was intended to serve two purposes. First, the

notice informed stakeholders and Indigenous communities that Hydro One had initiated the preparation of a draft ToR which outlines the framework and work plan for an Individual EA to be completed under the Ontario Environmental Assessment Act. Hydro One also noted that the draft ToR would be made available for stakeholders and Indigenous communities to review and provide comment. Second, the notice informed stakeholders and Indigenous communities of CICs scheduled for the week of June 11, 2018 which were intended to provide opportunity to discuss and provide input on the Project and ToR. The notice identified CIC meeting locations, dates and times.

Circulation of the notice included emails and letters sent to those identified stakeholders and Indigenous communities on the notification list, newspaper and radio advertisements, a Canada Post mail distribution to property owners, businesses and interest groups in each of the municipalities, and posting of the notice to Hydro One’s project website. The notification to municipalities also included an invitation to Council members and staff to “preview” the information to be presented at the CICs one hour in advance of the public session. The notice was produced and advertised in English and French, with both versions available on the project website. A copy of the notice distributed to stakeholders, as well as newspaper advertisements is included in Appendix A.

The Notice of Commencement of Terms of Reference and Invitation to CICs was published in several newspapers, as well as advertised on several radio stations. Publication of the Notice within newspapers and on the radio is identified in Tables 1 and 2 below.

Table 2.2-1: Notice of Commencement and CIC Invitation Newspaper Outlets and Publish Dates

Newspaper Outlet	Publish Date
Marathon Mercury (French and English)	May 29, 2018
	June 5, 2018
Nipigon Red Rock Gazette (French and English)	May 29, 2018
	June 5, 2018
Terrace Bay Schreiber News (French and English)	May 29, 2018
	June 5, 2018
Thunder Bay Chronicle (French and English)	June 2, 2018
	June 9, 2018
Thunder Bay Source (French and English)	May 31, 2018
	June 7, 2018
Wawa Algoma News (French and English)	May 30, 2018
	June 6, 2018
Wawa-News.com (French and English)	May 30, 2018 (for a month)

Table 2.2-2: Notice of Commencement and CIC Invitation Radio Outlets and Air Dates

Radio Outlet	Air Date
CFNO-FM and Thunder Bay	June 7 to June 10, 2018
	June 8 to June 11, 2018
	June 9 to June 12, 2018
CJSD-FM	June 7 to June 10, 2018

Radio Outlet	Air Date
	June 9 to June 12, 2018
CKPR-FM	June 7 to June 10, 2018
	June 9 to June 12, 2018
CKTG-FM	June 8 to June 11, 2018
CJUK-FM	June 8 to June 11, 2018
CJWA-FM	June 10 to June 13, 2018

Draft Terms of Reference – Request for Review

In consultation with MECP a draft ToR was made available for stakeholder and Indigenous communities review from June 11 to July 10, 2018, as a step in obtaining feedback on the framework for conducting the EA.

Notification letters and emails containing a link to the electronic version of the draft ToR available on the Hydro One project website were sent to stakeholders on June 11, 2018. In addition to the electronic version available online, hard copies of the draft ToR were made available for public viewing at each of the municipal offices identified in the notification list. Each of the eighteen (18) Indigenous communities was also sent a hard copy of the ToR, as well as a link to the electronic version for review and comment. A hard copy of the draft ToR will also made available to any stakeholder upon request.

Revised Draft Terms of Reference – Request for Review

Following review of the comments and feedback received from government agencies, Indigenous communities and other stakeholders during the June 11 – July 10, 2018 review period, a revised draft ToR was made available on August 7, 2018 for public review. The public review period for the revised draft ToR was from August 7 to August 21, 2018. The revised draft ToR included a record of consultation documenting responses to each of the comments received, and where any changes were made in the revised draft ToR.

Notification letters and emails containing a link to the electronic version of the revised draft ToR available on the Hydro One project website were sent to stakeholders on August 7 and 8, 2018. Each of the eighteen (18) Indigenous communities, were also sent a link to the electronic version for review and comment. Hard copies of the draft ToR will also made available to any stakeholder upon request.

Notice of Distribution of the Terms of Reference

Email notices were distributed by Hydro One to municipalities, government agencies, and Indigenous communities on August 22, 2018, advising of the distribution of the Terms of Reference, once completed. This notice advised that the ToR will be submitted to the Ministry of the Environment, Conservation and Parks for review, with hard copies and electronic copies being made available for public and agency review.

The notice requested confirmation regarding distribution requirements, and the number of hard copies to be made available and advised recipients of the next step in the EA process should the ToR be approved by MECP.

2.3 Project Website and Frequently Asked Questions

At the onset of the Project Hydro One created a dedicated webpage, www.HydroOne.com/LakeSuperiorLink, to provide stakeholders and Indigenous communities information on the Project, notice of any upcoming activities and consultation events, and access to key documentation. All public notices/invitations, CIC panels and other relevant documents (e.g. EA documents) are posted on the website to provide stakeholders and Indigenous communities ease of access to Project information. In addition, the website contains a list of frequently asked questions (FAQs) and also provides interested individuals contact information should they have any questions or comments on the Project. The website is regularly updated to ensure all relevant documentation is made available to stakeholders and to provide information/notices in a timely manner.

The list of FAQs on the Project website was developed to address common questions received at the onset of the Project. Over time the FAQs may be revised to address any additional common questions received. The current FAQs addressed on the webpage are:

- > What is Hydro One doing;
- > What is the Lake Superior Link project;
- > Hasn't this project already been awarded to another company;
- > Why is Hydro One doing this;
- > How will this benefit customers and northern communities;
- > How much will the project cost and who is paying for it;
- > How will Hydro One engage local communities; and
- > How can I get involved?

Responses to each of the FAQs are provided in Appendix C.

2.4 Hydro One Community Relations Email and Telephone Number

Hydro One has a dedicated Community Relations telephone number, 1-877-345-6799, which any interested individual can call to speak with Hydro One Community Relations staff during regular business hours or leave a voice message at any time. All messages left for the Project are reviewed and documented to ensure appropriate follow-up is completed.

In addition to a dedicated Community Relations telephone number, any interested individual can direct any inquiries they may have on the Project to the Community Relations email address Community.Relations@HydroOne.com. Emails specific to the Project will be reviewed and forwarded to

the appropriate staff for action. All emails received for the Project are documented to ensure appropriate follow-up is completed.

Both the Community Relations email and telephone number are available on the Project website. This contact information has also been made available on all Project notifications, handouts and at each of the CICs.

2.5 Agency and Municipal Consultation

Municipalities and government agencies were contacted at the onset of the Project (i.e. filing of Ontario Energy Board Leave to Construct application, Section 92 filing) and during preparation of the ToR to discuss any questions or concerns agencies or municipalities may have. A brief summary of the consultation activities completed during the preparation of the ToR and during the draft ToR review period are documented below.

Municipal Consultation

On May 28, 2018, Hydro One sent a Notice of Commencement of Terms of Reference and Invitation to CICs for the Project to each of the municipalities identified in the notification list. Municipal officials were invited to attend the CICs scheduled during the week of June 11, 2018 to discuss the Project and draft ToR. The notification to municipalities also included an invitation to Council members and staff to “preview” the information one hour in advance of the public session. Notification emails containing a link to the electronic version of the draft ToR available on the Hydro One project website were sent to municipalities on June 11, 2018. In addition to the electronic version available online, hard copies of the draft ToR were made available for public viewing at each of the municipal offices identified in the notification list. A summary of the CICs is provided in Section 2.7.

Municipal officials were in attendance at some of the CICs held within their respective communities. Members of council from the City of Thunder Bay, Township of Nipigon and Township of Terrace Bay attended CICs held within their respective communities on June 11, 2018 and June 13, 2018. Similarly, the Mayors of Schreiber and White River attended CICs within their respective communities held on June 13, 2018 and June 14, 2018. At these sessions, Hydro One staff provided municipal officials a brief overview of the CIC panels and addressed questions raised. No comments pertaining to the ToR at that time were provided.

On August 14, 2018, Hydro One met with the Township of Dorion Reeve and Council to present an update of the LSL project and to discuss the revised draft ToR. Hydro One provided an overview of the Project and discussed the inclusion of the alternative route through the Dorion/Loon Lake area. The presentation provided was well received and members of council indicated they would attend the upcoming CIC to discuss the routing alternatives to be considered in the EA.

Copies of the notifications sent to municipalities are included in Appendix B. Comments and questions provided by municipalities are identified in Section 4.

Government Agency Consultation

In addition to the notifications described in Section 2.2, meetings and conference calls were arranged with government agencies to discuss the draft ToR. A brief summary of these communications is provided below.

On May 30, 2018, Hydro One met with the MECP to discuss the Project schedule, draft ToR and Individual EA process. Hydro One provided MECP a tentative schedule outlining key milestones and submission dates. MECP was asked to provide comments on the schedule and discuss any questions, comments or concerns. Hydro One also discussed the ToR and the upcoming submission. In discussion with MECP it was agreed that providing a draft ToR to stakeholders and Indigenous communities for review prior to submission was a critical step to obtaining feedback on the framework for conducting the EA. A draft ToR was made available for stakeholders and Indigenous communities review from June 11 to July 10, 2018.

Key provincial and federal government agencies such as MECP, MNRF, Environment and Climate Change Canada, Ministry of Energy, Canadian Environmental Assessment Agency and Ministry of Northern Development and Mines were contacted in advance of the draft ToR release on June 8, 2018 to provide notice of the document release and to offer an opportunity to discuss both the Project and draft ToR. No requests for meetings or follow-up were received.

On June 15, 2018 Hydro One held a teleconference with MNRF where it provided an update on the Project and discussed the draft ToR. MNRF confirmed that it would review the draft ToR and provide comments to Hydro One for consideration in the ToR.

On July 12, 2018 Hydro One met with MECP to provide updates on Indigenous engagement, the field program, the draft ToR submission process and the assessment of alternatives. MECP suggested that a revised draft ToR be prepared and shared with those interested parties who provided comments to demonstrate how their concerns were addressed in the draft ToR. MECP stated it would provide Hydro One a formal letter identifying the recommendation following the meeting on the next steps in developing and submitting the ToR.

On July 17, 2018 Hydro One received a letter from MECP suggesting that consideration be given to circulating a revised draft ToR based on their review of the draft ToR and/or notifying government agencies and Indigenous communities who provided comments should Hydro One elect to substantially revise the document. MECP asked Hydro One to confirm its path forward on the submission of the final Terms of Reference. On July 19, 2018 Hydro One sent a letter to MECP to confirm it would like to retract its initial letter of intent to submit the final ToR for the Project and provided a revised date for submission to allow for further development of the ToR. Hydro One confirmed it intended to submit a revised draft ToR to MECP for review. Hydro One also noted it intended to submit the ToR for the Project by August 31, 2018.

On August 21, 2018, Hydro One met with MECP to provide updates on Indigenous engagement, the baseline field program, the ToR submission process and the assessment of alternatives. Hydro One

confirmed the ToR would be submitted to MECP on August 31, 2018, with the formal 30 day review period beginning on September 7, 2018. MECP confirmed submission requirements and noted comments on the revised draft ToR would be provided to Hydro One by August 27, 2018. Hydro One agreed to provide stakeholders and Indigenous communities copies of the ToR and supporting documentation two days prior to the formal review period.

On August 23, 2018 Hydro One held a teleconference with MNRF where it provided an update on the Project and discussed the draft ToR. MNRF confirmed that it had no additional comments on the draft ToR at that time. Hydro One informed MNRF that the formal review period would provide an additional 30 days for the ToR and supporting documentation to be reviewed.

The following government agencies have provided correspondence either requesting to be removed from the Project contact list or only to be contacted if an authorization or approval for the Project may be required:

- > Canadian Environmental Assessment Agency;
- > Department of Fisheries and Oceans;
- > Health Canada;
- > Ministry of Municipal Affairs and Housing;
- > Natural Resources Canada; and
- > Transport Canada.

No additional meetings with government agencies pertaining to the ToR were held. Correspondence and available meeting minutes with government agencies is provided in Appendix D.

Parks Canada

In late 2017, Hydro One initiated dialogue with Parks Canada to discuss the potential of alteration and renewal of the existing transmission line through Pukaskwa National Park to increase power transfer capacity by accommodating four circuits without widening the corridor. Hydro One met with Parks Canada staff in September and November 2017 to provide an overview of the proposed work and to discuss requirements for the renewal of the existing license of occupation and modification of license needed for any proposed infrastructure renewal.

On November 27, 2017, Hydro One received a letter from Parks Canada, following introductory meetings held, providing confirmation that it was not opposed to the Project in principle. Parks Canada noted it was prepared to continue to consider the Hydro One request. From regulatory perspective Parks Canada confirmed that a Detailed Impact Assessment under Section 67 of Canadian Environmental Assessment Act (2012) is required for the proposed infrastructure renewal work and a renewal of the licence of occupation.

Following the letter received on November 27, 2017, Hydro One has continued to meet with Parks Canada on a regular basis with the objective to provide updates on the Project (e.g. field program and

Indigenous engagement), initiate process to secure park access for environmental baseline surveys and to discuss Section 67 requirements under CEAA 2012. Formal meetings held to date are as follows:

- > April 12, 2018 – Teleconference;
- > May 17, 2018 – Teleconference;
- > June 5, 2018 – In-Person Meeting; and
- > August 23, 2018 - Teleconference.

On July 9, 2018, Parks Canada submitted comments on the draft ToR. In addition to the comments provided, Parks Canada reconfirmed that a Detailed Impact Assessment would be required to meet Section 67 requirements under CEAA 2012. Hydro One will continue to engage Parks Canada to provide updates on the Project and ensure all regulatory requirements are fulfilled.

Correspondence and available meeting minutes pertaining to Parks Canada are presented in Appendix D.

2.6 Public Consultation

Property owners, interest groups and members of the public were sent the Notice of Commencement of Terms of Reference and Invitation to CICs for the Project. These stakeholders were invited to attend the CICs to discuss any concerns or questions about the Project. Prior to some of the CIC meetings held during the week of June 11, 2018, Hydro One staff met with three (3) municipal Economic Development Corporations (EDCs) to discuss the Project. Meetings held were as follows:

- > Thunder Bay EDC – June 11, 2018;
- > Nipigon EDC – June 12, 2018; and
- > Wawa EDC – June 14, 2018.

Summaries from each of the meetings are provided below.

Thunder Bay EDC

On June 11, 2018, Hydro One staff met with the Thunder Bay EDC to discuss the Project. Hydro One provided an overview of the project and provided the EDC an opportunity to discuss any questions or concerns on the Project. The Thunder Bay EDC was well versed with the Project and the need and benefits that the expansion of the transmission system would bring to the region and City of Thunder Bay. The discussion was primarily focused on the Project providing supply and capacity to the region, which would in turn support economic growth and development (e.g. mines, smelters and saw mills). Questions received were primarily focused on system reliability and other transmission lines in the region.

Nipigon EDC

On June 12, 2018, Hydro One staff met with the Nipigon EDC to discuss the Project. Hydro One provided an overview of the project and provided the EDC the opportunity to discuss any questions or concerns on the Project. The Nipigon EDC inquired and asked questions regarding the difference between Hydro One's and NextBridge's proposed projects; why Hydro One submitted a Leave to Construct application to OEB now; and what opportunities were available for community engagement and sponsorship/investment. Hydro One explained the differences between the two projects and provided reasoning for the submission of the Leave to Construct application. In addition, potential community investment and event sponsorship opportunities were discussed.

Wawa EDC

On June 14, 2018, Hydro One staff met with the Wawa EDC to discuss the Project. Hydro One provided an overview of the project and provided the EDC the opportunity to discuss any questions or concerns on the Project. The Wawa EDC expressed its appreciation to Hydro One for reaching out and maintaining open lines of communication. The discussion was primarily focused on the Project work schedule and use of local resources (e.g. staffing, accommodation, catering, etc.) during the construction phase. Hydro One agreed to maximize use of local resources throughout the Project area where possible and to share additional project details on schedule and work locations once available.

Stakeholders representing a variety of interest groups attended the CICs held during the week of June 11, 2018. This included members from the following groups:

- > Trappers;
- > Property Owners;
- > Cottage Association;
- > Naturalist Club;
- > Economic Development Corporation;
- > Local Union;
- > Ski Club; and
- > Local vendors seeking procurement opportunities.

Comments and responses provided are identified in Section 4.3.

2.7 Community Information Centre Summary

A brief description of each of the CIC sessions held during the week of June 11, 2018 is provided below. Stakeholder comments received during each of the sessions and the responses provided are documented in Section 4. A copy of the CIC panels presented in each of the sessions is located in Appendix E.

City of Thunder Bay CIC

On June 11, 2018, Hydro One held a CIC at the Valhalla Inn in the City of Thunder Bay from 5:00 pm to 7:30 pm to discuss the Project and the draft ToR. The CIC was a drop-in style session, where panel displays were presented providing information on the Project and ToR process. Staff from Hydro One and its design and construction partner SNC-Lavalin were available to discuss and provide responses to any questions or concerns raised by participants at the session. A copy of the draft ToR was made available at the CIC for review by attendees.

A total of twenty-one (21) stakeholders attended the session. No formal comment forms were received at the event. A majority of the verbal questions and concerns were related to the regulatory approval process for the Project and potential impacts to private property.

Township of Nipigon CIC

On June 11, 2018, Hydro One held a CIC at the Royal Canadian Legion Branch 32 in the Township of Nipigon from 5:00 pm to 7:30 pm to discuss the Project and the draft ToR. The CIC was a drop-in style session, where display panels were presented providing information on the Project and ToR process. Staff from Hydro One and its design and construction partner SNC-Lavalin were available to discuss and provide responses to any questions or concerns raised by participants at the session. A copy of the draft ToR was made available at the CIC for review by attendees.

A total of eighteen (18) stakeholders attended the session and two (2) comment forms were completed and received at the event. A majority of the questions and concerns were related to the regulatory approval process for the Project, visual impacts of towers and potential impacts to private property.

Township Red Rock CIC

On June 12, 2018, Hydro One held a CIC at the Royal Canadian Legion Branch 226 in the Township of Red Rock from 12:00 pm to 2:00 pm to discuss the Project and the draft ToR. The CIC was a drop-in style session, where display panels were presented providing information on the Project and ToR process. Staff from Hydro One and its design and construction partner SNC-Lavalin were available to discuss and provide responses to any questions or concerns raised by participants at the session. A copy of the draft ToR was made available at the CIC for review by attendees.

A total of six (6) stakeholders attended the session and one (1) comment form was completed and received at the event. A majority of the questions and concerns were related to the regulatory approval process for the Project and potential impacts to private property.

Township of Dorion CIC

On June 12, 2018, Hydro One held a CIC at the Dorion Community Centre in the Township of Dorion from 5:00 pm to 7:30 pm to discuss the Project and the draft ToR. The CIC was a drop-in style session, where display panels were presented providing information on the Project and ToR process. Staff from Hydro One and its design and construction partner SNC-Lavalin were available to discuss and provide

responses to any questions or concerns raised by participants at the session. A copy of the draft ToR was made available at the CIC for review by attendees.

A total of eight (8) stakeholders attended the session. No comment forms were received at the event. A majority of the questions and concerns were related to the regulatory approval process for the Project, potential impacts to private property and consultation with Indigenous communities.

Township of Terrace Bay CIC

On June 12, 2018, Hydro One held a CIC at the Terrace Bay Cultural Centre in the Township of Terrace Bay from 5:00 pm to 7:30 pm to discuss the Project and the draft ToR. The CIC was a drop-in style session, where display panels were presented providing information on the Project and ToR process. Staff from Hydro One and its design and construction partner SNC-Lavalin were available to discuss and provide responses to any questions or concerns raised by participants at the session. A copy of the draft ToR was made available at the CIC for review by attendees.

A total of four (4) stakeholders attended the session. No comment forms were received at the event. A majority of the verbal questions and concerns were related to the regulatory approval process for the Project, opportunities for local economic development and potential impacts to private property.

Township of Schreiber CIC

On June 13, 2018, Hydro One held a CIC at the Schreiber Municipal Gym in the Township of Schreiber from 5:00 pm to 7:30 pm to discuss the Project and the draft ToR. The CIC was a drop-in style session, where display panels were presented providing information on the Project and ToR process. Staff from Hydro One and its design and construction partner SNC-Lavalin were available to discuss and provide responses to any questions or concerns raised by participants at the session. A copy of the draft ToR was made available at the CIC for review by attendees.

A total of seven (7) stakeholders attended the session. No comment forms were received at the event. A majority of the questions and concerns were related to the regulatory approvals processes and potential impacts to property.

During the CIC, the President of the Jackfish Métis Association requested a separate meeting with Hydro One staff on the Project. The President of the Jackfish Métis Association stated that he would appreciate respect and acknowledgement from Hydro One to recognize and consult his community, which has a strong presence in the Schreiber area. The President noted that his community had concerns with potential effects of the Project on moose movement corridors in the Schreiber area and existing trap lines. The President requested that continuous access to traplines be maintained throughout the project. The President also indicated that his community objects to the laydown areas proposed by others with a similar project proposal. There was no expressed objection to Hydro One's proposed laydown areas following review of the proposed locations at the session. The President generally expressed support for Hydro One's Project because: (1) it would result in less environmental impact compared to others with a similar project; and (2) Hydro One has a reputation as a good system

operator. The President requested that Hydro One continue to provide updates on the Project as the planning process progresses.

Town of Marathon

On June 13, 2018, Hydro One held a CIC at the Marathon Centre Mall in the Town of Marathon from 2:00 pm to 7:00 pm to discuss the Project and the draft ToR. The CIC was a drop-in style session, where display panels were presented providing information on the Project and ToR process. Staff from Hydro One and its design and construction partner SNC-Lavalin were available to discuss and provide responses to any questions or concerns raised by participants at the session. A copy of the draft ToR was made available at the CIC for review by attendees.

A total of eight (8) stakeholders attended the session. No comment forms were received at the event. A majority of the questions and concerns were related to the regulatory approval process and potential impacts to property.

Township of White River

On June 14, 2018, Hydro One held a CIC at the White River Community Centre in the Township of White River from 5:00 pm to 7:30 pm to discuss the Project and the draft ToR. The CIC was a drop-in style session, where display panels were presented providing information on the Project and ToR process. Staff from Hydro One and its design and construction partner SNC-Lavalin were available to discuss and provide responses to any questions or concerns raised by participants at the session. A copy of the draft ToR was made available at the CIC for review by attendees.

A total of five (5) stakeholders attended the session. No comment forms were received at the event. A majority of the questions and concerns were related to the regulatory approvals processes, the alternative route around Pukaskwa National Park and potential impacts to property.

Municipality of Wawa

On June 14, 2018, Hydro One held a CIC at the Royal Canadian Legion Branch 429 in the Municipality of Wawa from 5:00 pm to 7:30 pm to discuss the Project and the draft ToR. The CIC was a drop-in style session, where display panels were presented providing information on the Project and ToR process. Staff from Hydro One and its design and construction partner SNC-Lavalin were available to discuss and provide responses to any questions or concerns raised by participants at the session. A copy of the draft ToR was made available at the CIC for review by attendees.

A total of seven (7) stakeholders attended the session and one (1) comment form was completed and received at the event. A majority of the questions and concerns were related to the regulatory approval process for the Project, tower and right-of-way width details for the line and potential impacts to property.

2.8 Draft Terms of Reference Consultation

As part of the consultation undertaken for the ToR, a draft ToR was made available for stakeholder review from June 11 to July 10, 2018.

Notification letters and emails containing a link to the electronic version of the draft ToR available on the Hydro One project website were sent to stakeholders on June 11, 2018. In addition to the electronic version, hard copies of the draft ToR were made available for public viewing at each of the municipal offices identified on the notification list. Hard copies of the ToR and a link to the electronic copy were also sent to each of the eighteen (18) Indigenous communities for their review and comment. A hard copy of the draft ToR was also made available to any stakeholder upon request.

Following review of the comments and feedback received from government agencies, Indigenous communities and other stakeholders a revised draft ToR was made available for public review August 7 to August 21, 2018. The revised draft ToR included a record of consultation documenting responses to each of the comments received and where changes, if required, were made in the revised draft ToR.

Notification letters and emails containing a link to the electronic version of the revised draft ToR available on the Hydro One project website were sent to stakeholders on August 7 and 8, 2018. Each of the eighteen (18) Indigenous communities were also sent a link to the electronic version for review and comment. A hard copy of the draft ToR will also made available to any stakeholder upon request.

All comments received from stakeholders and Indigenous communities throughout the review periods and prior to submission were assessed to consider whether the ToR required revision prior to submission to MECP.

Comments were received from the following stakeholders and Indigenous communities:

June 13, 2018 – Red Sky Métis Independent Nation

June 18, 2018 – Red Rock Indian Band

July 6, 2018 – Ministry of Energy, Northern Development and Mines

July 9, 2018 – Parks Canada, Pukaskwa National Park

July 10, 2018 – Township of Dorion

July 10, 2018 – Biigtigong Nishnaabeg (Ojibways of the Pic River First Nation)

July 12, 2018 – Environment and Climate Change Canada

July 13, 2018 – Ministry of Tourism, Culture and Sport

July 20, 2018 – Ministry of Natural Resources and Forestry

July 26, 2018 – Ministry of the Environment, Conservation and Parks

July 27, 2018 – Red Sky Métis Independent Nation

August 8, 2018 – Michipicoten First Nation

August 19, 2018 – Local Resident

August 19, 2018 – Local Resident

August 21, 2018 – Parks Canada, Pukaskwa National Park

August 21, 2018 – East Loon Lake Campers' Association

August 21, 2018 – Township of Dorion

August 21, 2018 – Wildlands League

August 21, 2018 – West Loon Lake Campers' Association

August 21, 2018 – Township of Dorion

August 21, 2018 – Dorion Concerned Citizens Group

August 27, 2018 – Ministry of the Environment, Conservation and Parks

Responses to comments and/or questions received by stakeholders are identified in Section 4. Similarly, responses to comments and/or questions received by Indigenous communities are identified in Section 5.

On August 22, 2018, Hydro One issued an email to municipalities, government agencies and Indigenous communities advising that the ToR was in the process of being finalized, and once completed would be issued to the MECP for review. During this review period, the ToR would be available for public and stakeholder review/comment. The email requested confirmation regarding the number of electronic and hard copies to be made available for review, and advise of the next steps should the MECP approve the ToR.

The ToR was submitted to MECP on August 31, 2018, with the formal 30 day review period beginning on September 7, 2018.

3 Indigenous Community Engagement

3.1 Letter of Delegation

Indigenous communities

On March 2, 2018, Hydro One received a Duty to Consult letter from the Ministry of Energy identifying eighteen (18) Indigenous communities that are to be consulted for the proposed Project. Based on the Ministry of Energy's assessment, the following Indigenous communities were identified as needing to be consulted on the basis that they have, or may have, constitutionally protected Aboriginal or treaty rights that may be adversely affected by the Project:

Animbiigoo Zaagi'igan Anishinaabek First Nation (Lake Nipigon Ojibway)	Ojibways of Batchewana
Biinjitiwaabik Zaaging Anishinaabek First Nation (Rocky Bay)	Ojibways of Garden River
Biigitgong Nishnaabeg (Ojibways of the Pic River First Nation)	Pays Plat First Nation
Bingwi Neyaashi Anishinaabek (Sand Point First Nation)	Pic Mobert First Nation
Fort William First Nation	Red Rock Indian Band (Lake Helen)
Ginoogaming First Nation	MNO Greenstone Métis Council
Long Lake No. 58 First Nation	Red Sky Métis Independent Nation
Michipicoten First Nation	MNO Superior North Shore Métis Council
Missanabie Cree First Nation	MNO Thunder Bay Métis Council

Hydro One recognizes the importance of consultation with Indigenous communities. Hydro One, together with its construction partner, SNC-Lavalin Inc., will undertake consultation on all aspects of the Project, including the portion that goes through PNP.

The Hydro One's Indigenous engagement program is designed to provide relevant project information to Indigenous communities in a timely manner. The process enables affected Indigenous communities to review, consider and raise issues, concerns and questions they may have with the Project and the ToR that's intended to guide the EA. The process also allows for Hydro One to respond clearly and transparently to any concerns or questions raised.

3.2 Other Notifications

In addition to the notifications of the ToR provided to Indigenous communities identified in Section 2.2, invitations to participate and/or notify communities of environmental baseline field surveys/studies to support the EA were sent to each of the eighteen (18) Indigenous communities as described below.

Notice of Commencement and Invitation to Participate in Field Studies

On May 18, 2018, Hydro One issued a Notice of Commencement and Invitation to Participate in Field Studies to Indigenous communities. Hydro One informed each of the communities that it was intending on commencing with environmental field studies in support of an EA for the Project. Hydro One offered an invitation to meet with each community to discuss implementation of the environmental field studies and to discuss whether communities were interested in participating in the proposed field work. Each Indigenous community was asked to contact Hydro One to discuss participation and/or any inquiries they may have in relation to the field studies planned.

Archaeological Consultant Introduction and Invitation to Participate in Archaeological Studies

On June 29, 2018, Hydro One's archaeological consultant, Archaeological Research Associates Ltd. (ARA), sent an introduction letter to each of the eighteen (18) Indigenous communities with an invitation to participate in the planned Stage 1 and 2 archaeological assessments within their Treaty and Traditional Territory. This letter also respectfully requested information from communities, at their discretion, regarding cultural heritage resources for inclusion and consideration in the archaeological assessment. Indigenous communities were asked to contact ARA to confirm interest in participating and/or if there were any further questions on the proposed archaeological program.

Capacity Funding Agreement (CFA)

Hydro One has sent each of the eighteen (18) Indigenous communities a copy of the proposed CFA prepared for the Project. The CFA is meant to address the following aspects with communities:

- > Outline an agreed-upon method of consultation and engagement, taking into account community protocols and practices;
- > Outline a jointly agreed upon work plan and budget for each community to be meaningfully consulted on the project, including adequate capacity and resourcing to participate;
- > Identify a community consultation coordinator or similar position; and
- > Outline a process for the sharing of information regarding the project and associated studies and regulatory processes.

Hydro One recognizes that each community may wish to amend aspects of the agreement to reflect community consultation protocols that may already be established. Each Indigenous community was asked to review the document and share revisions with Hydro One. Hydro One offered an invitation to meet with each community to discuss the draft CFA.

On August 27, 2018 Hydro One sent a scoped CFA to each of the Indigenous communities who had not yet signed the consultation agreement in support of providing funding for the review of EA documentation. Hydro One explained that Ministry of the Environment, Conservation and Parks (MECP) intends to publish the final Terms of Reference for the Project's Environmental Assessment on September 7, 2018 for formal comment and review for a 30 day period. Hydro One noted it agrees to provide capacity funding to support review of key documents related to the EA of the Project including

for the purpose of reviewing the final Terms of Reference for the Project’s EA for formal comment and review. This CFA was not meant to preclude the broader consultation agreement Hydro One previously shared with each community, but instead provide capacity funding for the upcoming review of the ToR.

Advisement and Invitation to Participate in Environmental Field Studies

On August 22, 2018, Hydro One distributed a letter to the eighteen (18) Indigenous communities potentially impacted by the project advising of the continuation of environmental field studies in support of the Environmental Assessment (EA) for the project. The letter advised that the studies are to be undertaken during September to October 2018 and would be limited to the reference route and the reference route alternatives, including access routes, fly yards and laydown areas. Maps outlining the approximate location and timing of the field studies were also included. The letter also included the contact information for the Hydro One project leads and requested they be contacted should the community wish to participate in the environmental studies or their implementation.

Copies of Indigenous correspondence are provided in Appendix F.

3.3 Community Meetings and Discussions

Alongside the invitation to the public CICs held during the week of June 11, 2018, Hydro One offered each of the eighteen (18) Indigenous communities notified an opportunity to host a separate CIC within their respective community to discuss the LSL project and the draft ToR. Four Indigenous communities accepted Hydro One’s offer and as such CICs were arranged and held within each respective community during the draft ToR review period. The host communities and dates of each of the CICs held during the draft ToR review period are identified in Table 3.

Table 3.3-1: Indigenous Community CIC Dates and Locations

Host	Date
Biinjitiwaabik Zaaging Anishinaabek First Nation (Rocky Bay)	June 13, 2018
Red Rock Indian Band	June 18, 2018
Biigitgong Nishnaabeg (Ojibways of the Pic River First Nation)	June 25, 2018
Pic Moberg First Nation	June 26, 2018

In addition to the CICs held in each community, Hydro One has been in constant communication with each of the eighteen (18) communities at the onset of the Project in order to communicate updates and provide opportunities to discuss different aspects of the Project. Hydro One has met with several Indigenous communities to discuss different aspects of the Project such as consultation, the draft ToR and the field program (i.e. archaeological and environmental). A summary of these meetings is as follows:

Animbiigoo Zaaqgi’igan Anishinaabek (AZA) First Nation

- > June 8, 2018 – In-Person Meeting

Biigitgong Nishnaabeg (Ojibways of the Pic River First Nation)

- > June 5, 2018 – In-Person Meeting
- > June 15, 2018 – In-Person Meeting
- > July 20, 2018 – Teleconference
- > August 27, 2018 – Teleconference

Bingwi Neyaashi Anishinaabek (BNA) / Sand Point First Nation

- > June 7, 2018 – In-Person Meeting
- > July 4, 2018 – Teleconference

Biinjitiwaabik Zaaging Anishinaabek First Nation (Rocky Bay)

- > August 1, 2018 – In-Person Meeting

Fort William First Nation

- > July 26, 2018 – In-Person Meeting
- > August 9, 2018 – Teleconference

Ginoogaming First Nation

- > August 29, 2018 – In-Person Meeting

Métis Nation of Ontario

- > August 23, 2018 – In-Person Meeting

Michipicoten First Nation

- > July 31, 2018 – In-Person Meeting

Missanabie Cree First Nation

- > May 28, 2018 – In-Person Meeting
- > June 11, 2018 – In-Person Meeting
- > August 16, 2018 – In-Person Meeting

Ojibways of Batchewana

- > August 9, 2018 – In-Person Meeting

Pic Moberg First Nation

- > June 19, 2018 – In-Person Meeting

Red Rock Indian Band

- > June 7, 2018 – In-Person Meeting
- > June 14, 2018 – In-Person Meeting
- > July 24, 2018 – Teleconference
- > August 1, 2018 – In-Person Meeting

- > August 16, 2018 – In-Person Meeting

Red Sky Métis Independent Nation

- > May 25, 2018 – Teleconference
- > June 13, 2018 – In-Person Meeting
- > June 27, 2018 – In-Person Meeting

These meetings and discussions will continue as the Project progresses forward. A summary of each CIC held within Indigenous communities is described in Section 3.4.

3.4 Community Information Centre Summary

During the draft ToR review period four Indigenous communities expressed interest in holding CICs within their respective communities to discuss the Project and the draft ToR. Brief summaries of each of the CICs held are described below. Comments and questions received from each of the CICs are identified in Section 5.

Biinjitiwaabik Zaaging Anishinaabek First Nation (Rocky Bay)

On June 13, 2018, Hydro One held a CIC at the Biinjitiwaabik Zaaging Anishinaabek (BZA) Community Centre from 1:00-5:00 pm to discuss the project and draft ToR. The CIC was a drop-in style session, where display panels were presented providing information on the Project and ToR process. Staff from Hydro One and its design and construction partner SNC-Lavalin were available to discuss and provide responses to any questions or concerns raised by participants at the session. A copy of the draft ToR was made available at the CIC for review by attendees.

A total of fourteen (14) community members attended the session. No comment forms were received at the event. A number of questions were asked regarding why BZA First Nation was being consulted given how far the community is from where the transmission line would be built.

Red Rock Indian Band (Lake Helen)

On June 18, 2018, Hydro One held a CIC at the Red Rock Indian Band office from 2:00 pm to 5:00 pm to discuss the Project and the draft ToR. The CIC was a drop-in style session, where display panels were presented providing information on the Project and ToR process. Staff from Hydro One and its design and construction partner SNC-Lavalin were available to discuss and provide responses to any questions or concerns raised by participants at the session. A copy of the draft ToR was made available at the CIC for review by attendees.

A total of twenty-five (25) community members attended the session. No comment forms were received at the event. A number of questions were asked regarding involvement in the field program and accommodation to potentially impacted trappers. Hydro One agreed to accommodate Red Rock Indian Band staff who would participate in the field program (i.e. biological and archaeological studies). Hydro One also agreed to meet with trappers to discuss any concerns they may have.

Biigitgong Nishnaabeg (Ojibways of the Pic River First Nation)

On June 25, 2018, Hydro One held a CIC at the Biigitgong Nishnaabeg Community Centre from 6:00 pm to 8:00 pm to discuss the Project and the draft ToR. The CIC was a drop-in style session, where display panels were presented providing information on the Project and ToR process. Staff from Hydro One and its design and construction partner SNC-Lavalin were available to discuss and provide responses to any questions or concerns raised by participants at the session. A copy of the draft ToR was made available at the CIC for review by attendees.

A total of seventeen (17) community members attended the session and three (3) comment forms were completed and received at the event. One of the comment forms had no actual comments on the project, but instead only responses to the questions about the CIC itself (i.e., effectiveness, how the community member became aware of the meeting). Questions received from the comment forms are identified in Section 5.

Pic Moberg First Nation

On June 26, 2018, Hydro One held a CIC at the Pic Moberg Community Centre from 6:00 pm to 8:00 pm to discuss the Project and the draft ToR. The CIC was a drop-in style session, where display panels were presented providing information on the Project and ToR process. Staff from Hydro One and its design and construction partner SNC-Lavalin were available to discuss and provide responses to any questions or concerns raised by participants at the session. A copy of the draft ToR was made available at the CIC for review by attendees.

A total of fifty-seven (57) community members attended the session. No comment forms were received at the event. A number of questions were asked as to whether Hydro One would employ those community members who had been trained or are receiving training through the arrangement made between NextBridge and Supercom Industries.

4 Results of Consultation Activities

The following sections summarize the questions and comments provided to Hydro One on the release of the Draft Terms of Reference for review. This includes comments and questions provided to Hydro One at Community Information Centres, meetings held and those received during the review period for the Draft ToR.

Comments that resulted in a change to the Terms of Reference are noted in the “Hydro One Response Provided” column with the statement “change made”. The statement, “no change required” signifies that no changes were required or made to the Terms of Reference as a result of the comment.

4.1 Government Agency Comments on the Draft Terms of Reference

4.1.1 Government Agency Comments

Table 4.1-1 summarizes government agency questions and comments provided to Hydro One during the Community Information Centres held. Responses to each of the questions and/or comments are provided below.

Table 4.1-1: Government Agency Comments Received at Community Information Centres

	Agency Comment	Hydro One Response Provided
No.	Ministry of Natural Resources and Forestry	
MNRF - 1	There are sensitive watercourses south of Greenwich Road in the Dorion area. Will the access routes avoid this area?	Preliminary access roads for the Project are currently being identified by Hydro One and will be considered in the EA, including opportunities/options to avoid crossing of sensitive watercourses, where feasible.
MNRF - 2	A representative of the Ministry of Natural Resources and Forestry suggested that Hydro One consider an alternative route that avoids the loop around the community of Dorion. Specifically, either a twinning of the existing East – West Tie corridor or tower replacement like that proposed at PNP.	Hydro One will review the MNRF request for consideration of an additional alternative route for evaluation in the EA. It was noted that the option of expanding/twinning the existing East-West Tie line is not expected to receive community support based on the extensive consultation by others.

Table 4.1-2 summarizes government agency questions and comments provided to Hydro One during the draft ToR review period. Responses to each of the questions and/or comments are provided below.

Table 4.1-2: Government Agency Comments Received During the 30-day Review Period

	Agency Comment	Hydro One Response Provided	ToR Section Revision
No.	Ministry of the Environment, Conservation and Parks (MECP), Antonia Testa, Special Project Officer, Letter Dated July 26, 2018 to Bruce Hopper, Hydro One Networks Inc. (HONI)		
MECP - 1	<p>Supporting documentation is needed to confirm or validate any statements or conclusions made in the draft ToR. In accordance with Section 5.3.2 of the ministry’s Code of Practice, it is the ministry’s expectation that:</p> <p>Information contained in the supporting documentation should support Hydro One’s proposal by providing justification for the choices made, outline other processes or initiatives which provides the rationale, and details of processes or methods used. For example:</p> <ul style="list-style-type: none"> • a more detailed description of the problem or opportunity that prompted the proposed study; • more information and details about studies or events that triggered the Hydro One’s involvement with the proposed study; and • further background information supporting the selection of alternatives for further study. <p>Any supporting documentation provides more detailed information that will assist the Minister of the Environment,</p>	<p>Supporting documentation including reports, needs assessments, technical details and letters have been compiled and will be provided with the ToR and RoC.</p> <p>In addition to the supporting documentation, Section 1 of the ToR has been revised substantially to provide additional information on the background of the Project and the events that have led to the initiation of the Individual EA.</p>	Section 1 has been revised, supporting document package to be provided with ToR.

	Agency Comment	Hydro One Response Provided	ToR Section Revision
	<p>Conservation and Parks and other persons in understanding the planning process that Hydro One carried out in order to arrive at the proposal. Reference to the part of the ToR which is being explained in more detail should be made. Likewise, the ToR should reference the supporting documentation. Supporting documentation (i.e. letters, assessments, reports etc.) should accompany the final ToR to confirm or validate any statements or conclusions made in the ToR.</p>		
MECP – 2	<p>No Record of Consultation was provided with the draft ToR for the ministry’s review.</p> <p>A Record of Consultation is needed to describe the consultation carried out during the preparation of the ToR and the results of that consultation. It will be considered by the Minister in making the decision about whether to approve the ToR.</p> <p>In accordance with Section 5.3.1 of the ministry’s Code of Practice, it is the ministry’s expectation that the Record of Consultation will:</p> <ul style="list-style-type: none"> • Identify all persons consulted during the ToR preparation (personal names not required) and how they were identified; • Describe the consultation activities which took place (methods, schedule of events, notification that was given about 	<p>Information contained within the comment will be submitted as part of the RoC.</p> <p>It will include:</p> <ul style="list-style-type: none"> • Identify all persons consulted during the ToR preparation (personal names not required) and how they were identified; • Describe the consultation activities which took place (methods, schedule of events, notification that was given about the activity and materials used); • Describe how Indigenous communities were identified and how they were consulted; • Clearly and accurately summarize the comments made by all interested persons during the preparation of the ToR; • Describe Hydro One’s response and 	<p>Record of consultation will be provided with the ToR.</p>

	Agency Comment	Hydro One Response Provided	ToR Section Revision
	<p>the activity and materials used);</p> <ul style="list-style-type: none"> • Describe how Indigenous communities were identified and how they were consulted; • Clearly and accurately summarize the comments made by all interested persons during the preparation of the ToR; • Describe Hydro One’s response and how concerns were considered in the development of the ToR; • Describe any outstanding concerns; • Include minutes of any meetings held with interested persons; • Include copies of written comments received from interested persons. <p>It is also the ministry’s expectation that Hydro One will present a summary of the comments received and its responses to those comments in a table. As appropriate, the table should note where in the ToR the comment has been addressed. Comments from the general public should be arranged by type (for example, put all water quality comments together). For the Government Review Team and Indigenous communities, the comments should be organized by agency and community rather than by issue type. A Record of Consultation must accompany the final ToR.</p>	<p>how concerns were considered in the development of the ToR;</p> <ul style="list-style-type: none"> • Describe any outstanding concerns; • Include minutes of any meetings held with interested persons; • Include copies of written comments received from interested persons. 	
MECP - 3	<p>No executive summary was provided in the draft ToR. Please include an executive summary at</p>	<p>Executive summary has been provided with the ToR document.</p>	<p>An executive summary was inserted at the beginning of the document (Page 2)</p>

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	the beginning of the final ToR document.		
MECP – 4	<p>The ministry is no longer referred to as the Ministry of the Environment and Climate Change.</p> <p>All references to the ministry should be changed to the Ministry of the Environment, Conservation and Parks.</p>	Government agency name change during draft review period has been recognized.	All sections of the ToR that referenced previous agency names have been updated (i.e. MOECC has been changed to MECP).
MECP – 5	<p>In accordance with Section 5.2.6 of the ministry’s Code of Practice, the EA should attempt to examine the interrelationships between the undertaking and its alternatives with a changing climate over time.</p> <p>The proponent should also consider whether there could be environmental effects resulting from effects of the proposal combined with effects of other past and future undertakings.</p> <p>As such, please include a commitment in the ToR that specifies the EA will consider climate change (adaptation and mitigation) and cumulative effects in the evaluation and assessment of alternatives and the preferred undertaking.</p> <p>To facilitate this assessment and evaluation, refer to the ministry’s guide “Consideration of Climate Change in Environmental Assessment in Ontario” and the federal document “Cumulative Effects Assessment Practitioners’ Guide”.</p> <p>Revise text accordingly. Please include this commitment in the appropriate corresponding sections of the ToR</p>	The EA will consider climate change adaptation and mitigation and cumulative effects in the evaluation and assessment of alternatives and the preferred undertaking.	Section 4.5 and Section 7 changed to reflect commitment to climate change adaptation.

	Agency Comment	Hydro One Response Provided	ToR Section Revision
	document (i.e. Section 4.5 and 7 of this draft ToR).		
MECP – 6	<p>Section 1, Page 10</p> <p>To improve clarity, consider the following revision to the first paragraph: “The first key step of the EA process is the preparation of a ToR” “Hydro One will prepare the EA in accordance with the framework laid out in the ToR document and in accordance with...” Revise text accordingly.</p>	Revised sections for clarity as presented.	Section 1.1 has been modified to provide additional clarity and information.
MECP – 7	<p>Section 1.1, page 10</p> <p>What are the three separate entities (i.e. Ontario Power Generation, Hydro One, and the IESO) responsible for and/or what are their mandates? Revise the text accordingly. Please provide the additional information in this section of the ToR.</p>	Provided additional information on the three separate entities.	Section 1.1 has been modified to provide additional clarity and information.
MECP – 8	<p>Section 1.1, page 10</p> <p>The three bullets points are confusing. Why is the bullet format used for these points? Need more context with these bullets in order to provide more clarity. For instance: Does the IPSP refer to the 20 year energy plan? Clarify how they are related? Who and/or how was the government given discretion to determine further supply mix? What does “supply mix” mean?</p>	<p>Removed bullet points.</p> <p>IPSP refers to the 20 year energy plan. Link between LSL, IESO and IPSP has been made.</p> <p>Supply mix has been defined and clarified.</p> <p>OEB has been defined, role clarified, and provided responsibility and mandate.</p>	Section 1.1 has been modified to provide additional clarity and information.

	Agency Comment	Hydro One Response Provided	ToR Section Revision
	Define the term OEB. What is their responsibility and/or mandate? How do they fit into the overall project/process? Revise the text accordingly. Please provide the additional information in this section of the ToR.		
MECP – 9	Section 1.1, page 11 Provide more information on the IPSP and/or 20 year energy plan (2007). What was its focus, goals, targets etc.? Revise the text accordingly. Please provide the additional information in this section of the ToR.	Information on IPSP focus and goals provided.	Section 1.1 has been modified to provide additional clarity and information.
MECP – 10	Section 1.1, page 11 What does the Framework for Transmission Project Development Plans discuss in regards to the development and/or planning of transmission projects? Revise the text accordingly. Please provide the additional information in this section of the ToR.	Expanded on FTPDP.	Section 1.1 has been modified to provide additional clarity and information.
MECP – 11	Section 1.2, page 11 Please clarify what activities/processes have been completed regarding upgrades to the associated transformer station infrastructure. Why were these upgrades not included as part of this environmental assessment project? The discussion regarding the upgrades to the associated transformer station infrastructure should be provided in Section 4 of this ToR document.	A discussion around the modifications and upgrades to existing Transformer stations has been added to a new Section under Section 4.2.8.	Section 4.2.8 has been created to discuss transformer station expansions.

	Agency Comment	Hydro One Response Provided	ToR Section Revision
	Revise text accordingly. Please include a description of the work done regarding the transmission stations and justification and rationale for conducting this work independently of this environmental assessment project.		
MECP – 12	<p>Section 1.2, general</p> <p>Please avoid any direct references to NextBridge or the NextBridge EA project. If necessary, NextBridge should be referred to as the “designated electricity transmitter”.</p> <p>Please avoid direct comparisons to the NextBridge EA project. For example: “as compared to the NextBridge proposal... Lake Superior Link project... has a lower estimated cost, a smaller environmental footprint...”</p> <p>Also avoid any subjective comments regarding the NextBridge EA project. For instance: “In response to the concerns... Hydro One is proposing its East-West Tie Line project, called “Lake Superior Link”, to protect the interests of the public and ratepayers.”</p> <p>Revise text accordingly. Please remove references to NextBridge or the NextBridge EA project. Please remove any comparisons or subjective comments regarding the NextBridge EA project.</p>	<p>NextBridge references and subjective comments have been removed.</p> <p>NextBridge has been replaced with ‘designated electricity transmitter.’</p>	Section 1.2 has been modified to remove NextBridge references.
MECP – 13	<p>Section 1.2, general</p> <p>Provide more information on the current/existing East-West Tie</p>	Information on the existing EWT has been added.	Section 1.2 has been modified to provide information on the existing EWT.

	Agency Comment	Hydro One Response Provided	ToR Section Revision
	<p>transmission corridor. What does it currently consist of? How old is the infrastructure? etc.</p> <p>Revise the text accordingly. Please provide the additional information in this section of the ToR.</p>		
MECP – 14	<p>Section 1.2, general</p> <p>A better summary of the past provincial analysis and decision regarding the need and/or justification for the project is required.</p> <p>The description of the historical events related to the proposed expansion of the East-West Tie corridor is confusing and too vague. This information should be presented in a clear and comprehensive chronological summary of events.</p> <p>More information, detail and context are needed in order to fully understand and to justify the need for the project. For instance, provide more detail and context regarding the LTEP. What is the LTEP? Why was it updated? What is its focus, goals, key elements etc.?</p> <p>Also, provide more information for each of the bullet points on page 12. For instance, for bullet number 2, what does it mean to be the “designated electricity transmitter”? How does OEB decide who is designated and who is not? Can more than one proponent be designated? Lastly referring to a summary of the “East- West Tie project” is confusing</p>	<p>A more fulsome summary of the past provincial analysis and decision regarding the need and/or justification for the project has been provided.</p> <p>Chronology and additional information for the decision making and background part of the Project has been added.</p> <p>More information on the LTEP is found throughout Section 1.</p> <p>More information in the bullet point summary is found in the preceding paragraphs.</p> <p>East-West Tie has been renamed to the expansion of the East-West Tie corridor where prudent.</p>	<p>Section 1.2 has been modified to provide additional clarity and information.</p>

	Agency Comment	Hydro One Response Provided	ToR Section Revision
	<p>because there is currently another EA project with the same name. It would be better to frame it as the summary of the proposed expansion of the East-West Tie corridor.</p> <p>Revise the text accordingly. Please provide the additional information in this section of the ToR.</p> <p>Please provide supporting documentation to confirm and validate the information provided in the bullet points (See Comment #1).</p> <p>Supporting documentation (i.e. letters, assessment, reports etc.) should establish the need for:</p> <ul style="list-style-type: none"> • Electricity transmission. For instance, summarize documents that established the need specifically in northern Ontario • The project. For instance, summarize in detail the analysis and reporting that has been undertaken (to date) regarding the need for the project in northern Ontario. 		
MECP – 15	<p>Section 1.4, general</p> <p>This section must clearly state what the purpose is for the study and for the undertaking.</p> <p>What does Hydro One wish to achieve by engaging in the environmental assessment process? Why does Hydro One need to do this particular undertaking? What is the particular problem to be solved or alleviated? What is the opportunity which is to be</p>	<p>Additional clarity for the purpose of the study and undertaking has been added, including referencing supporting documentation for the need for the project.</p>	<p>Section 1.4 has been modified to provide additional clarity and information.</p>

	Agency Comment	Hydro One Response Provided	ToR Section Revision
	<p>pursued?</p> <p>If the need for the project has been satisfied and established by a defined planning process, then that needs to be clearly presented in the ToR and the associated supporting documentation must be provided (See Comments #1 and #14).</p> <p>Revise text accordingly. Please provide supporting documentation to confirm and validate the information provided (See Comment #1 and #14).</p>		
MECP – 16	<p>Section 1.5, general</p> <p>To improve clarity and flow of the ToR document, the following organizational changes to the ToR document are recommended: “Taken together, The ToR document is organized into the following sections of the ToR are intended in order to satisfy the requirements under Section 6(2)(c) and 6.1(3) of the EA Act:</p> <ul style="list-style-type: none"> • Regulatory Framework for the Project (Section 2) • Overview of the EA Process and Approval Requirements for the Project Indication of how the EA will be Prepared (Section 3) • Description of the Undertaking and Evaluation of Alternative Methods (Section 4) • Consultation (Section 5) • Existing Environmental Conditions in the Study Area (Section 5) 	<p>The sections have been renamed and reorganized.</p>	<p>Section 1.5 modified to incorporate new ToR structure and title names.</p>

	Agency Comment	Hydro One Response Provided	ToR Section Revision
	<ul style="list-style-type: none"> • Identification and Evaluation of Alternative Methods (Section 6) • Potential Environmental Effects Evaluation Assessment and Mitigation Measures (Section 7) • Commitments and Monitoring (Section 8) • Consultation (Section 9)“ Revise ToR document accordingly.		
MECP – 17	Section 2, general To improve clarity and flow of this section of ToR document, it is recommended this section be organized first by a discussion of the provincial regulatory framework, and then followed by the discussion of the federal regulatory framework. Revise this section accordingly.	Provincial and Federal regulatory framework headings have been created with specific regulatory subheadings.	Section 2 has been reorganized to incorporate federal and provincial headings.
MECP – 18	Section 2, page 15 The first paragraph of this section discusses other permits and approval activities and applications. To improve clarity and flow of the ToR document, it is recommended this paragraph be moved to Section 2.6 which discusses other relevant provincial legislation, permits and policies. The first paragraph refers to the construction phase; however it is suggested to keep the discussion of other permits and approval activities more general. To improve clarity, consider the following revision to the first paragraph:	Section discussing other permits has been moved and the suggested revisions have been incorporated into the document.	Section 2 has been modified with some text moved to Section 2.1.5 (old Section 2.6).

	Agency Comment	Hydro One Response Provided	ToR Section Revision
	<p>“Hydro One will identify all necessary approvals that may be required during project planning and construction. Where practical appropriate, Hydro One will begin preparation of construction-related applications initiate other permit and approval activities and applications concurrent with the EA process. It will be necessary to initiate some permit and approval activities or applications during the EA process including any required consultation activities with members of the public, municipalities, agencies, and Indigenous communities and groups. It should be noted that some other permits and approvals for construction typically rely on more detailed engineering and design information than is available during the EA process. In this event, Hydro One will carry out required studies necessary to support those approvals prior to start of construction, following the completion of the EA. The following sections outline the framework for regulatory approvals in Ontario for electricity transmission projects and how they apply to the Project.”</p> <p>Revise this section and text accordingly.</p>		
MECP – 19	<p>Section 2.1, page 15 Please specify that this undertaking is a Category C project under the Electricity Regulation (O.Reg 116). Revise text accordingly. Please provide</p>	<p>Specified that Lake Superior Link is a Category C project under the Electricity Regulation. Additional information of O.Reg. 116/01 has been added.</p>	<p>Section 2.1 has been revised to include Category C designation.</p>

	Agency Comment	Hydro One Response Provided	ToR Section Revision
	additional information on how the project is captured under O.Reg 116.		
MECP – 20	<p>Section 2.1, page 15</p> <p>To improve clarity, consider the following revision to the third paragraph of Section 2.1:</p> <p>“Hydro One is required to complete and submit a ToR to the MOECC for review and approval as illustrated on Figure 2. The purpose of the ToR is to provide the overall study framework for the planning and decision making process that will be followed during the EA...”</p> <p>Revise text accordingly.</p>	Text has been revised according to comment.	Section 2.1 revised with updated text.
MECP – 21	<p>Section 2.1, page 17</p> <p>To improve clarity, consider the following revision to the first paragraph on this page:</p> <p>“Should the ToR be approved by the Minister of the Environment of Climate Change Conservation and Parks, it will be used by Hydro One to guide the completion of the EA to ensure that it meets the intent fulfills the requirements of the EA Act and any other applicable requirements. The results of the EA process will then be documented in an EA Report to be submitted to the MOECC MECP for review and approval.</p> <p>There are two key documentation requirements for the an application for approval to proceed with an undertaking under subsection 5(1) of the EA Act:</p>	<p>The ToR will be submitted for reviewed and approved by the Minister of the Environment, Conservation and Parks. If approved, the ToR will then be used by Hydro One to direct the EA process to fulfill the requirements of the EA Act and other regulatory requirements. The resulting EA process will be then documented in an EA Report to be submitted to the MECP for review and approval.</p> <p>Suggested text modifications have been implemented.</p>	Section 2.1.1 modified to reflect text changes.

	Agency Comment	Hydro One Response Provided	ToR Section Revision
	<ul style="list-style-type: none"> • the development, submission, review and approval of the ToR; and, • the preparation, submission, review and approval of the EA document in accordance with the framework set out in the MOECC MECP approved ToR.” 		
MECP – 22	<p>Section 2.1, page 17 Table 1 and its preceding paragraph proposes how the EA will be prepared. To improve clarity and flow of the ToR document, it would be more appropriate for this information to be moved to Section 3.0 of this ToR document. Revise ToR document accordingly.</p>	Table 1 moved to section 3 of the ToR.	Table 1 (now Table 3) moved to section 3 of the ToR.
MECP – 23	<p>Section 2.1, page 17 More information and detail is required to support the “reason for proceeding with this undertaking has been established by the IESO...” See Comment #14.</p>	More information has been documented in Section 1 to support the IESO determination of need for the project.	Text has been moved to Section 3 as per Comment 22 (previously Section 2.1).
MECP – 24	<p>Section 2.1, page 17 Please provide further information on “focusing of the EA”. Define the term “focusing”. What does it mean to focus the EA? What general requirements will not be addressed in the EA? etc. Revise text accordingly. Please provide additional information in Section 3.0 of this ToR document.</p>	More information has been provided to support the ‘focusing’ of the EA IESO determination of need for the project.	Section 3 has been modified (previously Section 2.1).
MECP – 25	<p>Section 2.1, Table 1, page 17 Please correct references to “Section 0”. Revise Table accordingly.</p>	Section references have been corrected.	Table 1 (now Table 3) has been modified accordingly.
MECP – 26	Section 2.1, Table 1, page 17, row 2	Suggested revision has been	Table 1 (now Table 3) has been modified

	Agency Comment	Hydro One Response Provided	ToR Section Revision
	In order to provide flexibility to accommodate new circumstances, consider the following revision: “ii) The EA will evaluate and assess two alternative reference routes alternative methods of carrying out the undertaking”. Revise Table accordingly.	implemented.	accordingly.
MECP – 27	Section 2.1, Table 1, page 17, row 2 In accordance with Section 5.2.5 of the Code of Practice, the “Do Nothing” alternative should always be considered. It acts as a starting point for the comparison of alternatives. See Comment #42. Revise Table accordingly.	‘Do Nothing’ alternative will be evaluated.	Table 1 (now Table 3) has been modified accordingly.
MECP – 28	Section 2.1, Table 1, page 18, row 1, column 1 Alternative methods of carrying out the undertaking should be included in the “description of...” Revise Table accordingly.	Description of is a copied heading from the EA Act. Assessing alternative methods of carrying out the undertaking has been added to Table 3.	Table 3 has been modified.
MECP – 29	Section 2.1, Table 1, page 18, row 2 Alternative methods of carrying out the undertaking should be included in “an evaluation of advantages and disadvantages...” Revise Table accordingly	Alternative methods of carrying out the undertaking will be assessed in an evaluation of advantages and disadvantages.	Table 3 has been modified.
MECP – 30	Section 2.3 Are there any opportunities for public and/or Indigenous consultation? If so, please describe. Revise text accordingly. Please provide	Added information on OEB consultation.	Change made in section 2.1.3 (old Section 2.3).

	Agency Comment	Hydro One Response Provided	ToR Section Revision
	the additional information (if any) in this section of the ToR.		
MECP – 31	Section 2.4 What is meant by “the fee simple interest...” in the statement “Property Owners will be offered the choice of Hydro One acquiring either an easement or the fee simple interest in the lands required for the Project.”? Revise text accordingly. Please provide the additional information in this section of the ToR.	Fee simple interest is ownership of the land and any improvements to the land in perpetuity. This has been clarified in the text.	Section 2.1.4 has been modified to provide clarity on fee simple interest.
MECP – 32	Section 2.5, page 21 In order to clearly demonstrate that this undertaking is not a “designated project” under federal regulation, please provide further information on the requirements outlined in the federal regulation designating physical activities. Revise text accordingly. Please provide the additional information in this section of the ToR.	Federal regulators provided further comments on Project designation and federal regulation and revisions have added clarity to the section.	Section 2.2 has been revised with additional information from federal regulators.
MECP – 33	Section 2.5, page 21 Please include the November 27, 2017 letter from Parks Canada in your Record of Consultation. Please provide the additional information as part of the Record of Consultation (See Comment 2).	Letter will be included with record of consultation.	Record of Consultation will include Parks Canada letter.
MECP – 34	Section 2.5, general Provide more information regarding Section 67 of the Canadian Environmental Assessment Act (i.e. what does it state,	Subheading for Section 67 added. Additional information on Section 67 has been added to the Section 67 section.	Section 2.2.1 and 2.2.2 have been modified to incorporate additional information.

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	<p>what requirements does it outline etc.). Also, for improved clarity and flow, it is recommended a subheading be included for the discussion regarding Section 67. Revise text accordingly. Please provide the additional information in this section of the ToR.</p>		
MECP – 35	<p>Section 2.5, general What consultation has been conducted to date with ISC, CEAA and other federal authorities? Please provide the additional information as part of the Record of Consultation (See Comment 2).</p>	<p>Consultation with Federal authorities has been documented in the Record of Consultation.</p>	<p>No change required.</p>
MECP – 36	<p>Section 2.6, general To improve clarity and flow, it is suggested to organize the permits and/or approvals listed according to the responsible Ministry. Consider using a table format. Revise text accordingly.</p>	<p>Table format has been added.</p>	<p>Table 1 has been added.</p>
MECP – 37	<p>Section 2.6, general Include a statement at the end of this section that states:</p> <ul style="list-style-type: none"> • This is a preliminary list • This list is subject to change as the project is further developed and refined • A final list will be outlined the EA document. <p>Use similar wording as the last paragraph in Section 2.7 of this ToR document (See Comment #39). Revise text accordingly. Please provide</p>	<p>A statement similar to Comment 39 was provided at the end of this section.</p>	<p>Statement added in Section 2.2.5.</p>

	Agency Comment	Hydro One Response Provided	ToR Section Revision
	the additional information in this section of the ToR.		
MECP – 38	Section 2.7, general To improve clarity and flow, it is suggested to organize the permits and/or approvals listed according to the responsible federal agency. Consider using a table format. Revise text accordingly.	Federal approvals and permits have been listed in a table format.	Table 2 has been created in Section 2.2.5.
MECP – 39	Section 2.7, page 23 To improve clarity and flow, consider the following revision to the third paragraph of Section 2.1: “Section 2.0 provided a preliminary list of other federal permits and approvals that may be necessary for the Project. This list is subject to change as the Project is further developed and refined. All federal permits and approvals that are necessary for the Project to proceed will be outlined in the EA document. It may not be practicable to complete all required surveys in relation to other approvals prior to submission of the EA document, but Hydro One will commit to continue and complete all information collection prior to construction following the completion of the EA.” Revise text accordingly.	Statement has outlined adaptability and flexibility of permits and approvals for both provincial and federal authorities.	Statements have been added to Section 2.1.5 and 2.2.5.
MECP – 40	Section 3, page 24 Need to provide more information and detail to support your statement: “Based on the previously conducted needs	Information for the needs assessment has been added to Section 1 and a sentence directing the reader there has been added.	Discussion from previous Section 2.1 on focusing and Table 1 (now Table 3) has been moved to Section 3.0.

	Agency Comment	Hydro One Response Provided	ToR Section Revision
	<p>assessment and the prioritization of the project from regulatory bodies, a more focused approach to the EA will be utilized.”</p> <p>Please provide supporting documentation to confirm and validate the statement “Based on the previously conducted needs assessment and the prioritization of the project...” (See Comment #1 and #14).</p> <p>Please incorporate the discussion from Section 2.1 on “focusing” and Table 1 into this section of the ToR document (See Comment #24).</p> <p>Revise the ToR document and text accordingly.</p>	Rearrangement of sections has been completed as directed.	
MECP – 41	<p>Section 3, page 24, bullet 1</p> <p>To improve clarity, consider the following revision:</p> <p>“a description of the Project and the purpose of the Project based on the recommendations and decisions of the IESO and the government;”</p> <p>Revise text accordingly.</p>	Bullet revised.	Section 3.0 has been revised.
MECP – 42	<p>Section 3, page 24, bullet 3</p> <p>In accordance with section 5.2.5 of the Code of Practice, the “Do Nothing” alternative should be considered.</p> <p>Please be advised that the “Do Nothing” alternative represents what is expected to happen if the problem or opportunity that prompted the EA process is not addressed. The “Do Nothing” alternative</p>	The bullet has been revised to include a ‘Do Nothing’ alternative.	Section 3.0 has been revised.

	Agency Comment	Hydro One Response Provided	ToR Section Revision
	<p>represents what is expected to happen if none of the alternatives being considered during the EA process are carried out. It represents the benchmark against which the advantages and disadvantages of the alternatives being considered can be measured and compared.</p> <p>The “Do Nothing” alternative is not intended to be considered as a reasonable way in which the problem or opportunity that prompted the initiation of EA process can be addressed.</p> <p>It is the ministry’s expectation that during the EA process proponents will consider a reasonable range of alternatives, which will be assessed against the “Do Nothing” alternative.</p> <p>Revise text accordingly.</p>		
MECP – 43	<p>Section 3, page 24, bullet 4 Incorrect reference to alternative methods. Statement should refer to alternatives to.</p> <p>To improve clarity, consider the following revision: “the EA will not include a description and rationale of alternatives to methods of carrying out the Project as it has already been extensively studied by the OPA and IESO regulator and the preferred alternative to has already been identified. However, the EA will include a description of and statement of rationale for the alternative methods of carrying</p>	<p>The text has been modified as presented.</p>	<p>Section 3.0 has been revised.</p>

	Agency Comment	Hydro One Response Provided	ToR Section Revision
	out the undertaking such as identified reference route and reference route alternative will be considered for the Project as well as route alignment, design considerations and local refinements;" Revise text accordingly.		
MECP – 44	Section 3, page 24, bullet 5 To improve clarity, consider the following revision: "a description of the environment that will be affected, or might reasonably be expected to affected directly or indirectly by the Project and the alternative methods of carrying out the undertaking routes considered ;" Revise text accordingly.	The text has been modified as presented.	Section 3.0 has been revised.
MECP – 45	Section 3, page 24, bullet 6 To improve clarity, consider the following revision: "an description evaluation of the advantages and disadvantages that will be caused or might reasonably be expected to be caused to the environment as a result of the Project, and the alternative methods of carrying out the Project;" Revise text accordingly.	The text has been modified as presented.	Section 3.0 has been revised.
MECP – 46	Section 3, page 24, bullet 7 To improve clarity and flow, this bullet point should come after bullet point 5. Revise this section accordingly.	Bullet moved to bullet position 6.	Section 3.0 has been revised.
MECP – 47	Section 3, page 24, bullet 8 This statement is repetitive. It is already captured in in bullet point 6.	Bullet deleted due to repetition.	Section 3.0 has been revised.

	Agency Comment	Hydro One Response Provided	ToR Section Revision
	Revise this section accordingly.		
MECP – 48	Section 3, page 24, bullet 8 To improve clarity, consider the following revision: “description and documentation of the public, agency and stakeholder consultations and Indigenous communities and groups engagement and consultation undertaken during the EA process”. Revise text accordingly.	Revised bullet point to further clarify. “description and documentation of the public, agency, stakeholder, and Indigenous communities and groups engagement and consultation undertaken during the EA process”.	Section 3.0 has been revised.
MECP – 49	Section 3, page 24, bullet 9 To improve clarity, consider the following revision: “ pre and post development environmental monitoring plans, follow-up programs, and commitments (as necessary) ; and, Revise text accordingly.	Text modified as presented.	Section 3.0 has been revised.
MECP – 50	Section 3, page 24, bullet 10 To improve clarity, consider the following revision: “supporting documents, maps, etc., or any other documents as required under the EA Act and its regulations, such as Ontario Regulation 334. Revise text accordingly.	Text modified and further clarified: “supporting documents, maps, or any other documents as required under the EA Act and its regulations, such as O. Reg. 334.”	Section 3.0 has been revised.
MECP – 51	Section 3, page 24 This list should include a commitment that the EA will include a description of the effects that will be caused or that might reasonably be expected to be caused to the environment. Should follow	Bullet added after point 5.	Section 3.0 has been revised.

	Agency Comment	Hydro One Response Provided	ToR Section Revision
	bullet point 5. Revise this section accordingly.		
MECP – 52	Section 3.1, general To improve clarity and flow, it is recommended this subsection be moved to the end of Section 3. Revise this section accordingly.	Section 3.1 has been incorporated into Section 3.	Section 3.0 has been revised.
MECP – 53	Section 3.1, page 25 In accordance with Section 5.2.10 of the ministry’s Code of Practice, it is important that flexibility be incorporated when preparing the ToR document. However, flexibility is not to allow proponent to completely change the scope of their study at the EA stage. As such, consider the following revision: “...To address these potential changes, there is a requirement for flexibility within the ToR document to lay out a framework for a successful EA submission and subsequent construction and operational phases. Project design updates, study area refinements changes, novel information, and implementation of input from the consultation process are examples of new circumstances arising during a project lifecycle. These degrees of Flexibility allow proponents reasonable measures to address unforeseen circumstances but still maintain regulatory compliance throughout the project phases without starting the ToR and EA process anew.	Text modified as presented.	Section 3.0 has merged Section 3.1 with the recommended modifications.

	Agency Comment	Hydro One Response Provided	ToR Section Revision
	<p>Some of these changes are likely to be minor and have limited consequences while others may be more significant and require consultation with a number of stakeholders and agencies. Hydro One has prepared this ToR with the most complete state of knowledge at the time of its preparation but acknowledges the Project may need to adapt to new circumstances. If significant changes to the project are being considered, Hydro One will consult with the MECP to determine if the proposed changes can be accommodated with the framework of the ToR. ”</p> <p>Revise text accordingly.</p>		
MECP – 54	<p>Section 3.2, general When referencing the Code of Practice, specify which section(s) of the Code of Practice is being referenced. Revise the text accordingly</p>	Added Section 4.3 reference to Code of Practice.	Section 3.1 section reference has been added.
MECP – 55	<p>Section 3.2, page 25 To improve clarity, consider the following revision to the first paragraph: “The EA will be prepared in accordance consistent with the requirements on the EA Act described in Section 2.1 and in accordance with the MECP’s Code Practice on Preparing and Reviewing Environmental Assessments in Ontario” Revise text accordingly.</p>	Text modified as presented.	Section 3.1 has been modified.
MECP – 56	<p>Section 3.2, page 26 Please explain the term “reference</p>	Reference reports are detailed technical studies completed in support of the EA.	Section 3.1 has been modified.

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	reports”. Are they detailed technical studies completed in support of the EA? Revise the text accordingly. Please provide the additional information in this section of the ToR.	This language has been clarified and a reference to Section 4.3 of the Code of Practice has been added.	
MECP – 57	<p>Section 4, general This section provides a description of the undertaking and an evaluation of alternative methods. Both these components are important requirements of the EA process. As such, to improve clarity and flow of the ToR document, it would be more appropriate for this components to be separated into two separate sections:</p> <ul style="list-style-type: none"> • Section 4 – “Description of the Undertaking”. This section includes Subsections 4.1, 4.6 & 4.7. • Section 5 – “Identification and Evaluation of Alternatives”. This section includes subsection 4.2 to 4.5. It should begin with a brief general summary explaining the two different types of alternatives the Environmental Assessment Act requires proponents to assess (i.e. ‘alternatives to’ and ‘alternative methods’ of carrying out an undertaking). <p>Revise ToR document accordingly.</p>	<p>Comment #16 has placed Identification and Evaluation of Alternative Methods as Section 6. Otherwise, sections have been split out accordingly. Alternative methods vs. alternatives to have been further clarified.</p>	Sections 4 and 6 have been split out.
MECP – 58	<p>Section 4, general Please clarify that this section provides a general description of the undertaking. Include a commitment that a more</p>	<p>Text has been revised with the following: “This section provides a general description of the undertaking. A more detailed description of the undertaking</p>	Section 4.0 has been revised.

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	<p>detailed description of the undertaking will be provided in the EA. This description should be sufficiently detailed to enable the identification an assessment of potential effects for all phases of the project. Revise text accordingly.</p>	<p>will be provided in the EA. The description within the EA will be sufficiently detailed to enable the identification and assessment of potential effects for all phases of the project.”</p>	
MECP – 59	<p>Section 4.1, general Please clearly define the geographical boundaries of the study area. In accordance with Section 5.2.6 of the ministry’s Code of Practice, the boundaries should adequately represent the geographical area within which the potential environmental effects of the alternatives being considered and the proposed undertaking are likely to occur and will be studied. Interested government agencies, Indigenous communities and members of the public rely upon the description of study area to determine whether the proposed undertaking and its alternatives may impact their respective jurisdictional mandate, Indigenous rights or interests. It is therefore important to explain how the boundaries of the study area were determined. In addition, please include a commitment that a more detailed description of the study area and how the boundaries of the study area were determined will be provided in the EA.</p>	<p>Comment 57 has placed Section 4.1 after Section 4, which includes the Study Area. This section is prior to the description of the existing environment and will remain in place. PSA, LSA and RSA have been defined and clarification on updating the study areas was added as an EA commitment.</p>	<p>Section 4.1 has been revised with further information.</p>

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	<p>Also, in accordance with Section 5.2.6 of the ministry's Code of Practice, before the existing environment is described, a study area must be defined. As such, it would be more appropriate to move this section to Section 6 of this ToR document.</p> <p>Revise text and ToR document accordingly. Please provide the additional information in this section of the ToR.</p>		
MECP – 60	<p>Section 4.1, general</p> <p>Hydro One specifies that information from NextBridge's EA document will be used to supplement the Lake Superior Link EA. The ministry would like to emphasize that as outlined in our November 14, 2017 letter to Hydro One and reiterated in correspondence from March 16, 2018 and April 10, 2018; Hydro One's proposed Lake Superior Link Transmission Project is considered a new undertaking for the purpose of the Environmental Assessment Act. As such, Hydro One is required to complete the requirements of the Environmental Assessment Act including preparing technical studies for analysis and evaluation and consultation requirements. This information must be completed and submitted as part of the Lake Superior Link EA.</p> <p>Revise text accordingly. Please remove references to NextBridge or the</p>	<p>Reference to NextBridge has been removed. Clarification on assessment of areas previously studied has been made.</p>	<p>Section 4.1 updated to remove reference to NextBridge and clarification on scope of studies.</p>

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	NextBridge EA project. See Comment #12.		
MECP – 61	Section 4.2, general This section discusses alternatives to the project and therefore should be renamed “Alternatives To”. Revise heading accordingly.	Heading has been modified to ‘Alternatives To’.	Section 6.1 has been revised.
MECP – 62	Section 4.2, general This subsection states that an extensive ‘alternatives to’ assessment (i.e. local generation and other transmission solutions etc.) had been previously performed by OPA and IESO, and the proposed expansion to the East West Tie corridor was identified as the preferred option. Although Hydro One is proposing to prepare a focused EA, a detailed summary of the assessment conducted by OPA and IESO should be presented in the ToR document. The ToR should include some analysis of ‘alternatives to’ to provide the necessary justification and rationale for why the expansion of the current East West Tie corridor is the preferred option. This information should also be confirmed and validated by providing supporting documentation. Revise this section accordingly. Please provide a detailed summary and analysis of the ‘alternatives to’ assessment conducted through OPA and IESO planning processes. Include any further	Added reference to Section 1 which further outlines the IESO/OPA process to determine the scope and need of the Project. Supporting information is also available in an information packet.	Section 6.1 modified to include reference to other Section 1.

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	details as supporting documentation.		
MECP – 63	<p>Section 4.2, page 27</p> <p>A reference to “East-West Tie project” is confusing because there is currently another EA project with the same name. It would be better to frame it as the summary of the proposed expansion of the East-West Tie corridor. To improve clarity, consider the following revision: “The expansion of the East-West tie project corridor has been identified by the Ministry of Energy, the OEB and the IESO as a priority project, as per an Order-in-Council issued by the Lieutenant Governor in Council on March 4, 2016. As such, this ToR proposes and will utilize a focused EA will be prepared method.</p>	<p>The following text has been modified: “The East-West Tie Corridor Expansion project has been identified by the Ministry of Energy, the OEB and the IESO as a priority project, as per an Order-in-Council issued by the Lieutenant Governor in Council on March 4, 2016. As such, this ToR proposes a focused EA will be prepared. “</p>	<p>Section 6.1 has been modified with updated text.</p>
MECP – 64	<p>Section 4.2, page 28</p> <p>This paragraph is very confusing. At some points, it is unclear whether you are referring to alternatives to or alternative methods. To improve clarity, consider the following revision: “Under In accordance with subsections 6(2) (c) and 6.1(3) of the EA Act, a focused EA will be prepared. The assessment of alternatives to the undertaking and approach will take into account the IESO and OPA planning processes recommendations. As such, the need and method for the goals of the project have has been clearly identified and the ToR EA will not contain an</p>	<p>Alternative Methods have been moved to Section 6.3. The proposed text modifications have been implemented.</p>	<p>Section 6.1 modified, moved alternative methods to Section 6.3.</p>

	Agency Comment	Hydro One Response Provided	ToR Section Revision
	<p>assessment of alternatives to the undertaking.</p> <p>It is also recommended that any discussion of alternative methods of carrying out the undertaking be moved to Section 4.4.</p> <p>Revise this section accordingly</p>		
MECP – 65	<p>Section 4.3</p> <p>In accordance with Section 5.2.5 of the Code of Practice, the “Do Nothing” alternative should always be considered. It acts as a starting point for the comparison of alternatives.</p> <p>See Comment #42. Revise this section accordingly.</p>	<p>The Do Nothing alternative will be considered. Text has been revised to reflect this approach.</p>	<p>Section 6.2 has been modified to include a Do Nothing alternative.</p>
MECP – 66	<p>Section 4.4, general</p> <p>This section discusses alternatives methods of carrying out the undertaking and therefore should be renamed “Alternatives Methods of Carrying out the Undertaking”</p> <p>As such, there needs to be a clear statement at the beginning of this section listing the alternative methods of carrying out the undertaking that will be identified, evaluated and assessed in the EA. This is not limited to just routing alternatives. For instance, alternative methods should include but not limited to:</p> <ul style="list-style-type: none"> • Alternative routes between the Thunder Bay and Wawa • Local refinements to the Reference 	<p>Renamed “Alternatives Methods of Carrying out the Undertaking” section 6.3. Added additional methods and provided subsections for them.</p>	<p>Section 6.3 has been renamed.</p> <p>Added subsections 6.3.1., 6.3.2, and 6.3.3 for alternative routes, alternative designs, and local refinements.</p>

	Agency Comment	Hydro One Response Provided	ToR Section Revision
	<p>Route</p> <ul style="list-style-type: none"> Alternative designs: O Towers (i.e. types and specific siting), new access roads etc. <p>This should be following by subsections for each of the above referenced alternative methods which will provide further information and preliminary details.</p> <p>Revise heading and text accordingly. Please provide the additional information in this section of the ToR.</p>		
MECP – 67	<p>Section 4.4, general</p> <p>Need to expand on the explanation for limiting the number of route alternatives to be considered in the EA (i.e. connection criteria and Provincial Policy Statement). Our understanding is that there are a number of linear corridors that are located between Thunder Bay and Wawa. Why will the EA not identify, evaluate and assess all these potential corridors?</p> <p>If limiting the number of route alternatives to be considered in the EA, thorough justification and rationale is required. In accordance with section 5.2.5 of the Code of Practice, the ToR should provide justification for limiting the examination of alternatives and a statement of the rationale for the alternatives that will be examined the EA. This should be accompanied by</p>	<p>Text has been revised to the following: “There are a number of existing linear corridors between Thunder Bay and Wawa which would satisfy the connection criteria for the Project. The identified route alternatives have been presented due to cost, construction, operation, maintenance, reliability, stakeholder consultation and environmental concerns. Large portions of the proposed corridor have been previously studied and significant public and Indigenous consultation has gone into identifying the proposed route alternatives. Section 5.2.5 of the Code of Practice states the ToR should provide justification for limiting the examination of alternatives and a statement of the rationale for the alternatives that will be examined the EA. A thorough screening of route alternatives will be provided in</p>	<p>Section 6.3.1 has been modified to include an explanation on route alternatives.</p>

	Agency Comment	Hydro One Response Provided	ToR Section Revision
	<p>supporting documentation.</p> <p>Furthermore, provide background on the reference route and the justification for its use.</p> <p>If justification and rationale for limiting the number of route alternatives to be considered in the EA cannot be provided in the ToR, please include a commitment that a thorough screening of the route alternatives will be provided in the EA (i.e. the EA will identify, evaluate and assess a reasonable range of potential linear corridors that are located between Thunder Bay and Wawa).</p> <p>Revise text accordingly. Please provide the additional information in this section of the ToR.</p>	the EA.”	
MECP – 68	<p>Section 4.4, page 29</p> <p>Section 5.2.5 of the ministry’s Code of Practice identifies a number of questions that can be used by proponents when determining the alternatives that should be considered during the EA process. These questions are designed to aid proponents in identifying and determining an initial range of alternatives, that may reasonably address the problem or opportunity that prompted the initiation of the EA process and be within a proponent’s ability to implement, that should be carried forward for further consideration during the EA process. These questions are not</p>	List of questions has been removed.	Removed list from Section 6.3.1.

	Agency Comment	Hydro One Response Provided	ToR Section Revision
	<p>intended to be used as a means by which alternatives are compared and assessed or by which a preferred alternative is determined.</p> <p>Please remove text regarding the questions listed in section 5.2.5 of the ministry’s Code of Practice.</p>		
MECP – 69	<p>Section 4.4.1, general</p> <p>Local refinements to the reference route might be required as a result of consultation, to avoid sensitive environmental features (natural, socio-economic, cultural etc.), technical considerations, and request of landowners. This needs to be clearly articulate in this subsection.</p> <p>Also, please statement that the need for local refinements to the reference route and final siting will be determined and evaluated during the EA process.</p> <p>Revise text accordingly.</p>	<p>Added text:</p> <p>“Local refinements to the reference route might be required as a result of consultation, to avoid sensitive environmental features (natural, socio-economic, cultural etc.), technical considerations, and request of landowners. The need for local refinements to the reference route and final siting will be determined and evaluated during the EA process.”</p>	<p>Section 6.3.3 has been revised.</p>
MECP – 70	<p>Section 4.4.1, page 30</p> <p>The last three paragraphs on this page briefly describe a preliminary list of criteria and indicators (i.e. Appendix 2 of the draft ToR) and a preliminary assessment and evaluation methodology that will be utilized during the EA process. However the discussion only refers to the alternatives methods related to local refinements to the reference route and is insufficient.</p> <p>To improve clarity and flow, any</p>	<p>Text moved to Section 6.4 to discuss alternative methods (not just alternative routes).</p> <p>“When alternative methods are being considered, a local study area will be established. Data will be collected for environmental features within the study area to identify the preferred alternative method. This data is intended to assist in determining the overall effect of the ROW alignment on the natural, socio-economic and cultural/built</p>	<p>Last 3 paragraphs of Section 4.4.1 has been moved to Section 6.4 (old Section 4.5).</p>

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	<p>discussion of the preliminary list of criteria and indicators (i.e. Appendix 2 of the draft ToR) and a preliminary assessment and evaluation methodology should be moved to Section 4.5 of this ToR document.</p> <p>In addition, this discussion should be general and apply to all alternative methods. In accordance with Section 5.2.7 of the ministry’s Code of Practice, it is the ministry’s expectation that Hydro One will conduct a systematic evaluation of all the alternative methods of carrying out the undertaking.</p> <p>Please remove text regarding preliminary list of criteria and indicators and the preliminary assessment and evaluation methodology. See Comment #71.</p>	<p>environments to develop appropriate mitigation measures. These evaluation criteria and indicators may be subject to refinement and modification during the EA process based on study findings, consultation and provincial policy.</p> <p>Technical, administrative and cost criteria will also be considered in this process.”</p>	
MECP – 71	<p>Section 4.5, general</p> <p>The purpose of this section is to describe the approach to be taken in the assessment and evaluation of the alternatives in the EA. At the heart of the EA planning process in Ontario is the comparative analysis of alternatives, assessing advantages and disadvantages and determining the best alternative that is appropriate to address the problem or opportunity.</p> <p>In accordance with Section 5.2.7 of the ministry’s Code of Practice, proponents must conduct a systematic evaluation of the alternatives.</p>	<p>Section 6.4 has been significantly amended and expanded to incorporate the suggested text inclusions and commitments for outlining the methodology to alternative method assessment.</p> <p>Information on development of the criteria and indicators was also added to the section and so were commitments to outline preliminary criteria, rationale and data sources and their refinement during consultation.</p>	Section 6.4 has been modified.

	Agency Comment	Hydro One Response Provided	ToR Section Revision
	<p><u>Evaluation Methodology</u> The ToR should either identify the evaluation method(s) to be used and the reason for its selection or outline the general parameters that will be used to identify the evaluation method(s) in the EA. Please clearly indicated at the evaluation method(s) will be used during EA process to assess:</p> <ul style="list-style-type: none"> • Potential environmental effects • Impact management measures • Net effects • advantages and disadvantages of the alternatives on the environment during all phases of the project (i.e. construction, operation, maintenance etc.). <p>The method(s) chosen must be able to produce an assessment that is clear logical and traceable.</p> <p><u>Criteria and Indicators</u> The evaluation method(s) are based on a set of criteria and indicators. Sufficient information about the criteria and indicators, or how they will be developed, should be given in the ToR to ensure that they can be understood by interested persons who are then able to provide informed comments. For instance, the ToR should explain the rationale for the selection of each of the proposed criteria and indicators, and an</p>		

	Agency Comment	Hydro One Response Provided	ToR Section Revision
	<p>explanation about how each criteria and indicator may be further developed during the EA process.</p> <p><u>Data Sources</u> The main body of the ToR should state the potential data sources for the criteria and indicators that will be used during the EA process.</p> <p><u>Overall</u> Please indicate that the information provided in this section is preliminary and more detail will be provided in the EA. Include a commitment in the ToR document that the criteria, indicators and evaluation method(s) will be further developed and refined during the EA process, in consultation with the public, government agencies, Indigenous communities, and any other interested persons. Please revise this section accordingly.</p>		
MECP – 72	<p>Section 4.6, page 31 If the general location of the project and certain technical considerations has been determined through another planning process, then those details needs to be clearly presented in this section of the ToR document and the associated supporting documentation must be provided. (See Comments #1 and #14). Revise text accordingly. Please provide supporting documentation to confirm and validate the information provided</p>	<p>Text modified to incorporate additional information on the background of the technical and location considerations as identified by the IESO/OPA/OEB.</p>	<p>Section 4.2 text has been modified.</p>

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	(See Comment #1 and #14).		
MECP – 73	Section 4.6.1, general This section briefly describes alternative design considerations and preliminary assessment and evaluation methodology that will be utilized during the EA process. As per Comment #70, to improve clarity and flow, any discussion of criteria and indicators and a preliminary assessment and evaluation methodology should be moved to Section 4.5 of this ToR document. This discussion should be general and apply to all alternative methods of carrying out the undertaking. Please revise this section accordingly. See Comment #71	Text has been updated with: Design considerations are applicable to all alternative methods of carrying out the undertaking.	Section 4.2.1 has been moved under Section 4.2 (old Section 4.5).
MECP – 74	Section 4.6.2, general Any discussion of the technical considerations for the transmission line ROW should include all proposed routes and not be specific to the reference route (i.e. “For the section of the line through PNP...”). The preferred transmission line route will be determined through the EA process and the ToR should not presuppose the outcome of the EA.	Text modified to outline design criteria in a more generic manner: New ROWs not adjacent to the existing East-West Tie corridor, typically up to 46 m wide, will be cleared of vegetation to accommodate the transmission line. For any alternative routes where quad-circuit towers would be proposed as a design consideration, the corridor will not be widened and as such no vegetation removals would be required outside the existing ROW.	Section 4.2.2 has been modified to remove presuppositions of the EA.
MECP – 75	Section 4.6.3, page 32 To improve clarity, consider the following revision to the last sentence: “This will be confirmed in the detail design stage for the Project. further discussed in the EA”	Text has been revised as presented.	Section 4.2.3 has been modified.

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	Revise text accordingly.		
MECP – 76	Section 4.6.4, general Only temporary access roads are mentioned; however, will any of the access roads be considered permanent? Will these be new access roads or extensions to existing access roads? Revise text accordingly.	Information on access roads has been added to this section.	Text modified in Section 4.2.4.
MECP – 77	Section 4.6.6, general Will there be a need for construction camps? All components and structures associated with construction should be identified and discussed in the EA. Revise text accordingly.	Text added: “The need for construction camps during the execution of the project is expected. These camps are anticipated to be located in Nipigon, Marathon and White River in areas that are in proximity of the laydown yards and have easy access to the fly yards and major access points. Accommodations will also be sought in both Thunder Bay and Wawa, however we anticipate that the local infrastructure would be able to accommodate the anticipated labour force.”	Added Section 4.2.9
MECP – 78	Section 4.7.2, general The heading for this section should include “Maintenance” (i.e. operation and maintenance). Does the Transmission Vegetation Management Program apply to this project? If so please provide further information. Revise heading accordingly. Please provide any additional information in this section of the ToR.	Text added: A Transmission Vegetation Management Program developed within Hydro One will apply to the operation and maintenance of the corridor.	Section 4.3.2 has been modified.

	Agency Comment	Hydro One Response Provided	ToR Section Revision
MECP – 79	<p>Section 4.7.3, general</p> <p>What are examples of decommissioning activities for this type of project? Please include a commitment in this section of the ToR that states if decommissioning activities are required, a detailed review of the potential environmental effects and mitigation measures will be provide.</p> <p>Revise text accordingly. Please provide any additional information in this section of the ToR.</p>	<p>Text added:</p> <p>“If decommissioning activities are required, a detailed review of the potential environmental effects and mitigation measures will be provide”</p>	<p>Section 4.3.3 has been modified.</p>
MECP – 80	<p>Section 5, page 36 & Figure 5</p> <p>While the ministry understands proponents have specific project schedules they strive to maintain, delays may occur. However, it should be the purpose of Figure 5 to highlight the key milestones during in the EA process to ensure that interested persons understand the process, and when they are able to review documents and provide comments before decision are made.</p> <p>As such, to improve clarity, please remove the “when” column in Figure 5 and the second last sentence on page 36: “The timelines in the figure are required to meeting the project need date.”</p>	<p>Figure 5 has been removed as without specific timelines it is duplication of Figure 3.</p>	<p>Figure 5 modified.</p>
MECP – 81	<p>Figure 5, page 37</p> <p>There are other key milestones after the formal submission of a final EA document that are absent from in Figure 5 (i.e.</p>	<p>Figure 5 has been removed as without specific timelines it is duplication of Figure 3.</p>	<p>Figure 5 removed.</p>

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	<p>Inspection of the Ministry Review). In order to improve transparency, please incorporate the missing key milestones. Refer to Appendix A: Environmental Assessment Process Timelines of the ministry's Code of Practice.</p> <p>In addition, the "Specific Consultation Activities" should specify that documentation (i.e. draft & final ToRs and EAs) will be reviewed by government agencies and Indigenous communities, as well as the public.</p> <p>Revise Figure 5 accordingly.</p>		
MECP – 82	<p>Section 5.1, page 38</p> <p>To improve clarity, consider the following revision to the first sentence: "...best practices in public and stakeholder consultation and engagement..."</p> <p>Revise text accordingly.</p>	Text has been revised as presented.	Section 9.1 has been revised.
MECP – 83	<p>Section 5.2, general</p> <p>This section should be incorporated as a subsection under Section 5.5 "Consultation Plan for the EA"</p> <p>Revise ToR document accordingly.</p>	Text has been moved.	Section moved to 9.4.3 under Consultation Plan for the EA.
MECP – 84	<p>Section 5.2, page 38</p> <p>Stakeholders should be consulted throughout the EA process and not just with regard to alternative methods. Please revise the last sentence of the first paragraph accordingly.</p> <p>Revise text accordingly.</p>	Text modified: The following stakeholders will be consulted throughout the EA process	Section 9.4.3 modified accordingly.
MECP – 85	Section 5.2, page 39	Third paragraph has been revised to	Section 9.4.3 revised accordingly.

	Agency Comment	Hydro One Response Provided	ToR Section Revision
	<p>Third Paragraph - Section 5.3 provides further information and details regarding Duty to Consult and Indigenous community consultation. As such, to improve clarity, the third paragraph should include a reference to Section 5.3.</p> <p>Fourth Paragraph - Please include a commitment that the comprehensive project contact list will continually be reviewed and updated during the EA process.</p> <p>Revise this section accordingly.</p>	<p>incorporate a reference to section 9.2</p> <p>In delegating procedural aspects of consultation, the Ministry of Energy has identified fourteen First Nations and four Métis Groups as having a potential interest in the Project. The duty to consult is discussed further in Section 9.2</p> <p>Fourth paragraph has been revised to: “A comprehensive contact list is being maintained from the outset of the Project. Hydro One is committed that the comprehensive project contact list is continually reviewed and updated during the EA process as contacts change and new contacts are identified through consultation activities.”</p>	
MECP – 86	<p>Section 5.2, page 39</p> <p>These bullet points are describing the consultation and engagement activities planned for the project during the EA process. To improve clarity and flow of the ToR document, it would be more appropriate for this information to be moved and incorporated into to the list in Section 5.5.1.</p> <p>In addition, the last bullet point should remove reference to “draft and final ToR”. Any consultation and engagement activities related to the preparation of</p>	<p>List moved and incorporated into list under 9.4.1.</p> <p>Removed reference to draft and final ToR.</p> <p>Draft and final ToR and EA documents will be distributed to government agencies, key interest groups, and municipal officials and staff of communities along the project route.</p>	<p>Section 9.4.1 has incorporated these changes.</p>

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	<p>the Terms of Reference should be described in Section 5.4.</p> <p>Also, the last bullet should specify that documents will be made available to government agencies and Indigenous communities for review, in addition to the public.</p> <p>Revise this section accordingly.</p>		
MECP – 87	<p>Section 5.3, general</p> <p>This section should reflect the up-to-date status of the delegation and notification. In addition, to improve clarity and flow, it would be more appropriate for the list of communities as described in Section 5.4.2, to be incorporated into this section of the ToR document.</p> <p>Revise this section accordingly.</p>	<p>The section has been updated with the list of communities.</p>	<p>Section 9.2 updated with list of communities.</p>
MECP – 88	<p>Section 5.4, general</p> <p>In accordance with Section 5.2.9 of the ministry’s Code of Practice, do not confuse consultation plan with record of consultation.</p> <p>The consultation plan is for future consultation that will take place during the preparation of the EA.</p> <p>The record of consultation is for past consultation that took place during the preparation of the ToR. As such, this section of the ToR document should summarize the consultation activities that occurred and their results. In addition, proponents must submit a separate and more detailed document called a Record</p>	<p>Section 9.3 renamed to Consultation on the ToR.</p> <p>Section has been written in past tense where appropriate.</p>	<p>Section 9.3 has been modified accordingly.</p>

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	of Consultation. See Comment #2. In order to improve clarity, the heading for this section should be revised: “ Consultation Plan for on the ToR”. In addition, each of the subsection (i.e. 5.4.1 to 5.4.3) should be written in past tense since they are summarizing what has already occurred.		
MECP – 89	Section 5.5.1, page 45 The review of a draft EA document should be its own separate bullet point. Revise this section accordingly.	Review of a Draft EA document – Hydro One will notify stakeholders, government agencies, Indigenous communities and other interested parties on the contact list that the Draft EA document is available for review.	Section 9.4.1 has been modified.
MECP – 90	Section 5.5.2, general Refer to comments from Peter Brown, Indigenous Consultation Advisor, Client Services and Permissions Branch, MECP. The EA consultation plan for Indigenous communities should clearly set out the steps a proponent intends to take with respect to consultation activities. It should include, but not limited to, consideration of the following: <ul style="list-style-type: none"> • How Indigenous communities will be notified and consulted. This includes a description of the consultation activities planned (i.e. notifications, information sharing opportunities, open houses, individual meetings with the community etc.). • Points in the EA process when Indigenous communities will be 	Removed term groups from all language used for Indigenous communities. Text outlining that the EA consultation plan for Indigenous communities will clearly set out the steps Hydro One intends to take with respect to consultation activities. Added text for clarification: In addition to the tailored consultation approach for Indigenous communities, all public consultation processes and specific consultation activities outlined in Section 9.3.1 and throughout Section 9 will be available to Indigenous communities.	Section 9.4.2 (old Section 5.5.2) has been revised.

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	<p>consulted.</p> <ul style="list-style-type: none"> • Methods that will be used to consult with Indigenous communities. • Identify the decisions that Indigenous communities can provide input to and what role Indigenous communities play when the proponent makes decisions. • How traditional knowledge will be incorporated. <p>Consultation plans should be developed and refined in consultation with Indigenous communities. Each community may have different approaches and/or preferences with regard to consultation and engagement. As such, some communities may prefer to have individualized plans.</p> <p><u>Other Items</u> Please specify in this section that Indigenous communities are welcome to participate in the public consultation activities, in addition to the ones planned specifically for Indigenous communities. Please remove the word “groups” from all references to “Indigenous communities and groups”. The appropriate reference is just “Indigenous communities” Revise this section accordingly.</p>		
MECP – 91	<p>Section 5.5.3, general The appropriate reference is “government agencies” and not just “agency”.</p>	<p>References to agency throughout the document have been revised to include government agencies.</p>	<p>All sections of ToR.</p>

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	Revise this section accordingly.		
MECP – 92	Section 5.5.4, general Please use one term (i.e. record) when referring to the consultation record. Too many terms (i.e. log, database etc.) is confusing. Please clarify the last sentence in this section: “The Record of Consultation for the ToR EA will be submitted...” Revise text accordingly.	Record has been standardized. Log and database have been removed. Modifications made to last sentence.	Section 9.4.5.
MECP – 93	Section 5.6, page 49 Please specify: “all comments and inputs received from the public, government agencies and Indigenous communities will be documented...” Revise text accordingly.	All comments and input received from the public, government agencies, and Indigenous communities will be documented in a summary table and included in the EA document as part of the Record of Consultation.	Section 9.5 revised.
MECP – 94	Section 6, general The section notes that environmental studies have been completed by another proponent. Hydro One specifies that they intend on using this information and will conduct a gap analysis to identify the need of verification or collection of data to complete the description of the environment. What are the environmental studies you are referring too and by which proponent? Is this reference to NextBridge and the NextBridge EA? The ministry would like to emphasize that as outlined in our November 14, 2017 letter to Hydro One and reiterated in correspondence from March 16, 2018	Direct references to NextBridge will be removed. Desktop studies will supplement any proposed EA studies. Where studies have been conducted on the proposed corridor and they apply to the project, Hydro One will not duplicate these studies, but instead use publicly available information to inform assessment efforts. Hydro One will conduct the appropriate studies where information is needed to satisfy the EA requirements. The current preliminary focus of field surveys includes Pukaskwa National Park, the transmission corridor between Wawa and Marathon, the Dorion area, temporary and permanent access roads, laydown areas, fly yards	Section 5 revised.

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	<p>and April 10, 2018; Hydro One's proposed Lake Superior Link Transmission Project is considered a new undertaking for the purpose of the Environmental Assessment Act. As such, Hydro One is required to complete the requirements of the Environmental Assessment Act including preparing technical studies for analysis and evaluation and consultation requirements. This information must be completed and submitted as part of the Lake Superior Link EA.</p> <p>Revise text accordingly. Please remove references to other proponent's environmental studies throughout this section. See Comment #12 and #60.</p>	<p>and any additional areas identified as a concern. Hydro One will continue to engage regulators to ensure the baseline data is adequate for the EA.</p> <p>Text revised to the following: The biophysical and socio-economic baseline environmental conditions of the reference route alternative and much of the reference route have been recently extensively studied and these results are publicly available. Where there is an overlap of the study areas, Hydro One is generally not duplicating these studies, but using the information available publicly through existing environmental studies already funded by the ratepayers of Ontario.</p>	
MECP – 95	<p>Section 6, general</p> <p>Please include a commitment in the ToR document that a more detailed description of the environment and the baseline conditions for all environmental components will be provided in the EA.</p> <p>Revise text accordingly.</p>	<p>More detailed description of the environment and the baseline conditions for all environmental components will be provided in the EA.</p>	Section 5 revised.
MECP – 96	<p>Section 6.1 and 6.2, general</p> <p>The subsections of Section 6.1 and 6.2 provide information on proposed data collection tools/methods (i.e. studies, tests, surveys or mapping etc.) for each of the environmental components; however, in accordance with Section 5.2.6 of the ministry's Code of Practice, the ToR should provide a preliminary</p>	<p>Additional information on the environmental components in Sections 6.1, 6.2 and 6.3 have been added to bolster understanding of their current state. These sections have been revised substantially to provide additional information on existing environmental conditions.</p>	Sections 5.1, 5.2 and 5.3 have been revised substantially to reflect comments.

	Agency Comment	Hydro One Response Provided	ToR Section Revision
	<p>description of the environment and baseline conditions.</p> <p>The current descriptions of each of the environment components have limited information. Descriptions of the environment and baseline conditions should be sufficiently detailed to allow the government agencies to determine whether the proposed studies will meet the information requirements of the particular agency.</p> <p>For instance, further information that can be included, but not limited to:</p> <ul style="list-style-type: none"> • A description of the Lake Superior Watershed and any secondary or tertiary watersheds • A preliminary list of SARs in the study area • A list of the species of fish that are expected based on aquatic features of the study area. <p>Please provide further information on baseline conditions for each of the environmental components.</p> <p>Revise this section accordingly.</p>		
MECP – 97	<p>Section 6.1 and 6.2, general</p> <p>In accordance with Section 5.2.6 of the ministry’s Code of Practice, the ToR should include a list and brief explanation of the tools (i.e. studies, tests, surveys, mapping etc.) that will be used to provide a more detailed description of the environment in the EA. Lists will not</p>	<p>Significantly revised Sections 5. Overall data collection methodology has been placed into its own section and data sources have been tabulated. Where appropriate, study-specific data collection methodology is briefly discussed under the study subheadings where it is most pertinent.</p>	<p>Section 5.1 (Data Collection Methodology) and 5.1.1 (Published Sources of Information) have been added to provide a clearer flow and structure for data collection methodology. Sections and subsections under 5.2 and 5.3 have been revised to reflect the updated methodology</p>

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	<p>preclude proponents from conducting additional and more detailed studies as part of the EA.</p> <p>Although the subsections of Section 6.1 and 6.2 provide information on proposed data collection tools/methods, to improve clarity and flow, this information should be integrated into one subsection. As such, please incorporate a subsection in Section 6 that includes a list and a brief explanation for each of the available or existing data collection tools (i.e. studies, tests, surveys or mapping etc.) that were used to determine the existing conditions of each component of the environment. Also, please include a list and a brief explanation of the data collection tools (i.e. studies, tests, surveys, mapping etc.) that will be carried out to provide a more detailed description of the environment in the EA.</p> <p>Overall, sufficient information should be given in the ToR to ensure that data collection tools/methods can be understood by interested government agencies, Indigenous communities and members of the public who are then able to provide informed comments. Revise this section accordingly.</p>	<p>Study methods have been listed. The scope and intensity of study and its associated data collection methodology will be further refined during the EA process throughout consultation with stakeholders, Indigenous communities, data gap analysis, in response to novel information and Project refinements.</p>	<p>sections.</p>
MECP – 98	<p>Section 6.1.1 to 6.1.2, general Field work may be required to gather information on environmental baseline conditions. As such, please remove</p>	<p>No field work has been replaced with 'desktop studies will be used and supplemented with field work, where required.'</p>	<p>Sections 5.1.1 and 5.1.2 have been modified accordingly.</p>

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	<p>references to “no field work” and include statements such as “desktop studies will be used and supplemented with field work where required” or “field work will be conducted if necessary” etc. Revise these subsections accordingly.</p>		
MECP – 99	<p>Section 6.1.6, page 56 The last paragraph provides general information and references all environmental components. As such, it would be more appropriate to move this to the beginning of Section 6.1 of this ToR document. Revise this section accordingly.</p>	<p>All information collected as part of the natural environment field programs will be used in the EA, to identify potential effects and practicable mitigation measures, and to fine tune the locations of towers, access roads and water crossings (where appropriate). Information will also be used for any approvals that may be required prior to construction.</p>	<p>Last paragraph of Section 5.1.6 has been moved to Section 5.1.</p>
MECP – 100	<p>Section 6.1.8, general Please specify that potential project emission sources will be evaluated against regulatory standards in the EA. Revise text accordingly.</p>	<p>Potential Project emission sources will be evaluated against regulatory standards in the EA.</p>	<p>Section 5.1.8 modified accordingly.</p>
MECP – 101	<p>Section 6.1.9, general Please specify that potential noise emission sources will be evaluated against regulatory standards in the EA. Revise text accordingly.</p>	<p>Potential noise emission sources will be evaluated against regulatory standards in the EA.</p>	<p>Section 5.1.9 modified accordingly.</p>
MECP - 102	<p>Section 6.2, general To improve clarity and flow, considering separating the socio-economic environmental components and the cultural/built environment components into two separate sections. Revise ToR document accordingly.</p>	<p>Section 5.2 has been split into Section 5.2 and 5.3 separating the socio-economic environmental components and the cultural/built environment components.</p>	<p>Sections 5.2 and 5.3 have been revised.</p>

	Agency Comment	Hydro One Response Provided	ToR Section Revision
MECP - 103	<p>Section 6.2.3, page 58</p> <p>To improve clarity, considering the following revision to the first sentence of the last paragraph that: “The EA will describe and assess existing commercial, recreational and industrial activities...”</p> <p>Revise text accordingly.</p>	Text revised as presented.	Section 5.2.2 has been revised.
MECP - 104	<p>Section 6.2.5, general</p> <p>Refer to comments from Peter Brown, Indigenous Consultation Advisor, Client Services and Permissions Branch, MECP. Indigenous community-specific criteria and indicators may be required for the evaluation of alternatives and assessment of the preferred undertaking. Please include a commitment in the ToR that specifies criteria and indicators of relevance to Indigenous communities will be developed in consultation with Indigenous communities.</p> <p>Revise text accordingly.</p>	Criteria and indicators of relevance to Indigenous communities will be developed in consultation with Indigenous communities.	Section 5.3.2 has been revised.
MECP - 105	<p>Section 6.2.7, page 60</p> <p>The landscape characteristic should be described for the entire study area, not just “the area located West of Nigigon, and the Pukaskwa River Provincial Park”. As such please remove this reference.</p> <p>Revise text accordingly.</p>	During the EA, the Project team will prepare a description of the landscape character within the study areas, identifying landscape settings and features of importance. This assessment will focus on valued viewpoints by the public and those identified by the project team as contributing to the aesthetic character of an area (e.g., ESA’s and river valleys). Ongoing consultation has also identified potential areas of visual assessment that will be	Section 5.2.5 has been revised.

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		considered. The team will review available models for this assessment.	
MECP - 106	Section 6.2.8, general Has there been any preliminary consultation with municipalities, MTO etc. regarding services and infrastructure? Please provide the additional information as part of the Record of Consultation (See Comment 2).	Record of consultation will contain consultation with municipalities and other government agencies.	N/A
MECP - 107	Section 6.2.9, general What are the Hydro One Land Acquisition Compensation Principles? Please provide further information. Revise the text accordingly. Please provide the additional information in this section of the ToR.	Added text: LACP are project-specific land acquisition compensation principles are founded upon Hydro One's past experience pertaining to land acquisition matters for new transmission projects. Hydro One's central consideration has been the need for Property Owners to have flexibility and choice while balancing Hydro One's desire to achieve timely acquisition of property interests and its obligation to ensure that expenditures are fair and reasonable to ratepayers.	Section 5.2.7 has been modified.
MECP - 108	Section 7, general Once the assessment and comparative evaluation of the alternatives is completed, a preferred undertaking will be identified. The purpose of this section is to describe the approach to be taken in the evaluation of the environmental effects of preferred undertaking. The intent is to allow the additional details developed on the preferred undertaking (i.e. design, operations etc.) to be	Section 7 has been modified to incorporate refinement of evaluation of Project effects and the suggested changes in this comment.	Section 7 has been revised accordingly.

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	<p>assessed. It also allows for the evaluation of impact management measures and net effects within the context of a more comprehensive description for the preferred undertaking.</p> <p>In accordance with Section 5.2.7 of the ministry’s Code of Practice, the ToR should either identify the evaluation method(s) to be used and the reason for its selection or outline the general parameters that will be used to identify the evaluation method(s) in the EA. Please clearly indicated at the evaluation method(s) will be used during EA process to assess:</p> <ul style="list-style-type: none"> • Potential environmental effects • Impact management measures • Net effects • advantages and disadvantages of the undertaking on the environment during all phases of the project (i.e. construction, operation, maintenance etc.). <p>The method(s) chosen must be able to produce an assessment that is clear logical and traceable.</p>		
MECP - 109	<p>Section 7, page 61</p> <p>To improve clarity, consider the following revision: “The following section identifies the potential effects assessment and evaluation and associated mitigation measures to address them avoid or minimize negative effects. Table 2</p>	<p>The following section identifies the potential effects evaluation and associated mitigation measures to avoid or minimize negative effects. Table 7 identifies the preliminary environmental features and technical considerations that will be assessed in the evaluation of</p>	<p>Section 7 has been revised accordingly.</p>

	Agency Comment	Hydro One Response Provided	ToR Section Revision
	<p>identifies the preliminary environmental features and technical considerations that will be applied assessed in the evaluation of potential environmental effects.”</p> <p>Please include a statement that the preliminary list of features/considerations will be developed and refined during the EA process in consultation with the public, government agencies, Indigenous communities, and any other interested persons.</p> <p>Are you referring to the preliminary criteria and indicators in Appendix 2? If so please reference in the text.</p> <p>Revise text accordingly.</p>	<p>potential environmental effects.</p> <p>A preliminary list of criteria and indicators can be found in Appendix 1.</p>	
MECP - 110	<p>Section 7, page 62</p> <p>This first paragraph discusses mitigation measures. However, to improve clarity and flow of the ToR document, it would be more appropriate for the discussions regarding the assessment of potential environmental effects and mitigation measures to be separated into two separate subsections: i.e. ‘Effects Assessment’ & ‘Mitigation Measures’.</p> <p>Also consider the following revision: “Mitigation measures will be developed and described in the EA to avoid or minimize negative effects due to construction and operation of the project with due consideration of cost, safety,</p>	<p>Mitigation measures have been placed into Section 7.3.</p> <p>Proposed text revisions have implemented.</p> <p>Pre-and post- have been clarified to construction and operation, respectively.</p> <p>The EA will recommend construction and operational monitoring programs designed to verify effects prediction, the effectiveness of mitigation measures and the need for any remedial measures, should they be necessary.</p>	<p>Section 7.3 created for mitigation measures.</p>

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	<p>feasibility and technical standards. “ Please clarify what phases are included in ‘pre- and post-operational’”. Revise text and this section accordingly.</p>		
MECP - 111	<p>Section 7.1 and 7.2, general The information presented in these sections needs to be revised in order to improve clarity and flow. Potential environmental effects, mitigation measures, evaluation methods for alternatives, criteria and indicators, data sources etc. are all discussed at once. However, this information should be separated and incorporated into the appropriate corresponding sections of the ToR document (as facilitated by my comments on the draft ToR). <u>Potential environmental effects and mitigation measures</u> The preliminary information discussed in Section 7.1 and 7.2 with regards to the potential environmental effects and mitigation measures, is related to the assessment and evaluation of the alternatives and the preferred undertaking. As such, it would be more appropriate for this information to be incorporated as subsections at the end of Section 6 of this ToR document. In addition, to improve clarity, it is recommended that this information in sections 7.1 and 7.2 be put into tabular format.</p>	<p>Sections 7.1 and 7.2 have been moved to the end of Section 6. Appendix 1 has been substantially revised and sections have been incorporated into the preliminary criteria and indicators table. Other portions of this section have been tabularized.</p>	<p>Sections 7.1 and 7.2 have been moved to the end of Section 6. Appendix 1 modified accordingly.</p>

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	Revise this section and ToR document accordingly.		
MECP - 112	Section 7.2, general To improve clarity and flow, considering separating the potential socio-economic environmental effects and the potential cultural/built environment effects into two separate sections. Revise ToR document accordingly	Socio-economic and cultural/built environment have been separated in Table 4.	Table 4 revised.
MECP - 113	Section 7.3. general This section specifies that the technical, administrative and cost considerations should be used to evaluate the alternatives. As such, to improve clarity and flow, it would be more appropriate for this section to be moved to Section 4.5 of this ToR document. Revise ToR document accordingly.	Technical, administrative and cost considerations have been moved to the end of Section 6.4 (old Section 4.5).	Section 7.3 has been moved into Section 6.4.
MECP - 114	Section 8, general In accordance with Section 5.2.8 of the ministry's Code of Practice, the ToR must include a statement that the EA will include a comprehensive list of commitments made by the proponent during the ToR process, and where or how they have been dealt with in the EA. Furthermore, the EA will include a comprehensive list of commitments made by the proponent during the EA process; including all commitments relating to impact management measures, additional works and studies to be carried out, monitoring,	Added section on commitments: In accordance with Section 5.2.8 of the Ministry's Code of Practice, the EA will include a comprehensive list of commitments made by Hydro One during the ToR process, and where or how they have been dealt with in the EA. Furthermore, the EA will include a comprehensive list of commitments made by Hydro One during the EA process; including all commitments relating to impact management measures, additional works and studies to be carried out, monitoring, consultation and contingency planning,	Section 8.3 has been created for commitments.

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	consultation and contingency planning, and documentation and correspondence. As such, consider incorporating a new subsection in Section 8 of the ToR that speaks to ‘commitments’ and references these requirements. Revise this section accordingly.	and documentation and correspondence.	
MECP - 115	Section 8, general In accordance with Section 5.2.8 of the ministry’s Code of Practice, a monitoring framework will consider all phases of the proposed undertaking (planning, detailed design, construction, operations, decommissioning etc.). Please clarify what phases are included in ‘pre- and post-operational’. Include a commitment in the ToR that clearly states a monitoring framework will be develop during the EA and will consider all phases of the proposed undertaking. Revise text accordingly.	In accordance with Section 5.2.8 of the Ministry’s Code of Practice, a monitoring framework will be developed during the EA and will consider all phases of the proposed undertaking. Pre-and post- have been clarified to construction and operation, respectively.	Section 8 has been revised.
MECP - 116	Section 8.1 and 8.2, general In accordance with Section 5.2.8 of the ministry’s Code of Practice, the monitoring framework includes two types of monitoring: <ul style="list-style-type: none"> • compliance monitoring – assessment of whether an undertaking had been constructed, implemented and/or operated in accordance with commitments made during the EA and the conditions of EA approval; 	Definitions of compliance and effects monitoring have been added to the document.	Sections 8.1 and 8.2 have been revised.

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	<ul style="list-style-type: none"> • effects monitoring – activities carried out by the proponent after approval of the undertaking to determine the environmental effects of the undertaking. To improve clarity and flow, please clearly define the two types of monitoring in the corresponding sections; Sections 8.1 (effects monitoring) and 8.2 (compliance monitoring). Revise these sections accordingly. 		
MECP - 117	<p>Section 8.1, general This section is supposed to provide preliminary information on effects monitoring; however, it includes information on compliance monitoring (i.e. EA commitments). As such, it would be more appropriate to move information on compliance monitoring to Section 8.2 of this ToR document. What is the project environmental management system? Will it include effects monitoring in addition to compliance monitoring? Please provide further information. Revise text and section accordingly.</p>	<p>Environmental management system has been clarified to include both effects and compliance monitoring. Compliance monitoring has been moved to Section 8.2. Clarification on environmental management system has been added.</p>	<p>Sections 8.1 and 8.2 have been revised.</p>
MECP - 118	<p>Section 8.1, page 67 To improve clarity, consider the following revision: “During the later stages of the EA process, a monitoring program will be developed.... will ensure compliance with the all commitments set out in this assessment made during the EA process, plus other environmental</p>	<p>Text revised as provided, paragraph moved to Section 8.2, similar paragraph in Section 8.1 revised.</p>	<p>Paragraph moved to Section 8.2, similar paragraph in Section 8.1 revised.</p>

	Agency Comment	Hydro One Response Provided	ToR Section Revision
	<p>requirements....”</p> <p>Please move this paragraph to Section 8.2 (See Comment #119) and incorporate a similar commitment that speaks to effects monitoring.</p> <p>Revise text and section accordingly.</p>		
MECP – 119	<p>Section 8.2, general</p> <p>The current information in this section regarding compliance monitoring should be replaced with the information on compliance monitoring from Section 8.1. In accordance with Section 5.2.8 of the ministry’s Code of Practice, the EA will need to provide a monitoring strategy that sets out how and when all commitments made in the EA will be fulfilled and how the proponent will report to the ministry about compliance. Please include a commitment referencing this requirement in this section of the ToR.</p> <p>Revise text accordingly.</p>	<p>Compliance monitoring moved to Section 8.2</p> <p>Hydro One will provide a monitoring strategy that sets out how and when all commitments made in the EA will be fulfilled and how the proponent will report to the ministry about compliance.</p>	Sections 8.1 and 8.2 revised.
MECP - 120	<p>Appendix 2</p> <p>The table should clearly identify which column refers to the ‘criteria’ that will be used for the assessment and evaluation of alternatives. Also, the items under the “features considered” column should be separated into more specific criteria. For instance, “environmentally sensitive areas” can be separated further but not limited to:</p> <ul style="list-style-type: none"> • Natural heritage features (i.e. ANSI) 	<p>Appendix 1 criteria and indicators have been extensively modified based on the comments provided.</p> <p>Criteria and indicators have been updated and clarified, environment includes cultural/built environment, technical considerations have been added, references to existing EA studies have been removed (NextBridge).</p>	Appendix 1 has been modified.

	Agency Comment	Hydro One Response Provided	ToR Section Revision
	<ul style="list-style-type: none"> • Wetlands • Species at risk • Terrestrial habitat • Aquatic habitat <p>Also, items under the “environment” column should include cultural and built environments, and any other technical considerations.</p> <p>In addition, please include a column that identifies preliminary potential effects on each of the indicators.</p> <p>Also, as per Comments #12, #60 and #94 please remove references to the existing NextBridge EA studies.</p> <p>Overall, sufficient information should be given in the ToR to ensure that this table can be understood by interested persons who are then able to provide informed comments.</p> <p>Revise table accordingly.</p>		
	Ministry of the Environment, Conservation and Parks (MECP), Peter Brown, Indigenous Consultation Advisor, Letter Dated July 26, 2018 to Bruce Hopper, Hydro One Networks Inc. (HONI)		
MECP - 121	<p>Throughout (e.g., Sections 3.1, 4.4.1, 5.0, 5.1, 5.2, 5.4, 5.6)</p> <p>Please make sure that Indigenous communities are identified separately from stakeholders and agencies in the Final ToR. Many indigenous communities prefer to not be identified as stakeholders.</p> <p>Revise text throughout to identify Indigenous communities, stakeholders and agencies separately.</p>	<p>Differentiation between stakeholders and Indigenous communities has been clarified.</p>	<p>Section 3, 5 and Section 6.3.3 have been modified.</p>

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MECP - 122	<p>Section 5.3, page 40.</p> <p>The Ministry of Energy, on behalf of the Crown, formally delegated procedural aspects of consultation to Hydro One and provided a list of communities to be consulted for the environmental assessment process on March 2, 2018. The Ministry of Energy also notified the communities of this delegation.</p> <p>Revise the first parts of this section to reflect the up-to-date status of the delegation and notification. Please also indicate that consultation on a draft Indigenous consultation plan for the EA will occur with all identified Indigenous communities (see comment #4 below).</p>	<p>Revised section to include the following text:</p> <p>The Ministry of Energy, on behalf of the Crown, formally delegated procedural aspects of consultation to Hydro One and provided a list of communities to be consulted for the environmental assessment process on March 2, 2018. The Ministry of Energy also notified the communities of this delegation.</p> <p>Consultation on a draft Indigenous consultation plan for the EA will occur with all identified Indigenous communities.</p>	<p>Section 9.2 has been revised.</p>
MECP - 123	<p>Section 5.4, page 42.</p> <p>This section should provide a summary of the consultation undertaken during the development of the ToR, not a consultation plan for the ToR. A complete record of consultation undertaken by Hydro One during the development of the ToR should also be provided as an appendix to the ToR. Indigenous community input in the development of the ToR is a very important part of the EA process.</p> <p>Please include a summary of the consultation undertaken during the development of the ToR in the main body of the ToR. The Indigenous consultation summary should be organized by</p>	<p>Section 9.3 has been modified to include a summary of the consultation undertaken during the development of the ToR, not a consultation plan for the ToR.</p> <p>The Record of Consultation will be supplied as a supporting document to the ToR.</p> <p>Section 9.3.2, paragraph 3 has been revised to contain additional information on consultation of Indigenous communities in regards to the ToR.</p>	<p>Section 9.3 has been modified.</p>

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	community and identify key issues raised and how they are addressed in the ToR (e.g., responses to them and/or explanation of how the input informed EA methodology, study design, etc). The appended record of consultation should include all events and communications, and indicate how any questions, comments and concerns are addressed in the ToR and/or will be addressed through the EA process.		
MECP - 124	<p>Section 5.5.2</p> <p>It is not clear if the Indigenous consultation plan for the EA referenced in the draft ToR is contained within section 5.5.2 or also exists as a more extensive stand-alone document that can be modified through consultation with communities.</p> <p>It is also not clear how Hydro One will “incorporate traditional knowledge and use”, as indicated in the draft ToR (p.47). This is an important part of the EA process and requires further clarification. Please include a copy of the draft Indigenous consultation plan for the EA as part of the Final ToR or as a stand-alone document for review and consultation. I suggest calling it a draft plan until Hydro One consults with each individual Indigenous community on the plan. Some communities may request individualized plans, which should be</p>	<p>The Indigenous Consultation Plan is a standalone document that can be modified through consultation with communities. Language clarifying this has been added to Section 9.4.2. Expanded on Traditional and Indigenous Knowledge as suggested in the comment.</p>	<p>Section 9.4.2 has been revised.</p>

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	<p>honoured or accommodated appropriately (e.g., community-specific sections) within the overall consultation plan.</p> <p>Each community may have different approaches and preferences for the sharing of Traditional or Indigenous Knowledge, and this should also be honoured by Hydro One. Please note that Indigenous Knowledge should be an input to most physical, biological and human components of the environment. Please state a commitment to consider, and incorporate as appropriate, Indigenous consultation and knowledge in, for example:</p> <ul style="list-style-type: none"> • the methodology for and description of baseline conditions (e.g., study areas; environmental components; resources, species, other values of importance; timing of baseline studies, etc.); • the evaluation of alternatives and assessment of the preferred undertaking (e.g., criteria and indicators of relevance to Indigenous communities for all environmental components); • the development of mitigation measures and monitoring commitments; and • the conclusions of the EA, including any residual adverse effects on Aboriginal and treaty rights 		
MECP - 125	Section 6.2.5	Indigenous consultation and	Section 5.2.2 has been modified.

	Agency Comment	Hydro One Response Provided	ToR Section Revision
	<p>“potential employment and... other relevant socio-economic aspects” should be considered under a more appropriate socio-economic component rather than as part of Traditional/Indigenous Land Use.</p> <p>Move socio-economic references from Section 6.2.5 to 6.2.3 or 6.2.4, or create a separate Indigenous employment and economic activity component.</p>	<p>employment/economic participation has been moved to Section 5.2.2.</p>	
MECP - 126	<p>Section 7.0</p> <p>Commitments to consider Traditional or Indigenous Knowledge for each environmental component are not clear. Indigenous community- specific criteria and indicators may also be required to address specific concerns or requests. This is an important part of the EA process and requires further clarification. Information provided by Indigenous communities should be considered in developing all criteria, indicators and measures, not just “for effects on traditional/Indigenous land use where relevant” (p. 65). Please clarify this throughout Section 7.0. For example, Traditional or Indigenous Knowledge or Traditional/ Indigenous Resource Uses and/or Areas should be listed as a feature or consideration under Natural Environment (p.61).</p> <p>Under Socio-Economic Environment, it is recommended to refer to Traditional</p>	<p>The preliminary list of features/considerations will be developed and refined during the EA process in consultation with the public, government agencies, Indigenous communities, and any other interested persons.</p> <p>In Appendix 1, Indigenous consultation is listed as an information source for the criteria and indicators. Clarified throughout the document that Indigenous consultation is a key component of evaluation of alternatives, mitigations and assessment of the environment throughout the EA process. Information obtained through consultation will be used in developing indicators and measures for effects on all criteria and indicators.</p> <p>Removed ‘studies’ from Traditional Knowledge.</p>	<p>Section 7.0 has been modified.</p>

	Agency Comment	Hydro One Response Provided	ToR Section Revision
	Knowledge as opposed to 'Traditional Knowledge Studies' because communities may prefer to share knowledge in ways other than through a formal study. This should be considered throughout the ToR.		
	Ministry of the Environment, Conservation and Parks (MECP), Enoch Tse, Noise Engineer, Letter Dated July 26, 2018 to Bruce Hopper, Hydro One Networks Inc. (HONI)		
MECP - 127	I have reviewed the information and have no further comments.	Comment noted; no change required.	N/A
	Ministry of the Environment, Conservation and Parks (MECP), Stefanos Habtom, Senior Wastewater Engineer, Letter Dated July 26, 2018 to Bruce Hopper, Hydro One Networks Inc. (HONI)		
MECP - 128	I have reviewed the Draft ToR for the Hydro One Lake Superior Link Project and I have no comments in terms of the mandate of the Wastewater Review Unit.	Comment noted; no change required.	N/A
	Ministry of the Environment, Conservation and Parks (MECP), Guowang Qiu, Air Quality Analyst, Letter Dated July 26, 2018 to Bruce Hopper, Hydro One Networks Inc. (HONI)		
MECP - 129	Section 7.1 Within the section of evaluation of potential effects on the natural environment, air quality was not included. There is a potential air quality effects during the construction of the project due to construction activities, especially for the fugitive dust. Consider the potential air quality effects from the construction activities, especially for the potential receptors near the transmission line, air quality impact assessment should be conducted and included in the environment assessment.	Dust and noise from construction are controlled with appropriate mitigation measures and environmental best management practices. Potential air quality effects from construction activities, especially for the potential receptors near the transmission line will be considered. Air quality impact assessment will be conducted and included in the environment assessment.	Section 6.5 (old 7.1) has been modified.
MECP - 130	Appendix 2	Appendix 1 has been modified to include	

	Agency Comment	Hydro One Response Provided	ToR Section Revision
	Air quality was not included in the list of preliminary criteria and indicators. Air quality and greenhouse gas emissions should be considered and included in the list of criteria and indicators to assess the environmental impacts of the project.	air quality and greenhouse gases.	
	Ministry of the Environment, Conservation and Parks (MECP), Mira Majerovich, Northern Region Planner/EA Coordinator, Letter Dated July 26, 2018 to Bruce Hopper, Hydro One Networks Inc. (HONI)		
MECP - 131	Permit and Approval Requirements (Sec. 2, pg. 15): Please clarify that Lake Superior Links only plans to concurrently prepare for permits and approvals while the EA process is being undertaken. As written, it infers that permit and approval applications may be submitted during the EA process. Approval under the Environmental Assessment Act comes first and that approval under one piece of legislation does not guarantee approval under another. To reduce timelines, permit or approval applications may be submitted concurrently with the EA, however, these will not be approved until the EA process is complete. Also, the proponent can consult with other agencies to coordinate documentation that could meet both the EA and other applicable approvals as needed (Code of Practice: Environmental Assessments, pg 38).	Hydro One only plans to concurrently prepare for permits and approvals while the EA process is being undertaken. Approval under the Environmental Assessment Act comes first and approval under one piece of legislation does not guarantee approval under another. To reduce timelines, permit or approval applications may be submitted concurrently with the EA, however, these will not be approved until the EA process is complete. Hydro One will consult with other government agencies to coordinate documentation that could meet both the EA and other applicable approvals as needed.	Section 2.1.1
MECP - 132	Soil Contamination (Sec. 7.1, pg. 62; Sec. 7.3, pg. 66):	The issue of soil compaction and measures to mitigate effects on soil	Section 6.5.1

	Agency Comment	Hydro One Response Provided	ToR Section Revision
	Please provide an approach for determining if and when assessing or managing soil contamination may be considered. While this may not be a significant concern, a complete assessment should consider the potential for soil contamination concerns and outline how they may be addressed. The Guide on Site Assessment, the cleanup of Brownfield Sites and the Filing of Record of Site Condition can provide some direction.	permeability, drainage and hydraulic balance will be addressed in the EA. The potential for soil contamination will be considered and the Guide on Site Assessment, the cleanup of Brownfield Sites and the Filing of Record of Site Condition will be consulted to determine the most appropriate course of action.	
MECP - 133	Acoustic Environment (Sec. 6.1.9, pg 56): Please provide additional detail for the reference routes by referring to the communities that will be crossed, recreational areas, the existing transmission line and other potential sensitive receivers. Noise level measurements, studies and/or mitigation measures may be required in some areas depending on the proximity to sensitive receivers. Acoustic and noise become a consideration when there is a point of reception and communities have a different acoustic environment. When a facility is proposed Ministry of the Environment's Guideline D-1 Land Use Compatibility outlines the proponent's responsibility in determining: 1. The influence area 2. Identity and distance from existing or	Additional detail for the reference routes by referring to the communities that will be crossed, recreational areas, the existing transmission line and other potential sensitive receivers has been provided in the text.	Section 5.1.9 has been revised.

	Agency Comment	Hydro One Response Provided	ToR Section Revision
	<p>committed sensitive land use(s);</p> <p>3. Severity of impacts; and</p> <p>4. Feasible mitigation (Guideline D-1, Sec 1.3.2).</p> <p>Ministry of the Environment’s Environmental Noise Guideline NPC 300 applies to EA projects. It provides sound level limits for different classes of areas (eg. urban, rural).</p>		
MECP - 134	<p>Human Health (Sec. 6.2.6, pg. 59):</p> <p>Please provide detail on how noise, air and water quality will be assessed and managed either by linking these to other sections of the ToR (Sec. 6.1.8, Sec. 6.1.9, Sec. 6.1.2) or by adding details into this section. This section commits to only providing baseline conditions and potential effects for EMF’s. There are other human health issues that need to be addressed.</p>	<p>Human Health concerns will be addressed in the EA. In addressing potential health issues, Hydro One looks to the scientific expertise of Health Canada to assess the scientific studies and provide advice and guidance. Potential changes in surface water, air quality and noise due to Project activities can act as pathways to potential effects on human health. These criteria will be drawn upon to inform human health concern assessments in the EA.</p>	Section 5.2.4 modified.
MECP - 135	<p>Infrastructure and Service (Sec. 6.2.8; pg. 60):</p> <p>The construction phase of this project will likely generate significant waste. The proponent should assess the projects effect on existing waste management services. Do local waste management services have the capacity to accept additional waste from the project?</p>	<p>The construction portion of the Project will generate some galvanized steel waste (estimated at 500 MT) and other construction waste. Preliminary inquiries to local waste management companies indicate that sufficient capacity for waste management exists along the proposed corridor.</p>	Section 5.2.6
MECP - 136	Appendix 2 – List of Preliminary Criteria	All suggested changes have been	Appendix 1 has been modified.

	Agency Comment	Hydro One Response Provided	ToR Section Revision
	<p>and Indicators Table: Under Potential Data Sources, please add to Socio-economic Environment (existing land-use, approved development, commercial activities) MNRF, MMAH, MTCS, and Parks Canada. For unorganized land, MMAH is the approval authority. MNRF administers the affected crown land and conservation authorities and Parks Canada the federal parks. Update the table to reflect any criteria and indicators under the Socio-Economic Environment for First Nation Communities through consultation and also include any from other stakeholders (eg. Traditional Land and Resources). Please rephrase land use in the table under the Rationale for Selection of Indicator to land use compatibility, when referring to potential for conflicts with existing land uses. While it may be inferred as stated, this ministry prefers to see land use compatibility clearly referenced.</p>	<p>implemented to Appendix 1.</p>	
	<p>Ministry of the Environment, Conservation and Parks (MECP), Archana Uprety, Hydrogeologist, Letter Dated July 26, 2018 to Bruce Hopper, Hydro One Networks Inc. (HONI)</p>		
MECP - 137	<p>The study area in the EA should include 500 m on either side of the Reference Route and Alternative Routes. Project-specific potential environmental effects on groundwater resources are likely to occur within this area. For locations where extensive blasting is required, this</p>	<p>The Study Area can be broken up into three components: the Project Study Area (PSA), Local Study Area (LSA) and Regional Study Area (RSA). For the general purposes of Lake Superior Link, PSA is 500 m on either side of the ROW for reference route and alternative</p>	<p>Section 4.1 has been modified to outline the study areas.</p>

	Agency Comment	Hydro One Response Provided	ToR Section Revision
	distance may need to be increased. Amendment to the ToR/proposed commitment to address concern.	routes; LSA is 1 km from Reference Route boundary/ROW; and the RSA is approximately 5 km from the boundary of LSA. However, LSAs and RSAs aren't always consistent for each environmental factor. For example, study areas for the socio-economic assessment will be defined by criterion-specific LSAs and RSAs. A more detailed description of the study area and how the study area boundaries were determined will be provided in the EA.	
MECP - 138	The study area in the EA should also include the area within 1 km from the project footprint, within which potential cumulative environmental effects on groundwater resources may occur. Amendment to the ToR/proposed commitment to address concern.	See response above. For the general purposes of Lake Superior Link, PSA is 500 m on either side of the ROW for reference route and alternative routes; LSA is 1 km from Reference Route boundary/ROW; and the RSA is approximately 5 km from the boundary of LSA.	Section 4.1 has been modified to outline the study areas.
MECP - 139	Section 6.1.2, page 52 To reduce risk to groundwater, a desktop study and door-to-door survey should be conducted prior to construction to determine local groundwater conditions, and location of water supply wells. Should the study reveal shallow groundwater conditions, or water supply wells located within the vicinity of the transmission corridor, mitigation measures should be proposed to avoid potential negative effects.	Section 5.1.2 has been revised. Wellhead protection areas, intake protection zones, highly vulnerable aquifers and significant groundwater recharge areas, source water protection documentation and relevant policies will be reviewed. The description will be conducted via desktop studies and supplemented with field work, where required, for characterization of groundwater quality, or measurements	Section 5.1.2 has been revised.

	Agency Comment	Hydro One Response Provided	ToR Section Revision
	Amendment to the ToR/proposed commitment to address concern.	of water levels or drawdown of water wells.	
MECP - 140	The EA should include a spill prevention and response plan, a waste management plan, and a blast management should blasting be required. The use of ammonium nitrate explosive in the vicinity of water supply wells should be avoided. Amendment to the ToR/proposed commitment to address concern.	Commitments on blasting, spills, waste management and blast management are outlined in Section 6.5.	Section 6.5 modified.
MECP - 141	Section 7, page 61 The EA should identify potential effects, assess them, and recommend mitigation measures to reduce or avoid potential negative effects. Project activities which may impact groundwater resources such as during construction, operation and maintenance should be assessed. Including but not limited to, impact to water supply wells, potential contaminant discharges, disturbing pre-existing shallow contaminated soils, leaching of herbicides, managing precipitation and runoff, effects from dewatering, blasting, and artesian conditions. Amendment to the ToR/proposed commitment to address concern.	Project activities which may impact groundwater resources such as during construction, operation and maintenance should be assessed. Including but not limited to, impact to water supply wells, potential contaminant discharges, disturbing pre-existing shallow contaminated soils, leaching of herbicides, managing precipitation and runoff, effects from dewatering, blasting, and artesian conditions. The issue of soil compaction and measures to mitigate effects on soil permeability, drainage and hydraulic balance will be addressed in the EA.	Section 6.5 revised.
Ministry of the Environment, Conservation and Parks (MECP), Scott Parker, Surface Water Specialist, Letter Dated July 26, 2018 to Bruce Hopper, Hydro One Networks Inc. (HONI)			

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MECP - 142	The environmental impacts to surface water quantity and quality from transmission line construction are generally limited to access road construction and RoW clearing. The potential long-term operational impacts are related primarily to increased erosion and sedimentation as well as short-term increases in water level or “flashy” stream flows due to access roads and the cleared RoW. There is also the potential that removal of tree cover in the RoW and changes in stream flows and water levels may increase concentrations of certain chemical constituents, stream temperature and suspended solids in receiving water. However, 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.	Detailed mitigation measures for potential effects on surface water will be developed during the EA and are addressed in Section 7.	No changes required.
MECP - 143	As the Lake Superior Link project moves forward, uncertainty can be reduced by making conservative assumptions, planning implementation of effective	Detailed mitigation measures for potential effects on surface water will be developed during the EA and are addressed in Section 7.	No changes required

	Agency Comment	Hydro One Response Provided	ToR Section Revision
	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 road (and transmission line) construction projects throughout northern Ontario.		
MECP - 144	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 guidelines listed on page 63 of the Draft LSL ToR as well as 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	All of the mentioned best management practices, guidelines, standards and guidebooks have been implemented into Section 6.5. Sediment and erosion control measures will be identified and addressed in the EA document. This includes identification of areas where soil or other factors could affect the effectiveness of those measures. Trigger/threshold values will be established for suspended sediment and turbidity be followed where bankside, in-stream and/or dewatering work is required. Sampling will occur in potential sensitive receivers before, during and after such work is undertaken.	Section 6.5 has been modified.

	Agency Comment	Hydro One Response Provided	ToR Section Revision
	<p>dewatering work is required. Trigger/threshold values should be established and sampling should occur in potential 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:</p> <ul style="list-style-type: none"> • Ontario Provincial Standard Specification (OPSS 805) – Construction Specifications for Temporary Erosion and Sediment Control Measures • Ontario Provincial Standard Specification (OPSS 182) – General specifications for Environmental Protection for Construction in Waterbodies and on Waterbody Banks • Ontario Provincial Standard Specification (OPSS 518) – Construction Specifications for Control of Water from Dewatering Operations 		
	Ministry of the Environment, Conservation and Parks (MECP), Sam Shippam, Senior Environmental Officer, Letter Dated July 26, 2018 to Bruce Hopper, Hydro One Networks Inc. (HONI)		
MECP - 145	I reviewed the DRAFT TOR. At this point the district has no comments.	Comment noted; no change required.	N/A
	Ministry of Natural Resources and Forestry (MNR), Londa Mortson, Letter Dated July 20, 2018 to Bruce Hopper, Hydro One Network Inc. (HONI)		
MNR – 1	A full consideration of alternatives assessment and rationale for current route selection; specifically in the Dorion Area/Loon Lake greenfield route.	Hydro One is committed to undertaking a full alternatives assessment, including rationale for route selection. This alternatives assessment will include the	Section 6 has been revised to clarify commitment for alternatives assessment, including the reference route alternative through Dorion.

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		reference route alternative through Dorion.	
MNRF – 2	Understanding of the origin for the current route selection presented as well as alternative analysis completed.	Hydro One is committed to undertaking a full alternatives assessment, including rationale and original of route selection. This alternatives assessment will include the reference route alternative through Dorion.	Section 6 has been revised to clarify commitment for alternatives assessment, including the reference route alternative through Dorion.
MNRF – 3	Complete understanding of criteria and indicators used to complete alternatives analysis for all project infrastructure/impacts.	Hydro One will utilize identified criteria and indicators in the alternatives analysis throughout the EA to objectively complete alternatives analysis for all project infrastructure/impacts.	No changes required.
MNRF – 4	Avoidance and protection considerations of known values of significant interest and protected areas and understanding of site specific mitigation measures.	The EA process will further understanding of areas of significance, protected areas and known values. Alternatives assessments will inform local design considerations and mitigation measures will be tailored to areas of significance.	Section 6 has incorporated this comment.
MNRF – 5	MNRF strongly recommends the submission of a data sharing agreement application to help inform values of interest considerations within the ToR and IEA development for the Lake Superior Link project.	Hydro One will work with MNRF to collaborate on a data sharing agreement.	No changes required.
MNRF – 6	MNRF also encourages Hydro One to review publically available reports and comments related to similar proposed projects in this study area to inform the preparation of the ToR.	Hydro One will leverage all existing sources of knowledge throughout the EA process to minimize duplication of effort, including available reports and similar proposed projects in the study areas.	No changes required.
Ministry of Energy, Northern Development and Mines, Jennifer Paetz, Initiatives Coordinator, Letter Dated July 6, 2018 to			

	Agency Comment	Hydro One Response Provided	ToR Section Revision
	Bruce Hopper, Hydro One Networks Inc. (HONI)		
MENDM – 1	The Ministry's Regional Economic Development Branch (REDB) has been working with Supercom, a group of First Nations that have partnered with NextBridge on their proposed East- West Tie transmission line. REDB has supported Supercom in negotiating funding through the Ministry of Advanced Education and Skills Development for training for Supercom communities in preparation for the opportunities associated with the construction and the spin-off business development opportunities of the East-West tie development. If the Ontario Energy Board approves Hydro One's proposal the training for the communities will remain relevant. As well, the ministry expects that a partnership with Supercom would be facilitated by Hydro One. REDB would continue to support the communities' needs related to economic development and training through programming and partnerships with other ministries.	Hydro One is committed to engaging all 18 Indigenous communities throughout the Project to discuss training, economic and employment opportunities that may be available.	No changes required.
MENDM – 2	MENDM has identified 21 Abandoned Mine Information System (AMIS) sites (with 61 associated mine hazard features) under the jurisdiction of the Mining Act within 1 km of the study area. There are also two (2) AMIS sites (with three (3) associated AMIS features) under the jurisdiction of the Aggregate Resources	Hydro One will assess the data provided to confirm all abandoned mines that may be located within the vicinity of the project study area. Mitigation and/or avoidance measures will be identified in the EA, if required, to avoid any potential known or unknown mine hazards that may pose a serious risk to	No changes required.

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	<p>Act. All of these sites are classified as Type C sites (see Attachment 1). Within a 2-4 km buffer of the study area there are an additional 50 AMIS sites (with 132 associated mine hazard features) under the jurisdiction of the Mining Act and two (2) AMIS sites (with two (2) associated mine hazard features) under the jurisdiction of the Aggregate Resources Act.</p> <p>Known and unknown mine hazards have the potential to pose a serious risk to public safety, human health and the environment.</p>	<p>public safety, human health and the environment.</p>	
MENDM – 3	<p>With respect to mining lands, there are a number of dispositions within the study area (see Attachment 4). The majority of these dispositions are surface rights patents, for which the ministry has very little information for. Mining claim information can be found at the ministry’s Mining Lands Administration (MLAS) map viewer: https://www.MENDM.gov.on.ca/en/mine-s-and-minerals/applications/mining-lands-administration-system-mlas-map-viewer</p> <p>The ministry’s review of MLAS indicates that there is an unpatented mining claim located within the proposed withdrawal area. Overall, the ministry has no objections to the withdrawal as long as the necessary consent(s) are obtained</p>	<p>Hydro One has identified and notified all potentially directly impacted property owners of the proposed project. Directly impacted property owners will be offered the choice of Hydro One acquiring either an easement or the fee simple interest in the lands required for the Project. Should consent to the disposition of surface rights from the claim holder be provided to Hydro One, the Ministry will be informed of such consent.</p>	<p>No changes required.</p>

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	from the claim holder(s) pursuant to Section 51 of the Mining Act. Therefore the proponent must obtain consent to the dispositions of the surface rights from the claim holder and provide the ministry with such consent.		
MENDM – 4	<p>From Thunder Bay to Black Sturgeon River the routes deviates north from the previously proposed route by NextBridge. The new corridor directly impacts Panoramic Resources Ltd.’s Thunder Bay North PGM Project: http://panoramicresources.com/thunder-bay-north-pgm-project. Please contact the exploration company directly for comments.</p> <p>From Black Sturgeon River to Wawa, the route appears to match the existing 230kV line and the previous proposal from NextBridge. For this reason impacts on local mineral exploration will be minimal in both the negative and positive aspects.</p> <p>Published reports and Mineral Deposit Inventory (and as well as AMIS records) are available for viewing or free download through the Geology Ontario portal at http://www.geologyontario.MNDM.gov.on.ca and OGS Earth at https://www.MNDM.gov.on.ca/en/mines-and-minerals/applications/ogsearth</p>	Panoramic Resources Ltd. has been added to the stakeholder contact list for the Project. Hydro One will engage Panoramic Resources to discuss any potential impacts to mining claims. No active mining operations will be impacted by the proposed project.	No changes required.
MENDM – 5	Regarding Appendix 2, “Potential effect	Comment accepted.	The text has been revised in Appendix 1

	Agency Comment	Hydro One Response Provided	ToR Section Revision
	on Mineral and aggregate resources”, page 75: mining claims do not only represent “future mining operations”, they represent an industry of their own, specifically the mineral exploration industry. Therefore, MENDM suggests that the rationale be “Potential effects may occur on the mineral exploration industry.”		to reflect the suggested change.
	Parks Canada, Christine Drake, Pukaskwa Park Superintendent, Email Dated July 9, 2018 to Bruce Hopper, Hydro One Networks Inc. (HONI)		
PNP - 1	Section 2.5 (Comment) “Canadian Environmental Assessment Act (CEA Act).” Normally we refer to this as CEAA 2012.	The text has been revised to: <i>Canadian Environmental Assessment Act, 2012 (CEAA 2012)</i> . CEAA 2012 will replace all <i>CEA Act</i> references in the document.	Change made in Section 2.2.1 and 2.2.2
PNP – 2	Section 2.5 (Text Adjustment) “The Lake Superior Lake project is not considered a “designated project” as the Project does not meet the requirements as stipulated in the regulation designating physical activities, and therefore the CEA Act does not apply.” This is incorrect, as Section 67 of CEAA 2012 applies to this project.	The text has been revised in Section 2.5 to: “The Lake Superior Link project is not considered a “designated project” as the Project does not meet the requirements as stipulated in the regulation designating physical activities”. Although the Lake Superior Link project is not a designated project, it is acknowledged that Section 67 approval under CEAA 2012 will apply to the Project.”	Change made in Section 2.2.1 and 2.2.2
PNP – 3	Section 2.5 (Text Adjustment) “Although the Lake Superior Link project is not a designated project under the CEA Act, the Project may <i>will</i> require federal approvals or authorizations where the transmission route crosses federal lands”	The text has been revised to replace “may” with “will” require. This is in acknowledgement of Section 67 approvals that will be required.	Section 2.2.1 and 2.2.2 revised.
PNP – 4	Section 2.5 (Text Adjustment)	Text has been revised to provide clarity	Section 2.2.1 and 2.2.2 revised.

	Agency Comment	Hydro One Response Provided	ToR Section Revision
	The 4th paragraph is confusing. The new project vs the “maintenance” project should be more defined. I would not give detail of the renewed project as it is not the mandate of this ToR.	with respect to the proposed renewal of the existing Hydro One infrastructure and the current License of Occupation with Parks Canada. The change of existing towers to quad-circuit towers has been clarified as part of the Project.	
PNP – 5	<p>Section 2.5 (Text Adjustment) <i>“Authorization for works within Pukaskwa National Park will be required from Parks Canada. Hydro One currently has a License of Occupation for its existing infrastructure and this license is currently being renewed, remaining in effect until such renewal is complete. Upgrades to existing infrastructure within the Park are allowable within the existing license agreement as they are not considered new development.</i></p> <p>The completion of either a Detailed Impact Assessment will be necessary to fulfill Section 67 of the CEEA 2012 legal requirement for the section of the Reference Route which passes through Pukaskwa National Park.</p>	The text has been updated to acknowledge a Detailed Impact Assessment will be necessary to fulfill Section 67 of CEEA 2012 for the section of the transmission line which passes through Pukaskwa National Park. In addition, the text acknowledges that a land use permit or equivalent authorization under Section 28(2) of the <i>Indian Act</i> to use federal lands (i.e. to allow for crossing of First Nation reserves) may be required by Indigenous Services Canada.	Section 2.2.1 and 2.2.2 revised.
PNP – 6	<p>Section 2.5 (Text Adjustment) <i>Parks Canada has confirmed in a letter sent on 27 November 2017 that Parks Canada is prepared to continue to consider the Hydro One request in accordance with the License of Occupation, applicable laws and policies, and Indigenous consultation obligations. Additionally, mitigations would need to be</i></p>	The identified text has been removed.	The identified text has been removed in Section 2.2.1 and 2.2.2.

	Agency Comment	Hydro One Response Provided	ToR Section Revision
	<p><i>identified and more information on construction impacts, as per Article 8.01 of the current License Agreement, is required, as well as completion of either a Basic or Detailed Impact Assessment under Section 67 of the CEA Act. An updated Environmental Evaluation Report was provided to Parks Canada on January 24, 2018, which satisfies the requirements of the agreement. Studies and consultation will address impacts and mitigations within the Park area and the Impact Assessment will be provided to Parks Canada per Section 67.”</i></p> <p>Please remove the identified text.</p>		
PNP – 7	<p>Section 2.5 (Text Adjustment) <i>“An updated Environmental Evaluation Report was provided to Parks Canada on January 24, 2018, which satisfies the requirements of the agreement.”</i> This is incorrect: the Environmental Evaluation Report does not currently have approval to satisfy the requirements of the new License of Occupation (review is currently ongoing), and does not satisfy the requirements of this new construction (a DIA is required).</p>	<p>The text has been revised to acknowledge the new License of Occupation will be approved following the completion of a DIA.</p>	<p>Section 2.2.1 and 2.2.2 revised.</p>
PNP – 8	<p>Section 2.7 (Text Adjustment) <i>“Parks Canada Agency Act”</i> Please change to Canada National Parks Act.</p>	<p>The text has been revised to reflect the correct wording.</p>	<p>The text has been revised in Section 2.2.5 to reflect the correct wording.</p>
PNP – 9	<p>Section 5.2 (Text Adjustment) Please include visitors to Pukaskwa</p>	<p>List has been updated to include <i>“visitors to Pukaskwa National</i></p>	<p>The stakeholder list in Section 9.4.3 updated.</p>

	Agency Comment	Hydro One Response Provided	ToR Section Revision
	National Park to the stakeholder identification list.	<i>Park</i> ".	
PNP – 10	Section 5.3 (Comment) <i>"Hydro One is committed to working closely with the Crown to ensure that the duty to consult Indigenous communities and groups is fulfilled"</i> . Engagement and relationship between indigenous communities and Pukaskwa National Park should be considered.	Engagement and relationship between indigenous communities and Pukaskwa National Park will be considered.	The text has been revised in Section 9.2 to acknowledge the comment provided.
PNP – 11	Section 7 (Text Adjustment) Table 2, Natural Environment Please add in "Geophysical Structure"	Comment accepted. Geophysical structure will be considered as a potential indicator for physical environment.	Table has been removed. Reference to geophysical structure added to Section 5.2.1.
	Environment and Climate Change Canada, Denise Fell, Environmental Assessment Officer, Environmental Protection Branch – Ontario Region, Email Dated July 12, 2018 to Bruce Hopper, Hydro One Networks Inc. (HONI)		
ECCC - 1	Section 6, Page 51 Existing Environmental Conditions in the Study Area (page 51 of the draft ToR), it is explained that Hydro One will use the information from the East-West Tie EA where there is an overlap of study area. This section goes on to advise that Hydro One has performed a gap analysis to identify where there is a need to verify or collect data to complete the existing environmental description, and field studies are underway to fill in the identified gaps. To complement the gap analysis and work being undertaken as a result, ECCC recommends that Hydro One complete	Where studies have been conducted on the proposed corridor and they apply to the project, Hydro One will not duplicate these studies, but instead use publicly available information to inform assessment efforts. Hydro One will conduct the appropriate studies where information is needed to satisfy the EA requirements. The current preliminary focus of field surveys includes Pukaskwa National Park, the transmission corridor between Wawa and Marathon, the Dorion area, temporary and permanent access roads, laydown areas, fly yards and any additional areas identified as a concern. Hydro One will continue to	Additional scope added to Section 5.2.4.

	Agency Comment	Hydro One Response Provided	ToR Section Revision
	the necessary environmental field studies in relation to migratory birds and species at risk that have not been completed by NextBridge, in particular with respect to the First Nation reserve lands (specifically Pays Plat and Michipicoten First Nations) being crossed by the project.	engage regulators to ensure the baseline data is adequate for the EA. Studies of migratory birds and species at risk with respect to the First Nation reserve lands (specifically Pays Plat and Michipicoten First Nations) proposed to be crossed by the Project will be conducted based on a gap analysis of available data and consultation agreement with First Nations. The data gathered would be used to satisfy CEAA 2012 and ISC requirements.	
ECCC – 2	Section 2.1, Page 18 We further suggest that the environmental assessment requirements committed to in Table 1 – EA and ToR Requirements (page 18 of the draft ToR), that include providing a detailed description of the environment to be affected by the project, identification and assessment of any effects to the environment, and addressing any effects through prevention, change or mitigation, be conducted and documented for those portions of the project that cross First Nation reserve lands.	The commitment to assess the environment that may be directly or indirectly affected by the Project includes the assessment of First Nation reserve lands. It is important to note the Reference Route at this time is preliminary in nature. Following engagement and input from stakeholders and the public and detailed engineering, the proposed route may be subject to local refinement. Dependent on the route selected, environmental sensitivities and issues/concerns identified during the EA process the focus of the studies will vary. Should the transmission route cross First Nation reserve lands, appropriate studies will be completed to characterize the local environment and assess potential effects including identifying mitigation measures to address effects, where	Comment added to Table 3 to clarify scope of assessment.

	Agency Comment	Hydro One Response Provided	ToR Section Revision
		<p>applicable.</p> <p>The EA will include a detailed description of the environment to be affected by the project, identification and assessment of any effects to the environment, and addressing any effects through prevention, change or mitigation, be conducted and documented for those portions of the project that cross First Nation reserve lands</p>	
ECCC – 3	<p>Appendix 2, Page 73-77</p> <p>We also note that in Appendix 2 – List of Preliminary Criteria and Indicators, it is important to include engagement of the First Nation communities as a data source where appropriate.</p>	<p>Engagement of Indigenous communities as a data source has been added where appropriate including identifying Criteria and Indicators of importance to communities for the assessment of potential project effects.</p>	Change made in Appendix 1.
ECCC – 4	<p>Section 2.5, Page 21</p> <p>Canadian Environmental Assessment Act, it is mentioned that the Project may require federal approvals or authorizations where the transmission route crosses federal lands. Please be advised that a permit may be required from ECCC under the Species at Risk Act for the works occurring on the First Nation reserve lands. It is further stated on page 21 that the Canadian Environmental Assessment Act (CEAA) does not apply to the project, as it is not considered a designated project. However, further down it is acknowledged CEAA 2012 does apply as</p>	<p>Hydro One will continue to engage federal agencies throughout the project to ensure all required permits and authorizations are obtained in a timely manner.</p> <p>The text has been revised to acknowledge Section 67 authorizations will be required from Parks Canada and Indigenous Services Canada, as well as ECCC should a SARA permit be required for works on Federal lands.</p>	Changes made in Section 2.2.1 and 2.2.2.

	Agency Comment	Hydro One Response Provided	ToR Section Revision
	Parks Canada will require “completion of either a Basic or Detailed Impact Assessment under Section 67 of the CEA Act” ECCC advises that Section 67 of CEAA 2012 would also apply should the project require ECCC to issue a SARA permit, and will also be required by Indigenous Services Canada to support their authorization for the use of First Nation reserve lands.		
ECCC – 5	Section 7, Page 62 It is also stated in Section 7 – Effects Evaluation and Mitigation, on page 62, that “the EA will recommend pre- and post-operational monitoring programs designed to verify effects prediction, the effectiveness of mitigation measures and the need for any remedial measures, should they be necessary”. ECCC wishes to stress the importance that these monitoring programs, once developed, focus on the individual species as well as the surrounding landscape.	Comment noted; no change required. Environmental monitoring programs will be developed and implemented by Hydro One to verify the effects predicted, the effectiveness of mitigation measures and the need for any remedial measures, if necessary. Specific and focused monitoring programs may also be developed for species at risk, where permits are required under federal and/or provincial legislation (i.e. Species At Risk Act).	No changes required.
	Ministry of Tourism, Culture and Sport, Jeff Elkow, Heritage Planner, Letter Dated July 13, 2018 to Bruce Hopper, Hydro One Networks Inc. (HONI)		
MTCS – 1	Section 4.4 (Reference Route and Reference Route Alternative) Replace “archaeological resources, built heritage” with “cultural heritage resources” as the term “cultural heritage resources” comprises archaeology, built heritage, and cultural heritage landscapes.	Comment accepted.	Change made throughout section 5.4 and document to ensure consistency.

	Agency Comment	Hydro One Response Provided	ToR Section Revision
<p>MTCS – 2</p>	<p>Section 6.2.1 (Cultural Heritage Environment) Please clarify the specific studies for cultural heritage evaluation to be undertaken referenced (i.e. Cultural Heritage Assessment Report (CHAR) or Cultural Heritage Evaluation Report (CHER)). Reference is currently made to “cultural heritage studies” and “a background historical study”. It should be noted that technical cultural heritage studies (such as CHAR, CHERs and/or HIAs) should be completed by a qualified person. The technical studies shall be submitted to MTCS and the local municipalities for review and comment. Should additionally state that archaeological assessment should be undertaken by an archaeologist licenced under the OHA, who is responsible for submitting the report directly to MTCS for review. We recommend that a response protocol be developed with relevant aboriginal groups to manage any accidental discovery of archaeological and/or human remains. We also suggest that First Nations and Métis be consulted for information on any archaeological, built heritage and cultural heritage landscape resources in the study area.</p>	<p>Comment accepted. Hydro One will complete a <i>Criteria for Evaluating Potential for Built Heritage Resources and Cultural Heritage Landscapes</i> checklist. Should it be determined that a Cultural Heritage Evaluation Report and/or Heritage Impact Assessment is required, a qualified person will be obtained and a report will be submitted to MTCS and local municipalities for review and comment. This commitment will be reflected within the ToR. On June 29, 2018 Hydro One’s archaeology consultant Archaeological Research Associates Ltd. (ARA) sent an introduction and invitation to participate letter to each of the eighteen (18) Indigenous communities. Each community was invited to participate in the planned archaeological assessments by providing information, at their discretion, regarding sacred or spiritual sites, undocumented archaeological sites, or sites of value to the community for inclusion in the Stage 1 assessment; and/or participation in the Stage 2 fieldwork surveys within their Treaty and Traditional Territory. ARA and Hydro One will work with Indigenous communities to incorporate any information provided and will provide opportunities for participation of</p>	<p>Changes made to Section 6.2.1 to clarify archaeological assessments and reporting commitments for cultural heritage resources.</p>

	Agency Comment	Hydro One Response Provided	ToR Section Revision
		monitors in the fieldwork surveys. At the time of this report, several communities have expressed an interest in participating in the planned field work and/or have requested that reports be provided for review, once available. ARA will work with Indigenous communities to ensure a response protocol is in place should any accidental discovery of archaeological and/or human remains occur. This protocol will also ensure compliance with provincial legislation and/or regulations that may be applicable.	
MTCS – 3	<p>7.2.2 (Effects on the Cultural Environment)</p> <p>The Archaeological Assessment should be undertaken as soon as possible as its results should be incorporated into the EA report, in addition to the results of any further stages of Archaeological Assessment as needed. The Archaeological Assessments should be undertaken by an archaeologist licenced under the OHA, who is responsible for submitting the report directly to MTCS for review.</p> <p>Consistent use of terminology should be followed throughout the Terms of Reference. The term “cultural heritage resources” comprises archaeology, built heritage, and cultural heritage landscapes, and are formalized in</p>	<p>Comment accepted.</p> <p>Hydro One has retained ARA to complete the planned Stage 1 and 2 archaeological assessments and this work is currently on-going. At a minimum, the Stage 1 assessment will be completed and the results will be documented in Stage 1 Archaeological Assessment report as part of the Individual EA. The Stage 2 assessment for select properties where required may be delayed due to property access restrictions, seasonal constraints (i.e., frozen ground conditions) and/or accommodation of Indigenous monitors. All required archaeological work will be completed prior to construction and reports submitted to MTCS for review and acceptance.</p>	Changes made to Section 6.7.

	Agency Comment	Hydro One Response Provided	ToR Section Revision
	provincial legislation, regulations, guidelines, and the Provincial Policy Statement 2014. For clarity, we suggest that this terminology is used. Revise the first bullet to include archaeological sites and areas of archaeological potential.	The draft ToR has been updated to use the term “cultural heritage resources” in place of “archaeological resources, built heritage”. First bullet includes archaeological sites and areas of archaeological potential	
MTCS – 4	Section 6.2.1 Section 6.2.1 of the TOR states that Stage 1 and 2 archaeological assessments are planned while Section 7.2.2 states only that a Stage 1 will be undertaken. Please clarify the commitment and ensure consistency.	Comment noted. Hydro One would like to clarify that Section 5.4.1 acknowledges that at a minimum Stage 1 and 2 archaeological assessments will be completed for the project to address data gaps identified, whereas Section 6.7 acknowledges that at a minimum the results of the Stage 1 analysis will be drawn upon to assess potential impact to cultural heritage resources for the EA effects analysis. It is Hydro One’s preference that all necessary archaeology assessment work be completed before the submission of the Individual EA, however this may not be possible due to property access restrictions, seasonal constraints to complete the work (i.e., frozen ground conditions) and/or accommodation of Indigenous monitors. As noted in the response to the MTCS - 4 comment all required archaeological work will be completed prior to construction and reports submitted to MTCS for review and acceptance.	Section 5.4.1 and Section 6.7 have been revised for clarification based on comments received.
MTCS – 5	“Cultural and heritage assessments”	Hydro One acknowledges that any	Changes made to Section 6.7 to commit

	Agency Comment	Hydro One Response Provided	ToR Section Revision
	<p>should be revised to identify the specific studies that are being referenced (i.e. Cultural Heritage Assessment Report (CHAR) or Cultural Heritage Evaluation Report (CHER)) to document baseline information about the existing conditions and preliminary impact assessment. These reports may additionally recommend that Heritage Impact Assessments be undertaken. It should be noted that technical cultural heritage studies (such as CHAR, CHERs and/or HIAs) should be completed by a qualified person. The technical studies shall be submitted to MTCS and the local municipalities for review and comment.</p> <p>The TOR should commit that all technical heritage studies and their recommendations are to be addressed and incorporated into EA project.</p>	<p>technical cultural heritage studies (CHAR, CHER, HIA) will be completed by a qualified person and submitted to the MTCS and the local municipalities for their review and comment.</p>	<p>that all technical heritage studies and their recommendations are to be addressed and incorporated into the Project for implementation to ensure compliance with all applicable regulations.</p>
MTCS – 6	<p>Appendix 2 – List of Preliminary Criteria and Indicators</p> <p>Under the Socio-economic Environment heading, a section should be included under Features Considered for Cultural Heritage Resources. Appropriate Indicators, Rationale and Data Sources should be included, following the commitments made Section 7.2 of the Terms of Reference.</p>	<p>List has been updated to include a section for <i>Features Considered for Cultural Heritage Resources</i>.</p>	<p>Appendix 1 has been updated.</p>

Table 4.1-3 summarizes government agency questions and comments provided to Hydro One during the revised draft ToR review period. Responses to each of the questions and/or comments are provided below.

Table 4.1-3: Government Agency Comments Received During the Revised Draft ToR Review Period

Parks Canada, Christine Drake, Pukaskwa Park Superintendent, Email Dated August 21, 2018 to Bruce Hopper, Hydro One Networks Inc. (HONI)	
PNP - 1	
Agency Comment	PNP-7: The Response Provided by Hydro One “The text has been removed revised to acknowledge the new License of Occupation will be approved following the completion of a DIA” is incorrect. However, the text of sections 2.2.1 and 2.2.2 is mostly correct.
Hydro One Response Provided	Comment noted. The text has been revised to acknowledge upgrades to infrastructure within the Park to quad-circuit towers as part of the Lake Superior Link Project can be considered within the License of Occupation agreement, provided all federal laws and policies including the results of the detailed impact assessment, and Indigenous consultation obligations are fulfilled.
ToR Section Revision	Section 2.2.2 has been revised.
PNP - 2	
Agency Comment	<p>Section 2.2.2</p> <ul style="list-style-type: none"> • “Upgrades to infrastructure within the Park to quad-circuit towers as part of the Lake Superior Link Project are allowable <i>can be considered</i> within the existing <i>License of Occupation</i> agreement, <i>provided all federal laws and policies including the results of the detailed impact assessment, and Indigenous consultation obligations are fulfilled.</i>” • “The completion of a Detailed Impact Assessment will be necessary to fulfill Section 67 of the CEAA 2012 legal requirement for the section of the Reference Route which passes through Pukaskwa National Park. <i>The Detailed Impact Assessment will identify the potential effects of the Lake Superior Link Project to natural and cultural resources within Pukaskwa National Park and identify results of consultations with public, stakeholder and Indigenous groups about this Project within Pukaskwa National Park.</i>”
Hydro One Response Provided	Section 2.2.2 has been revised to reflect the suggested changes.
ToR Section Revision	Section 2.2.2 has been updated.
PNP - 3	
Agency Comment	<p>Section 5.2.3</p> <ul style="list-style-type: none"> • Figures 4 and 5 should designate light green areas as provincial parks, national parks and ANSIs

Hydro One Response Provided	Figures 4 and 5 have designated light green areas as provincial parks, national parks and ANSIs
ToR Section Revision	5.3.3, Figure 4 and Figure 5.
PNP - 4	
Agency Comment	Section 5.2.7 <ul style="list-style-type: none"> Table 6 – <i>Rangifer tarandus</i> was observed in Pukaskwa National Park in 2016
Hydro One Response Provided	Table 6 has been revised to include <i>Rangifer tarandus</i> .
ToR Section Revision	Table 6 has been updated in Section 5.3.7
Ministry of the Environment, Conservation and Parks (MECP), Antonia Testa, Special Project Officer, Email Dated August 27, 2018 to Bruce Hopper, Hydro One Networks Inc. (HONI)	
MECP – 1	
Agency Comment	Supporting documentation is needed to confirm or validate any statements or conclusions made in the draft ToR. In accordance with Section 5.3.2 of the ministry’s Code of Practice, it is the ministry’s expectation that: Information contained in the supporting documentation should support Hydro One’s proposal by providing justification for the choices made, outline other processes or initiatives which provides the rationale, and details of processes or methods used. For example: <ul style="list-style-type: none"> a more detailed description of the problem or opportunity that prompted the proposed study; more information and details about studies or events that triggered the Hydro One’s involvement with the proposed study; and further background information supporting the selection of alternatives for further study. Any supporting documentation provides more detailed information that will assist the Minister of the Environment, Conservation and Parks and other persons in understanding the planning process that Hydro One carried out in order to arrive at the proposal. Reference to the part of the ToR which is being explained in more detail should be made. Likewise, the ToR should reference the supporting documentation. Supporting documentation (i.e. letters, assessments, reports etc.) should accompany the final ToR to confirm or validate any statements or conclusions made in the ToR.
Hydro One Response Provided	Supporting documentation including reports, needs assessments, technical details and letters have been compiled and will be provided with the ToR and RoC.

	In addition to the supporting documentation, Section 1 of the ToR has been revised substantially to provide additional information on the background of the Project and the events that have led to the initiation of the Individual EA.
Draft ToR Section Revision	Section 1 has been revised, supporting document package to be provided with ToR.
MECP Response	<ul style="list-style-type: none"> • Appendix 2 of this revised draft ToR should include a table of contents that lists the supporting documents included in this appendix. • Appendix 2 should also include a summary of each supporting document upfront in the appendix. The information contained in these summaries should support Hydro One’s proposal. For example: <ul style="list-style-type: none"> ○ a more detailed description of the problem or opportunity that prompted the proposed study; ○ more information and details about studies or events that triggered the Hydro One’s involvement with the proposed study; and ○ further background information supporting the selection of alternatives for further study <p>References to the supporting documentation should be made throughout the ToR, particularly if referring to a document contained in Appendix 2. For example, see comment 14, 15, 62 and 72.</p>
Hydro One Response	Appendix 2 has been revised to include a table of contents which lists the supporting documents included. In addition, a summary of each supporting document is provided upfront in the appendix.
ToR Section Revision	Appendix 2 has been revised.
MECP – 2	
Agency Comment	<p>No Record of Consultation was provided with the draft ToR for the ministry’s review.</p> <p>A Record of Consultation is needed to describe the consultation carried out during the preparation of the ToR and the results of that consultation. It will be considered by the Minister in making the decision about whether to approve the ToR.</p> <p>In accordance with Section 5.3.1 of the ministry’s Code of Practice, it is the ministry’s expectation that the Record of Consultation will:</p> <ul style="list-style-type: none"> • Identify all persons consulted during the ToR preparation (personal names not required) and how they were identified; • Describe the consultation activities which took place (methods, schedule of events, notification that was given about the activity and materials used);

	<ul style="list-style-type: none"> • Describe how Indigenous communities were identified and how they were consulted; • Clearly and accurately summarize the comments made by all interested persons during the preparation of the ToR; • Describe Hydro One’s response and how concerns were considered in the development of the ToR; • Describe any outstanding concerns; • Include minutes of any meetings held with interested persons; • Include copies of written comments received from interested persons. <p>It is also the ministry’s expectation that Hydro One will present a summary of the comments received and its responses to those comments in a table. As appropriate, the table should note where in the ToR the comment has been addressed. Comments from the general public should be arranged by type (for example, put all water quality comments together). For the Government Review Team and Indigenous communities, the comments should be organized by agency and community rather than by issue type.</p> <p>A Record of Consultation must accompany the final ToR.</p>
Hydro One Response Provided	<p>Information contained within the comment will be submitted as part of the RoC.</p> <p>It will include:</p> <ul style="list-style-type: none"> • Identify all persons consulted during the ToR preparation (personal names not required) and how they were identified; • Describe the consultation activities which took place (methods, schedule of events, notification that was given about the activity and materials used); • Describe how Indigenous communities were identified and how they were consulted; • Clearly and accurately summarize the comments made by all interested persons during the preparation of the ToR; • Describe Hydro One’s response and how concerns were considered in the development of the ToR; • Describe any outstanding concerns; • Include minutes of any meetings held with interested persons; • Include copies of written comments received from interested persons.
Draft ToR Section Revision	Record of consultation will be provided with the ToR.
MECP Response	In accordance with Section 5.3.1 of the ministry’s Code of Practice, please include a section in the Record of Consultation that clearly describes any outstanding concerns or issues.
Hydro One Response	Section 6 of the Record of Consultation describes outstanding concerns and issues.
ToR Section Revision	Section 6 has been added to the Record of Consultation.
MECP – 3	
Agency Comment	No executive summary was provided in the draft ToR.

	Please include an executive summary at the beginning of the final ToR document.
Hydro One Response Provided	Executive summary has been provided with the ToR document.
Draft ToR Section Revision	An executive summary was inserted at the beginning of the document (Page 2)
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 4	
Agency Comment	The ministry is no longer referred to as the Ministry of the Environment and Climate Change. All references to the ministry should be changed to the Ministry of the Environment, Conservation and Parks.
Hydro One Response Provided	Government agency name change during draft review period has been recognized.
Draft ToR Section Revision	All sections of the ToR that referenced previous agency names have been updated (i.e. MOECC has been changed to MECP).
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 5	
Agency Comment	<p>In accordance with Section 5.2.6 of the ministry’s Code of Practice, the EA should attempt to examine the interrelationships between the undertaking and its alternatives with a changing climate over time. The proponent should also consider whether there could be environmental effects resulting from effects of the proposal combined with effects of other past and future undertakings.</p> <p>As such, please include a commitment in the ToR that specifies the EA will consider climate change (adaptation and mitigation) and cumulative effects in the evaluation and assessment of alternatives and the preferred undertaking.</p> <p>To facilitate this assessment and evaluation, refer to the ministry’s guide “Consideration of Climate Change in Environmental Assessment in Ontario” and the federal document “Cumulative Effects Assessment Practitioners’ Guide”.</p> <p>Revise text accordingly. Please include this commitment in the appropriate corresponding sections of the ToR document (i.e. Section 4.5 and 7 of this draft ToR).</p>
Hydro One Response Provided	The EA will consider climate change adaptation and mitigation and cumulative effects in the evaluation and assessment of alternatives and the preferred undertaking.

Draft ToR Section Revision	Section 4.5 and Section 7 changed to reflect commitment to climate change adaptation.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 6	
Agency Comment	Section 1, Page 10 To improve clarity, consider the following revision to the first paragraph: “The first key step of the EA process is the preparation of a ToR” “Hydro One will prepare the EA in accordance with the framework laid out in the ToR document and in accordance with...” Revise text accordingly.
Hydro One Response Provided	Revised sections for clarity as presented.
Draft ToR Section Revision	Section 1.1 has been modified to provide additional clarity and information.
MECP Response	Section 1, Page 11 of the revised draft ToR <ul style="list-style-type: none"> To improve clarity, consider the following revision to the first paragraph: “... Hydro One has initiated the first key step in the EA process for the Lake Superior Link...”
Hydro One Response	Text modified as presented.
ToR Section Revision	Section 1
MECP – 7	
Agency Comment	Section 1.1, page 10 What are the three separate entities (i.e. Ontario Power Generation, Hydro One, and the IESO) responsible for and/or what are their mandates? Revise the text accordingly. Please provide the additional information in this section of the ToR.
Hydro One Response Provided	Provided additional information on the three separate entities.
Draft ToR Section Revision	Section 1.1 has been modified to provide additional clarity and information.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 8	
Agency Comment	Section 1.1, page 10 The three bullets points are confusing. Why is the bullet format used for these points? Need more context with these bullets in order to provide more clarity. For instance:

	<p>Does the IPSP refer to the 20 year energy plan? Clarify how they are related?</p> <p>Who and/or how was the government given discretion to determine further supply mix? What does “supply mix” mean?</p> <p>Define the term OEB. What is their responsibility and/or mandate? How do they fit into the overall project/process?</p> <p>Revise the text accordingly. Please provide the additional information in this section of the ToR.</p>
Hydro One Response Provided	<p>Removed bullet points.</p> <p>IPSP refers to the 20 year energy plan. Link between LSL, IESO and IPSP has been made.</p> <p>Supply mix has been defined and clarified.</p> <p>OEB has been defined, role clarified, and provided responsibility and mandate.</p>
Draft ToR Section Revision	Section 1.1 has been modified to provide additional clarity and information.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 9	
Agency Comment	<p>Section 1.1, page 11</p> <p>Provide more information on the IPSP and/or 20 year energy plan (2007). What was its focus, goals, targets etc.?</p> <p>Revise the text accordingly. Please provide the additional information in this section of the ToR.</p>
Hydro One Response Provided	Information on IPSP focus and goals provided.
Draft ToR Section Revision	Section 1.1 has been modified to provide additional clarity and information.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 10	
Agency Comment	<p>Section 1.1, page 11</p> <p>What does the Framework for Transmission Project Development Plans discuss in regards to the development and/or planning of transmission projects?</p> <p>Revise the text accordingly. Please provide the additional information in this section of the ToR.</p>
Hydro One Response Provided	Expanded on FTPDP.
Draft ToR Section Revision	Section 1.1 has been modified to provide additional clarity and information.

MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 11	
Agency Comment	<p>Section 1.2, page 11 Please clarify what activities/processes have been completed regarding upgrades to the associated transformer station infrastructure.</p> <p>Why were these upgrades not included as part of this environmental assessment project?</p> <p>The discussion regarding the upgrades to the associated transformer station infrastructure should be provided in Section 4 of this ToR document.</p> <p>Revise text accordingly. Please include a description of the work done regarding the transmission stations and justification and rationale for conducting this work independently of this environmental assessment project.</p>
Hydro One Response Provided	A discussion around the modifications and upgrades to existing Transformer stations has been added to a new Section under Section 4.2.8.
Draft ToR Section Revision	Section 4.2.8 has been created to discuss transformer station expansions.
MECP Response	<p>Section 4.2.8, page 37-38, of the revised draft ToR</p> <p>To improve clarity and flow, consider separating the discussion for each TS into separate paragraphs. For instance, a paragraph that only discusses the EA triggers and the project status for the Marathon TS, followed by another paragraph that discusses the Wawa TS etc.</p> <p>The Class EA projects are considered approved if they have successfully followed the planning process in the approved parent Class EA document and no Part II Order requests were received. As such, it is the subsequent permits and approvals that will not be issued until a decision on the EWT EA. Since this permit discussion does not pertain to the Class EA process, it does not need to be included in the ToR. Please remove the following statement:</p> <p>“These TS expansions are reliant upon the approval of the transmission line, and it is expected that a Minister’s decision will be withheld until such a time as a decision is made on the East-West Tie Corridor Expansion Individual EAs.”</p>

	However, it would be informative to include a list of the subsequent permits and approvals needed for the TS projects.
Hydro One Response	Wawa, Lakehead and Marathon TS have been moved to their own sections. Removed quoted text. List of potential approvals and permits for the TS have been added.
ToR Section Revision	Section 4.1.8.
MECP – 12	
Agency Comment	<p>Section 1.2, general Please avoid any direct references to NextBridge or the NextBridge EA project. If necessary, NextBridge should be referred to as the “designated electricity transmitter”.</p> <p>Please avoid direct comparisons to the NextBridge EA project. For example: “as compared to the NextBridge proposal... Lake Superior Link project... has a lower estimated cost, a smaller environmental footprint...”</p> <p>Also avoid any subjective comments regarding the NextBridge EA project. For instance: “In response to the concerns... Hydro One is proposing its East-West Tie Line project, called “Lake Superior Link”, to protect the interests of the public and ratepayers.”</p> <p>Revise text accordingly. Please remove references to NextBridge or the NextBridge EA project. Please remove any comparisons or subjective comments regarding the NextBridge EA project.</p>
Hydro One Response Provided	NextBridge references and subjective comments have been removed. NextBridge has been replaced with ‘designated electricity transmitter.’
Draft ToR Section Revision	Section 1.2 has been modified to remove NextBridge references.
MECP Response	<p>Section 1.2, page 14 (third paragraph) of this revised draft ToR:</p> <ul style="list-style-type: none"> • Please avoid detailed references to the NextBridge EA project. <ul style="list-style-type: none"> ○ The discussion regarding project costs should be presented at a high level, without specific details. State in general terms that there were concerns with the scale of cost increases. ○ Specific numbers/figures and quotes are not necessary. It is recommended these references be removed. Those who are interested can obtain these specific details in Appendix 2. <p>Why is this discussion regarding project cost relevant? Was it the catalyst for an updated needs assessment which further justifies the need for the project? This is not clearly articulated.</p>
Hydro One Response	Specific cost figures have been removed. The Lake Superior Link Project has been developed in response to the

	<p>updated cost estimates. Modified the sentence below slightly to improve clarity:</p> <p>In response to the OEB’s concerns regarding the cost of the project, as well as its environmental impacts, Hydro One is proposing its expansion of the East-West Tie corridor project, called “Lake Superior Link”.</p>
ToR Section Revision	Section 1.2
MECP – 13	
Agency Comment	<p>Section 1.2, general</p> <p>Provide more information on the current/existing East-West Tie transmission corridor. What does it currently consist of? How old is the infrastructure? etc.</p> <p>Revise the text accordingly. Please provide the additional information in this section of the ToR.</p>
Hydro One Response Provided	Information on the existing EWT has been added.
Draft ToR Section Revision	Section 1.2 has been modified to provide information on the existing EWT.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 14	
Agency Comment	<p>Section 1.2, general</p> <p>A better summary of the past provincial analysis and decision regarding the need and/or justification for the project is required.</p> <p>The description of the historical events related to the proposed expansion of the East-West Tie corridor is confusing and too vague. This information should be presented in a clear and comprehensive chronological summary of events.</p> <p>More information, detail and context are needed in order to fully understand and to justify the need for the project. For instance, provide more detail and context regarding the LTEP. What is the LTEP? Why was it updated? What is its focus, goals, key elements etc.?</p> <p>Also, provide more information for each of the bullet points on page 12. For instance, for bullet number 2, what does it mean to be the “designated electricity transmitter”? How does OEB decide who is designated and who is not? Can more than one proponent be designated?</p> <p>Lastly referring to a summary of the “East- West Tie project” is confusing because there is currently another EA</p>

	<p>project with the same name. It would be better to frame it as the summary of the proposed expansion of the East-West Tie corridor.</p> <p>Revise the text accordingly. Please provide the additional information in this section of the ToR. Please provide supporting documentation to confirm and validate the information provided in the bullet points (See Comment #1).</p> <p>Supporting documentation (i.e. letters, assessment, reports etc.) should establish the need for:</p> <ul style="list-style-type: none"> • Electricity transmission. For instance, summarize documents that established the need specifically in northern Ontario • The project. For instance, summarize in detail the analysis and reporting that has been undertaken (to date) regarding the need for the project in northern Ontario.
Hydro One Response Provided	<p>A more fulsome summary of the past provincial analysis and decision regarding the need and/or justification for the project has been provided.</p> <p>Chronology and additional information for the decision making and background part of the Project has been added. More information on the LTEP is found throughout Section 1.</p> <p>More information in the bullet point summary is found in the preceding paragraphs.</p> <p>East-West Tie has been renamed to the expansion of the East-West Tie corridor where prudent.</p>
Draft ToR Section Revision	Section 1.2 has been modified to provide additional clarity and information.
MECP Response	<p>Section 1.2, page 12-15 of the revised draft ToR:</p> <p>To improve clarity and flow, this section should also include references to Appendix 2 after a supporting document is first introduced so that those who are interested in obtaining more information can find specific supporting documents easily and efficiently.</p>
Hydro One Response	References to Appendix 2 have been added throughout Section 1 where appropriate.
ToR Section Revision	Section 1
MECP – 15	
Agency Comment	<p>Section 1.4, general</p> <p>This section must clearly state what the purpose is for the study and for the undertaking.</p> <p>What does Hydro One wish to achieve by engaging in the environmental assessment process? Why does Hydro</p>

	<p>One need to do this particular undertaking? What is the particular problem to be solved or alleviated? What is the opportunity which is to be pursued?</p> <p>If the need for the project has been satisfied and established by a defined planning process, then that needs to be clearly presented in the ToR and the associated supporting documentation must be provided (See Comments #1 and #14).</p> <p>Revise text accordingly. Please provide supporting documentation to confirm and validate the information provided (See Comment #1 and #14).</p>
Hydro One Response Provided	Additional clarity for the purpose of the study and undertaking has been added, including referencing supporting documentation for the need for the project.
Draft ToR Section Revision	Section 1.4 has been modified to provide additional clarity and information.
MECP Response	<p>Section 1.4, page 15 of the revised draft ToR:</p> <ul style="list-style-type: none"> To improve clarity, consider the following revision to the first paragraph: “The purpose of the EA study is to determine the preferred undertaking and to assess the natural...”
Hydro One Response	Text has been modified as presented.
ToR Section Revision	Section 1.4
MECP – 16	
Agency Comment	<p>Section 1.5, general</p> <p>To improve clarity and flow of the ToR document, the following organizational changes to the ToR document are recommended: “Taken together, The ToR document is organized into the following sections of the ToR are intended in order to satisfy the requirements under Section 6(2)(c) and 6.1(3) of the EA Act:</p> <ul style="list-style-type: none"> Regulatory Framework for the Project (Section 2) Overview of the EA Process and Approval Requirements for the Project Indication of how the EA will be Prepared (Section 3) Description of the Undertaking and Evaluation of Alternative Methods (Section 4) Consultation (Section 5) Existing Environmental Conditions in the Study Area (Section 5) Identification and Evaluation of Alternative Methods (Section 6) Potential Environmental Effects Evaluation Assessment and Mitigation Measures (Section 7) Commitments and Monitoring (Section 8) Consultation (Section 9)”

	Revise ToR document accordingly.
Hydro One Response Provided	The sections have been renamed and reorganized.
Draft ToR Section Revision	Section 1.5 modified to incorporate new ToR structure and title names.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 17	
Agency Comment	<p>Section 2, general</p> <p>To improve clarity and flow of this section of ToR document, it is recommended this section be organized first by a discussion of the provincial regulatory framework, and then followed by the discussion of the federal regulatory framework.</p> <p>Revise this section accordingly.</p>
Hydro One Response Provided	Provincial and Federal regulatory framework headings have been created with specific regulatory subheadings.
Draft ToR Section Revision	Section 2 has been reorganized to incorporate federal and provincial headings.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 18	
Agency Comment	<p>Section 2, page 15</p> <p>The first paragraph of this section discusses other permits and approval activities and applications. To improve clarity and flow of the ToR document, it is recommended this paragraph be moved to Section 2.6 which discusses other relevant provincial legislation, permits and policies.</p> <p>The first paragraph refers to the construction phase; however it is suggested to keep the discussion of other permits and approval activities more general.</p> <p>To improve clarity, consider the following revision to the first paragraph: “Hydro One will identify all necessary approvals that may be required during project planning and construction. Where practical appropriate, Hydro One will begin preparation of construction-related applications initiate other permit and approval activities and applications concurrent with the EA process. It will be necessary to initiate some permit and approval activities or applications during the EA process including any required consultation activities with members of the public, municipalities, agencies, and Indigenous communities and groups. It should be noted that some other permits and approvals for construction typically rely on more detailed</p>

	<p>engineering and design information than is available during the EA process. In this event, Hydro One will carry out required studies necessary to support those approvals prior to start of construction, following the completion of the EA. The following sections outline the framework for regulatory approvals in Ontario for electricity transmission projects and how they apply to the Project.”</p> <p>Revise this section and text accordingly.</p>
Hydro One Response Provided	Section discussing other permits has been moved and the suggested revisions have been incorporated into the document.
Draft ToR Section Revision	Section 2 has been modified with some text moved to Section 2.1.5 (old Section 2.6).
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 19	
Agency Comment	<p>Section 2.1, page 15 Please specify that this undertaking is a Category C project under the Electricity Regulation (O.Reg 116).</p> <p>Revise text accordingly. Please provide additional information on how the project is captured under O.Reg 116.</p>
Hydro One Response Provided	Specified that Lake Superior Link is a Category C project under the Electricity Regulation. Additional information of O.Reg. 116/01 has been added.
Draft ToR Section Revision	Section 2.1 has been revised to include Category C designation.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 20	
Agency Comment	<p>Section 2.1, page 15 To improve clarity, consider the following revision to the third paragraph of Section 2.1: “Hydro One is required to complete and submit a ToR to the MOECC for review and approval as illustrated on Figure 2. The purpose of the ToR is to provide the overall study framework for the planning and decision making process that will be followed during the EA...”</p> <p>Revise text accordingly.</p>
Hydro One Response Provided	Text has been revised according to comment.
Draft ToR Section Revision	Section 2.1 revised with updated text.
MECP Response	No further comment.

Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 21	
Agency Comment	<p>Section 2.1, page 17</p> <p>To improve clarity, consider the following revision to the first paragraph on this page: “Should the ToR be approved by the Minister of the Environment of Climate Change Conservation and Parks, it will be used by Hydro One to guide the completion of the EA to ensure that it meets the intent fulfills the requirements of the EA Act and any other applicable requirements. The results of the EA process will then be documented in an EA Report to be submitted to the MOECC MECP for review and approval.</p> <p>There are two key documentation requirements for the an application for approval to proceed with an undertaking under subsection 5(1) of the EA Act:</p> <ul style="list-style-type: none"> • the development, submission, review and approval of the ToR; and, • the preparation, submission, review and approval of the EA document in accordance with the framework set out in the MOECC MECP approved ToR.”
Hydro One Response Provided	<p>The ToR will be submitted for reviewed and approved by the Minister of the Environment, Conservation and Parks. If approved, the ToR will then be used by Hydro One to direct the EA process to fulfill the requirements of the EA Act and other regulatory requirements. The resulting EA process will be then documented in an EA Report to be submitted to the MECP for review and approval.</p> <p>Suggested text modifications have been implemented.</p>
Draft ToR Section Revision	Section 2.1.1 modified to reflect text changes.
MECP Response	<p>Section 2.1.1, page 20 of the revised draft ToR:</p> <ul style="list-style-type: none"> • To improve clarity, consider the following revision to the first paragraph: “The ToR will be submitted for reviewed and approved by the Minister...”
Hydro One Response	Text modified as presented.
ToR Section Revision	Section 2.1.1
MECP – 22	
Agency Comment	<p>Section 2.1, page 17</p> <p>Table 1 and its preceding paragraph proposes how the EA will be prepared. To improve clarity and flow of the ToR document, it would be more appropriate for this information to be moved to Section 3.0 of this ToR document.</p>

	Revise ToR document accordingly.
Hydro One Response Provided	Table 1 moved to section 3 of the ToR.
Draft ToR Section Revision	Table 1 (now Table 3) moved to section 3 of the ToR.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 23	
Agency Comment	Section 2.1, page 17 More information and detail is required to support the “reason for proceeding with this undertaking has been established by the IESO...” See Comment #14.
Hydro One Response Provided	More information has been documented in Section 1 to support the IESO determination of need for the project.
Draft ToR Section Revision	Text has been moved to Section 3 as per Comment 22 (previously Section 2.1).
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 24	
Agency Comment	Section 2.1, page 17 Please provide further information on “focusing of the EA”. Define the term “focusing”. What does it mean to focus the EA? What general requirements will not be addressed in the EA? etc. Revise text accordingly. Please provide additional information in Section 3.0 of this ToR document.
Hydro One Response Provided	More information has been provided to support the ‘focusing’ of the EA IESO determination of need for the project.
Draft ToR Section Revision	Section 3 has been modified (previously Section 2.1).
MECP Response	Section 2.1.1, page 28-29 of the revised draft ToR: <ul style="list-style-type: none"> To improve clarity and flow, consider the following revision to the last paragraph: “...are not fully fleshed out. Proponents will submit an EA under subsection 6(2)(c) and 6.1(3) of the EA Act if there is a more defined planning process and more details of the project are already known. This is generally referred to as a ‘focused EA’. The reason for proceeding with this undertaking has been established... The focused EA will meet the requirements of subsection 6.1(2) and will not assess

	'alternatives to' and not reexamine the 'purpose of the undertaking' but will include a 'Do Nothing' alternative."
Hydro One Response	Text has been modified as presented.
ToR Section Revision	Section 3.
MECP – 25	
Agency Comment	Section 2.1, Table 1, page 17 Please correct references to "Section 0". Revise Table accordingly.
Hydro One Response Provided	Section references have been corrected.
Draft ToR Section Revision	Table 1 (now Table 3) has been modified accordingly.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 26	
Agency Comment	Section 2.1, Table 1, page 17, row 2 In order to provide flexibility to accommodate new circumstances, consider the following revision: "ii) The EA will evaluate and assess two alternative reference routes alternative methods of carrying out the undertaking". Revise Table accordingly.
Hydro One Response Provided	Suggested revision has been implemented.
Draft ToR Section Revision	Table 1 (now Table 3) has been modified accordingly.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 27	
Agency Comment	Section 2.1, Table 1, page 17, row 2 In accordance with Section 5.2.5 of the Code of Practice, the "Do Nothing" alternative should always be considered. It acts as a starting point for the comparison of alternatives. See Comment #42. Revise Table accordingly.
Hydro One Response Provided	'Do Nothing' alternative will be evaluated.
Draft ToR Section Revision	Table 1 (now Table 3) has been modified accordingly.

MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 28	
Agency Comment	Section 2.1, Table 1, page 18, row 1, column 1 Alternative methods of carrying out the undertaking should be included in the “description of...” Revise Table accordingly.
Hydro One Response Provided	Description of is a copied heading from the EA Act. Assessing alternative methods of carrying out the undertaking has been added to Table 3.
Draft ToR Section Revision	Table 3 has been modified.
MECP Response	There seems to be some confusion regarding the row and column references in my original comments. As such, to improve clarity and flow, please revise Table 3 of the revised draft ToR accordingly: <ul style="list-style-type: none"> • page 29, row 1, column 3: “The EA will describe the purpose of the undertaking and alternative methods of carrying out the undertaking.” • Page 30, row 1, column 1: “(iii) the actions necessary or that may reasonably be expected to prevent, change, mitigate or remedy the effects upon or the effects that might reasonably be expected upon the environment by the undertaking and the alternative methods of carrying out the undertaking”
Hydro One Response	Table 3 has been modified as presented.
ToR Section Revision	Section 3, Table 3.
MECP – 29	
Agency Comment	Section 2.1, Table 1, page 18, row 2 Alternative methods of carrying out the undertaking should be included in “an evaluation of advantages and disadvantages...” Revise Table accordingly
Hydro One Response Provided	Alternative methods of carrying out the undertaking will be assessed in an evaluation of advantages and disadvantages.
Draft ToR Section Revision	Table 3 has been modified.
MECP Response	There seems to be some confusion regarding the row and column references in my original comments. As

	<p>such, to improve clarity and flow, please revise Table 3 of the revised draft ToR accordingly:</p> <ul style="list-style-type: none"> Page 30, row 2, column 1: “(d) an evaluation of the advantages and disadvantages to the environment of the undertaking and the alternative methods of carrying out the undertaking” Page 30, row 2, column 3: “The EA will provide an evaluation of the advantages and disadvantages to the environment of the undertaking and the alternative methods of carrying out the undertaking”
Hydro One Response	Text has been modified as presented.
ToR Section Revision	Section 3, Table 3
MECP – 30	
Agency Comment	Section 2.3 Are there any opportunities for public and/or Indigenous consultation? If so, please describe. Revise text accordingly. Please provide the additional information (if any) in this section of the ToR.
Hydro One Response Provided	Added information on OEB consultation.
Draft ToR Section Revision	Change made in section 2.1.3 (old Section 2.3).
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 31	
Agency Comment	Section 2.4 What is meant by “the fee simple interest...” in the statement “Property Owners will be offered the choice of Hydro One acquiring either an easement or the fee simple interest in the lands required for the Project.”? Revise text accordingly. Please provide the additional information in this section of the ToR.
Hydro One Response Provided	Fee simple interest is ownership of the land and any improvements to the land in perpetuity. This has been clarified in the text.
Draft ToR Section Revision	Section 2.1.4 has been modified to provide clarity on fee simple interest.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 32	
Agency Comment	Section 2.5, page 21 In order to clearly demonstrate that this undertaking is not a “designated project” under federal regulation,

	<p>please provide further information on the requirements outlined in the federal regulation designating physical activities.</p> <p>Revise text accordingly. Please provide the additional information in this section of the ToR.</p>
Hydro One Response Provided	Federal regulators provided further comments on Project designation and federal regulation and revisions have added clarity to the section.
Draft ToR Section Revision	Section 2.2 has been revised with additional information from federal regulators.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 33	
Agency Comment	<p>Section 2.5, page 21</p> <p>Please include the November 27, 2017 letter from Parks Canada in your Record of Consultation.</p> <p>Please provide the additional information as part of the Record of Consultation (See Comment 2).</p>
Hydro One Response Provided	Letter will be included with record of consultation.
Draft ToR Section Revision	Record of Consultation will include Parks Canada letter.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 34	
Agency Comment	<p>Section 2.5, general</p> <p>Provide more information regarding Section 67 of the Canadian Environmental Assessment Act (i.e. what does it state, what requirements does it outline etc.). Also, for improved clarity and flow, it is recommended a subheading be included for the discussion regarding Section 67.</p> <p>Revise text accordingly. Please provide the additional information in this section of the ToR.</p>
Hydro One Response Provided	Subheading for Section 67 added. Additional information on Section 67 has been added to the Section 67 section.
Draft ToR Section Revision	Section 2.2.1 and 2.2.2 have been modified to incorporate additional information.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 35	

Agency Comment	Section 2.5, general What consultation has been conducted to date with ISC, CEAA and other federal authorities? Please provide the additional information as part of the Record of Consultation (See Comment 2).
Hydro One Response Provided	Consultation with Federal authorities has been documented in the Record of Consultation.
Draft ToR Section Revision	No change required.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 36	
Agency Comment	Section 2.6, general To improve clarity and flow, it is suggested to organize the permits and/or approvals listed according to the responsible Ministry. Consider using a table format. Revise text accordingly.
Hydro One Response Provided	Table format has been added.
Draft ToR Section Revision	Table 1 has been added.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 37	
Agency Comment	Section 2.6, general Include a statement at the end of this section that states: <ul style="list-style-type: none"> • This is a preliminary list • This list is subject to change as the project is further developed and refined • A final list will be outlined the EA document. Use similar wording as the last paragraph in Section 2.7 of this ToR document (See Comment #39). Revise text accordingly. Please provide the additional information in this section of the ToR.
Hydro One Response Provided	A statement similar to Comment 39 was provided at the end of this section.
Draft ToR Section Revision	Statement added in Section 2.2.5.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 38	
Agency Comment	Section 2.7, general

	To improve clarity and flow, it is suggested to organize the permits and/or approvals listed according to the responsible federal agency. Consider using a table format. Revise text accordingly.
Hydro One Response Provided	Federal approvals and permits have been listed in a table format.
Draft ToR Section Revision	Table 2 has been created in Section 2.2.5.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 39	
Agency Comment	Section 2.7, page 23 To improve clarity and flow, consider the following revision to the third paragraph of Section 2.1: “Section 2.0 provided a preliminary list of other federal permits and approvals that may be necessary for the Project. This list is subject to change as the Project is further developed and refined. All federal permits and approvals that are necessary for the Project to proceed will be outlined in the EA document. It may not be practicable to complete all required surveys in relation to other approvals prior to submission of the EA document, but Hydro One will commit to continue and complete all information collection prior to construction following the completion of the EA.” Revise text accordingly.
Hydro One Response Provided	Statement has outlined adaptability and flexibility of permits and approvals for both provincial and federal authorities.
Draft ToR Section Revision	Statements have been added to Section 2.1.5 and 2.2.5.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 40	
Agency Comment	Section 3, page 24 Need to provide more information and detail to support your statement: “Based on the previously conducted needs assessment and the prioritization of the project from regulatory bodies, a more focused approach to the EA will be utilized.” Please provide supporting documentation to confirm and validate the statement “Based on the previously conducted needs assessment and the prioritization of the project...” (See Comment #1 and #14).

	<p>Please incorporate the discussion from Section 2.1 on “focusing” and Table 1 into this section of the ToR document (See Comment #24).</p> <p>Revise the ToR document and text accordingly.</p>
Hydro One Response Provided	<p>Information for the needs assessment has been added to Section 1 and a sentence directing the reader there has been added.</p> <p>Rearrangement of sections has been completed as directed.</p>
Draft ToR Section Revision	Discussion from previous Section 2.1 on focusing and Table 1 (now Table 3) has been moved to Section 3.0.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 41	
Agency Comment	<p>Section 3, page 24, bullet 1</p> <p>To improve clarity, consider the following revision: “a description of the Project and the purpose of the Project based on the recommendations and decisions of the” IESO and the government;</p> <p>Revise text accordingly.</p>
Hydro One Response Provided	Bullet revised.
Draft ToR Section Revision	Section 3.0 has been revised.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 42	
Agency Comment	<p>Section 3, page 24, bullet 3</p> <p>In accordance with section 5.2.5 of the Code of Practice, the “Do Nothing” alternative should be considered. Please be advised that the “Do Nothing” alternative represents what is expected to happen if the problem or opportunity that prompted the EA process is not addressed. The “Do Nothing” alternative represents what is expected to happen if none of the alternatives being considered during the EA process are carried out. It represents the benchmark against which the advantages and disadvantages of the alternatives being considered can be measured and compared.</p> <p>The “Do Nothing” alternative is not intended to be considered as a reasonable way in which the problem or</p>

	<p>opportunity that prompted the initiation of EA process can be addressed.</p> <p>It is the ministry's expectation that during the EA process proponents will consider a reasonable range of alternatives, which will be assessed against the "Do Nothing" alternative.</p> <p>Revise text accordingly.</p>
Hydro One Response Provided	The bullet has been revised to include a 'Do Nothing' alternative.
Draft ToR Section Revision	Section 3.0 has been revised.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 43	
Agency Comment	<p>Section 3, page 24, bullet 4</p> <p>Incorrect reference to alternative methods. Statement should refer to alternatives to.</p> <p>To improve clarity, consider the following revision:</p> <p>"the EA will not include a description and rationale of alternatives to methods of carrying out the Project as it has already been extensively studied by the OPA and IESO regulator and the preferred alternative to has already been identified. However, the EA will include a description of and statement of rationale for the alternative methods of carrying out the undertaking such as identified reference route and reference route alternative will be considered for the Project as well as route alignment, design considerations and local refinements;"</p> <p>Revise text accordingly.</p>
Hydro One Response Provided	The text has been modified as presented.
Draft ToR Section Revision	Section 3.0 has been revised.
MECP Response	<p>Section 3, page 27 of the revised draft ToR:</p> <ul style="list-style-type: none"> To improve clarity, consider the following revision to the forth bullet point: "the EA will not include a description and rationale of alternatives to as it has already been extensively studied by the OPA and IESO and the preferred alternative to has already been identified..."
Hydro One Response	Text has been modified as presented.
ToR Section Revision	Section 3.
MECP – 44	
Agency Comment	Section 3, page 24, bullet 5

	To improve clarity, consider the following revision: “a description of the environment that will be affected, or might reasonably be expected to be affected directly or indirectly by the Project and the alternative methods of carrying out the undertaking routes considered; ” Revise text accordingly.
Hydro One Response Provided	The text has been modified as presented.
Draft ToR Section Revision	Section 3.0 has been revised.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 45	
Agency Comment	Section 3, page 24, bullet 6 To improve clarity, consider the following revision: “an description evaluation of the advantages and disadvantages that will be caused or might reasonably be expected to be caused to the environment as a result of the Project, and the alternative methods of carrying out the Project;” Revise text accordingly.
Hydro One Response Provided	The text has been modified as presented.
Draft ToR Section Revision	Section 3.0 has been revised.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 46	
Agency Comment	Section 3, page 24, bullet 7 To improve clarity and flow, this bullet point should come after bullet point 5. Revise this section accordingly.
Hydro One Response Provided	Bullet moved to bullet position 6.
Draft ToR Section Revision	Section 3.0 has been revised.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 47	

Agency Comment	Section 3, page 24, bullet 8 This statement is repetitive. It is already captured in in bullet point 6. Revise this section accordingly.
Hydro One Response Provided	Bullet deleted due to repetition.
Draft ToR Section Revision	Section 3.0 has been revised.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 48	
Agency Comment	Section 3, page 24, bullet 8 To improve clarity, consider the following revision: “description and documentation of the public, agency and stakeholder consultations and Indigenous communities and groups engagement and consultation undertaken during the EA process”. Revise text accordingly.
Hydro One Response Provided	Revised bullet point to further clarify. “description and documentation of the public, agency, stakeholder, and Indigenous communities and groups engagement and consultation undertaken during the EA process”.
Draft ToR Section Revision	Section 3.0 has been revised.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 49	
Agency Comment	Section 3, page 24, bullet 9 To improve clarity, consider the following revision: “ pre and post development environmental monitoring plans, follow-up programs, and commitments (as necessary); and, Revise text accordingly.
Hydro One Response Provided	Text modified as presented.
Draft ToR Section Revision	Section 3.0 has been revised.
MECP Response	No further comment.

Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 50	
Agency Comment	<p>Section 3, page 24, bullet 10 To improve clarity, consider the following revision: “supporting documents, maps, etc., or any other documents as required under the EA Act and its regulations, such as Ontario Regulation 334.</p> <p>Revise text accordingly.</p>
Hydro One Response Provided	Text modified and further clarified: “supporting documents, maps, or any other documents as required under the EA Act and its regulations, such as O. Reg. 334.”
Draft ToR Section Revision	Section 3.0 has been revised.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 51	
Agency Comment	<p>Section 3, page 24 This list should include a commitment that the EA will include a description of the effects that will be caused or that might reasonably be expected to be caused to the environment. Should follow bullet point 5.</p> <p>Revise this section accordingly.</p>
Hydro One Response Provided	Bullet added after point 5.
Draft ToR Section Revision	Section 3.0 has been revised.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 52	
Agency Comment	<p>Section 3.1, general To improve clarity and flow, it is recommended this subsection be moved to the end of Section 3.</p> <p>Revise this section accordingly.</p>
Hydro One Response Provided	Section 3.1 has been incorporated into Section 3.
Draft ToR Section Revision	Section 3.0 has been revised.

MECP Response	Section 3, page 31 of the revised draft ToR: The first paragraph on this page should have been kept as its own separate subsection at the end of Section 3 (i.e. Section 3.2 Flexibility to Accommodate New Circumstances). Please revise the ToR document accordingly.
Hydro One Response	Added paragraph to Section 3.2.
ToR Section Revision	Section 3.2
MECP – 53	
Agency Comment	Section 3.1, page 25 In accordance with Section 5.2.10 of the ministry’s Code of Practice, it is important that flexibility be incorporated when preparing the ToR document. However, flexibility is not to allow proponent to completely change the scope of their study at the EA stage. As such, consider the following revision: “...To address these potential changes, there is a requirement for flexibility within the ToR document to lay out a framework for a successful EA submission and subsequent construction and operational phases. Project design updates, study area refinements changes, novel information, and implementation of input from the consultation process are examples of new circumstances arising during a project lifecycle. These degrees of Flexibility allow proponents reasonable measures to address unforeseen circumstances but still maintain regulatory compliance throughout the project phases without starting the ToR and EA process anew. Some of these changes are likely to be minor and have limited consequences while others may be more significant and require consultation with a number of stakeholders and agencies. Hydro One has prepared this ToR with the most complete state of knowledge at the time of its preparation but acknowledges the Project may need to adapt to new circumstances. If significant changes to the project are being considered, Hydro One will consult with the MECP to determine if the proposed changes can be accommodated with the framework of the ToR.” Revise text accordingly.
Hydro One Response Provided	Text modified as presented.
Draft ToR Section Revision	Section 3.0 has merged Section 3.1 with the recommended modifications.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 54	
Agency Comment	Section 3.2, general When referencing the Code of Practice, specify which section(s) of the Code of Practice is being referenced. Revise the text accordingly

Hydro One Response Provided	Added Section 4.3 reference to Code of Practice.
Draft ToR Section Revision	Section 3.1 section reference has been added.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 55	
Agency Comment	Section 3.2, page 25 To improve clarity, consider the following revision to the first paragraph: “The EA will be prepared in accordance consistent with the requirements on the EA Act described in Section 2.1 and in accordance with the MECP’s Code Practice on Preparing and Reviewing Environmental Assessments in Ontario” Revise text accordingly.
Hydro One Response Provided	Text modified as presented.
Draft ToR Section Revision	Section 3.1 has been modified.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 56	
Agency Comment	Section 3.2, page 26 Please explain the term “reference reports”. Are they detailed technical studies completed in support of the EA? Revise the text accordingly. Please provide the additional information in this section of the ToR.
Hydro One Response Provided	Reference reports are detailed technical studies completed in support of the EA. This language has been clarified and a reference to Section 4.3 of the Code of Practice has been added.
Draft ToR Section Revision	Section 3.1 has been modified.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 57	
Agency Comment	Section 4, general This section provides a description of the undertaking and an evaluation of alternative methods. Both these components are important requirements of the EA process. As such, to improve clarity and flow of the ToR document, it would be more appropriate for this components to be separated into two separate sections: • Section 4 – “Description of the Undertaking”. This section includes Subsections 4.1, 4.6 & 4.7.

	<ul style="list-style-type: none"> • Section 5 – “Identification and Evaluation of Alternatives”. This section includes subsection 4.2 to 4.5. It should begin with a brief general summary explaining the two different types of alternatives the Environmental Assessment Act requires proponents to assess (i.e. ‘alternatives to’ and ‘alternative methods’ of carrying out an undertaking). <p>Revise ToR document accordingly.</p>
Hydro One Response Provided	<p>Comment #16 has placed Identification and Evaluation of Alternative Methods as Section 6. Otherwise, sections have been split out accordingly.</p> <p>Alternative methods vs. alternatives to have been further clarified.</p>
Draft ToR Section Revision	Sections 4 and 6 have been split out.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 58	
Agency Comment	<p>Section 4, general</p> <p>Please clarify that this section provides a general description of the undertaking. Include a commitment that a more detailed description of the undertaking will be provided in the EA. This description should be sufficiently detailed to enable the identification an assessment of potential effects for all phases of the project.</p> <p>Revise text accordingly.</p>
Hydro One Response Provided	Text has been revised with the following: “This section provides a general description of the undertaking. A more detailed description of the undertaking will be provided in the EA. The description within the EA will be sufficiently detailed to enable the identification and assessment of potential effects for all phases of the project.”
Draft ToR Section Revision	Section 4.0 has been revised.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 59	
Agency Comment	<p>Section 4.1, general</p> <p>Please clearly define the geographical boundaries of the study area. In accordance with Section 5.2.6 of the ministry’s Code of Practice, the boundaries should adequately represent the geographical area within which the potential environmental effects of the alternatives being considered and the proposed undertaking are likely to occur and will be studied.</p>

	<p>Interested government agencies, Indigenous communities and members of the public rely upon the description of study area to determine whether the proposed undertaking and its alternatives may impact their respective jurisdictional mandate, Indigenous rights or interests. It is therefore important to explain how the boundaries of the study area were determined.</p> <p>In addition, please include a commitment that a more detailed description of the study area and how the boundaries of the study area were determined will be provided in the EA.</p> <p>Also, in accordance with Section 5.2.6 of the ministry's Code of Practice, before the existing environment is described, a study area must be defined. As such, it would be more appropriate to move this section to Section 6 of this ToR document.</p> <p>Revise text and ToR document accordingly. Please provide the additional information in this section of the ToR.</p>
Hydro One Response Provided	<p>Comment 57 has placed Section 4.1 after Section 4, which includes the Study Area. This section is prior to the description of the existing environment and will remain in place.</p> <p>PSA, LSA and RSA have been defined and clarification on updating the study areas was added as an EA commitment.</p>
Draft ToR Section Revision	Section 4.1 has been revised with further information.
MECP Response	<p>Section 4.1, page 33 of the revised draft ToR:</p> <ul style="list-style-type: none"> In accordance with Section 5.2.6 of the ministry's Code of Practice, before the existing environment is described, a study area must be defined. As such, it would be more appropriate to move subsection 4.1 to Section 5 of this revised draft ToR (i.e. as its own subsection before subsection 5.1 on page 41). Please revise the ToR document accordingly.
Hydro One Response	Subsection 4.1 has been moved to Section 5.1.
ToR Section Revision	Section 5.1.
MECP – 60	
Agency Comment	<p>Section 4.1, general</p> <p>Hydro One specifies that information from NextBridge's EA document will be used to supplement the Lake Superior Link EA. The ministry would like to emphasize that as outlined in our November 14, 2017 letter to Hydro One and reiterated in correspondence from March 16, 2018 and April 10, 2018; Hydro One's proposed Lake Superior Link Transmission Project is considered a new undertaking for the purpose of the Environmental Assessment Act. As such, Hydro One is required to complete the requirements of the Environmental Assessment</p>

	<p>Act including preparing technical studies for analysis and evaluation and consultation requirements. This information must be completed and submitted as part of the Lake Superior Link EA.</p> <p>Revise text accordingly. Please remove references to NextBridge or the NextBridge EA project. See Comment #12.</p>
Hydro One Response Provided	Reference to NextBridge has been removed. Clarification on assessment of areas previously studied has been made.
Draft ToR Section Revision	Section 4.1 updated to remove reference to NextBridge and clarification on scope of studies.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 61	
Agency Comment	<p>Section 4.2, general This section discusses alternatives to the project and therefore should be renamed “Alternatives To”. Revise heading accordingly.</p>
Hydro One Response Provided	Heading has been modified to ‘Alternatives To’.
Draft ToR Section Revision	Section 6.1 has been revised.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 62	
Agency Comment	<p>Section 4.2, general This subsection states that an extensive ‘alternatives to’ assessment (i.e. local generation and other transmission solutions etc.) had been previously performed by OPA and IESO, and the proposed expansion to the East West Tie corridor was identified as the preferred option.</p> <p>Although Hydro One is proposing to prepare a focused EA, a detailed summary of the assessment conducted by OPA and IESO should be presented in the ToR document. The ToR should include some analysis of ‘alternatives to’ to provide the necessary justification and rationale for why the expansion of the current East West Tie corridor is the preferred option. This information should also be confirmed and validated by providing supporting documentation.</p> <p>Revise this section accordingly. Please provide a detailed summary and analysis of the ‘alternatives to’ assessment conducted through OPA and IESO planning processes. Include any further details as supporting</p>

	documentation.
Hydro One Response Provided	Added reference to Section 1 which further outlines the IESO/OPA process to determine the scope and need of the Project. Supporting information is also available in an information packet.
Draft ToR Section Revision	Section 6.1 modified to include reference to other Section 1.
MECP Response	<p>Section 6.1, page 68, of the revised draft ToR:</p> <ul style="list-style-type: none"> • A detailed summary of the analysis conducted through OPA and IESO planning processes should be presented in the ToR document. • The ToR should include a summary of the analysis of ‘alternatives to’ (i.e. what options were considered, what were the conclusions? etc.) • This section should also include references to Appendix 2 so that those who are interested in obtaining more information can find specific supporting documents easily and efficiently.
Hydro One Response	<p>Statement added which ties into previous comments about planning summaries.</p> <p>"A summary of the needs assessments and analysis of alternatives to conducted by OPA and IESO planning processes can be found in Appendix 2."</p>
ToR Section Revision	Section 6.1
MECP – 63	
Agency Comment	<p>Section 4.2, page 27</p> <p>A reference to “East-West Tie project” is confusing because there is currently another EA project with the same name. It would be better to frame it as the summary of the proposed expansion of the East-West Tie corridor. To improve clarity, consider the following revision:</p> <p>“The expansion of the East-West tie project corridor has been identified by the Ministry of Energy, the OEB and the IESO as a priority project, as per an Order-in-Council issued by the Lieutenant Governor in Council on March 4, 2016. As such, this ToR proposes and will utilize a focused EA will be prepared method.”</p>
Hydro One Response Provided	<p>The following text has been modified:</p> <p>“The East-West Tie Corridor Expansion project has been identified by the Ministry of Energy, the OEB and the IESO as a priority project, as per an Order-in-Council issued by the Lieutenant Governor in Council on March 4, 2016. As such, this ToR proposes a focused EA will be prepared. “</p>
Draft ToR Section Revision	Section 6.1 has been modified with updated text.
MECP Response	No further comment.

Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 64	
Agency Comment	<p>Section 4.2, page 28</p> <p>This paragraph is very confusing. At some points, it is unclear whether you are referring to alternatives to or alternative methods. To improve clarity, consider the following revision:</p> <p>Under In accordance with subsections 6(2) (c) and 6.1(3) of the EA Act, a focused EA will be prepared. The assessment of alternatives to the undertaking and approach will take into account the IESO and OPA planning processes recommendations. As such, the need and method for the goals of the project have been clearly identified and the ToR EA will not contain an assessment of alternatives to the undertaking.</p> <p>It is also recommended that any discussion of alternative methods of carrying out the undertaking be moved to Section 4.4.</p> <p>Revise this section accordingly</p>
Hydro One Response Provided	Alternative Methods have been moved to Section 6.3. The proposed text modifications have been implemented.
Draft ToR Section Revision	Section 6.1 modified, moved alternative methods to Section 6.3.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 65	
Agency Comment	<p>Section 4.3</p> <p>In accordance with Section 5.2.5 of the Code of Practice, the “Do Nothing” alternative should always be considered. It acts as a starting point for the comparison of alternatives.</p> <p>See Comment #42. Revise this section accordingly.</p>
Hydro One Response Provided	The Do Nothing alternative will be considered. Text has been revised to reflect this approach.
Draft ToR Section Revision	Section 6.2 has been modified to include a Do Nothing alternative.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 66	
Agency Comment	<p>Section 4.4, general</p> <p>This section discusses alternatives methods of carrying out the undertaking and therefore should be renamed “Alternatives Methods of Carrying out the Undertaking”</p> <p>As such, there needs to be a clear statement at the beginning of this section listing the alternative methods of</p>

	<p>carrying out the undertaking that will be identified, evaluated and assessed in the EA. This is not limited to just routing alternatives. For instance, alternative methods should include but not limited to:</p> <ul style="list-style-type: none"> • Alternative routes between the Thunder Bay and Wawa • Local refinements to the Reference Route • Alternative designs: <p>O Towers (i.e. types and specific siting), new access roads etc.</p> <p>This should be following by subsections for each of the above referenced alternative methods which will provide further information and preliminary details.</p> <p>Revise heading and text accordingly. Please provide the additional information in this section of the ToR.</p>
Hydro One Response Provided	Renamed “Alternatives Methods of Carrying out the Undertaking” section 6.3. Added additional methods and provided subsections for them.
Draft ToR Section Revision	<p>Section 6.3 has been renamed.</p> <p>Added subsections 6.3.1., 6.3.2, and 6.3.3 for alternative routes, alternative designs, and local refinements.</p>
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 67	
Agency Comment	<p>Section 4.4, general</p> <p>Need to expand on the explanation for limiting the number of route alternatives to be considered in the EA (i.e. connection criteria and Provincial Policy Statement). Our understanding is that there are a number of linear corridors that are located between Thunder Bay and Wawa. Why will the EA not identify, evaluate and assess all these potential corridors?</p> <p>If limiting the number of route alternatives to be considered in the EA, thorough justification and rationale is required. In accordance with section 5.2.5 of the Code of Practice, the ToR should provide justification for limiting the examination of alternatives and a statement of the rationale for the alternatives that will be examined the EA. This should be accompanied by supporting documentation.</p> <p>Furthermore, provide background on the reference route and the justification for its use.</p> <p>If justification and rationale for limiting the number of route alternatives to be considered in the EA cannot be provided in the ToR, please include a commitment that a thorough screening of the route alternatives will be</p>

	<p>provided in the EA (i.e. the EA will identify, evaluate and assess a reasonable range of potential linear corridors that are located between Thunder Bay and Wawa).</p> <p>Revise text accordingly. Please provide the additional information in this section of the ToR.</p>
Hydro One Response Provided	<p>Text has been revised to the following: “There are a number of existing linear corridors between Thunder Bay and Wawa which would satisfy the connection criteria for the Project. The identified route alternatives have been presented due to cost, construction, operation, maintenance, reliability, stakeholder consultation and environmental concerns. Large portions of the proposed corridor have been previously studied and significant public and Indigenous consultation has gone into identifying the proposed route alternatives. Section 5.2.5 of the Code of Practice states the ToR should provide justification for limiting the examination of alternatives and a statement of the rationale for the alternatives that will be examined the EA. A thorough screening of route alternatives will be provided in the EA.”</p>
Draft ToR Section Revision	Section 6.3.1 has been modified to include an explanation on route alternatives.
MECP Response	<p>Section 6.3.1, page 70 of the revised draft ToR:</p> <p>As per the second paragraph, what “sections below identify the transmission route that will be assessed” are you referring to? Clearly list the preliminary transmission routes that will be assessed.</p>
Hydro One Response	<p>Added further information:</p> <p>The red solid and dotted lines indicate the reference route and reference route alternatives, respectively. The figure below identifies these transmission routes which will be assessed and will describe the local refinement and design considerations.</p>
ToR Section Revision	Section 6.3.1
MECP – 68	
Agency Comment	<p>Section 4.4, page 29</p> <p>Section 5.2.5 of the ministry’s Code of Practice identifies a number of questions that can be used by proponents when determining the alternatives that should be considered during the EA process. These questions are designed to aid proponents in identifying and determining an initial range of alternatives, that may reasonably address the problem or opportunity that prompted the initiation of the EA process and be within a proponent’s ability to implement, that should be carried forward for further consideration during the EA process. These questions are not intended to be used as a means by which alternatives are compared and assessed or by which a preferred alternative is determined.</p>

	Please remove text regarding the questions listed in section 5.2.5 of the ministry's Code of Practice.
Hydro One Response Provided	List of questions has been removed.
Draft ToR Section Revision	Removed list from Section 6.3.1.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 69	
Agency Comment	<p>Section 4.4.1, general Local refinements to the reference route might be required as a result of consultation, to avoid sensitive environmental features (natural, socio-economic, cultural etc.), technical considerations, and request of landowners. This needs to be clearly articulate in this subsection. Also, please statement that the need for local refinements to the reference route and final siting will be determined and evaluated during the EA process.</p> <p>Revise text accordingly.</p>
Hydro One Response Provided	<p>Added text: “Local refinements to the reference route might be required as a result of consultation, to avoid sensitive environmental features (natural, socio-economic, cultural etc.), technical considerations, and request of landowners. The need for local refinements to the reference route and final siting will be determined and evaluated during the EA process.”</p>
Draft ToR Section Revision	Section 6.3.3 has been revised.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 70	
Agency Comment	<p>Section 4.4.1, page 30 The last three paragraphs on this page briefly describe a preliminary list of criteria and indicators (i.e. Appendix 2 of the draft ToR) and a preliminary assessment and evaluation methodology that will be utilized during the EA process. However the discussion only refers to the alternatives methods related to local refinements to the reference route and is insufficient.</p> <p>To improve clarity and flow, any discussion of the preliminary list of criteria and indicators (i.e. Appendix 2 of the draft ToR) and a preliminary assessment and evaluation methodology should be moved to Section 4.5 of this ToR</p>

	<p>document.</p> <p>In addition, this discussion should be general and apply to all alternative methods. In accordance with Section 5.2.7 of the ministry’s Code of Practice, it is the ministry’s expectation that Hydro One will conduct a systematic evaluation of all the alternative methods of carrying out the undertaking.</p> <p>Please remove text regarding preliminary list of criteria and indicators and the preliminary assessment and evaluation methodology. See Comment #71.</p>
Hydro One Response Provided	<p>Text moved to Section 6.4 to discuss alternative methods (not just alternative routes). “When alternative methods are being considered, a local study area will be established. Data will be collected for environmental features within the study area to identify the preferred alternative method. This data is intended to assist in determining the overall effect of the ROW alignment on the natural, socio-economic and cultural/built environments to develop appropriate mitigation measures. These evaluation criteria and indicators may be subject to refinement and modification during the EA process based on study findings, consultation and provincial policy. Technical, administrative and cost criteria will also be considered in this process.”</p>
Draft ToR Section Revision	Last 3 paragraphs of Section 4.4.1 has been moved to Section 6.4 (old Section 4.5).
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 71	
Agency Comment	<p>Section 4.5, general</p> <p>The purpose of this section is to describe the approach to be taken in the assessment and evaluation of the alternatives in the EA. At the heart of the EA planning process in Ontario is the comparative analysis of alternatives, assessing advantages and disadvantages and determining the best alternative that is appropriate to address the problem or opportunity.</p> <p>In accordance with Section 5.2.7 of the ministry’s Code of Practice, proponents must conduct a systematic evaluation of the alternatives.</p> <p><u>Evaluation Methodology</u></p> <p>The ToR should either identify the evaluation method(s) to be used and the reason for its selection or outline the general parameters that will be used to identify the evaluation method(s) in the EA. Please clearly indicated at the evaluation method(s) will be used during EA process to assess:</p> <ul style="list-style-type: none"> • Potential environmental effects

	<ul style="list-style-type: none"> • Impact management measures • Net effects • advantages and disadvantages of the alternatives on the environment during all phases of the project (i.e. construction, operation, maintenance etc.). <p>The method(s) chosen must be able to produce an assessment that is clear logical and traceable.</p> <p><u>Criteria and Indicators</u> The evaluation method(s) are based on a set of criteria and indicators. Sufficient information about the criteria and indicators, or how they will be developed, should be given in the ToR to ensure that they can be understood by interested persons who are then able to provide informed comments. For instance, the ToR should explain the rationale for the selection of each of the proposed criteria and indicators, and an explanation about how each criteria and indicator may be further developed during the EA process.</p> <p><u>Data Sources</u> The main body of the ToR should state the potential data sources for the criteria and indicators that will be used during the EA process.</p> <p><u>Overall</u> Please indicate that the information provided in this section is preliminary and more detail will be provided in the EA. Include a commitment in the ToR document that the criteria, indicators and evaluation method(s) will be further developed and refined during the EA process, in consultation with the public, government agencies, Indigenous communities, and any other interested persons.</p> <p>Please revise this section accordingly.</p>
Hydro One Response Provided	<p>Section 6.4 has been significantly amended and expanded to incorporate the suggested text inclusions and commitments for outlining the methodology to alternative method assessment. Information on development of the criteria and indicators was also added to the section and so were commitments to outline preliminary criteria, rationale and data sources and their refinement during consultation.</p>
Draft ToR Section Revision	<p>Section 6.4 has been modified.</p>
MECP Response	<p>Section 6.4, page 71-72 of the revised draft ToR:</p> <p>The information presented this section needs to be revised in order to improve clarity and flow. Information on</p>

	<p>data, criteria and indicators, evaluation methods etc. are all discussed intermittently throughout the section. However, this information should be presented in a more cohesive and logical manner.</p> <ul style="list-style-type: none"> • To facilitate the reorganization of Section 6.4, EAS offers the following recommendations: To improve clarity: “In accordance with Section 5.2.7 of the Ministry’s Code of Practice, the this ToR will identify the evaluation methods to be used and the reason for its selection or outline the general parameters that will be used to identify the evaluation methods in the EA.” • In accordance with Section 5.2.7 of the ministry’s Code of Practice, consider using stepwise approach to organize your discussion of the assessment and evaluation process. For instance, a possible arrangement could include: <ol style="list-style-type: none"> 1. Criteria and indicators – in order to evaluate alternatives, criteria and indicators must be developed 2. Collection of data – to inform criteria and indicators 3. Evaluating alternative methods. What method of comparative evaluation will be used? Clearly state that the evaluation methods will be developed and refined during the EA process to assess: <ul style="list-style-type: none"> Potential environmental effects; ▪ Impact management measures; ▪ Net effects; and, ▪ Advantages and disadvantages. of the alternative methods on the environment, during all phases of the project (i.e. construction, operation, maintenance etc.). Also, the method(s) chosen must be able to produce an assessment that is clear logical and traceable. 4. Identify the preferred alternative/undertaking
Hydro One Response	Text modified as presented. The remainder of the comment has been addressed in an addition of text in Section 6.4 with a more fulsome description of criteria and indicators
ToR Section Revision	Section 6.4
MECP – 72	
Agency Comment	Section 4.6, page 31 If the general location of the project and certain technical considerations has been determined through another

	<p>planning process, then those details needs to be clearly presented in this section of the ToR document and the associated supporting documentation must be provided. (See Comments #1 and #14).</p> <p>Revise text accordingly. Please provide supporting documentation to confirm and validate the information provided (See Comment #1 and #14).</p>
Hydro One Response Provided	Text modified to incorporate additional information on the background of the technical and location considerations as identified by the IESO/OPA/OEB.
Draft ToR Section Revision	Section 4.2 text has been modified.
MECP Response	<p>Section 4.2, page 34 of the revised draft ToR:</p> <p>To improve clarity and flow, the first paragraph should also include references to Appendix 2 so that those who are interested in obtaining more information can find specific supporting documents easily and efficiently.</p> <ul style="list-style-type: none"> • What was the project definition provided in the information package? • What were the minimum technical requirements for the project?
Hydro One Response	Project description added to Section 4.1. Minimum technical requirement document is quoted but the requirements are part of a highly technical and detailed document not suitable for the body of the ToR.
ToR Section Revision	Section 4.1
MECP – 73	
Agency Comment	<p>Section 4.6.1, general</p> <p>This section briefly describes alternative design considerations and preliminary assessment and evaluation methodology that will be utilized during the EA process. As per Comment #70, to improve clarity and flow, any discussion of criteria and indicators and a preliminary assessment and evaluation methodology should be moved to Section 4.5 of this ToR document. This discussion should be general and apply to all alternative methods of carrying out the undertaking.</p> <p>Please revise this section accordingly. See Comment #71</p>
Hydro One Response Provided	Text has been updated with: Design considerations are applicable to all alternative methods of carrying out the undertaking.
Draft ToR Section Revision	Section 4.2.1 has been moved under Section 4.2 (old Section 4.5).
MECP Response	<p>Section 4.2.1, page 34 of the revised draft ToR:</p> <p>The first paragraph of this section states “The criteria and indicators defined above will...” However, criteria and indicators were not defined “above” as indicated in this section. To improve clarity, please revise this reference</p>

	in the text accordingly.
Hydro One Response	<p>This sentence was not in relation to criteria and indicators but rather criteria and principles. As revisions have taken place it is out of context and the sentence has been removed. Criteria and indicators are defined more clearly in Section 5.</p> <p>"Identification and subsequent assessment of criteria and indicators is a vital part of the EA process. Criteria are overarching concerns about components of the environment whereas indicators are specific, measurable factors that can then inform the assessment of the criteria. For instance, if a criterion was a concern about the effect of air quality the indicator for air quality could be a measure of air particles like NOx, or particulate matter (PM) such as PM10 or PM2.5."</p>
ToR Section Revision	Section 5.
MECP – 74	
Agency Comment	<p>Section 4.6.2, general</p> <p>Any discussion of the technical considerations for the transmission line ROW should include all proposed routes and not be specific to the reference route (i.e. "For the section of the line through PNP..."). The preferred transmission line route will be determined through the EA process and the ToR should not presuppose the outcome of the EA.</p>
Hydro One Response Provided	<p>Text modified to outline design criteria in a more generic manner:</p> <p>New ROWs not adjacent to the existing East-West Tie corridor, typically up to 46 m wide, will be cleared of vegetation to accommodate the transmission line. For any alternative routes where quad-circuit towers would be proposed as a design consideration, the corridor will not be widened and as such no vegetation removals would be required outside the existing ROW.</p>
Draft ToR Section Revision	Section 4.2.2 has been modified to remove presuppositions of the EA.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 75	
Agency Comment	<p>Section 4.6.3, page 32</p> <p>To improve clarity, consider the following revision to the last sentence: "This will be confirmed in the detail design stage for the Project. further discussed in the EA"</p> <p>Revise text accordingly.</p>
Hydro One Response Provided	Text has been revised as presented.

Draft ToR Section Revision	Section 4.2.3 has been modified.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 76	
Agency Comment	Section 4.6.4, general Only temporary access roads are mentioned; however, will any of the access roads be considered permanent? Will these be new access roads or extensions to existing access roads? Revise text accordingly.
Hydro One Response Provided	Information on access roads has been added to this section.
Draft ToR Section Revision	Text modified in Section 4.2.4.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 77	
Agency Comment	Section 4.6.6, general Will there be a need for construction camps? All components and structures associated with construction should be identified and discussed in the EA. Revise text accordingly.
Hydro One Response Provided	Text added: “The need for construction camps during the execution of the project is expected. These camps are anticipated to be located in Nipigon, Marathon and White River in areas that are in proximity of the laydown yards and have easy access to the fly yards and major access points. Accommodations will also be sought in both Thunder Bay and Wawa, however we anticipate that the local infrastructure would be able to accommodate the anticipated labour force.”
Draft ToR Section Revision	Added Section 4.2.9
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 78	
Agency Comment	Section 4.7.2, general The heading for this section should include “Maintenance” (i.e. operation and maintenance).

	<p>Does the Transmission Vegetation Management Program apply to this project? If so please provide further information.</p> <p>Revise heading accordingly. Please provide any additional information in this section of the ToR.</p>
Hydro One Response Provided	<p>Text added: A Transmission Vegetation Management Program developed within Hydro One will apply to the operation and maintenance of the corridor.</p>
Draft ToR Section Revision	Section 4.3.2 has been modified.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 79	
Agency Comment	<p>Section 4.7.3, general What are examples of decommissioning activities for this type of project?</p> <p>Please include a commitment in this section of the ToR that states if decommissioning activities are required, a detailed review of the potential environmental effects and mitigation measures will be provide.</p> <p>Revise text accordingly. Please provide any additional information in this section of the ToR.</p>
Hydro One Response Provided	<p>Text added: “If decommissioning activities are required, a detailed review of the potential environmental effects and mitigation measures will be provide”</p>
Draft ToR Section Revision	Section 4.3.3 has been modified.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 80	
Agency Comment	<p>Section 5, page 36 & Figure 5 While the ministry understands proponents have specific project schedules they strive to maintain, delays may occur. However, it should be the purpose of Figure 5 to highlight the key milestones during in the EA process to ensure that interested persons understand the process, and when they are able to review documents and provide comments before decision are made.</p> <p>As such, to improve clarity, please remove the “when” column in Figure 5 and the second last sentence on page</p>

	36: “The timelines in the figure are required to meeting the project need date.”
Hydro One Response Provided	Figure 5 has been removed as without specific timelines it is duplication of Figure 3.
Draft ToR Section Revision	Figure 5 modified.
MECP Response	Section 9, page 82 of the revised draft ToR: Figure 5 of the June 2018 draft ToR provided a good overview of Hydro One’s specific consultation activities in relation to the steps in the EA process. It is recommended that Figure 5 of the June 2018 be incorporated into Section 9 with the revisions specified in Comment 80 and Comment 81.
Hydro One Response	Figure 7 has been re-added with the previous comments incorporated.
ToR Section Revision	Section 9, Figure 7.
MECP – 81	
Agency Comment	Figure 5, page 37 There are other key milestones after the formal submission of a final EA document that are absent from in Figure 5 (i.e. Inspection of the Ministry Review). In order to improve transparency, please incorporate the missing key milestones. Refer to Appendix A: Environmental Assessment Process Timelines of the ministry’s Code of Practice. In addition, the “Specific Consultation Activities” should specify that documentation (i.e. draft & final ToRs and EAs) will be reviewed by government agencies and Indigenous communities, as well as the public. Revise Figure 5 accordingly.
Hydro One Response Provided	Figure 5 has been removed as without specific timelines it is duplication of Figure 3.
Draft ToR Section Revision	Figure 5 removed.
MECP Response	See MECP response to Comment 80.
Hydro One Response	Figure 7 has been re-added with the previous comments incorporated.
ToR Section Revision	Section 9, Figure 7.
MECP – 82	
Agency Comment	Section 5.1, page 38 To improve clarity, consider the following revision to the first sentence: “...best practices in public and stakeholder consultation and engagement...” Revise text accordingly.
Hydro One Response Provided	Text has been revised as presented.
Draft ToR Section Revision	Section 9.1 has been revised.
MECP Response	No further comment.
Hydro One Response	N/A

ToR Section Revision	N/A
MECP – 83	
Agency Comment	Section 5.2, general This section should be incorporated as a subsection under Section 5.5 “Consultation Plan for the EA” Revise ToR document accordingly.
Hydro One Response Provided	Text has been moved.
Draft ToR Section Revision	Section moved to 9.4.3 under Consultation Plan for the EA.
MECP Response	Section 9.4.3, page 93 of the revised draft ToR: To improve clarity and flow, it would be more appropriate to move subsection 9.4.3 before subsection 9.4.1 of the revised draft ToR (page 88). Please revise the ToR document accordingly.
Hydro One Response	Section 9.4.3 has been moved to Section 9.4.1
ToR Section Revision	Section 9.4.1
MECP – 84	
Agency Comment	Section 5.2, page 38 Stakeholders should be consulted throughout the EA process and not just with regard to alternative methods. Please revise the last sentence of the first paragraph accordingly. Revise text accordingly.
Hydro One Response Provided	Text modified: The following stakeholders will be consulted throughout the EA process
Draft ToR Section Revision	Section 9.4.3 modified accordingly.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 85	
Agency Comment	Section 5.2, page 39 Third Paragraph - Section 5.3 provides further information and details regarding Duty to Consult and Indigenous community consultation. As such, to improve clarity, the third paragraph should include a reference to Section 5.3. Fourth Paragraph - Please include a commitment that the comprehensive project contact list will continually be reviewed and updated during the EA process.

	Revise this section accordingly.
Hydro One Response Provided	<p>Third paragraph has been revised to incorporate a reference to section 9.2</p> <p>In delegating procedural aspects of consultation, the Ministry of Energy has identified fourteen First Nations and four Métis Groups as having a potential interest in the Project. The duty to consult is discussed further in Section 9.2</p> <p>Fourth paragraph has been revised to: “A comprehensive contact list is being maintained from the outset of the Project. Hydro One is committed that the comprehensive project contact list is continually reviewed and updated during the EA process as contacts change and new contacts are identified through consultation activities.”</p>
Draft ToR Section Revision	Section 9.4.3 revised accordingly.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 86	
Agency Comment	<p>Section 5.2, page 39</p> <p>These bullet points are describing the consultation and engagement activities planned for the project during the EA process. To improve clarity and flow of the ToR document, it would be more appropriate for this information to be moved and incorporated into to the list in Section 5.5.1.</p> <p>In addition, the last bullet point should remove reference to “draft and final ToR”. Any consultation and engagement activities related to the preparation of the Terms of Reference should be described in Section 5.4. Also, the last bullet should specify that documents will be made available to government agencies and Indigenous communities for review, in addition to the public.</p> <p>Revise this section accordingly.</p>
Hydro One Response Provided	<p>List moved and incorporated into list under 9.4.1.</p> <p>Removed reference to draft and final ToR.</p> <p>Draft and final ToR and EA documents will be distributed to government agencies, key interest groups, and municipal officials and staff of communities along the project route.</p>

Draft ToR Section Revision	Section 9.4.1 has incorporated these changes.
MECP Response	<p>Section 9.4.1, page 88 of the revised draft ToR:</p> <ul style="list-style-type: none"> This section should be renamed “Consultation and Engagement Activities” since it describes activities that could pertain to all stakeholders including members of the public, Indigenous communities and government agencies. As such, consider the following revision to the first sentence of this section: <p>“The following outlines the specific consultation activities that are planned for members of the public, government agencies and Indigenous communities during the EA.”</p> <p>This section should also include a summary of the key decision making milestones and when consultation will occur. For example, how consultation activities (i.e. CICs, presentations, meetings etc.) aligns with key milestones in the EA process (i.e. the assessment of alternative methods, impact assessment of the preferred undertaking, review of draft EA etc.). Refer to Figure 5 of the June 2018 draft ToR for guidance. See Comment 80.</p>
Hydro One Response	The following outlines the specific consultation activities that are planned for members of the public, government agencies and Indigenous communities during the EA. A flowchart of specific consultation activities in relation to key EA milestones can be found in Figure 7.
ToR Section Revision	Section 9.4.1
MECP – 87	
Agency Comment	<p>Section 5.3, general</p> <p>This section should reflect the up-to-date status of the delegation and notification. In addition, to improve clarity and flow, it would be more appropriate for the list of communities as described in Section 5.4.2, to be incorporated into this section of the ToR document.</p> <p>Revise this section accordingly.</p>
Hydro One Response Provided	The section has been updated with the list of communities.
Draft ToR Section Revision	Section 9.2 updated with list of communities.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 88	

Agency Comment	<p>Section 5.4, general In accordance with Section 5.2.9 of the ministry’s Code of Practice, do not confuse consultation plan with record of consultation.</p> <p>The consultation plan is for future consultation that will take place during the preparation of the EA. The record of consultation is for past consultation that took place during the preparation of the ToR. As such, this section of the ToR document should summarize the consultation activities that occurred and their results. In addition, proponents must submit a separate and more detailed document called a Record of Consultation. See Comment #2.</p> <p>In order to improve clarity, the heading for this section should be revised: “Consultation-Plan for on the ToR”. In addition, each of the subsection (i.e. 5.4.1 to 5.4.3) should be written in past tense since they are summarizing what has already occurred.</p>
Hydro One Response Provided	<p>Section 9.3 renamed to Consultation on the ToR.</p> <p>Section has been written in past tense where appropriate.</p>
Draft ToR Section Revision	Section 9.3 has been modified accordingly.
MECP Response	<p>Section 9.3, page 84-88 of the revised draft ToR:</p> <ul style="list-style-type: none"> This entire section should be written in past tense since it is meant to summarize what has already occurred. For example on page 84 of the revised draft ToR: “Hydro One has had a detailed consultation plan... activities undertaken or to be undertaken in relation to the preparation of the ToR” <p>This section should reflect the up-to-date status of the consultation activities that have occurred on the preparation of the ToR and their results. Please update and include a summary of the results of consultation with members of the public, government agencies and Indigenous communities.</p>
Hydro One Response	Section written in past tense. Text modified as presented. Summary of results is included in the RoC as well as summarized in Section 9.3
ToR Section Revision	Section 9.3
MECP – 89	
Agency Comment	Section 5.5.1, page 45

	<p>The review of a draft EA document should be its own separate bullet point.</p> <p>Revise this section accordingly.</p>
Hydro One Response Provided	Review of a Draft EA document – Hydro One will notify stakeholders, government agencies, Indigenous communities and other interested parties on the contact list that the Draft EA document is available for review.
Draft ToR Section Revision	Section 9.4.1 has been modified.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 90	
Agency Comment	<p>Section 5.5.2, general</p> <p>Refer to comments from Peter Brown, Indigenous Consultation Advisor, Client Services and Permissions Branch, MECP.</p> <p>The EA consultation plan for Indigenous communities should clearly set out the steps a proponent intends to take with respect to consultation activities. It should include, but not limited to, consideration of the following:</p> <ul style="list-style-type: none"> • How Indigenous communities will be notified and consulted. This includes a description of the consultation activities planned (i.e. notifications, information sharing opportunities, open houses, individual meetings with the community etc.). • Points in the EA process when Indigenous communities will be consulted. • Methods that will be used to consult with Indigenous communities. • Identify the decisions that Indigenous communities can provide input to and what role Indigenous communities play when the proponent makes decisions. • How traditional knowledge will be incorporated. <p>Consultation plans should be developed and refined in consultation with Indigenous communities. Each community may have different approaches and/or preferences with regard to consultation and engagement. As such, some communities may prefer to have individualized plans.</p> <p><u>Other Items</u></p> <p>Please specify in this section that Indigenous communities are welcome to participate in the public consultation activities, in addition to the ones planned specifically for Indigenous communities.</p> <p>Please remove the word “groups” from all references to “Indigenous communities and groups”. The appropriate reference is just “Indigenous communities”</p>

	Revise this section accordingly.
Hydro One Response Provided	<p>Removed term groups from all language used for Indigenous communities.</p> <p>Text outlining that the EA consultation plan for Indigenous communities will clearly set out the steps Hydro One intends to take with respect to consultation activities.</p> <p>Added text for clarification: In addition to the tailored consultation approach for Indigenous communities, all public consultation processes and specific consultation activities outlined in Section 9.3.1 and throughout Section 9 will be available to Indigenous communities.</p>
Draft ToR Section Revision	Section 9.4.2 (old Section 5.5.2) has been revised.
MECP Response	<p>Section 9.4.2, page 90-93 of the revised draft ToR:</p> <ul style="list-style-type: none"> • Reference to Section 9.3.1 in the first paragraph on page 91 is incorrect. Please revise. • To improve clarity, please include a statement that the standalone Consultation Plan will be developed and refined in consultation with Indigenous communities and the Plan will be submitted to MECP for review prior to initiating the EA. • In addition, please include a statement that if requested, Hydro One may need to develop individual consultation plans that are tailored to specific Indigenous communities. <p>Please refer to comments from Peter Brown, Indigenous Consultation Advisor, Client Services and Permissions Branch, MECP.</p>
Hydro One Response	Reference corrected and commitment to sending MECP consultation plan has been added to Section 9.4.3. If requested, Hydro One will develop tailored consultation plans for specific Indigenous communities. In addition to the tailored consultation approach for Indigenous communities, all public consultation processes and specific consultation activities outlined in 9.4.2 and throughout Section 9 will be available to Indigenous communities.
ToR Section Revision	Section 9.4.3.
MECP – 91	
Agency Comment	<p>Section 5.5.3, general</p> <p>The appropriate reference is “government agencies” and not just “agency”.</p> <p>Revise this section accordingly.</p>
Hydro One Response Provided	References to agency throughout the document have been revised to include government agencies.

Draft ToR Section Revision	All sections of ToR.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 92	
Agency Comment	<p>Section 5.5.4, general Please use one term (i.e. record) when referring to the consultation record. Too many terms (i.e. log, database etc.) is confusing.</p> <p>Please clarify the last sentence in this section: “The Record of Consultation for the ToR EA will be submitted...” Revise text accordingly.</p>
Hydro One Response Provided	Record has been standardized. Log and database have been removed. Modifications made to last sentence.
Draft ToR Section Revision	Section 9.4.5.
MECP Response	<p>Comment 92 would apply to Section 9.3.3, page 87 of the revised draft ToR. Please revise accordingly.</p> <p>Please include a statement in Section 9.3.3 that the Record of Consultation for the ToR will be submitted under a separate cover.</p>
Hydro One Response	<p>Comment added to 9.3.3:</p> <p>The Record of Consultation for the ToR will be submitted under a separate cover.</p>
ToR Section Revision	Section 9.3.3
MECP – 93	
Agency Comment	<p>Section 5.6, page 49 Please specify: “all comments and inputs received from the public, government agencies and Indigenous communities will be documented...”</p> <p>Revise text accordingly.</p>
Hydro One Response Provided	All comments and input received from the public, government agencies, and Indigenous communities will be documented in a summary table and included in the EA document as part of the Record of Consultation.
Draft ToR Section Revision	Section 9.5 revised.
MECP Response	Section 9.5, page 96 of the revised draft ToR:

	<ul style="list-style-type: none"> To improve clarity, consider the following revision: “The summary table will provide a response to each issue and how the issue was addressed.”
Hydro One Response	Text modified as presented.
ToR Section Revision	Section 9.5
MECP – 94	
Agency Comment	<p>Section 6, general</p> <p>The section notes that environmental studies have been completed by another proponent. Hydro One specifies that they intend on using this information and will conduct a gap analysis to identify the need of verification or collection of data to complete the description of the environment.</p> <p>What are the environmental studies you are referring too and by which proponent? Is this reference to NextBridge and the NextBridge EA? The ministry would like to emphasize that as outlined in our November 14, 2017 letter to Hydro One and reiterated in correspondence from March 16, 2018 and April 10, 2018; Hydro One's proposed Lake Superior Link Transmission Project is considered a new undertaking for the purpose of the Environmental Assessment Act. As such, Hydro One is required to complete the requirements of the Environmental Assessment Act including preparing technical studies for analysis and evaluation and consultation requirements. This information must be completed and submitted as part of the Lake Superior Link EA. Revise text accordingly. Please remove references to other proponent’s environmental studies throughout this section. See Comment #12 and #60.</p>
Hydro One Response Provided	<p>Direct references to NextBridge will be removed. Desktop studies will supplement any proposed EA studies. Where studies have been conducted on the proposed corridor and they apply to the project, Hydro One will not duplicate these studies, but instead use publicly available information to inform assessment efforts. Hydro One will conduct the appropriate studies where information is needed to satisfy the EA requirements. The current preliminary focus of field surveys includes Pukaskwa National Park, the transmission corridor between Wawa and Marathon, the Dorion area, temporary and permanent access roads, laydown areas, fly yards and any additional areas identified as a concern. Hydro One will continue to engage regulators to ensure the baseline data is adequate for the EA.</p> <p>Text revised to the following: The biophysical and socio-economic baseline environmental conditions of the reference route alternative and much of the reference route have been recently extensively studied and these results are publicly available. Where there is an overlap of the study areas, Hydro One is generally not duplicating these studies, but using the information available publicly through existing environmental studies already funded by the ratepayers of Ontario.</p>

Draft ToR Section Revision	Section 5 revised.
MECP Response	<p>Section 5, page 41 of the revised draft ToR::</p> <ul style="list-style-type: none"> For consistency with previous sections of the ToR (i.e. Section 4.1), please revise the first paragraph as follows: “The biophysical and socio- economic baseline environmental conditions of the reference route alternative and much of the reference route have been recently extensively studied and these results are publicly available. Where there is an overlap of the study areas, Hydro One is generally not duplicating these studies, but using the information available publicly through existing environmental studies already funded by the ratepayers of Ontario. Where studies have been conducted on the proposed corridor and they apply to the project, Hydro One will not be duplicating these studies, but use publicly available information to inform assessment efforts. Hydro One will conduct the appropriate studies where information is needed to satisfy the EA requirements.”
Hydro One Response	Text modified as presented.
ToR Section Revision	Section 5.
MECP – 95	
Agency Comment	<p>Section 6, general Please include a commitment in the ToR document that a more detailed description of the environment and the baseline conditions for all environmental components will be provided in the EA.</p> <p>Revise text accordingly.</p>
Hydro One Response Provided	More detailed description of the environment and the baseline conditions for all environmental components will be provided in the EA.
Draft ToR Section Revision	Section 5 revised.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 96	
Agency Comment	<p>Section 6.1 and 6.2, general The subsections of Section 6.1 and 6.2 provide information on proposed data collection tools/methods (i.e. studies, tests, surveys or mapping etc.) for each of the environmental components; however, in accordance with Section 5.2.6 of the ministry’s Code of Practice, the ToR should provide a preliminary description of the environment and baseline conditions.</p>

	<p>The current descriptions of each of the environment components have limited information. Descriptions of the environment and baseline conditions should be sufficiently detailed to allow the government agencies to determine whether the proposed studies will meet the information requirements of the particular agency. For instance, further information that can be included, but not limited to:</p> <ul style="list-style-type: none"> • A description of the Lake Superior Watershed and any secondary or tertiary watersheds • A preliminary list of SARs in the study area • A list of the species of fish that are expected based on aquatic features of the study area. <p>Please provide further information on baseline conditions for each of the environmental components.</p> <p>Revise this section accordingly.</p>
Hydro One Response Provided	Additional information on the environmental components in Sections 6.1, 6.2 and 6.3 have been added to bolster understanding of their current state. These sections have been revised substantially to provide additional information on existing environmental conditions.
Draft ToR Section Revision	Sections 5.1, 5.2 and 5.3 have been revised substantially to reflect comments.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 97	
Agency Comment	<p>Section 6.1 and 6.2, general</p> <p>In accordance with Section 5.2.6 of the ministry’s Code of Practice, the ToR should include a list and brief explanation of the tools (i.e. studies, tests, surveys, mapping etc.) that will be used to provide a more detailed description of the environment in the EA. Lists will not preclude proponents from conducting additional and more detailed studies as part of the EA.</p> <p>Although the subsections of Section 6.1 and 6.2 provide information on proposed data collection tools/methods, to improve clarity and flow, this information should be integrated into one subsection. As such, please incorporate a subsection in Section 6 that includes a list and a brief explanation for each of the available or existing data collection tools (i.e. studies, tests, surveys or mapping etc.) that were used to determine the existing conditions of each component of the environment. Also, please include a list and a brief explanation of the data collection tools (i.e. studies, tests, surveys, mapping etc.) that will be carried out to provide a more detailed description of the environment in the EA.</p> <p>Overall, sufficient information should be given in the ToR to ensure that data collection tools/methods can be</p>

	<p>understood by interested government agencies, Indigenous communities and members of the public who are then able to provide informed comments.</p> <p>Revise this section accordingly.</p>
Hydro One Response Provided	<p>Significantly revised Sections 5. Overall data collection methodology has been placed into its own section and data sources have been tabulated. Where appropriate, study-specific data collection methodology is briefly discussed under the study subheadings where it is most pertinent.</p> <p>Study methods have been listed.</p> <p>The scope and intensity of study and its associated data collection methodology will be further refined during the EA process throughout consultation with stakeholders, Indigenous communities, data gap analysis, in response to novel information and Project refinements.</p>
Draft ToR Section Revision	<p>Section 5.1 (Data Collection Methodology) and 5.1.1 (Published Sources of Information) have been added to provide a clearer flow and structure for data collection methodology. Sections and subsections under 5.2 and 5.3 have been revised to reflect the updated methodology sections.</p>
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 98	
Agency Comment	<p>Section 6.1.1 to 6.1.2, general</p> <p>Field work may be required to gather information on environmental baseline conditions. As such, please remove references to “no field work” and include statements such as “desktop studies will be used and supplemented with field work where required” or “field work will be conducted if necessary” etc.</p> <p>Revise these subsections accordingly.</p>
Hydro One Response Provided	No field work has been replaced with ‘desktop studies will be used and supplemented with field work, where required.’
Draft ToR Section Revision	Sections 5.1.1 and 5.1.2 have been modified accordingly.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 99	
Agency Comment	<p>Section 6.1.6, page 56</p> <p>The last paragraph provides general information and references all environmental components. As such, it would</p>

	<p>be more appropriate to move this to the beginning of Section 6.1 of this ToR document.</p> <p>Revise this section accordingly.</p>
Hydro One Response Provided	All information collected as part of the natural environment field programs will be used in the EA, to identify potential effects and practicable mitigation measures, and to fine tune the locations of towers, access roads and water crossings (where appropriate). Information will also be used for any approvals that may be required prior to construction.
Draft ToR Section Revision	Last paragraph of Section 5.1.6 has been moved to Section 5.1.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 100	
Agency Comment	<p>Section 6.1.8, general</p> <p>Please specify that potential project emission sources will be evaluated against regulatory standards in the EA.</p> <p>Revise text accordingly.</p>
Hydro One Response Provided	Potential Project emission sources will be evaluated against regulatory standards in the EA.
Draft ToR Section Revision	Section 5.1.8 modified accordingly.
MECP Response	N/A
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 101	
Agency Comment	<p>Section 6.1.9, general</p> <p>Please specify that potential noise emission sources will be evaluated against regulatory standards in the EA.</p> <p>Revise text accordingly.</p>
Hydro One Response Provided	Potential noise emission sources will be evaluated against regulatory standards in the EA.
Draft ToR Section Revision	Section 5.1.9 modified accordingly.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 102	
Agency Comment	Section 6.2, general

	To improve clarity and flow, considering separating the socio-economic environmental components and the cultural/built environment components into two separate sections. Revise ToR document accordingly.
Hydro One Response Provided	Section 5.2 has been split into Section 5.2 and 5.3 separating the socio-economic environmental components and the cultural/built environment components.
Draft ToR Section Revision	Sections 5.2 and 5.3 have been revised.
MECP Response	Section 5.3, page 62 of the revised draft ToR: To improve clarity, please remove “and Cultural/Built” from the subsection title since this section only pertains to Socio-economic environment.
Hydro One Response	Cultural/Built environment has been removed from the title.
ToR Section Revision	Section 5.4
MECP – 103	
Agency Comment	Section 6.2.3, page 58 To improve clarity, considering the following revision to the first sentence of the last paragraph that: “The EA will describe and assess existing commercial, recreational and industrial activities...” Revise text accordingly.
Hydro One Response Provided	Text revised as presented.
Draft ToR Section Revision	Section 5.2.2 has been revised.
MECP Response	Section 5.3.2, page 63 of the revised draft ToR: <ul style="list-style-type: none"> To improve clarity, considering the following revision to the first sentence of the third paragraph: “The EA document will describe and assess existing...”
Hydro One Response	Text modified as presented.
ToR Section Revision	Section 5.4.2.
MECP – 104	
Agency Comment	Section 6.2.5, general Refer to comments from Peter Brown, Indigenous Consultation Advisor, Client Services and Permissions Branch, MECP. Indigenous community-specific criteria and indicators may be required for the evaluation of alternatives and

	assessment of the preferred undertaking. Please include a commitment in the ToR that specifies criteria and indicators of relevance to Indigenous communities will be developed in consultation with Indigenous communities. Revise text accordingly.
Hydro One Response Provided	Criteria and indicators of relevance to Indigenous communities will be developed in consultation with Indigenous communities.
Draft ToR Section Revision	Section 5.3.2 has been revised.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 105	
Agency Comment	Section 6.2.7, page 60 The landscape characteristic should be described for the entire study area, not just “the area located West of Nigigon, and the Pukaskwa River Provincial Park”. As such please remove this reference. Revise text accordingly.
Hydro One Response Provided	During the EA, the Project team will prepare a description of the landscape character within the study areas, identifying landscape settings and features of importance. This assessment will focus on valued viewpoints by the public and those identified by the project team as contributing to the aesthetic character of an area (e.g., ESA’s and river valleys). Ongoing consultation has also identified potential areas of visual assessment that will be considered. The team will review available models for this assessment.
Draft ToR Section Revision	Section 5.2.5 has been revised.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 106	
Agency Comment	Section 6.2.8, general Has there been any preliminary consultation with municipalities, MTO etc. regarding services and infrastructure? Please provide the additional information as part of the Record of Consultation (See Comment 2).
Hydro One Response Provided	Record of consultation will contain consultation with municipalities and other government agencies.
Draft ToR Section Revision	N/A
MECP Response	No further comment.
Hydro One Response	N/A

ToR Section Revision	N/A
MECP – 107	
Agency Comment	Section 6.2.9, general What are the Hydro One Land Acquisition Compensation Principles? Please provide further information. Revise the text accordingly. Please provide the additional information in this section of the ToR.
Hydro One Response Provided	Added text: LACP are project-specific land acquisition compensation principles are founded upon Hydro One’s past experience pertaining to land acquisition matters for new transmission projects. Hydro One’s central consideration has been the need for Property Owners to have flexibility and choice while balancing Hydro One’s desire to achieve timely acquisition of property interests and its obligation to ensure that expenditures are fair and reasonable to ratepayers.
Draft ToR Section Revision	Section 5.2.7 has been modified.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 108	
Agency Comment	Section 7, general Once the assessment and comparative evaluation of the alternatives is completed, a preferred undertaking will be identified. The purpose of this section is to describe the approach to be taken in the evaluation of the environmental effects of preferred undertaking. The intent is to allow the additional details developed on the preferred undertaking (i.e. design, operations etc.) to be assessed. It also allows for the evaluation of impact management measures and net effects within the context of a more comprehensive description for the preferred undertaking. In accordance with Section 5.2.7 of the ministry’s Code of Practice, the ToR should either identify the evaluation method(s) to be used and the reason for its selection or outline the general parameters that will be used to identify the evaluation method(s) in the EA. Please clearly indicated at the evaluation method(s) will be used during EA process to assess: <ul style="list-style-type: none"> • Potential environmental effects • Impact management measures • Net effects • advantages and disadvantages of the undertaking on the environment during all phases of the project (i.e. construction, operation, maintenance etc.).

	The method(s) chosen must be able to produce an assessment that is clear logical and traceable.
Hydro One Response Provided	Section 7 has been modified to incorporate refinement of evaluation of Project effects and the suggested changes in this comment.
Draft ToR Section Revision	Section 7 has been revised accordingly.
MECP Response	Section 7, page 78 of the revised draft ToR: Please include a statement that the evaluation methods chosen will be able to produce an assessment that is clear, logical and traceable.
Hydro One Response	Added statement as presented
ToR Section Revision	Section 7.
MECP – 109	
Agency Comment	Section 7, page 61 To improve clarity, consider the following revision: “The following section identifies the potential effects assessment and evaluation and associated mitigation measures to address them avoid or minimize negative effects. Table 2 identifies the preliminary environmental features and technical considerations that will be applied assessed in the evaluation of potential environmental effects.” Please include a statement that the preliminary list of features/considerations will be developed and refined during the EA process in consultation with the public, government agencies, Indigenous communities, and any other interested persons. Are you referring to the preliminary criteria and indicators in Appendix 2? If so please reference in the text. Revise text accordingly.
Hydro One Response Provided	The following section identifies the potential effects evaluation and associated mitigation measures to avoid or minimize negative effects. Table 7 identifies the preliminary environmental features and technical considerations that will be assessed in the evaluation of potential environmental effects. A preliminary list of criteria and indicators can be found in Appendix 1.
Draft ToR Section Revision	Section 7 has been revised accordingly.
MECP Response	Section 7, page 78 of the revised draft ToR: <ul style="list-style-type: none"> To improve clarity, please consider the following revision to page 78: “The evaluation methods will be developed and refined during the EA process to assess the undertaking

	<p>on the environment during all phases of the project (i.e. construction, operation, maintenance etc.) are:</p> <ul style="list-style-type: none"> ▪ Potential environmental effects; ▪ Impact management measures; ▪ Net effects; and, ▪ Advantages and disadvantages. <p>of undertaking on the environment, during all phases of the project (i.e. construction, operation, maintenance etc.)”</p> <p>The evaluation methods are based on a set of criteria and indicators. Table 8 identifies... and technical criteria... have been developed for the potential environmental effects evaluation...”</p>
Hydro One Response	The text has been modified as presented.
ToR Section Revision	Section 7
MECP – 110	
Agency Comment	<p>Section 7, page 62</p> <p>This first paragraph discusses mitigation measures. However, to improve clarity and flow of the ToR document, it would be more appropriate for the discussions regarding the assessment of potential environmental effects and mitigation measures to be separated into two separate subsections: i.e. ‘Effects Assessment’ & ‘Mitigation Measures’.</p> <p>Also consider the following revision: “Mitigation measures will be developed and described in the EA to avoid or minimize negative effects due to construction and operation of the project with due consideration of cost, safety, feasibility and technical standards. “</p> <p>Please clarify what phases are included in ‘pre- and post-operational”.</p> <p>Revise text and this section accordingly.</p>
Hydro One Response Provided	<p>Mitigation measures have been placed into Section 7.3.</p> <p>Proposed text revisions have implemented.</p> <p>Pre-and post- have been clarified to construction and operation, respectively.</p> <p>The EA will recommend construction and operational monitoring programs designed to verify effects prediction,</p>

	the effectiveness of mitigation measures and the need for any remedial measures, should they be necessary.
Draft ToR Section Revision	Section 7.3 created for mitigation measures.
MECP Response	Section 7, page 78 of the revised draft ToR: To improve clarity and flow, include a subheading for the discussions on page 78 regarding evaluation methods and the assessment of potential environmental effects (i.e. 7.1 Effects Assessment). Please revise the ToR document accordingly.
Hydro One Response	Section 7.1 Effects Assessment has been added
ToR Section Revision	Section 7.1
MECP – 111	
Agency Comment	Section 7.1 and 7.2, general The information presented in these sections needs to be revised in order to improve clarity and flow. Potential environmental effects, mitigation measures, evaluation methods for alternatives, criteria and indicators, data sources etc. are all discussed at once. However, this information should be separated and incorporated into the appropriate corresponding sections of the ToR document (as facilitated by my comments on the draft ToR). <u>Potential environmental effects and mitigation measures</u> The preliminary information discussed in Section 7.1 and 7.2 with regards to the potential environmental effects and mitigation measures, is related to the assessment and evaluation of the alternatives and the preferred undertaking. As such, it would be more appropriate for this information to be incorporated as subsections at the end of Section 6 of this ToR document. In addition, to improve clarity, it is recommended that this information in sections 7.1 and 7.2 be put into tabular format. Revise this section and ToR document accordingly.
Hydro One Response Provided	Sections 7.1 and 7.2 have been moved to the end of Section 6. Appendix 1 has been substantially revised and sections have been incorporated into the preliminary criteria and indicators table. Other portions of this section have been tabularized.
Draft ToR Section Revision	Sections 7.1 and 7.2 have been moved to the end of Section 6. Appendix 1 modified accordingly.
MECP Response	There seems to be some confusion regarding section references in my original comments. In accordance with Section 5.2.6 of the ministry's Code of Practice, after the existing environment is described, the potential effects

	<p>of the undertaking and its alternatives should be described. As such, it would be more appropriate to move Sections 6.5, 6.6 and 6.7 (of this revised draft ToR) to the end Section 5 (of this revised draft ToR). Also, please remove the term “Evaluation” from the titles for Sections 6.5, 6.6 and 6.7, as these sections are not an evaluation but rather a description of preliminary environmental effects.</p> <p><u>Additional Comments:</u></p> <p>Section 6.5, page 73 of the revised draft ToR:</p> <ul style="list-style-type: none"> To improve clarity, consider the following revision to the first sentence on this page: <p>“The following section identifies the preliminary potential environmental effects of the project and its alternatives evaluation and associated preliminary mitigation measures to avoid or minimize negative effects.”</p> <p>To improve clarity and flow, consider including a subheading on page 74 that incorporates the discussion on preliminary mitigation measures.</p> <p>Section 6.6, page 75 of the revised draft ToR:</p> <ul style="list-style-type: none"> Please include a table (similar to Table 7 on page 73 of the revised draft ToR) that summarizes the preliminary potential effects of project activities on the socio- economic environment. What does “Appendix 1” at the end of this page refer too? Is this a typo?
Hydro One Response	Text modified as presented. Sections 6.5, 6.6 and 6.7 are now 5.5, 5.6 and 5.7. Evaluation removed from titles. Tables added to Sections 5.6 and 5.7 for consistency. Typo removed. Section 5.6.1 (preliminary mitigation measures) has been added.
ToR Section Revision	Section 5.5, 5.6 and 5.7.
MECP – 112	
Agency Comment	Section 7.2, general To improve clarity and flow, considering separating the potential socio-economic environmental effects and the potential cultural/built environment effects into two separate sections.

	Revise ToR document accordingly
Hydro One Response Provided	Socio-economic and cultural/built environment have been separated in Table 4.
Draft ToR Section Revision	Table 4 revised.
MECP Response	Reference to Table 4 (page 42 of this revised draft ToR) is incorrect. Are you referring to the revisions to Table 8?
Hydro One Response	Table 8 (now Table 10) was revised. The original reference was incorrect.
ToR Section Revision	Section 7.1.
MECP – 113	
Agency Comment	<p>Section 7.3. general This section specifies that the technical, administrative and cost considerations should be used to evaluate the alternatives. As such, to improve clarity and flow, it would be more appropriate for this section to be moved to Section 4.5 of this ToR document.</p> <p>Revise ToR document accordingly.</p>
Hydro One Response Provided	Technical, administrative and cost considerations have been moved to the end of Section 6.4 (old Section 4.5).
Draft ToR Section Revision	Section 7.3 has been moved into Section 6.4.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 114	
Agency Comment	<p>Section 8, general In accordance with Section 5.2.8 of the ministry's Code of Practice, the ToR must include a statement that the EA will include a comprehensive list of commitments made by the proponent during the ToR process, and where or how they have been dealt with in the EA. Furthermore, the EA will include a comprehensive list of commitments made by the proponent during the EA process; including all commitments relating to impact management measures, additional works and studies to be carried out, monitoring, consultation and contingency planning, and documentation and correspondence.</p> <p>As such, consider incorporating a new subsection in Section 8 of the ToR that speaks to 'commitments' and references these requirements.</p> <p>Revise this section accordingly.</p>
Hydro One Response Provided	<p>Added section on commitments: In accordance with Section 5.2.8 of the Ministry's <i>Code of Practice</i>, the EA will include a comprehensive list of commitments made by Hydro One during the ToR process, and where or how they have been dealt with in the</p>

	EA. Furthermore, the EA will include a comprehensive list of commitments made by Hydro One during the EA process; including all commitments relating to impact management measures, additional works and studies to be carried out, monitoring, consultation and contingency planning, and documentation and correspondence.
Draft ToR Section Revision	Section 8.3 has been created for commitments.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 115	
Agency Comment	<p>Section 8, general</p> <p>In accordance with Section 5.2.8 of the ministry’s Code of Practice, a monitoring framework will consider all phases of the proposed undertaking (planning, detailed design, construction, operations, decommissioning etc.). Please clarify what phases are included in ‘pre- and post-operational’.</p> <p>Include a commitment in the ToR that clearly states a monitoring framework will be develop during the EA and will consider all phases of the proposed undertaking.</p> <p>Revise text accordingly.</p>
Hydro One Response Provided	<p>In accordance with Section 5.2.8 of the Ministry’s Code of Practice, a monitoring framework will be developed during the EA and will consider all phases of the proposed undertaking.</p> <p>Pre-and post- have been clarified to construction and operation, respectively.</p>
Draft ToR Section Revision	Section 8 has been revised.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 116	
Agency Comment	<p>Section 8.1 and 8.2, general</p> <p>In accordance with Section 5.2.8 of the ministry’s Code of Practice, the monitoring framework includes two types of monitoring:</p> <ul style="list-style-type: none"> • compliance monitoring – assessment of whether an undertaking had been constructed, implemented and/or operated in accordance with commitments made during the EA and the conditions of EA approval; • effects monitoring – activities carried out by the proponent after approval of the undertaking to determine the environmental effects of the undertaking. <p>To improve clarity and flow, please clearly define the two types of monitoring in the corresponding sections; Sections 8.1 (effects monitoring) and 8.2 (compliance monitoring).</p>

	Revise these sections accordingly.
Hydro One Response Provided	Definitions of compliance and effects monitoring have been added to the document.
Draft ToR Section Revision	Sections 8.1 and 8.2 have been revised.
MECP Response	Section 8.2, page 81 of the revised draft ToR: <ul style="list-style-type: none"> To improve clarity, please revise the title of subsection 8.2 to “Compliance EA Process Monitoring”.
Hydro One Response	Section 8.2 renamed
ToR Section Revision	Section 8.2.
MECP – 117	
Agency Comment	Section 8.1, general This section is supposed to provide preliminary information on effects monitoring; however, it includes information on compliance monitoring (i.e. EA commitments). As such, it would be more appropriate to move information on compliance monitoring to Section 8.2 of this ToR document. What is the project environmental management system? Will it include effects monitoring in addition to compliance monitoring? Please provide further information. Revise text and section accordingly.
Hydro One Response Provided	Environmental management system has been clarified to include both effects and compliance monitoring. Compliance monitoring has been moved to Section 8.2. Clarification on environmental management system has been added.
Draft ToR Section Revision	Sections 8.1 and 8.2 have been revised.
MECP Response	Section 8.1, page 80-81 of the revised draft ToR: This section discusses effects monitoring and not compliance monitoring. As such to improve clarity, please consider the following revision: “...environmental management system that will monitor the environmental effects of the project and ensure compliance with all commitments set out in this assessment made during the EA process, plus other environmental requirements...”
Hydro One Response	Section 8.1 has been revised accordingly.
ToR Section Revision	Section 8.1
MECP – 118	

Agency Comment	<p>Section 8.1, page 67</p> <p>To improve clarity, consider the following revision: “During the later stages of the EA process, a monitoring program will be developed.... will ensure compliance with the all commitments set out in this assessment made during the EA process, plus other environmental requirements....”</p> <p>Please move this paragraph to Section 8.2 (See Comment #119) and incorporate a similar commitment that speaks to effects monitoring.</p> <p>Revise text and section accordingly.</p>
Hydro One Response Provided	Text revised as provided, paragraph moved to Section 8.2, similar paragraph in Section 8.1 revised.
Draft ToR Section Revision	Paragraph moved to Section 8.2, similar paragraph in Section 8.1 revised.
MECP Response	<p>Section 8.2, page 81 of the revised draft ToR:</p> <ul style="list-style-type: none"> To improve clarity, please consider the following revisions: <ul style="list-style-type: none"> “...compliance with EA process commitments outlined in the ToR will be regularly...” “Appropriate commitments to Compliance monitoring will be reflected...” <p>Section 8.3, page 81 of the revised draft ToR:</p> <ul style="list-style-type: none"> To improve clarity, consider the following revision: <ul style="list-style-type: none"> “the EA will include a comprehensive list of commitments...including but not limited to, all commitments relating...”
Hydro One Response	Text has been modified as presented.
ToR Section Revision	Section 8.2
MECP – 119	
Agency Comment	<p>Section 8.2, general</p> <p>The current information in this section regarding compliance monitoring should be replaced with the information on compliance monitoring from Section 8.1.</p> <p>In accordance with Section 5.2.8 of the ministry’s Code of Practice, the EA will need to provide a monitoring strategy that sets out how and when all commitments made in the EA will be fulfilled and how the proponent will report to the ministry about compliance.</p>

	<p>Please include a commitment referencing this requirement in this section of the ToR.</p> <p>Revise text accordingly.</p>
Hydro One Response Provided	<p>Compliance monitoring moved to Section 8.2</p> <p>Hydro One will provide a monitoring strategy that sets out how and when all commitments made in the EA will be fulfilled and how the proponent will report to the ministry about compliance.</p>
Draft ToR Section Revision	Sections 8.1 and 8.2 revised.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 120	
Agency Comment	<p>Appendix 2</p> <p>The table should clearly identify which column refers to the ‘criteria’ that will be used for the assessment and evaluation of alternatives. Also, the items under the “features considered” column should be separated into more specific criteria. For instance, “environmentally sensitive areas” can be separated further but not limited to:</p> <ul style="list-style-type: none"> • Natural heritage features (i.e. ANSI) • Wetlands • Species at risk • Terrestrial habitat • Aquatic habitat <p>Also, items under the “environment” column should include cultural and built environments, and any other technical considerations.</p> <p>In addition, please include a column that identifies preliminary potential effects on each of the indicators. Also, as per Comments #12, #60 and #94 please remove references to the existing NextBridge EA studies. Overall, sufficient information should be given in the ToR to ensure that this table can be understood by interested persons who are then able to provide informed comments.</p> <p>Revise table accordingly.</p>
Hydro One Response Provided	<p>Appendix 1 criteria and indicators have been extensively modified based on the comments provided. Criteria and indicators have been updated and clarified, environment includes cultural/built environment, technical considerations have been added, references to existing EA studies have been removed (NextBridge).</p>
Draft ToR Section Revision	Appendix 1 has been modified.
MECP Response	No further comment.

Hydro One Response	N/A
ToR Section Revision	N/A
Peter Brown, Indigenous Consultation Advisor, CSPB	
MECP – 121	
Agency Comment	Throughout (e.g., Sections 3.1, 4.4.1, 5.0, 5.1, 5.2, 5.4, 5.6) Please make sure that Indigenous communities are identified separately from stakeholders and agencies in the Final ToR. Many indigenous communities prefer to not be identified as stakeholders. Revise text throughout to identify Indigenous communities, stakeholders and agencies separately.
Hydro One Response Provided	Differentiation between stakeholders and Indigenous communities has been clarified.
Draft ToR Section Revision	Section 3, 5 and Section 6.3.3 have been modified.
MECP Response	Thank you, I am satisfied with the response.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 122	
Agency Comment	Section 5.3, page 40. The Ministry of Energy, on behalf of the Crown, formally delegated procedural aspects of consultation to Hydro One and provided a list of communities to be consulted for the environmental assessment process on March 2, 2018. The Ministry of Energy also notified the communities of this delegation. Revise the first parts of this section to reflect the up-to-date status of the delegation and notification. Please also indicate that consultation on a draft Indigenous consultation plan for the EA will occur with all identified Indigenous communities (see comment #4 below).
Hydro One Response Provided	Revised section to include the following text: The Ministry of Energy, on behalf of the Crown, formally delegated procedural aspects of consultation to Hydro One and provided a list of communities to be consulted for the environmental assessment process on March 2, 2018. The Ministry of Energy also notified the communities of this delegation. Consultation on a draft Indigenous consultation plan for the EA will occur with all identified Indigenous communities.
Draft ToR Section Revision	Section 9.2 has been revised.
MECP Response	Thank you. The first few paragraphs of Section 9.2 now do not flow well, but the requested text has been added. For example, the second paragraph of Section 9.2 with two bullets could be removed to improve readability.
Hydro One Response	Second paragraph and two bullet points have been removed.

ToR Section Revision	Section 9.2.
MECP – 123	
Agency Comment	<p>Section 5.4, page 42.</p> <p>This section should provide a summary of the consultation undertaken during the development of the ToR, not a consultation plan for the ToR. A complete record of consultation undertaken by Hydro One during the development of the ToR should also be provided as an appendix to the ToR. Indigenous community input in the development of the ToR is a very important part of the EA process.</p> <p>Please include a summary of the consultation undertaken during the development of the ToR in the main body of the ToR. The Indigenous consultation summary should be organized by community and identify key issues raised and how they are addressed in the ToR (e.g., responses to them and/or explanation of how the input informed EA methodology, study design, etc). The appended record of consultation should include all events and communications, and indicate how any questions, comments and concerns are addressed in the ToR and/or will be addressed through the EA process.</p>
Hydro One Response Provided	<p>Section 9.3 has been modified to include a summary of the consultation undertaken during the development of the ToR, not a consultation plan for the ToR.</p> <p>The Record of Consultation will be supplied as a supporting document to the ToR.</p> <p>Section 9.3.2, paragraph 3 has been revised to contain additional information on consultation of Indigenous communities in regards to the ToR.</p>
Draft ToR Section Revision	Section 9.3 has been modified.
MECP Response	The response is insufficient. Please include in Section 9.3 a summary of issues (comments, questions, concerns) raised by Indigenous communities (e.g., from meetings, written comments, etc.) and how they are or will be addressed. The complete record of consultation can be appended to the ToR, but a summary should be included in the main body of the ToR (see original July 26, 2018 comments).
Hydro One Response	Text has been added to 9.3 to address consultation and summary of issues.
ToR Section Revision	Section 9.3
MECP – 124	
Agency Comment	<p>Section 5.5.2</p> <p>It is not clear if the Indigenous consultation plan for the EA referenced in the draft ToR is contained within section 5.5.2 or also exists as a more extensive stand-alone document that can be modified through consultation with communities.</p>

	<p>It is also not clear how Hydro One will “incorporate traditional knowledge and use”, as indicated in the draft ToR (p.47). This is an important part of the EA process and requires further clarification.</p> <p>Please include a copy of the draft Indigenous consultation plan for the EA as part of the Final ToR or as a stand-alone document for review and consultation. I suggest calling it a draft plan until Hydro One consults with each individual Indigenous community on the plan. Some communities may request individualized plans, which should be honoured or accommodated appropriately (e.g., community-specific sections) within the overall consultation plan.</p> <p>Each community may have different approaches and preferences for the sharing of Traditional or Indigenous Knowledge, and this should also be honoured by Hydro One. Please note that Indigenous Knowledge should be an input to most physical, biological and human components of the environment. Please state a commitment to consider, and incorporate as appropriate, Indigenous consultation and knowledge in, for example:</p> <ul style="list-style-type: none"> • the methodology for and description of baseline conditions (e.g., study areas; environmental components; resources, species, other values of importance; timing of baseline studies, etc.); • the evaluation of alternatives and assessment of the preferred undertaking (e.g., criteria and indicators of relevance to Indigenous communities for all environmental components); • the development of mitigation measures and monitoring commitments; and • the conclusions of the EA, including any residual adverse effects on Aboriginal and treaty rights
Hydro One Response Provided	<p>The Indigenous Consultation Plan is a standalone document that can be modified through consultation with communities. Language clarifying this has been added to Section 9.4.2.</p> <p>Expanded on Traditional and Indigenous Knowledge as suggested in the comment.</p>
Draft ToR Section Revision	Section 9.4.2 has been revised.
MECP Response	Thank you. I look forward to reviewing the consultation plan for the EA.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 125	
Agency Comment	<p>Section 6.2.5 “potential employment and... other relevant socio-economic aspects” should be considered under a more appropriate socio-economic component rather than as part of Traditional/Indigenous Land Use.</p> <p>Move socio-economic references from Section 6.2.5 to 6.2.3 or 6.2.4, or create a separate Indigenous employment and economic activity component.</p>

Hydro One Response Provided	Indigenous consultation and employment/economic participation has been moved to Section 5.2.2.
Draft ToR Section Revision	Section 5.2.2 has been modified.
MECP Response	Thank you, I am satisfied with the response.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 126	
Agency Comment	<p>Section 7.0</p> <p>Commitments to consider Traditional or Indigenous Knowledge for each environmental component are not clear. Indigenous community- specific criteria and indicators may also be required to address specific concerns or requests. This is an important part of the EA process and requires further clarification.</p> <p>Information provided by Indigenous communities should be considered in developing all criteria, indicators and measures, not just “for effects on traditional/Indigenous land use where relevant” (p. 65). Please clarify this throughout Section 7.0. For example, Traditional or Indigenous Knowledge or Traditional/ Indigenous Resource Uses and/or Areas should be listed as a feature or consideration under Natural Environment (p.61).</p> <p>Under Socio-Economic Environment, it is recommended to refer to Traditional Knowledge as opposed to ‘Traditional Knowledge Studies’ because communities may prefer to share knowledge in ways other than through a formal study. This should be considered throughout the ToR.</p>
Hydro One Response Provided	<p>The preliminary list of features/considerations will be developed and refined during the EA process in consultation with the public, government agencies, Indigenous communities, and any other interested persons. In Appendix 1, Indigenous consultation is listed as an information source for the criteria and indicators. Clarified throughout the document that Indigenous consultation is a key component of evaluation of alternatives, mitigations and assessment of the environment throughout the EA process.</p> <p>Information obtained through consultation will be used in developing indicators and measures for effects on all criteria and indicators.</p> <p>Removed ‘studies’ from Traditional Knowledge.</p>
Draft ToR Section Revision	Section 7.0 has been modified.
MECP Response	Thank you, I am satisfied with the response.
Hydro One Response	N/A
ToR Section Revision	N/A
Enoch Tse, Noise Engineer	
MECP – 127	
Agency Comment	I have reviewed the information and have no further comments.

Hydro One Response Provided	Comment noted; no change required.
Draft ToR Section Revision	N/A
MECP Response	N/A
Hydro One Response	N/A
ToR Section Revision	N/A
Stefanos Habtom, Senior Wastewater Engineer	
MECP – 128	
Agency Comment	I have reviewed the Draft ToR for the Hydro One Lake Superior Link Project and I have no comments in terms of the mandate of the Wastewater Review Unit.
Hydro One Response Provided	Comment noted; no change required.
Draft ToR Section Revision	N/A
MECP Response	N/A
Hydro One Response	N/A
ToR Section Revision	N/A
Guowang Qiu, Air Quality Analyst, Northern Region	
MECP – 129	
Agency Comment	Section 7.1 Within the section of evaluation of potential effects on the natural environment, air quality was not included. There is a potential air quality effects during the construction of the project due to construction activities, especially for the fugitive dust. Consider the potential air quality effects from the construction activities, especially for the potential receptors near the transmission line, air quality impact assessment should be conducted and included in the environment assessment.
Hydro One Response Provided	Dust and noise from construction are controlled with appropriate mitigation measures and environmental best management practices. Potential air quality effects from construction activities, especially for the potential receptors near the transmission line will be considered. Air quality impact assessment will be conducted and included in the environment assessment.
Draft ToR Section Revision	Section 6.5 (old 7.1) has been modified.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 130	

Agency Comment	<p>Appendix 2 Air quality was not included in the list of preliminary criteria and indicators.</p> <p>Air quality and greenhouse gas emissions should be considered and included in the list of criteria and indicators to assess the environmental impacts of the project.</p>
Hydro One Response Provided	Appendix 1 has been modified to include air quality and greenhouse gases.
Draft ToR Section Revision	Appendix 1 has been modified.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
Mira Majerovich, EA Coordinator, Northern Region	
MECP – 131	
Agency Comment	<p>Permit and Approval Requirements (Sec. 2, pg. 15): Please clarify that Lake Superior Links only plans to concurrently prepare for permits and approvals while the EA process is being undertaken. As written, it infers that permit and approval applications may be submitted during the EA process. Approval under the Environmental Assessment Act comes first and that approval under one piece of legislation does not guarantee approval under another. To reduce timelines, permit or approval applications may be submitted concurrently with the EA, however, these will not be approved until the EA process is complete. Also, the proponent can consult with other agencies to coordinate documentation that could meet both the EA and other applicable approvals as needed (Code of Practice: Environmental Assessments, pg 38).</p>
Hydro One Response Provided	<p>Hydro One only plans to concurrently prepare for permits and approvals while the EA process is being undertaken.</p> <p>Approval under the Environmental Assessment Act comes first and approval under one piece of legislation does not guarantee approval under another. To reduce timelines, permit or approval applications may be submitted concurrently with the EA, however, these will not be approved until the EA process is complete. Hydro One will consult with other government agencies to coordinate documentation that could meet both the EA and other applicable approvals as needed.</p>
Draft ToR Section Revision	Section 2.1.1
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 132	

Agency Comment	Soil Contamination (Sec. 7.1, pg. 62; Sec. 7.3, pg. 66): Please provide an approach for determining if and when assessing or managing soil contamination may be considered. While this may not be a significant concern, a complete assessment should consider the potential for soil contamination concerns and outline how they may be addressed. The Guide on Site Assessment, the cleanup of Brownfield Sites and the Filing of Record of Site Condition can provide some direction.
Hydro One Response Provided	The issue of soil compaction and measures to mitigate effects on soil permeability, drainage and hydraulic balance will be addressed in the EA. The potential for soil contamination will be considered and the Guide on Site Assessment, the cleanup of Brownfield Sites and the Filing of Record of Site Condition will be consulted to determine the most appropriate course of action.
Draft ToR Section Revision	Section 6.5.1
MECP Response	In addition to those guidelines and BMPs listed in Section 6.5.1, Hydro One commits to consulting with the Guide on Site Assessment, the cleanup of Brownfield Sites and the Filing of Record of Site Condition to determine the most appropriate course of action.
Hydro One Response	Comment noted.
ToR Section Revision	N/A
MECP – 133	
Agency Comment	Acoustic Environment (Sec. 6.1.9, pg 56): Please provide additional detail for the reference routes by referring to the communities that will be crossed, recreational areas, the existing transmission line and other potential sensitive receivers. Noise level measurements, studies and/or mitigation measures may be required in some areas depending on the proximity to sensitive receivers. Acoustic and noise become a consideration when there is a point of reception and communities have a different acoustic environment. When a facility is proposed Ministry of the Environment’s Guideline D-1 Land Use Compatibility outlines the proponent’s responsibility in determining: 1. The influence area 2. Identity and distance from existing or committed sensitive land use(s); 3. Severity of impacts; and 4. Feasible mitigation (Guideline D-1, Sec 1.3.2). Ministry of the Environment’s Environmental Noise Guideline NPC 300 applies to EA projects. It provides sound level limits for different classes of areas (eg. urban, rural).

Hydro One Response Provided	Additional detail for the reference routes by referring to the communities that will be crossed, recreational areas, the existing transmission line and other potential sensitive receivers has been provided in the text.
Draft ToR Section Revision	Section 5.1.9 has been revised.
MECP Response	It is section 5.2.9, not Section 5.1.9 (typo) in which Acoustic Environment is discussed. Hydro One has committed to verify existing noise sensitive land uses in the EA, including through ground-truthing, if required. Typo: change MOECP to MECP
Hydro One Response	Typo addressed.
ToR Section Revision	Section 5.3.9.
MECP – 134	
Agency Comment	Human Health (Sec. 6.2.6, pg. 59): Please provide detail on how noise, air and water quality will be assessed and managed either by linking these to other sections of the ToR (Sec. 6.1.8, Sec. 6.1.9, Sec. 6.1.2) or by adding details into this section. This section commits to only providing baseline conditions and potential effects for EMF's. There are other human health issues that need to be addressed.
Hydro One Response Provided	Human Health concerns will be addressed in the EA. In addressing potential health issues, Hydro One looks to the scientific expertise of Health Canada to assess the scientific studies and provide advice and guidance. Potential changes in surface water, air quality and noise due to Project activities can act as pathways to potential effects on human health. These criteria will be drawn upon to inform human health concern assessments in the EA.
Draft ToR Section Revision	Section 5.2.4 modified.
MECP Response	Now Section 5.3.4. Hydro one has committed to addressing all aspects of Human Health concerns and will seek the expertise of Health Canada to assess the scientific studies and provide advice and guidance. Please discuss issues that may arise from potential changes in surface water, air quality and noise due to project activities, and assess in the EA. This section should reflect on more than solely EMFs, and their impacts on human health.
Hydro One Response	Comment noted.
ToR Section Revision	Section 5.4.4
MECP – 135	
Agency Comment	Infrastructure and Service (Sec. 6.2.8; pg. 60):

	The construction phase of this project will likely generate significant waste. The proponent should assess the projects effect on existing waste management services. Do local waste management services have the capacity to accept additional waste from the project?
Hydro One Response Provided	The construction portion of the Project will generate some galvanized steel waste (estimated at 500 MT) and other construction waste. Preliminary inquiries to local waste management companies indicate that sufficient capacity for waste management exists along the proposed corridor.
Draft ToR Section Revision	Section 5.2.6
MECP Response	Now section 5.3.6. Within the EA please include specific details of the water management companies contacted regarding existing capacity.
Hydro One Response	Comment noted.
ToR Section Revision	Section 5.4.6
MECP – 136	
Agency Comment	<p>Appendix 2 – List of Preliminary Criteria and Indicators Table: Under Potential Data Sources, please add to Socio-economic Environment (existing land-use, approved development, commercial activities) MNRF, MMAH, MTCS, and Parks Canada. For unorganized land, MMAH is the approval authority. MNRF administers the affected crown land and conservation authorities and Parks Canada the federal parks.</p> <p>Update the table to reflect any criteria and indicators under the Socio-Economic Environment for First Nation Communities through consultation and also include any from other stakeholders (eg. Traditional Land and Resources).</p> <p>Please rephrase land use in the table under the Rationale for Selection of Indicator to land use compatibility, when referring to potential for conflicts with existing land uses. While it may be inferred as stated, this ministry prefers to see land use compatibility clearly referenced.</p>
Hydro One Response Provided	All suggested changes have been implemented to Appendix 1.
Draft ToR Section Revision	Appendix 1 has been modified.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
Archana Uprety, Hydrogeologist, Northern Region	
MECP – 137	
Agency Comment	The study area in the EA should include 500 m on either side of the Reference Route and Alternative Routes. Project-specific potential environmental effects on groundwater resources are likely to occur within this area.

	For locations where extensive blasting is required, this distance may need to be increased. Amendment to the ToR/proposed commitment to address concern.
Hydro One Response Provided	The Study Area can be broken up into three components: the Project Study Area (PSA), Local Study Area (LSA) and Regional Study Area (RSA). For the general purposes of Lake Superior Link, PSA is 500 m on either side of the ROW for reference route and alternative routes; LSA is 1 km from Reference Route boundary/ROW; and the RSA is approximately 5 km from the boundary of LSA. However, LSAs and RSAs aren't always consistent for each environmental factor. For example, study areas for the socio-economic assessment will be defined by criterion-specific LSAs and RSAs. A more detailed description of the study area and how the study area boundaries were determined will be provided in the EA.
Draft ToR Section Revision	Section 4.1 has been modified to outline the study areas.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 138	
Agency Comment	The study area in the EA should also include the area within 1 km from the project footprint, within which potential cumulative environmental effects on groundwater resources may occur. Amendment to the ToR/proposed commitment to address concern.
Hydro One Response Provided	See response above. For the general purposes of Lake Superior Link, PSA is 500 m on either side of the ROW for reference route and alternative routes; LSA is 1 km from Reference Route boundary/ROW; and the RSA is approximately 5 km from the boundary of LSA.
Draft ToR Section Revision	Section 4.1 has been modified to outline the study areas.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 139	
Agency Comment	Section 6.1.2, page 52 To reduce risk to groundwater, a desktop study and door-to-door survey should be conducted prior to construction to determine local groundwater conditions, and location of water supply wells. Should the study reveal shallow groundwater conditions, or water supply wells located within the vicinity of the transmission corridor, mitigation measures should be proposed to avoid potential negative effects. Amendment to the ToR/proposed commitment to address concern.
Hydro One Response Provided	Section 5.1.2 has been revised. Wellhead protection areas, intake protection zones, highly vulnerable aquifers and significant groundwater

	recharge areas, source water protection documentation and relevant policies will be reviewed. The description will be conducted via desktop studies and supplemented with field work, where required, for characterization of groundwater quality, or measurements of water levels or drawdown of water wells.
Draft ToR Section Revision	Section 5.1.2 has been revised.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 140	
Agency Comment	The EA should include a spill prevention and response plan, a waste management plan, and a blast management should blasting be required. The use of ammonium nitrate explosive in the vicinity of water supply wells should be avoided. Amendment to the ToR/proposed commitment to address concern.
Hydro One Response Provided	Commitments on blasting, spills, waste management and blast management are outlined in Section 6.5.
Draft ToR Section Revision	Section 6.5 modified.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 141	
Agency Comment	Section 7, page 61 The EA should identify potential effects, assess them, and recommend mitigation measures to reduce or avoid potential negative effects. Project activities which may impact groundwater resources such as during construction, operation and maintenance should be assessed. Including but not limited to, impact to water supply wells, potential contaminant discharges, disturbing pre-existing shallow contaminated soils, leaching of herbicides, managing precipitation and runoff, effects from dewatering, blasting, and artesian conditions. Amendment to the ToR/proposed commitment to address concern.
Hydro One Response Provided	Project activities which may impact groundwater resources such as during construction, operation and maintenance should be assessed. Including but not limited to, impact to water supply wells, potential contaminant discharges, disturbing pre-existing shallow contaminated soils, leaching of herbicides, managing precipitation and runoff, effects from dewatering, blasting, and artesian conditions. The issue of soil compaction and measures to mitigate effects on soil permeability, drainage and hydraulic balance will be addressed in the EA.

Draft ToR Section Revision	Section 6.5 revised.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
Scott Parker, Surface Water Specialist, Northern Region	
MECP – 142	
Agency Comment	The environmental impacts to surface water quantity and quality from transmission line construction are generally limited to access road construction and RoW clearing. The potential long-term operational impacts are related primarily to increased erosion and sedimentation as well as short-term increases in water level or “flashy” stream flows due to access roads and the cleared RoW. There is also the potential that removal of tree cover in the RoW and changes in stream flows and water levels may increase concentrations of certain chemical constituents, stream temperature and suspended solids in receiving water. However, 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.
Hydro One Response Provided	Detailed mitigation measures for potential effects on surface water will be developed during the EA and are addressed in Section 7.
Draft ToR Section Revision	No changes required.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
MECP – 143	
Agency Comment	As the Lake Superior Link 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 road (and transmission line) construction projects throughout northern Ontario.
Hydro One Response Provided	Detailed mitigation measures for potential effects on surface water will be developed during the EA and are addressed in Section 7.
Draft ToR Section Revision	No changes required
MECP Response	No further comment.
Hydro One Response	N/A

ToR Section Revision	N/A
MECP – 144	
Agency Comment	<p>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 guidelines listed on page 63 of the Draft LSL ToR as well as 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. Trigger/threshold values should be established and sampling should occur in potential 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:</p> <ul style="list-style-type: none"> • Ontario Provincial Standard Specification (OPSS 805) – Construction Specifications for Temporary Erosion and Sediment Control Measures • Ontario Provincial Standard Specification (OPSS 182) – General specifications for Environmental Protection for Construction in Waterbodies and on Waterbody Banks • Ontario Provincial Standard Specification (OPSS 518) – Construction Specifications for Control of Water from Dewatering Operations
Hydro One Response Provided	<p>All of the mentioned best management practices, guidelines, standards and guidebooks have been implemented into Section 6.5.</p> <p>Sediment and erosion control measures will be identified and addressed in the EA document. This includes identification of areas where soil or other factors could affect the effectiveness of those measures. Trigger/threshold values will be established for suspended sediment and turbidity be followed where bankside, in-stream and/or dewatering work is required. Sampling will occur in potential sensitive receivers before, during and after such work is undertaken.</p>
Draft ToR Section Revision	Section 6.5 has been modified.
MECP Response	No further comment.
Hydro One Response	N/A
ToR Section Revision	N/A
Sam Shippam, Senior Environmental Officer	
MECP – 145	
Agency Comment	I reviewed the DRAFT TOR. At this point the district has no comments.

Hydro One Response Provided	Comment noted; no change required.
Draft ToR Section Revision	N/A
MECP Response	N/A
Hydro One Response	N/A
ToR Section Revision	N/A

4.2 Municipal Comments

4.2.1 Municipal Comments

No municipalities provided comments on the draft ToR or the Project during the Community Information Centres.

Table 4.2-1 summarizes municipal questions and comments provided to Hydro One during the draft ToR review period. Responses to each of the questions and/or comments are provided below.

Table 4.2-1: Municipal Comments Received During the 30-day Review Period

No.	Municipal Comment	Hydro One Response Provided	ToR Section Revision
	Dorion Township, Ed Chambers, Reeve, Letter Dated July 10, 2018 to Steven Mantifel, Hydro One Networks Inc. (HONI)		
DT – 1	With respect to comments on the draft Terms of Reference (ToR) document, the Township of Dorion would like to reiterate that it is in full support of the reference route outlined in Figure 3 - Reference route (solid red line) - Hydro One Networks Inc. - Lake Superior Link Transmission Project, which has minimal impact on the residents of the community.	The reference route continues to be Hydro One’s preferred route alternative. Alternatives to the Project must be assessed and whether or not a preferred route is identified, Hydro One must objectively assess alternative methods to the Project.	Section 6 has been updated to discuss identification and evaluation of Project alternatives
DT – 2	We have been informed during one of your Public Information Centres, during a webinar with our Township, in newspaper articles and notices and on a map in the Terms of Reference, that Hydro One will follow this route. We would appreciate if this route could be confirmed.	In response to comments received from the Ministry of Natural Resources and Forestry (MNRF), Hydro One will assess an alternative route in the Dorion area to the Reference Route presented at the Community Information Centre and as documented in the Draft Terms of Reference. The new alternative will consist of routing the line adjacent to the existing East-West Transmission Line right-of-way for approximately 50 km within the	Section 6 has been updated to discuss identification and evaluation of Project alternatives.

		section between Nipigon and the Lakehead Transformer Station in Thunder Bay.	
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Table 4.2-2 summarizes municipal questions and comments provided to Hydro One during the revised draft ToR review period. Responses to each of the questions and/or comments are provided below.

Table 4.2-2: Municipal Comments Received During the Revised Draft ToR Review Period

	Dorion Township, Ed Chambers, Reeve, Letter Dated August 21, 2018 to Steven Mantifel, Hydro One Networks Inc. (HONI)		
DT - 1	<p>Further to previous consultation and Hydro One's deputation to Council, at our regular meeting held on August 14, 2018, Council wishes to comment on Hydro One's updated terms of reference.</p> <p>As you know, Dorion Council and a committee appointed by Council, the Dorion Concerned Citizen Committee [DCCC], met several times over the past few years with Nextbridge to agree upon a route [The "Dorion Bypass"] that would have minimal impact on our community, compared to a line parallel to an existing line.</p> <p>We realize that your preferred route is a line behind Ouimet Canyon; however, Council is concerned that the line paralleling the existing line is now being studied as a new Reference Route Alternative.</p> <p>In summary, Council is supportive of a line [behind Ouimet Canyon] that was established by Nextbridge, after lengthy consultation with the Township of Dorion and a group representing the</p>	<p>Comment Noted.</p> <p>The reference route continues to be Hydro One's preliminary preferred route alternative. Alternatives to the Project must be assessed and whether or not a preferred route is identified, Hydro One must objectively assess alternative methods to the Project in accordance with MECP Code of Practice for EA's.</p>	<p>No change required.</p>

	<p>citizens of our community. Please be cognizant that we are absolutely opposed to a line paralleling the existing line through our community. If the latter is chosen, we will take every effort to oppose it.</p> <p>We look forward to attending the Community Information Centre in Dorion on August 30, 2018.</p>		
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4.3 Public, Interest Group and Property Owner Comments

4.3.1 Public, Interest Group and Property Owner Comments

Table 4.3-1 summarizes public, interest group and property owner questions and comments provided to Hydro One during the Community Information Centres held. Responses to each of the questions and/or comments are provided below.

Table 4.3-1: Public, Interest Group and Property Owner Comments received at the CICs held during the week of June 11, 2018

Stakeholder Comment	Hydro One Response
OEB Regulatory Process	
<p>What is the difference between Hydro One's and NextBridge's proposal?</p>	<p>Hydro One's proposal is the most cost-effective solution to deliver the required power supply to northwestern Ontario while also minimizing the environmental footprint.</p> <p>When compared to other proposals to build the East-West Tie line:</p> <p>Hydro One's reference route is approximately 50 km shorter overall.</p> <ul style="list-style-type: none"> - Hydro One has the unique ability to modify existing infrastructure through Pukaskwa National Park, significantly reducing the length of the overall transmission line and reducing impact on the Park. <p>Our reference route would use approximately 50% less land than NextBridge's proposal and our reference route alternative would use 36% less.</p> <ul style="list-style-type: none"> - Hydro One will not be cutting new corridor or access routes through Pukaskwa National Park. - For the majority of the transmission line, Hydro One is proposing a narrower corridor (ranging from approximately 37 to 46 metres.)
<p>Why has Hydro One decided to submit a leave to construct application at this time?</p>	<p>When concerns were raised in August 2017 by Ontario's Minister of Energy about the increased costs of NextBridge's East West Tie proposal, Hydro One saw an opportunity to provide a brighter future with a more cost-effective, reliable, environmentally -friendly transmission solution that will truly benefit the people and businesses of Northern Ontario. We believe in advocating for communities and customers first. That is why we introduced our Lake Superior Link project: it is our belief that competition will benefit everyone involved, especially in Northern Ontario. At a</p>

Stakeholder Comment	Hydro One Response
	difference of over \$100 million in construction costs along with ongoing annual savings of over \$3 million, introducing competition to this market will provide real benefits on electricity costs, as compared to the alternate filed application.
If the OEB selects Hydro One to construct the Project, will the construction procurement process be initiated again?	If Hydro One is selected by the OEB to construct the LSL project it would need to initiate a new construction procurement process through its design/construction partner (SNC-Lavalin Inc.).
Is this project in competition with NextBridge?	Yes. Both Hydro One and NextBridge have each filed a Leave to Construct application to the OEB to seek approval to construct the expansion of the existing East-West Tie line.
Has NextBridge received approval for their EA?	NextBridge has not received approval for their EA. Hydro One staff referred the stakeholder to the NextBridge project website for update on the status of their approvals.
Has the proponent to construct the line been selected?	The OEB has not awarded the approval to construct the line and currently reviewing the Leave to Construct applications submitted by Hydro One and NextBridge.
Can additional proponents apply to construct the East-West tie?	The construction phase for the expansion of the new East-West Tie line has not yet been awarded by the Ontario Energy Board (OEB). Last fall the Minister of Energy wrote a letter to the Independent Electricity System Operator (IESO) about the cost of the plan that was submitted and asked the IESO to review all possible options to ensure customers are protected. In response, Hydro One has developed the Lake Superior Link project which will deliver benefits to Ontario's electricity customers, and submitted a Leave to Construct application to the OEB on February 15 th , 2018.
Will the Hydro One project offer savings in relation to the NextBridge proposal?	In comparison to the NextBridge proposal, the Hydro One LSL project is estimated to provide a capital cost savings of approximately of \$100 million and an operating and maintenance cost savings of about \$3 million annually.
A resident wanted to know why a submarine cable had not been proposed as an option.	Hydro One staff responded that IESO had provided the preferred alternative, an overland transmission line, to the proponents.
There is no need to have the line along the existing northern Ontario corridor. The surplus power from northern Ontario is being sent to southern Ontario. The energy board has to justify their	Comment Noted.

Stakeholder Comment	Hydro One Response
actions in my mind. Power from northern Manitoba and northern Quebec can fill the requirements.	
Environmental Assessment	
Who regulates the EA?	The Ministry of the Environment, Conservation and Parks is the provincial agency responsible for overseeing and regulating environmental assessments.
Can concerns be provided to Hydro One for consideration in the project?	All written and verbal comments and concerns on the Project will be considered and addressed by Hydro One during the EA.
Why are we considering a reference route?	Under the <i>Environmental Assessment Act</i> , proponents are required to consider alternative methods of carrying out a project. In the case of the LSL project this will involve the consideration of the preliminary preferred reference route for the transmission line and an alternative route around Pukaskwa National Park.
Why initiate this project and EA now?	The construction phase for the expansion of the East-West Tie line has not yet been awarded by the Ontario Energy Board (OEB). Last fall the Minister of Energy wrote a letter to the Independent Electricity System Operator (IESO) about the cost of the plan that was submitted and asked the IESO to review all possible options to ensure customers are protected. In response, Hydro One has developed the Lake Superior Link Project which will deliver benefits to Ontario's electricity customers, and submitted a Leave to Construct application to the OEB on February 15 th , 2018. The Project is subject to approval under <i>the Environmental Assessment Act</i> , and as such Hydro One has initiated this process.
Why isn't Hydro One adopting the NextBridge Individual EA?	Hydro One's LSL project is different to that proposed by NextBridge, although they share similar routing for the line. The Ministry of the Environment, Conservation and Parks views the LSL project as an independent/separate project and since the NextBridge EA has not been approved Hydro One must undertake its own Individual EA.
Has the transmission route changed in relation to NextBridge's?	The Hydro One preferred route for the Project differs from NextBridge's proposed route, as Hydro One's reference route goes through PNP and NextBridge's goes around.
In the March information centre there was no	The information drop-ins held with communities in

Stakeholder Comment	Hydro One Response
discussion of an alternative route, why is there one now?	March 2018 was intended to introduce the Project to the public and provide details on the Hydro One Leave to Construct application to the OEB, including benefits of the Project. Since then Hydro One has initiated the EA for the Project, which requires the consideration of alternative routes and/or methods for carrying out the Project.
What has changed since the March information centre?	Since the March 2018 information drop-ins Hydro One has formally initiated the Environmental Assessment (EA) process for the Project. As part of this process a draft ToR to guide the EA has been prepared for public review and this CIC is seeking feedback on the ToR and in general the Project.
Why is there a CIC in White River when the preference is to go through Pukaskwa National Park?	The Hydro One reference route alternative is proposed near the community White River. This alternative is proposed to be examined the EA and therefore Hydro One is consulting with the community to receive their feedback and address any concerns or issues.
Is there any proposed approach or mitigation to address the visual intrusion of new towers at the crossing of the Nipigon River.	The crossing at the Nipigon River will be examined in the EA and detail design. Potential mitigation measures discussed to address concerns included consideration of low lying vegetation for restoration near the base of the towers closest to the river as visual screen, as well as vegetation management during operations.
Sensitive natural heritage features were noted around the Cavern Lake area.	Sensitive natural heritage features will be considered in the EA, including routing alternatives and refinements to minimize impacts to these areas.
Route Selection and Design	
I would like the corridor route to parallel the existing transmission corridor crossing through my property and to be informed of any new developments.	Hydro One obtained the contact information of the impacted property owner and added them to the contact list. Hydro One confirmed with the property owner that it would parallel the existing line on the subject property. The original corridor alignment drawing which was shared with the impacted property owner was inaccurate. A subsequent revised drawing was shared with the property owner confirming a parallel proposed corridor alignment on their lands.
Why did Hydro One choose not to go through Dorion to follow the existing transmission line?	From the extensive consultation undertaken by others (i.e., NextBridge) Hydro One is aware of and acknowledges the concerns raised by the community of Dorion with respect to the routing of a new transmission line adjacent to the existing

Stakeholder Comment	Hydro One Response
	<p>East-West Tie corridor. As discussed at the CIC and at the March information drop-in sessions, based on these community concerns, Hydro One's preferred route bypasses the community. In response to comments received from the Ministry of Natural Resources and Forestry (MNRF) however, Hydro One will now assess an alternative route in the Dorion area to the Reference Route presented at the Community Information Centre and as documented in the Draft Terms of Reference. The new alternative will consist of routing the line adjacent to the existing East-West Transmission Line right-of-way for approximately 50 km within the section between Nipigon and the Lakehead Transformer Station in Thunder Bay.</p>
<p>Not supportive of the Dorion/Loon lake bypass</p>	<p>Comment noted.</p>
<p>Could the existing structures through Dorion be modified to accommodate four circuits to avoid the Dorion loop?</p>	<p>As discussed at the CIC and at the March information drop-in sessions, based on these community concerns, Hydro One's preferred route bypasses Dorion. The modification of existing structures is not required to accommodate this preferred route. However, Hydro One will be reviewing all stakeholder comments on the draft ToR, and input received at the CICs in finalizing those alternative routes for consideration in the EA</p>
<p>Upgrading of existing service roads north of Highway 17 to transmission line.</p>	<p>The use and upgrading of existing access/service roads for the Project are currently being identified by Hydro One and will be considered in the EA.</p>
<p>What type of tower structures will to be used for the Project, as the current structures are not considered visually attractive.</p>	<p>Three types of tower structures are proposed for the Project – guyed tower (double-circuit); self-supporting structure (double-circuit); and guyed tower (quadruple circuit). Schematic figures of the structure type were shown.</p>
<p>Simply makes sense to follow existing line and to go around Dorion.</p>	<p>Comment noted.</p>
<p>Will existing structures be used through Pukaskwa National Park?</p>	<p>The existing tower structures in Pukaskwa National Park will be replaced with new towers to accommodate four circuits without widening the corridor. Existing structure foundations will be used and reinforced where required.</p>
<p>Cottager near White River expressed concerns with reference route alternative if selected as it will impact an informal access trail to their cottage. They expressed support for Hydro One preferred reference route.</p>	<p>Comment noted.</p>

Stakeholder Comment	Hydro One Response
Prefer that the alternative route around Pukaskwa National Park be selected.	Comment noted.
Noted support for the Hydro One preferred reference route in comparison to the alternative greenfield route around PNP as it will reduce environmental footprint impact and is lower cost.	Comment noted.
Is there widening of the existing East –West Tie right-of-way within the PNP and what types of structures are proposed for the Project?	There is no proposed widening of the existing right-of-way within PNP. The existing towers in the park will be replaced with new towers to accommodate four circuits. Three types of tower structures are proposed for the Project – guyed tower (double-circuit); self-supporting structure (double-circuit); and guyed tower (quadruple circuit for PNP). Schematic figures of the structure type were shown and discussed.
Property Owners	
Are you buying land for the line or acquiring easements?	Directly impacted property owners will be offered the choice of Hydro One acquiring either an easement or the fee simple interest in the lands required for the Project Corridor.
Could Hydro One provide an overview map capturing my property?	Hydro One provided a copy of the map requested. The property owner thanked Hydro One and had no further comments.
I would like to be consulted if access is required through my property to ensure my concerns are addressed.	Hydro One obtained the contact information of the property owner and added the individual to the notification list. Staff will contact the property owner in advance of any proposed work and discuss any access agreements that may be required.
I would like Hydro One to avoid accessing my property for the proposed project.	Information on the specific property was noted by Hydro One staff, including the request to avoid access of these lands for the Project.
Please note that there is a new building located near one of the proposed structures.	Hydro One staff noted the building location and confirmed that the proposed line is located to the south of the property in question.
Property owner/cottager at Three Finger Lake asked about the right-of-way width for the proposed line by Hydro One in comparison to that proposed by NextBridge.	For the majority of the transmission line, Hydro One is proposing a narrower corridor (ranging from approximately 37 to 46 metres.)
Property may be affected by the proposed line. Would like Hydro One to confirm whether it will be affected and informed of any developments.	Hydro One obtained the property owner’s contact information and identified the property in question. Hydro One followed up with the property owner to confirm their property would not be affected by the proposed project as it was located south of the proposed line.
Trapping and Bait Harvesting	

Stakeholder Comment	Hydro One Response
Bait harvesting will be affected by the alternative route. Request that Hydro One consult in advance of any proposed work to avoid bait areas if possible. If unavoidable, prefer compensation.	Non-traditional land and resource uses (both commercial and non-commercial), such as mining, forestry, agriculture, energy production, hunting, trapping, fishing will be assessed in the EA as part of the factors and criteria to evaluate and compare the preferred reference route to the proposed alternative route. Further consultation on impacts and mitigation will be documented in the EA Report and presented at future community information centres to be held in Fall 2018.
Will trappers affected by the proposed project be compensated?	Where the impacts to trapping can be demonstrated as a result of the Project, Hydro One will consider a damage/compensation claim or alternative resolution where applicable.
Local trapper raised concerns with conflict and potential loss of earnings from the harvest of Marten pelts during the construction of the line.	Hydro One staff noted concerns and will follow-up with trapper, as the project progresses, to further discuss and resolve any issues.
Timber Harvesting	
What happens with the timber when it is cut?	Merchantable timber will be cleared in accordance with an approved Forest Resource Licence, overlapping agreements or in accordance with landowner agreements. Timber and disposal options are subject to agreements with landowners, Sustainable Forest Licencee and the appropriate regulatory agency.
How will trees cut for the ROW be utilized?	Merchantable timber will be cleared in accordance with an approved Forest Resource Licence, overlapping agreements or in accordance with landowner agreements. Timber and disposal options are subject to agreements with landowners, Sustainable Forest Licencee and the appropriate regulatory agency.
Consultation	
Has Hydro One initiated consultation/engagement with Indigenous communities?	Hydro One has initiated consultation with the 18 identified Indigenous communities who have or may have constitutionally protected Aboriginal or treaty rights that may be adversely affected by the Project. Hydro One recognizes the importance of consultation with Indigenous communities and will continue to engage and address First Nations and Métis concerns, issues and questions.
Will Batchewana First Nation be consulted on the project and will economic opportunities be provided to the community?	Hydro One recognizes the importance of consultation with Indigenous communities in connection with the Project. Hydro One has identified 18 Indigenous communities that are to be consulted for the proposed LSL project, which

Stakeholder Comment	Hydro One Response
	includes Batchewana First Nation.
EMF	
Will the EMF from the new lines present a health hazard?	Health Canada does not consider that any precautionary measures are needed regarding daily exposures to EMFs at extremely low frequencies. Both Health Canada and the World Health Organization have found that to date, there is no conclusive evidence of any harm caused by exposures at the low levels found in Canadian homes, including those located just outside the boundaries of power line corridors.
Procurement, Investment and Economic Opportunities	
Is there an opportunity for local companies to be involved in the procurement process?	Contracting opportunities will be provided to local companies during the procurement process to maximize the economic benefits of the Project to communities.
A local councillor from Terrace Bay expressed general support for Hydro One LSL project and cost saving to electricity customers. Noted that should Hydro One be successful with their Leave to Construct application to the OEB, then municipality would like to further discuss economic opportunities to the community.	Hydro One staff noted support and will follow-up with the Township as the project progresses to explore and further discuss economic opportunities to the community.
A green energy developer noted benefits of strengthening the transmission system and opportunities this could provide for connection of local wind and solar projects.	Comment noted.
What opportunities are available for local community investment?	We want to hear from the public and local communities to ensure our proposal delivers tangible benefits to Ontario consumers and local communities. We will be engaging with communities, elected officials, oversight agencies, affected property owners and other interested parties for their feedback on the proposal. Hydro One will also explore and discuss various benefits for Indigenous communities, including, but not limited to: capacity building to participate in the engagement process, procurement and sub-contracting opportunities, job training, employment and equity participation.

Table 4.3-2 summarizes public, interest group and property owner questions and comments received during the revised Draft ToR review period. Responses to each of the questions and/or comments are provided below.

Table 4.3-2: Public, Interest Group and Property Owner Comments received during the revised Draft ToR review period

	Stakeholder Comment	Hydro One Response Provided	ToR Section Revision
No.	East Loon Lake Campers Association, Zoie Yurick, Secretary, Letter Dated August 20, 2018 to Melissa Fast, Hydro One Networks Inc. (HONI)		
ELLCA - 1	<p>This letter is written on behalf of the residents and campers at East Loon Lake to convey our opposition to the proposed alternative route outlined in the Draft Terms of Reference for the Hydro One Lake Superior Link Transmission Project. This proposed alternative route would twin the existing Hydro transmission line that currently exists on the northern side of Loon Lake.</p> <p>We find it necessary to first point out that Loon Lake is not part of Dorion. Loon Lake is situated in Shuniah Township. It is necessary for you to recognize that we are a community separate from Dorion with our own set of concerns and objections.</p> <p>From 2014 to 2016, our Association met with Nextbridge representatives on several occasions within Shuniah and Thunder Bay to discuss our concerns with the proposed routing of the East West Tie adjacent to Loon Lake. Please give our community the recognition that we deserve by holding future meetings, if required, to discuss the Hydro One Lake Superior Link Transmission Project in either Shuniah or Thunder Bay.</p>	<p>Hydro One recognizes the level of consultation that occurred with community members and would like to reiterate that it's preferred route remains the route that bypasses Loon Lake. Hydro One has been asked to study an alternative route during our Individual Environmental Assessment (EA) which is why it has been included in our Terms of Reference document. Throughout the entire lifespan of planning and building electrical infrastructure, including during the EA, Hydro One makes all efforts to demonstrate thorough analysis of all factors along our reference route and reference route alternative sections.</p> <p>There is currently not an approved EA for the project but Hydro One will be using as much publicly available information as possible from previous consultation and</p>	No changes required.

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	<p>This spring, representatives of Hydro One held a community meeting at the Victoria Inn to share the draft Terms of Reference for the Lake Superior Link. At that meeting, only one route from Thunder Bay to Dorion was presented. This was the same path that Nextbridge had determined it would be using, and members of our Association were assured by Hydro One representatives at this meeting that Hydro One would follow this same path and would not twin the existing line along Loon. Now that has all changed and we feel that Hydro One has misled our community.</p> <p>Comments were made by the Ministry of Natural Resources and Forestry (MNRF) during the review of the draft Terms of Reference. The MNRF views the Lake Superior Link project as a new undertaking, completely separate from the Nextbridge project. How can this be when Hydro One is now examining the exact same path that Nextbridge has already studied and rejected?</p> <p>The draft Terms of Reference state that the project will “enhance safety and security of electrical supply” (4.2.1). With weather events becoming more severe and unpredictable, what would happen to a twinned transmission line that is struck by a tornado or ice storm? Separating the transmission line to follow different paths would provide a greater guarantee that the security of the electrical supply would be protected.</p> <p>Loon Lake is a beautiful lake steeped in history and</p>	<p>studies when assessing the routes. Community input is important to Hydro One, and as the project goes through the regulatory process for approvals there will be additional opportunities for stakeholders to formally comment on the project. Stakeholders will be able to provide comments during the Ministry of the Environment, Conservation and Parks public review period for Hydro One’s Terms of Reference, and during the Environmental Assessment stage.</p>	

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	<p>tradition. Today, more than 200 families enjoy a wide-range of lake-based activities that provide a wealth of happy times and great memories.</p> <p>These families have been good stewards of the lake for almost a century. They created two, separate campers' associations that look after the interests of the lake's water quality and any development that threatens the integrity of the lake.</p> <p>The East Loon Lake Campers' Association is gravely concerned that Hydro One and its project could jeopardize much that we cherish about Loon Lake.</p> <p>Hydro One wants to build a second high voltage transmission line parallel to the one that currently runs along the North side of Loon Lake. That first line was erected in the 1960's by Ontario Hydro. It was built without giving notice to property owners at Loon Lake and with no environmental assessment.</p> <p>In order to build this second line, we are concerned that East Loon Road would be used to access the project site.</p> <p>Our road is constantly used for many forms of active transportation all year round. The safety of children and adults walking, jogging and biking would be at risk when forced to share the roads with all the traffic this project would bring.</p> <p>Our roadway was recently paved and is not designed for heavy equipment. We are concerned</p>		

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	<p>that the roads may be damaged. If damaged, will we, the property owners of Loon Lake, bear the burden of repairing our roads?</p> <p>The noise and vibration produced by this traffic on the roads would prevent everyone from enjoying their time at Loon Lake. It also raises concerns that continuous heavy vibration would disrupt the water table and underground springs that feed the lake and wells around it.</p> <p>Hydro One states that the existing transmission line's right-of-way would be widened and another set of towers would be erected.</p> <p>Doubling the right of way for this second transmission line means the creation of a vast clear cut path within the watershed of Loon Lake.</p> <p>Loon Lake is in a bowl. The largest expanse of the watershed lies to the north and west of the lake. The proposed transmission corridor would run directly through this key portion of watershed.</p> <p>As property owners living in this delicate bowl, we believe that disturbing the watershed on such a scale will create additional erosion, impacting the flow of surface water and groundwater flow into the lake.</p> <p>Many of us remember a clear-cut logging operation that occurred on the west and north end of Loon Lake a few years ago.</p>		

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	<p>The heavy equipment on the land disrupted groundwater seeps into that portion of the lake. The water still doesn't flow to one, century-old shoreline artesian well.</p> <p>We also know of one cottage owner who had to spend ten thousand dollars to filter out the disturbed ground sulphur that ended up in his well water.</p> <p>Groundwater flow dynamics are very complex. Concrete footings are required to erect the towers. Blasting through bedrock to establish these footings could disrupt those sensitive groundwater seeps.</p> <p>Wells that supply drinking water to residents and campers could be affected both in the amount and quality of water they supply. Disrupting this groundwater supply would also affect the health of the lake water.</p> <p>Disrupting both surface water and ground water would affect the aquatic life in Loon Lake, from the vegetation and tiny organisms at the base of the food chain up to the fish and waterfowl that rely upon them. Loons, cormorants, eagles, bats and fish are just a few species that would be affected.</p> <p>It is important to remember that Loon is a speckled trout lake, dependent on the integrity of the flow of these underground seeps that make their way into</p>		

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	<p>the lake by way of underwater springs.</p> <p>Clearing the right of way and the transmission line construction would affect the diverse vegetation and wildlife that exists here. In addition, a doubled right-of-way will require double the amount of chemical herbicides to curb vegetation growth. This will all flow downhill to the lake. Again, what harm will this do to other vegetation in the area as well as the water quality of Loon Lake and its vegetation and wildlife? Blueberry picking is an activity that campers have enjoyed for generations on this land and it would be damaged by this project.</p> <p>Members of the Loon Lake community have laid the ashes of deceased loved ones in the area of the proposed path. These were spread with the belief that their family members would lie in peace close to the Lake that they had loved. Construction of the proposed path would disturb those remains.</p> <p>Once erected, the towers will have a devastating visual impact on the sightline of Loon Lake. The path for the second set of towers is on higher ground, uphill from the existing line. Both the towers and the missing vegetation will be visible. A double set of towers would be visible down the entire length of the lake.</p> <p>Whether it was generations ago or in the present day, the property owners at Loon Lake have worked very hard to purchase their land for the specific purpose of finding peace and enjoyment from</p>		

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	<p>lakeside living.</p> <p>The desire of people to be at Loon Lake is directly linked to the health and beauty of Loon Lake. If Hydro One proceeds with their proposed path, both the health and beauty will be diminished. As a result, the value of the property at Loon Lake which we have cared for, will also diminish.</p> <p>The fact of the matter is that Loon Lake has already borne more than its share of the burden created by modern utilities. Besides the existing transmission line on the north shore of the lake, the CP Rail main line hugs the south shore. Just beyond the watershed is the Trans-Canada pipeline and a second power transmission line. Then there's the doubling of the Trans-Canada highway just to the south of that.</p> <p>Hydro One has made no secret that the proposed path along Loon Lake is the most efficient and cost effective. But at what cost to us?</p> <p>In 2016, when Nextbridge was considering the path along Loon Lake, a petition requesting that another path for this transmission line be found was circulated to residents and campers of Loon Lake. A majority of property owners signed this petition making it clear that we want the proposed path moved outside of Loon Lake's watershed.</p> <p>We hope you will consider our concerns as your own. We are asking Hydro One to follow the</p>		

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	preferred route, away from Loon Lake, as determined by Nextbridge, and reject the proposal to twin the existing transmission line along Loon Lake. We ask this of you so that Loon Lake, its environment and community, can be preserved for the present and for years to come.		
	West Loon Lake Campers' Association, Maggie Nattress, President, Letter Dated August 21, 2018 to Melissa Fast, Hydro One Networks Inc. (HONI)		
WLLCA - 1	<p>This letter is written on behalf of the members of the West Loon Lake Campers Association (WLLCA) to convey the Association's strong opposition to the Reference Route Alternative in the Dorion/Loon Lake Area proposed in the revised draft Terms of Reference.</p> <p>Loon Lake is a high-value recreational area with more than 200 seasonal and year round residential waterfront properties. The existing 230kV transmission line on the north shore of the lake is clearly visible from most properties. The towers and lines are both unsightly and take away from the beauty and natural surroundings of the Lake. Construction of a new transmission line in the existing transmission corridor will have a large negative impact on an area that provides cultural, recreational, social and economic benefit for a large population of residents.</p> <p>The subject Reference Route Alternative Section was previously considered by Nextbridge Inc. during their EA study. It was later abandoned for a more favorable route near the Greenwich wind farm and Escape Lake Rd corridor. This route had</p>	<p>Hydro One recognizes the level of consultation that occurred with community members and would like to reiterate that it's preferred route remains the route that bypasses Loon Lake. Hydro One has been asked to study an alternative route during our Individual Environmental Assessment (EA) which is why it has been included in our Terms of Reference document. Throughout the entire lifespan of planning and building electrical infrastructure, including during the EA, Hydro One makes all efforts to demonstrate thorough analysis of all factors along our reference route and reference route alternative sections.</p> <p>There is currently not an approved EA for the project but Hydro One will be using as much publicly available information as possible</p>	No changes required.

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	<p>many benefits including passage through predominantly Crown land, industrial road access, minimal impacts on recreational and residential properties, and minimal encroachment on many of the sensitive speckled trout lakes in the area. This is the Reference Route being considered by Hydro One and it is the only route that was presented by Hydro One during many public consultations. Hydro One only recently introduced a new Reference Route Alternative Section. This was done without appropriate public information and consultation, and only 4 business days (Aug 15 – Aug 21) have been allowed for public comment. Hydro One has stated that the new Reference Route Alternative Section must be considered based on feedback received on the draft TOR from the MNRF, however documents and feedback made available to the public lack any rationale for the inclusion of the new route.</p> <p>It is the opinion of the WLLCA that Hydro One is attempting to re-establish the study of an inferior route with many significant and unwelcome impacts as a low-cost route option for the project, and clearly to the detriment of the residents Loon Lake area. As such, the WLLCA respectfully requests that Hydro One immediately remove this Reference Route Alternative Section from the draft TOR.</p>	<p>from previous consultation and studies when assessing the routes. Community input is important to Hydro One, and as the project goes through the regulatory process for approvals there will be additional opportunities for stakeholders to formally comment on the project. Stakeholders will be able to provide comments during the Ministry of the Environment, Conservation and Parks public review period for Hydro One’s Terms of Reference, and during the Environmental Assessment stage.</p>	
	Wildlands League, Anna Baggio, Director Conservation Planning, Letter Dated August 21, 2018 to Paul Dobson, Hydro One Networks Inc. (HONI)		
WLL - 1	CPAWS Wildlands League is writing to urgently request that you avoid Pukaskwa National Park in the proposed Lake Superior Link Transmission	Throughout the entire lifespan of planning and building electrical infrastructure, including during	No changes required.

	Stakeholder Comment	Hydro One Response Provided	ToR Section Revision
	<p>Project. This Hydro One project is currently undergoing consultation on its revised draft Terms of Reference for an independent environmental assessment under the province’s Environmental Assessment Act and its preferred route would extend through the National Park.</p> <p>Wildlands League does not support renewing or replacing existing transmission through Pukaskwa National Park because it is inconsistent with the maintenance and restoration of ecological integrity (the first priority in managing all aspects of the Park). We urgently advise Hydro One to use an alternative around the Park called the Reference Route Alternative.</p> <p>Hydro One’s preferred route through the Park would delay restoration of the Park’s ecological integrity and ultimately lead to more fragmentation and disturbance within the Park. This is not in the public interest and not consistent with the first priority of maintaining and restoring ecological integrity. A line through the Park, including a proposal to renew or replace existing transmission, must be rejected because it would be moving park management in the wrong direction on the ecological integrity continuum. Hydro One must avoid Pukaskwa National Park and phase out the existing transmission line so the Park’s ecological integrity can be restored, allowing the Park to fulfill its proper role in helping to preserve the nation’s biodiversity.</p> <p>In May of this year, the Honourable Catherine</p>	<p>the EA, Hydro One makes all efforts to demonstrate thorough analysis of all factors along our reference route and reference route alternative sections.</p> <p>There is currently not an approved EA for the project but Hydro One will be using as much publicly available information as possible from previous consultation and studies when assessing the routes. Community and stakeholder input is important to Hydro One, and as the project goes through the regulatory process for approvals there will be additional opportunities for stakeholders to formally comment on the project. Stakeholders will be able to provide comments during the Ministry of the Environment, Conservation and Parks public review period for Hydro One’s Terms of Reference, and during the Environmental Assessment stage.</p> <p>Hydro One is also working with Parks Canada to fulfill all of its obligations under applicable federal laws and policies.</p>	

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	<p>McKenna, Minister of Environment and Climate Change, and Minister responsible for Parks Canada issued a formal declaration¹ reaffirming that “ecological integrity is the first priority in considering all aspects of management of national parks – through focused investments, limiting development, and by working with Indigenous peoples, provinces and territories.” We welcome and support this statement as it reflects our long standing position too.</p> <p>Wildlands League has been following the planning for East-West Tie Expansion Project. We shared our view over five years ago directly with proponent NextBridge Infrastructure that any proposed transmission line must avoid Pukaskwa National Park in order to maintain and restore the ecological integrity of the Park. We were pleased to see that proponent’s preferred route avoid the National Park. This is also consistent with Parks Canada’s direction in 2014 to not allow a study of a route through the Park by then Acting Field Superintendent R. Lessard. This was and still is the correct course of action. Limiting development in the Park is what’s needed at this time.</p> <p>As you may know, Canada is not immune to the biodiversity crisis gripping the planet. Our national parks are key anchors in our country’s protected areas network and we cannot allow them to continue to be degraded. We need them and other new protected areas if we are going to reverse the</p>		

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	<p>decline of biodiversity and meet our obligations under the Convention for Biological Diversity. Wildlands League strongly urges Hydro One to avoid Pukaskwa National Park in order to limit development within the Park, to demonstrate support for affirming maintenance and restoration of ecological integrity as the first priority for Park management, and to support the phase out of the existing transmission line so that the corridor and Park's ecological integrity can be restored.</p> <p>We understand that Hydro One is committed to the communities it serves, and has been rated highly in Canada for its corporate citizenship, sustainability, and diversity initiatives. In order to maintain your reputation as a top utility in Canada for sustainability, we strongly advise you to avoid Pukaskwa National Park.</p>		
	Dorion Concerned Citizens Group, Wayne Tocheri, Email Dated August 21, 2018 to Melissa Fast, Hydro One Networks Inc. (HONI)		
DCCG - 1	<p>Thank you for your recent telephone call advising of Hydro One's intention to commence an alternative reference route for the East-West Tie Transmission Line through Dorion Township.</p> <p>This communication is to advise, on behalf of the Dorion Concerned Citizens Committee (DCCC), that we are deeply disappointed in Hydro One's decision in this regard.</p> <p>Our Committee was formed several years ago when the East-West Tie Transmission Line was proposed; and, Nextbridge (the organization formed to plan,</p>	<p>Hydro One recognizes the level of consultation that occurred with community members and would like to reiterate that it's preferred route remains the route that bypasses Loon Lake. Hydro One has been asked to study an alternative route during our Individual Environmental Assessment (EA) which is why it has been included in our Terms of Reference document. Throughout the entire lifespan of planning and</p>	<p>No changes required.</p>

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	<p>develop, and manage the Line) indicated the proposed route would likely parallel an existing transmission line as much as possible.</p> <p>Our citizens group comprises landowners both on and near the original selected parallel route. We met with Nextbridge officials many times over the study period.</p> <p>It was clear to all interested parties - Nextbridge, affected property owners, Dorion Council and other landowners in Dorion - that there was absolutely no support for the proposed parallel utility line as it would seriously bisect our community and present further negative consequences.</p> <p>In a sincere effort to seek a responsible solution, the DCCC met over many months with Dorion property owners and Council members to identify alternative routes which were then presented to Nextbridge for their consideration.</p> <p>After numerous meetings and correspondence, a clear consensus was achieved which confirmed support for the "Dorion Loop" - a route behind the Ouimet Canyon.</p> <p>This Dorion Loop route, supported by the new affected property owners as well as Dorion Council, and Dorion ratepayers in general, was in due course, fully embraced by Nextbridge as the preferred reference route.</p>	<p>building electrical infrastructure, including during the EA, Hydro One makes all efforts to demonstrate thorough analysis of all factors along our reference route and reference route alternative sections.</p> <p>There is currently not an approved EA for the project but Hydro One will be using as much publicly available information as possible from previous consultation and studies when assessing the routes. Community input is important to Hydro One, and as the project goes through the regulatory process for approvals there will be additional opportunities for stakeholders to formally comment on the project. Stakeholders will be able to provide comments during the Ministry of the Environment, Conservation and Parks public review period for Hydro One's Terms of Reference, and during the Environmental Assessment stage.</p>	

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	While we understand your intention to examine a parallel route alternative, please be assured that the DCCC does not support a parallel alternative and will pursue all opportunity to oppose it.		
Local resident, Email Dated August 19, 2018 to Melissa Fast, Hydro One Networks Inc. (HONI)			
LR - 1	<p>Hydro One has failed to provide adequate information and public consultation on the revised draft TOR and the new Reference Route Alternative Section in the Dorion/Loon Lake area:</p> <ul style="list-style-type: none"> • Hydro One has held numerous public consultations and open houses about the Superior Link proposal and has only communicated the Reference route. No alternative routes in the Dorion and Loon Lake areas were ever proposed during public consultations. • Hydro One only recently introduced a new Reference Route Alternative Section in the Dorion/Loon Lake area in a revised draft Terms of Reference (TOR). Hydro One has advised that the Reference Route Alternative Section was added based on feedback from the MNRF, however documents and feedback made available to the public lack any rationale for the inclusion of the new Route in the revised draft TOR. • Hydro One publicly announced revisions to the draft TOR on August 15, 2018, and Hydro One has set a deadline for public comment of August 21, 2018. This clearly does not allow adequate time for the public to comment on the new Reference Route Alternative Section in the Dorion/Loon Lake area. 	<p>Hydro One recognizes the level of consultation that occurred with community members and would like to reiterate that it's preferred route remains the route that bypasses Loon Lake. Hydro One has been asked to study an alternative route during our Individual Environmental Assessment (EA) which is why it has been included in our Terms of Reference document. Throughout the entire lifespan of planning and building electrical infrastructure, including during the EA, Hydro One makes all efforts to demonstrate thorough analysis of all factors along our reference route and reference route alternative sections.</p> <p>There is currently not an approved EA for the project but Hydro One will be using as much publicly available information as possible from previous consultation and studies when assessing the routes. Community input is important to</p>	No changes required.

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	<ul style="list-style-type: none"> • Hydro One is planning a Community Information Centre (CIC) meeting in Dorion to provide details on the Reference Route Alternative Section in the Dorion/Loon Lake area. This CIC will not be held until August 30, 2018, which is well beyond the August 21 deadline for public comment on the revised draft TOR. • Hydro One has failed to provide a CIC in Municipality of Shuniah where the majority of affected residents reside. • Hydro One has failed to include the West Loon Lake Campers' Association in the Project Notification List, and have not notified the Association of the project status. 	<p>Hydro One, and as the project goes through the regulatory process for approvals there will be additional opportunities for stakeholders to formally comment on the project. Stakeholders will be able to provide comments during the Ministry of the Environment, Conservation and Parks public review period for Hydro One's Terms of Reference, and during the Environmental Assessment stage.</p>	
LR - 2	<p>Nextbridge had previously considered the reference route alternative in the Dorion/Loon Lake area, and this route was not found to be viable. Hydro One needs to remove this route from the draft TOR otherwise it would re-establish the study of an inferior route with many significant and unwelcome impacts.</p> <ul style="list-style-type: none"> • Loon Lake has a total of 219 waterfront dwellings and is an important, high-value recreational area. Loon Lake is also one of the most densely populated areas along the existing 230kV transmission corridor between Wawa and Thunder Bay. • The existing 230kV transmission line is clearly visible from most shoreline properties. The towers 	<p>Hydro One recognizes the level of consultation that occurred with community members and would like to reiterate that it's preferred route remains the route that bypasses Loon Lake. Hydro One has been asked to study an alternative route during our Individual Environmental Assessment (EA) which is why it has been included in our Terms of Reference document. Throughout the entire lifespan of planning and building electrical infrastructure, including during the EA, Hydro One makes all efforts to demonstrate thorough analysis of</p>	No changes required.

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	<p>and lines are both unsightly and take away from the beauty and natural surroundings of the Lake. This transmission line was constructed in the 1960's without giving notice to property owners at Loon Lake and without an environmental assessment. Twinning this route would repeat the errors of the past.</p> <ul style="list-style-type: none"> • Construction of a new transmission line in the same corridor will have a large negative effect on an area which provides cultural, recreational, social and economic benefit for a large population of residents. • The Loon Lake area has already borne more than its share of the burden created by modern utilities. Besides the existing transmission line on the north shore of the lake, a CP Rail line, a Transcanada Inc pipeline, a highway, and two other Hydro One transmission lines encroach the south shore of the lake. • Nextbridge previously considered the subject Reference Route Alternative Section which twins the existing transmission line on the north shore of Loon Lake. A significant amount of public consultation occurred between Nextbridge and the residents in the Loon Lake, and the East and West Loon Lake Campers Associations. • A Petition of the West Loon Lake area yielded 154 signatures from local residents who were strongly opposed to this route and were in favour of a more 	<p>all factors along our reference route and reference route alternative sections.</p> <p>There is currently not an approved EA for the project but Hydro One will be using as much publicly available information as possible from previous consultation and studies when assessing the routes. Community input is important to Hydro One, and as the project goes through the regulatory process for approvals there will be additional opportunities for stakeholders to formally comment on the project. Stakeholders will be able to provide comments during the Ministry of the Environment, Conservation and Parks public review period for Hydro One's Terms of Reference, and during the Environmental Assessment stage.</p>	

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	<p>northern route outside of the Loon Lake water shed.</p> <ul style="list-style-type: none"> • The Municipality of Shuniah passed a Resolution in support of the Loon Lake Campers Association's position to have the East-West Tie Line located outside the Loon Lake watershed and urged Nextbridge Inc to seriously review and consider re-routing the proposed East-West Tie Line. • The Loon Lake Campers' Association's worked closely with Nextbridge to establish the subject Reference Route near the Greenwich wind farm and Escape Lake Rd corridor. This route had many benefits. They include passage through predominantly Crown land, industrial road access, minimal impacts on recreational and residential properties, and minimal encroachment on many of the sensitive speckled trout lakes in the area. • In the end, Nextbridge concluded that the route paralleling the existing transmission line was not viable for a significant number of reasons, and the subject Reference Route had many benefits. Nextbridge solely adopted the subject Reference Route in their TOR for study in the Environmental Assessment. • It is both frustrating and disappointing that the past efforts of many to establish the best possible route are being undermined by Hydro One, and that Hydro One is attempting to re-establish the study of an inferior route with many significant and 		

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	unwelcome impacts. Hydro One’s interest is clearly to introduce a low-cost route option to the detriment of the residents Loon Lake.		
	Local resident 2, Email Dated August 19, 2018 to Melissa Fast, Hydro One Networks Inc. (HONI)		
LR 2 – 1	<p>I wish to object to the inclusion of a new Reference Route Alternative in your Terms of Reference for the Lake Superior Link.</p> <p>I’m speaking of the alternate route proposed to run parallel to the existing right of way through the township of Dorion and Loon Lake. Specifically, I am concerned about any proposal to twin the current route as it passes close to Loon Lake.</p> <p>Having reviewed the feedback to the draft Terms of Reference from the MNRF that has prompted this alternative, I am concerned about the lack of a rationale for the Reference Route Alternative’s inclusion.</p> <p>No where in the documents made available to the public does it say why the MNRF official who made the “suggestion” believes the alternate route should be included.</p> <p>This should disqualify the inclusion of the alternate route from the get-go.</p> <p>Presumably this is a judgement on the forest values affected by the Reference Route as it passes by Dorion and near the Greenwich Wind Farm north of Loon Lake.</p>	<p>Hydro One recognizes the level of consultation that occurred with community members and would like to reiterate that it’s preferred route remains the route that bypasses Loon Lake. Hydro One has been asked to study an alternative route during our Individual Environmental Assessment (EA) which is why it has been included in our Terms of Reference document. Throughout the entire lifespan of planning and building electrical infrastructure, including during the EA, Hydro One makes all efforts to demonstrate thorough analysis of all factors along our reference route and reference route alternative sections.</p> <p>There is currently not an approved EA for the project but Hydro One will be using as much publicly available information as possible from previous consultation and studies when assessing the routes. Community input is important to Hydro One, and as the project</p>	No changes required.

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	<p>I should point out that the northerly route is in the heart of the industrial forest. The proposed Reference Route has already been subject to considerable disturbance, including several forest access roads and extensive logging. Given this disturbance, this northerly route is not currently in conflict with other forest values.</p> <p>Contrarily, except for the shoreline of Loon Lake itself, the area of the alternative route is disturbed only by the current Hydro One right-of-way. Loon Lake is an important, high-value recreation area that the MNRF official appears to have failed to recognize.</p> <p>You should be aware, however, that the Municipal Council of Shuniah has recognized the recreational values of the lake. Shuniah council in fact passed a resolution asking Nextbridge to avoid Loon Lake for its proposed routing of its project.</p> <p>My concern is that the construction phase of any alternate route near Loon Lake will cause erosion of soils into and the siltation of Loon Lake, a noted speckled trout lake. (I should point out that this is one of the reasons that the MNRF has refused to allow logging in the area directly north of Loon Lake. This exclusion zone runs northward to the point just below Greenwich Lake where the current Reference Route is proposed.) I am also concerned that the long-term impact of a doubling of the current right-of-way will adversely impact the flow</p>	<p>goes through the regulatory process for approvals there will be additional opportunities for stakeholders to formally comment on the project. Stakeholders will be able to provide comments during the Ministry of the Environment, Conservation and Parks public review period for Hydro One's Terms of Reference, and during the Environmental Assessment stage.</p>	

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	<p>of groundwater into Loon Lake. Groundwater upwelling from the bottom of Loon Lake is important for the survival of the trout. This upwelling is also important to the existence of the lake itself. There are no major inflows into Loon Lake. Without the upwelling, the lake could well be merely a low-lying swamp.</p> <p>For the above reasons, I urge you to reject the suggestion to include the Reference Route Alternative in the Terms of Reference and to explain the rationale for the decision to the Ministry of the Environment.</p>		

5 Indigenous Community Feedback and Comments

The following section summarizes the questions and comments provided to Hydro One on the release of the Draft Terms of Reference for review. This includes comments and questions provided to Hydro One at Community Information Centres, dedicated meetings held with Indigenous communities, and those received during the review periods for the Draft ToR.

Comments that resulted in a change to the Terms of Reference are noted in the “Hydro One Response Provided” column with the statement “change made”. The statement, “no change required” signifies that no changes were required or made to the Terms of Reference as a result of the comment.

5.1 Indigenous Community Comments

Table 5.1-1 summarizes Indigenous community questions and comments provided to Hydro One during the Community Information Centres held. Responses to each of the questions and/or comments are provided below.

Table 5.1-1: General Indigenous community comments received at the Community Information Centres

Indigenous Community Comment	Hydro One Response
Biigitgong Nishnaabeg (Ojibways of the Pic River First Nation)	
When will the next meeting be on updates?	Hydro One will meet regularly with community members as the project progresses to keep them updated.
Is there going to be any disruption in any waterways?	Disruption to watercourses/waterways will be limited to temporary watercourse crossings (i.e., bridges, culverts, etc.) needed for temporary access roads during the construction period for the project. Mitigation measures to protect fish and fish habitat, including restoration of site crossings, will be implemented in accordance industry best management practices and conditions of applicable permits/authorizations for the works.
Is there going to be any power interruptions during this time?	No temporary power outages are required for the development of the Project.
Are they going to hire any of the people trained (Supercom) for this project?	The training provided through the Supercom programs will continue to be relevant for the construction and maintenance of the transmission line, regardless of which proponent is awarded the Leave to Construct. Hydro One is committed to maximizing the employment of members from local Indigenous communities including those who have received or who are currently completing project related skills training.
Are they going to make more access roads, even when not needed?	Hydro One will continue the same maintenance access for LSL as it has with the existing EWT which

	is largely done through helicopters. No additional permanent accesses are required. The construction will focus on using helicopters to minimize the need for these temporary access roads.
Are there any chemicals being used that would interfere in our land?	Herbicides will not be used during the construction phase. Targeted, hand-applied herbicides may be used for vegetation control purposes during operations and maintenance but Hydro One has not aerial sprayed herbicides for close to 60 years.
Biinjitiwaabik Zaaging Anishinaabek First Nation (Rocky Bay)	
Why is our community being consulted given how far the community is from where the transmission line would be built?	In their letter dated March 2, 2018, the Ministry of Energy determined that Hydro One's proposed Lake Superior Link Project may have the potential to affect First Nation and Métis communities who hold or claim Aboriginal or Treaty rights protected under Section 35 of Canada's Constitution Act 1982. Based on the Crown's assessment of First Nation and Métis community rights and project impacts, the Crown listed Aboriginal communities that should be consulted on the basis that they have or may have constitutionally protected Aboriginal or treaty rights that may be adversely affected by the project.
Pic Mobert First Nation	
Would Hydro One employ those community members who had been trained or are receiving training through the arrangement made between NextBridge and Supercom Industries?	The training provided through the Supercom programs will continue to be relevant for the construction and maintenance of the transmission line, regardless of which proponent is awarded the Leave to Construct. Hydro One is committed to maximizing the employment of members from local Indigenous communities including those who have received or who are currently completing project related skills training.
Red Rock Indian Band	
If a dead eagle were found in the course of the field study or construction stages, could it be given to Red Rock Indian Band so that they can make use of the feathers?	Hydro One agreed to share any dead eagle found in the course of the field program or construction stages with Red Rock Indian Band. Hydro One will inform field staff and construction teams of the dead wildlife protocol.

Table 5.1-2 summarizes Indigenous community questions and comments provided to Hydro One during the draft ToR review period. Responses to each of the questions and/or comments are provided below.

Table 5.1-2: Indigenous community Comments Received During the 30 Day Review Period

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
No.	Biigtigong Nishnaabeg, Duncan Michano, Chief, Letter Dated July 9, 2018 to Steven Mantifel, Hydro One Networks Inc. (HONI)		
SVS 1	SVS Technical Review Report, Introduction Page 1 <i>"In addition to completing this initial review, SVS has previously provided a memo, date June 22, 2019 with a list of 6 issues regarding the Draft ToR and 20 questions to be brought to HONI during an open house meeting on June 25, 2018, under separate cover. As of the date of this report (July 5, 2018) there has been no correspondence in reply from HONI from these concerns."</i>	Comment noted; no change required. As of the date of this document, Hydro One has not received any of the identified correspondence from either Biigtigong Nishnaabeg or SVS. Hydro One held a CIC in Biigtigong Nishnaabeg on June 25, but was not asked, nor did it receive a list of 20 questions to address. Hydro One would be pleased to discuss any comments, questions or concerns either Biigtigong Nishnaabeg or representative SVS may have on the LSL project.	No changes required.
BN – 1a	Biigtigong Nishnaabeg requires HONI to thoroughly review a "do nothing" alternative within the EA. Using a "do nothing" alternative is a normal and accepted methodology in Ontario EAs. In this case, the "do nothing" alternative would likely include the existing OEB designated NextBridge EWT project proceeding to construction and operation. The existing OEB designated NextBridge EWT project is a reasonably foreseeable project that is likely to proceed. As such, the "do nothing"	"Proceeding with the Project" will be compared to the "do nothing" alternative in the EA. This approach is proposed given that the provincial government has already analyzed options for supplying electricity for Northwestern Ontario and identified the Project (Expansion of the East-West Tie) as the	Changes made to Table 3, and Section 6.2.

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
	alternative is a reasonable and practical component for the HONI EA.	preferred alternative. The “Do Nothing” alternative has historically included the use of existing infrastructure and/or the use of planned, <u>approved</u> infrastructure. The NextBridge project/alternative has not been approved and will therefore not be included as part of the “Do Nothing” scenario.	
BN – 1b	Biigtigong Nishnaabeg requires HONI to conduct an updated needs assessment for the LSL project EA, with more recent economic growth data for Northwestern Ontario, more recent data on the electricity needs of the mining sector in Northwestern Ontario, and transmission and generation options that include advances in distributed energy resources, and the use of such systems for providing reliable electricity to the mining sector.	On December 1, 2017, the IESO submitted its Updated Assessment of the Need for the East-West Tie Expansion to the Ministry of Energy. In the Updated Need Assessment, the IESO concluded that Northwest capacity needs and the options to address them demonstrate that the east-west tie line project continues to be the preferred option for meeting Northwest supply needs under a range of system conditions (See IESO Updated Assessment of the Need for the East-West Tie Expansion, December 1, 2017). The request for a needs re-assessment should be directed to the IESO, the provincial planning body responsible for identifying system energy needs.	No changes required.
BN – 2a	HONI must provide First Nations including BN with a seat at the decision-making table to have	Hydro One’s Indigenous engagement program is designed	No changes required.

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
	<p>meaningful input and allow for a full and complete assessment of the implications of the Project alternatives.</p>	<p>to provide relevant project information to Indigenous communities in a timely manner. The process enables affected Indigenous communities to review the project proposals, provide input on project alternatives, and raise issues, concerns and questions they may have with the Project. Hydro One has, and will continue to meet with Indigenous communities to collect information and discuss any concerns/questions/feedback communities may have on all aspects of the Project, including the alternatives assessment. Comments/concerns raised through this process will be taken into consideration during the identification and evaluation of alternatives, and changes will be made where necessary/feasible.</p>	
BN – 2b	<p>HONI must include detailed plans on the assessment of their preferred route and how they will protect traditionally important areas to BN.</p>	<p>The EA will document and demonstrate the advantages and disadvantages of the reference route and alternative reference route(s). Avoidance of traditionally important areas (e.g., cultural and spiritual) to Indigenous communities is an element of the alternatives assessment under the socio-</p>	<p>Section 6 has been modified to clarify further alternatives assessment methods.</p>

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
		<p>economic environment factor and the corresponding indicators and criteria for evaluation. Where impacts are identified, Where applicable mitigation measures will be identified to protect and/or avoid traditionally important areas to the BN.</p> <p>Through the CFA process, Hydro One seeks permission to utilize any available Traditional Knowledge studies that are available to help with the assessment. Hydro One will also provide assistance to BN in the development and/or completion of these studies if they are not complete at this time.</p>	
BN – 3a	<p>HONI must commit in the ToR to provide a comprehensive Environmental Assessment study, while following regulatory guidelines and having sufficient time for meaningful consultation with BN and other First Nations. HONI must demonstrate how they will achieve both these goals in the tight timelines without compromising on either.</p>	<p>The preparation of a ToR in support of an Individual EA demonstrates Hydro One’s commitment to completing a comprehensive EA study. The LSL Individual EA will be prepared in accordance with all applicable legislation, regulations and guidelines to ensure any potential environmental effects are either avoided and/or mitigated. A critical component of this process is the engagement of Indigenous communities and other stakeholders. Hydro One is</p>	<p>No changes required.</p>

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
		committed to full and meaningful engagement with all interested persons and Indigenous communities to ensure feedback is incorporated into the EA study in a timely manner and within the timelines prescribed by the EA Act.	
BN – 4a	HONI must commit in the ToR to provide detailed plans on how they will ensure that existing electrical customers on the EWT line have reliability of supply during construction and maintenance of the LSL. HONI must provide proof that a twinned line will have better reliability of supply than a line on a separate corridor.	The Individual Environmental Assessment Terms of Reference deals with requirements laid out by EA Act, for which MECP is regulator. Reliability of supply during construction and maintenance of the LSL, contingency plans for accidents and malfunctions, status of existing towers etc. is something which is not covered by EA Act, and therefore not part of IEA ToR, but it is a subject of Leave to Construct S.92 process, for which OEB is regulator. Hydro One will address these concerns during the S.92 process and ensure they meet engineering and design specifications.	No changes required.
BN – 4b	HONI must commit in the ToR to provide detailed contingency plans for accidents and malfunctions and how they will limit the duration and frequency of power outages for customers on the existing EWT line.	Both commitments to monitoring and environmental protection Planning will be identified in the EA for implementation during the construction and operation phases of the Project.	Section 7 and 8 discuss potential effects and monitoring programs to be developed during the EA process. These have been revised according to regulatory comment.

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
		<p>The Individual Environmental Assessment Terms of Reference deals with requirements laid out by EA Act, for which MECP is regulator.</p> <p>Reliability of supply during construction and maintenance of the LSL, contingency plans for accidents and malfunctions, status of existing towers etc. is something which is not covered by EA Act, and therefore not part of IEA ToR, but it is a subject of Leave to Construct S.92 process, for which OEB is regulator. Hydro One will address these concerns during the S.92 process and ensure they meet engineering and design specifications.</p>	
BN – 5	<p>HONI must commit in the ToR to assessing all existing towers to ensure that they meet current and future standards for reliability and structural stability in our changing climate. HONI must provide rationale for maintaining existing structures, upgrading towers or tower replacement.</p>	<p>The only structures on the existing EWT that will be modified are the 86 structures going through the Pukaskwa National Park. Each of these double circuit structures will be replaced by new quad circuit structures. The design of these structures will meet all relevant current codes including: OEB Minimum Technical Requirements; OEB Minimum Design Criteria; Overhead Systems, CSA 22.3 No.1-15, Canadian Standards Association,</p>	<p>No change required.</p>

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
		<p>June 2015 (“CSA Overhead Systems Standard”); Design Criteria of Overhead Transmission Lines, CSA 22.3 No. 60826:10, Canadian Standards Association, December 2010 (“CSA Design Criteria Standard”); and Guidelines for Electrical Transmission Line Structural Loading, American Society of Civil Engineers Manual No. 74, Fourth Edition, 2016 (“ASCE Structural Loading Manual”).</p> <p>Climate change will be assessed in the evaluation of alternatives as well as part of mitigation measures and integrated into engineering design.</p> <p>The Individual Environmental Assessment Terms of Reference deals with requirements laid out by EA Act, for which MECP is regulator.</p> <p>Reliability of supply during construction and maintenance of the LSL, contingency plans for accidents and malfunctions, status of existing towers etc. is something which is not covered by EA Act, and therefore not part of IEA ToR, but it is a subject of Leave to Construct S.92 process, for which OEB is regulator. Hydro One</p>	

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
		will address these concerns during the S.92 process and ensure they meet engineering and design specifications.	
BN – 6	HONI must perform detailed assessments of water quality at each water body crossing during baseline conditions. All waterbody crossings must have at minimum an assessment of the baseline conditions for water quality including temperature, dissolved oxygen, total suspended sediments, conductivity, nutrients and metals. This data should then be used during construction monitoring to determine exceedances to baseline water quality and when to implement contingency measures.	The assessment of water quality will be conducted at select and representative waterbodies, particularly those where temporary access road crossings are proposed, to characterize baseline conditions for the impact assessment and to use during the construction monitoring program to determine effectiveness of mitigation measures and need for contingency measures. The potential to affect water quality may occur during construction through erosion, inappropriate sediment control, inappropriate vehicle maintenance practices, or fuel/lubricant spills. A component of the environmental protection plan will be the implementation of sediment and erosion control measures when working near waterbodies, the development of a vehicle refuelling and maintenance plan and procedures that prohibits such activities near waterbodies, and the availability of on-site spill kits. These and other appropriate mitigation	Additional information on surface water has been added to Section 5.2.2

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
		measures and environmental operational procedures will be identified in the EA to ensure that water quality impacts during construction and maintenance periods are minimized and/or avoided.	
BN – 7a	HONI needs to complete sufficient baseline studies of all potential water body crossings along the reference route to give BN assurance that indicators of impacts will be detected during construction or that existing exceedance can be mitigated for.	Water body crossings will be characterized to ensure sufficient baseline data is available to inform the EA and secure all other permits and/or authorizations where applicable. The focus of this work will be on those waterbodies where temporary access road crossings are proposed, and/or where substantive in-water or near work will occur during the construction phase.	Additional information on surface water has been added to Section 5.2.2
BN – 7b	An assessment of the flow regime including mean annual flow must also be completed at each watercourse crossing.	An assessment of mean annual flow at select watercourses will be conducted through the review of background information sources and field surveys. The focus of determining surface flow rates at watercourses will be to address appropriate design sizing of structures needed for temporary access road crossings and to generally characterize the hydrology in the local study area for the Reference Route.	Additional information on surface water has been added to Section 5.2.2. Additional information on waterbodies and fish habitat has been added to Section 5.2.6
BN – 8a	HONI must commit in the ToR to provide a good	Where studies have been	Additional information on

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
	<p>characterization and understanding of the fish and fish habitat along the Project Footprint to ensure that important fish species to BN are protected and their habitat is not compromised. Fish surveys are needed to locate critical fish habitat as well as fish presence and assemblages This is especially important within the Pukaskwa National Park where no recent surveying has been completed.</p>	<p>conducted on the proposed corridor and they apply to the project, Hydro One will not duplicate these studies, but instead use publicly available information to inform assessment efforts. Hydro One will conduct the appropriate studies where information is needed to satisfy the EA requirements. The current preliminary focus of field surveys includes Pukaskwa National Park, the transmission corridor between Wawa and Marathon, the Dorion area, temporary and permanent access roads, laydown areas, fly yards and any additional areas identified as a concern. This will include aquatic habitat assessments to characterize fish community, and quality and sensitivity of fish habitat, including species at risk. Hydro One will continue to engage regulators to ensure the baseline data is adequate for the EA.</p>	<p>waterbodies and fish habitat has been added to Section 5.2.6</p>
BN – 8b	<p>HONI must commit in the ToR to complete fish habitat surveys to determine fish presence in and around (upstream and downstream) of crossings and using the information to determine the crossing structures and potential mitigation measures.</p>	<p>Where studies have been conducted on the proposed corridor and they apply to the project, Hydro One will not duplicate these studies, but instead use publicly available information to inform assessment</p>	<p>Additional information on waterbodies and fish habitat has been added to Section 5.2.6.</p>

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
		<p>efforts. Hydro One will conduct the appropriate studies where information is needed to satisfy the EA requirements. The current preliminary focus of field surveys includes Pukaskwa National Park, the transmission corridor between Wawa and Marathon, the Dorion area, temporary and permanent access roads, laydown areas, fly yards and any additional areas identified as a concern. This will include aquatic habitat assessments to characterize fish community, and quality and sensitivity of fish habitat, including species at risk. Hydro One will continue to engage regulators to ensure the baseline data is adequate for the EA.</p>	
BN – 8c	<p>HONI must commit in the ToR to an Environmental Protection Plan that integrates the fish habitat survey results and mitigation measures being added to the Plan based on the field surveys.</p>	<p>It is recognized that the preparation of an Environmental Protection Plan (EPP) is necessary to ensure impacts to water crossing areas are minimized or avoided. An EPP for the construction phase will be developed during the EA and protection and mitigation measures, including those specific to fish habitat, will be defined at that time. The EPP is expected to include compilation of</p>	<p>Mitigation measures are discussed in Section 8 and will be further developed during the EA process.</p>

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
		environmental protection measures, contingency plans, and management plans with the objective to address known and anticipated environmental conditions or events that could occur during the construction of the Project.	
BN – 9	HONI must commit in the ToR to avoid placing transmission towers in PSWs, ANSIs, ESAs and in areas of traditionally importance to BN.	Effort will be made to avoid PSWs, ANSIs, ESAs and areas of traditional importance, where possible. This will be a consideration in assessing the advantages and disadvantages of routing alternatives using natural, socio-economic and technical criteria and indicators. Information from Indigenous communities relating to traditional knowledge and values will be incorporated into evaluation of alternative routing and refinement of the preferred route.	Environmentally significant areas are discussed further in Section 5.2.3.
BN – 10a	HONI must commit in the ToR to using guidelines for riparian buffers based on slope, such as the MNRG Guide for Conserving Biodiversity at the Stand and Site Scales to protect adjacent waterbodies, at a minimum.	The MNRG Guide for Conserving Biodiversity at the Stand and Site Scales will be considered with respect to vegetation management and retention of riparian buffers at waterbodies, in addition to other applicable regulations, policies and guidelines We note that the MNRG	No changes required.

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
		guide provides direction for forest management planning teams and practitioners to help them plan and implement specific forest operations, and as such it is not specifically applicable to linear infrastructure developments, such as the LSL project. However, the primary objective noted in the guide of ensuring biodiversity at the stand and site scales will be considered.	
BN – 10b	HONI must commit in the ToR to limit removal of existing riparian buffers along the Project Footprint.	Hydro One will make its best efforts to limit removal of existing riparian buffers along the Project footprint, where possible. This will be a consideration in assessing the advantages and disadvantages of project route alternatives.	Section 6 further discusses alternative assessments.
BN – 10c	HONI must commit in the ToR to restore disturbed riparian buffers as soon as possible and look for opportunities to improve marginal riparian buffers where possible along the Project Footprint.	Hydro One will make its best efforts to restore riparian buffers that have been disturbed by construction activities, where possible.	No changes required.
BN – 11	HONI must commit in the ToR to providing detailed analysis on the crossing structures and flow needs of each water body crossing to determine how flow hydraulics and connectivity will be maintained.	An analysis of flow conditions at waterbody crossings will be undertaken to assess the appropriate sizing and type of structures (bridges, culverts) needed to convey hydraulic conditions in accordance with the MNRF guidelines and design criteria for temporary access road	Additional information on surface water has been added to Section 5.2.2. Additional information on waterbodies and fish habitat has been added to Section 5.2.6

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
		crossings of waterbodies.	
BN – 12a	HONI must commit in the ToR to complete all necessary baseline studies for the entire study area to show their due diligence and gain a full understanding of both the existing environmental conditions and the resulting potential effects. This will ensure that HONI is taking responsibility of the Project and its effects by ensuring that baseline data is sufficient, reliable, scientifically sound, and protective of the environment. These studies need to be thorough and multi-seasonal to account for natural temporal variability in species presence and identifiability.	Where studies have been conducted on the proposed corridor and they apply to the project, Hydro One will not duplicate these studies, but instead use publicly available information to inform assessment efforts. Hydro One will conduct the appropriate studies where information is needed to satisfy the EA requirements. The current preliminary focus of field surveys includes Pukaskwa National Park, the transmission corridor between Wawa and Marathon, the Dorion area, temporary and permanent access roads, laydown areas, fly yards and any additional areas identified as a concern. Hydro One will continue to engage regulators to ensure the baseline data is adequate for the EA.	Section 5 discusses the environments to be assessed and methodology associated with it.
BN – 12b	HONI must commit in the ToR to completing any mammal surveys beyond winter aerial surveys, and define which species the intended aerial surveys will be evaluating.	On May 23, 2018, Hydro One provided Biigtigong Nishnaabeg a copy of its Natural Heritage Field Work Plans for review and comment. A component of the wildlife fieldwork program includes conducting mammal surveys and is supplemental to the Woodland Caribou winter aerial surveys completed in winter 2018.	Section 5.2.4 further discusses terrestrial wildlife and habitat.

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
		<p>The results of these surveys, as well as those others will be described and documented in the Individual EA Report and supporting technical reports.</p> <p>To date no comments or feedback on the work plans has been received from Biigtigong Nishnaabeg.</p>	
BN – 12c	<p>HONI must commit in the ToR to incorporating traditional knowledge and traditional ecological knowledge in their baseline studies in order to determine the full extent of Project effects.</p>	<p>Comment noted; No change required.</p> <p>Hydro One is working toward securing Capacity Funding Agreements (CFA) with the 18 identified Indigenous communities. A component of the CFA is the sharing of Traditional Knowledge (TK) and Traditional Land Use (TLU) data that can inform the baselines studies, evaluation of alternatives and impact assessment, including the identification of avoidance, protection and/or mitigation measures. Hydro One will work closely with Indigenous communities to incorporate TK and TLU data to the extent possible, provided this data is shared with Hydro One.</p> <p>Through the Capacity Funding Agreement (CFA) process, Hydro One seeks permission to utilize</p>	<p>Section 5.4.2 discusses Traditional/Indigenous Land Use and will incorporate Traditional Knowledge into aspects of the Project.</p>

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
		any available Traditional Knowledge studies that are available to help with the assessment. Hydro One will also provide assistance to BN in the development and/or completion of these studies if they are not complete at this time.	
BN – 12d	HONI must commit in the ToR to involving First Nations communities in the execution of environmental baseline studies and fieldwork.	<p>On May 18, 2018, Hydro One sent a letter to each of the eighteen (18) Indigenous communities to provide notice it would soon be commencing field studies in support of an EA for the LSL project, and offered each of the communities an opportunity to participate in the field program. The natural heritage field work plans were shared shortly thereafter with communities, and more specifically with BN on May 23, 2018 to allow for the review of the work plans.</p> <p>To date, several First Nations have expressed interest in participating in the field program and are in the process of completing CFAs to accommodate monitors. Some First Nations monitors have already participated in field work. Hydro One will continue to engage Indigenous communities to accommodate those who wish to</p>	No changes required.

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
		participate, and will work to sign CFAs to provide funding for the monitors.	
BN – 13a	HONI must identify if new helipads will need to be created to accommodate this work, or if existing infrastructure can be used. In either case, HONI must complete thorough baseline studies in and around the areas for identified aerial works to ensure that no species of significance (both vegetative and wildlife), significant wetlands, or sensitive habitat areas will be disturbed. Appropriate setback distances and timing restrictions will need to be applied.	The Hydro One baseline studies will cover supportive infrastructure for the Project such as temporary laydown yards, construction camps, fly yards and access roads for evaluation in the EA. The environmental protection plan will guide construction activities and outline mitigations for working in and around sensitive habitat areas.	Section 4 discusses Project infrastructure which includes fly yards and the assessment of these areas is further outlined in Section 5.
BN – 13b	If helicopter work is to occur as part of the Project's ongoing operation and maintenance, HONI must commit to ensuring that no fuelling or mechanical maintenance activities will occur in or around the helipads located in Pukaskwa National Park.	No fly yards will be located within Pukaskwa National Park, and therefore no refuelling or mechanical maintenance activities will occur within the park. All required fly yards will be located outside of PNP. These plans will be further developed as part of the EA.	No changes required.
BN – 13c	HONI will need to undertake vegetation management practices in order to maintain helipads for safe operations. HONI must identify, through a full Vegetation Management Program, how they intend to manage vegetation growth in these remote areas.	Hydro One has developed a Vegetation Management Program for its transmission facilities that will be applied to the LSL project. This program will be implemented with a goal to ensure vegetation does not interfere with the safe and reliable operation and maintenance of the transmission line, or prohibit access to the	No changes required.

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
		transmission line structures. Details of the vegetation management program will be discussed as part of the EA.	
BN – 14a	HONI must commit in the ToR to indicating the anticipated spatial extent of vegetation clearing for construction, and if it is in excess of the proposed 37-46m wide ROW. They must also indicate the extent that such site preparation is expected to occur within Pukaskwa National Park.	<p>In Section 4.2.2 of the ToR specifies: <i>Where the proposed transmission line is adjacent to existing East-West Tie the ROW will typically be up to 37 m wide. A ROW, typically up to 46 m wide, will be cleared of vegetation to accommodate the transmission line around the communities of Dorion and Loon Lake between Nipigon and Lakehead. For the section of line through PNP, the corridor will not be widened and as such no vegetation removals are required outside the existing ROW.</i></p> <p>Therefore, the need for vegetation clearing in excess of the proposed 37-46 m widths is not expected based on the preliminary engineering and construction assessment completed to date. In the event the proposed width requirements for the new transmission line change the EA will assess these effects. Similarly, the need for clearing outside of the ROW through PNP is not expected. Construction within PNP</p>	No changes required.

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
		will be completed via helicopter to minimize impacts. The use of helicopters eliminates the need for access roads, temporary water crossings and heavy machinery traversing the ROW.	
BN – 14b	HONI must commit in the ToR to completing baseline field surveys to ensure that vegetation clearing and site preparation activities will not negatively impact any ecological sensitive areas, wildlife and wildlife habitat, and species-at-risk.	Baseline studies and background data collection will be completed to characterize the environmental features of the project study area and allow for the assessment of potential impacts of the preferred route. Mitigation measures will be identified in the EA to minimize and/or avoid impacts to sensitive areas, wildlife and wildlife habitat, and species at risk. Additionally, Environmental Operational Procedures for the construction phase will be developed and documented in an Environmental Protection Plan, which will include mitigation measures to minimize impacts during site preparation activities (e.g., vegetation clearing and grubbing, topsoil stripping and grading, etc.).	Section 5 outlines proposed environmental assessment of particular environmental components.
BN – 14c	HONI indicates that some construction activities will be staged to minimize potential environmental effects, such as avoiding clearing of vegetation during migratory bird nesting season. HONI must commit in the ToR to avoiding clearing of	As part of the EA, standard mitigation measures and operational timing constraints will identified for clearing activities to protect migratory birds during	No changes required.

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
	vegetation during bat hibernation and maternity roosting period, amphibian breeding and hibernation periods, and turtle nesting periods.	their nesting period, including also bats, amphibians and other wildlife during their key life cycle periods. To address potential effects to wildlife, it is expected that vegetation clearing activities will likely be scheduled to occur in the winter to avoid impacts to ecological sensitive areas, wildlife and wildlife habitat, and species at -risk.	
BN – 14d	HONI must commit in the ToR to explore alternative vegetation management practices, as part of the "alternative method" section of the ToR, to implement during all project phases to avoid the use of herbicides. HONI must also commit in the ToR to no aerial spraying herbicides on or off the ROW.	Hydro One has developed a Vegetation Management Program for its transmission facilities that will be applied to the LSL project. This program includes management practices to minimize and/or avoid the use of herbicides with the goal to ensure vegetation does not interfere with the safe and reliable operation and maintenance of the transmission line. In general, where herbicides are required the storage, handling, and application will comply with the Ontario Clean Water Act (2006). No aerial application of herbicides is typically undertaken on Hydro One transmission line corridors. However, the application of herbicide near rare plants or rare ecological communities, if	No changes required.

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
		required, will be restricted by using spot spraying, wicking, mowing, or hand picking, which are acceptable measures for weed control in these areas. Details of the vegetation management program and practices will be discussed as part of the EA.	
BN – 15	HONI must commit in the ToR to identify if there are any provincially significant wetlands or environmentally sensitive areas within the Project area and identify appropriate mitigation measures and monitoring programs to ensure that these significant areas are appropriately protected. Wetlands in and around the proposed transmission route should be delineated and evaluated using the Ontario Wetland Evaluation System.	An assessment of the environmental effects of the Project on vegetation and wetlands will be described in the EA. In the EA, vegetation and wetlands, including environmental sensitive areas (e.g. Provincially Significant Wetland), will be considered at the ecosystem level (riparian, wetland, upland). Potential environmental effects and mitigation measures will be identified, including predicting the net effects and characterizing the net effects (i.e., after mitigation). Inspection and monitoring programs to assess the effectiveness of mitigation measures during and after construction will also be identified in the EA.	Section 5 outlines proposed environmental assessment of particular environmental components.
BN – 16a	HONI must commit in the ToR to indicating how they intend on collecting and verifying unpublished information and personal communications that will be used to compile known incidences of species at	Known published data sources (e.g., Natural Heritage Information Centre, etc.) will be utilized to inform on the presence/absence	Section 5.2.7 outlines proposed environmental assessment of particular environmental components including Species at

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
	risk.	of species at risk. In addition Hydro One, as part of its baseline field studies, will be undertaking targeted species at risk surveys (e.g., bats, Eastern Whip-poor-will, etc.) throughout the corridor. Where unpublished and/or personal communication is available attempts will be made to verify the data through the fieldwork programs. In addition, anecdotal and unpublished information provided by members of the Indigenous and non-Indigenous communities will be reviewed, verified where possible, and incorporated into the EA.	Risk.
BN – 16b	Desktop studies are not sufficient for determining the presence of species at risk in the Project area, and as such HONI must commit in the ToR to including species at risk surveys as part of their baseline field studies.	On May 23, 2018, Hydro One provided Biigtigong Nishnaabeg a copy of its Natural Heritage Field Work Plans for review and comment. A component of the field program is species at risk surveys. The results of these surveys, as well as those others described in the EA. Where studies have been conducted on the proposed corridor and they apply to the project, Hydro One will not duplicate these studies, but instead use publicly available	Section 5.2.7 outlines proposed environmental assessment of particular environmental components including Species at Risk.

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
		information to inform assessment efforts. Hydro One will conduct the appropriate studies where information is needed to satisfy the EA requirements. The current preliminary focus of field surveys includes Pukaskwa National Park, the transmission corridor between Wawa and Marathon, the Dorion area, temporary and permanent access roads, laydown areas, fly yards and any additional areas identified as a concern. This will include aquatic habitat assessments to characterize fish community, and quality and sensitivity of fish habitat, including species at risk. Hydro One will continue to engage regulators to ensure the baseline data is adequate for the EA.	
BN – 16c	HONI must commit in the ToR to indicating their proposed process for screening locations based on presence/absence of species at risk within the study area that could be directly affected by construction activities.	The screening of habitat suitability for species at risk within study area for the Project will be undertaken followed by field surveys to verify presence/absence of species at risk, including potential effect as a result of the Project.	Section 5.2.7 outlines proposed environmental assessment of particular environmental components including Species at Risk.
BN – 17a	HONI must commit in the ToR to conducting baseline noise surveys in ecologically sensitive and remote areas (including Pukaskwa National Park and known habitat for sensitive birds and wildlife)	Information for the acoustic environment baseline will be collected from review of the existing data sources. As part of	Section 5.2.9 outlines proposed environmental assessment of particular environmental components including Acoustic

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	that will be near construction and maintenance activities.	the data collection process, consideration and input from Indigenous communities, government agencies, other communities, property owners and interest groups will be sought. Baseline conditions will be determined to characterize the existing acoustic environment and identify potential human Points of Reception (or Noise Reception Points) to allow for the evaluation of potential effects, appropriate mitigation measures, and predicted net effects as result of the Project (including Pukaskwa National Park).	Environment.
BN – 17b	HONI must commit in the ToR to restricting noise activities near identified habitat areas during active bat maternity roosting periods, migratory bird nesting periods, amphibian breeding periods, turtle nesting periods, and ungulate calving periods.	During the construction phase, Hydro One and its contractors will comply with the permitted hours stipulated in local municipal noise by-laws, and the MOECC Model Municipal Noise Control Bylaw (i.e., NPC-115). Noise abatement equipment on machinery will be properly maintained and in good working order. Applying the above mitigation and restrictions are anticipated to minimize noise effects to nearby identified habitat areas.	No changes required.
BN – 18a	HONI must commit in the ToR to avoiding the use of aerial spraying of pesticides and herbicides	Hydro One has developed a Vegetation Management Program	No changes required.

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	during construction and line maintenance.	for its transmission facilities that will be applied to the LSL project. This program includes management practices to minimize and/or avoid the use of herbicides with the goal to ensure vegetation does not interfere with the safe and reliable operation and maintenance of the transmission line. No aerial application of herbicides is typically undertaken on Hydro One transmission line corridors. However, the application of herbicide near rare plants or rare ecological communities, if required, will be restricted by using spot spraying, wicking, mowing, or hand picking, which are acceptable measures for weed control in these areas. Details of the vegetation management program and practices will be discussed as part of the EA.	
BN – 18b	HONI must commit in the ToR to include a country foods assessment and human health risk assessment in their EA studies and include input from First Nations, including BN.	The Human Health and Risk Assessment (HHRA) will rely on available information sources with input from Indigenous communities. The assessment will evaluate the change in human health that could result from a change in environmental quality (i.e., specifically from a change in	Section 5.3.4 outlines proposed environmental assessment of particular environmental components including Human Health.

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		contaminant concentrations), such as groundwater quality; surface water quality; and air quality. In general, the HHRA would follow the risk assessment framework endorsed by provincial and federal regulatory agencies (MOE 2005; Health Canada 2012).	
BN – 19a	HONI must commit in the ToR to consider preferential hiring of First Nations members for positions as Environmental Monitors or 'Guardians' to ensure that BN's traditional territories and traditional environmental values are being monitored.	Environmental Monitors/Inspectors are envisioned to be part of Hydro One's Environmental Management Team for the Project. Employment opportunities to fulfil these monitoring roles will be provided to First Nation members.	No changes required.
BN – 19b	HONI must commit in the ToR to establishing a bi-lateral agreement to provide support, capacity and training for BN to be involved in the environmental aspects of the EA, and the Project, at all phases.	Hydro One is committed to entering into Capacity Funding Agreements with Indigenous communities to provide support, capacity and training throughout the phases of the Project. It is intended that the approach to training, employment and procurement throughout all phases of the Project will be developed with input from Indigenous community representatives.	No changes required.
BN – 19c	HONI must commit in the ToR establish and provide capacity for a First Nation Environmental	Hydro is committed to entering into consultation with Indigenous	No changes required.

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	<p>Management Committee with BN and other First Nations, as soon as possible in the EA process, and certainly by the next version of the Draft ToR. This Committee would ensure First Nation oversight for all environmental issues, would have direct access to review and comment on any environmental reports and regulatory applications and approvals, and would have decision- making authority with respect to the environmental practices of HONI throughout the life of the project.</p>	<p>communities to provide support, capacity and training throughout the phases of the Project. Hydro One’s Indigenous engagement program is designed to provide relevant project information to Indigenous communities in a timely manner. The process enables affected Indigenous communities to review the project proposals, provide input on project alternatives, and raise issues, concerns and questions they may have with the Project. Hydro One has, and will continue to meet with Indigenous communities to collect information and discuss any concerns/questions/feedback communities may have on all aspects of the Project, including the alternatives assessment.</p>	
BN – 20a	<p>HONI must commit in the ToR to performing field monitoring studies throughout all Project phases, including during the EA, to ensure that all ecologically sensitive and significant features are identified, protected, and if necessary, remediated. These studies need to be performed directly by HONI, in collaboration with BN, for all Project areas, not just in areas that haven't been previously investigated by other proponents. These studies must be field based for all indicators to collect the most up to date and accurate information and</p>	<p>Hydro One is committed to implementing field monitoring studies throughout phases of the Project, and will work in collaborative manner to engage Indigenous communities in the collection of field data and identification of indicators and criteria that should be considered in the EA, including monitoring programs during and after</p>	<p>No changes required.</p>

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	subsequently develop the most appropriate mitigation measures and monitoring programs.	construction.	
BN – 20b	HONI must commit in the ToR that it will provide funding and support for members of Indigenous communities must be part of the field monitoring teams, as third-party monitoring technicians or "Environmental Guardians", during the EA and for all other project monitoring activities, to provide important cultural insight to the monitoring activities, to ensure that significant environmental features are being considered and adequately protected, and to act as a third party environmental compliance body.	Environmental Monitors/Inspectors are envisioned to be part of Hydro One's Environmental Management Team for the Project. Employment opportunities to fulfil these monitoring roles will be provided to First Nation members. Hydro is committed to entering into consultation with Indigenous communities to provide support and capacity for members of the communities to be engaged during the EA, including providing important cultural insight to the monitoring activities and protection of significant environmental features.	No changes required.
BN – 21a	Monitoring prior to, during and post- construction are necessary to determine the effects of the Project in the local and regional area. HONI must commit in the ToR to doing environmental monitoring during all phases of the Project to understand impacts of the Project on the environment, and develop and implement appropriate mitigation measures and contingency plans.	Hydro One is committed to implementing field monitoring studies throughout all phases of the Project, and will work in a collaborative manner with Indigenous communities to develop and execute these programs and plans.	No changes required.
BN – 21b	Once baseline conditions have been studied, monitoring construction must be completed to ensure that mitigation measures are working	Environmental Monitors/Inspectors are envisioned to be part of Hydro	No changes required.

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	properly and the water bodies are not being negatively impacted by the construction. HONI must commit in the ToR for that construction monitoring activities must include Biigtigong Nishnaabeg member involvement as Environmental Monitors or Guardians.	One's Environmental Management Team for the Project. Employment opportunities to fulfil these monitoring roles will be provided to First Nation members.	
BN – 21c	HONI must commit in the ToR for Biigtigong Nishnaabeg member involvement third-party monitoring technicians, sometimes referred to as "Environmental Guardians", and provided training and capacity from the Proponent for involvement during the EA and all project phases.	Hydro One is committed to entering into Capacity Funding Agreements with Indigenous communities to provide support, capacity and training throughout the phases of the Project. Environmental Monitors/Inspectors are envisioned to be part of Hydro One's Environmental Management Team for the Project. Employment opportunities to fulfil these monitoring roles will be provided to First Nation members.	No changes required.
BN – 22a	HONI must commit in the ToR to engaging Biigtigong Nishnaabeg in all its meetings with Parks Canada with regard to the renewal process for HONI's License of Occupation in relation to BN's assertion of Aboriginal Title and its comprehensive land claim over its traditional territory.	As the regulator, consultation is Parks Canada's realm of authority for issuance of permits and renewal of the existing licenses.	No changes required.
BN – 22b	HONI must commit in the ToR to engaging Biigtigong Nishnaabeg in all meetings with Parks Canada with respect to HONI's apparent assertion that the LSL project is limited to "upgrades to infrastructure" within Pukaskwa National Park that are "not considered new development" under the	As the regulator, consultation is Parks Canada's realm of authority for issuance of permits and renewal of the existing licenses.	No changes required.

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	existing HONI License of Occupation, or any future License of Occupation.		
BN – 23a	<p>Biigtigong Nishnaabeg has requested a thorough archeology assessment and traditional knowledge study be completed prior to any work to be done on the existing infrastructure through Pukaskwa Park. This assessment was never meaningfully done on the original line and given BN's historic ties to the land within and around Pukaskwa, we feel this is necessary. BN would also like to utilize an archaeologist of their choosing.</p>	<p>On June 29, 2018, Hydro One's archaeological consultant, Archaeological Research Associates Ltd. (ARA), sent an introduction and invitation to participate letter to each of the eighteen (18) Indigenous communities.</p> <p>Hydro One is working with Parks Canada to identify a mitigation strategy, scope and archaeological procedure for assessments within the Park. This permit will be subject to consultation with Indigenous communities.</p> <p>Impacts outside of the tower bases are not expected and July 20, 2018 correspondence with the Ministry of Tourism, Culture and Sport has indicated that the proposed scope of the archaeological assessments centered around the bases of towers within areas of disturbance is supported.</p> <p>Each community was invited to participate in the planned archaeological assessments by providing information, at their discretion, regarding cultural heritage resources for inclusion in</p>	No changes required.

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		the Stage 1 report and/or participation in the Stage 2 fieldwork surveys within their Treaty and Traditional Territory. ARA and Hydro One will work with Indigenous communities to incorporate any information provided and to accommodate participation in any fieldwork surveys. No construction work will begin until it has been confirmed that work areas have no archaeological potential or all required archaeological assessments have been completed following applicable legislation and guidelines and accepted by the Ontario Ministry of Tourism, Culture and Sport.	
BN – 23b	Biigtigong Nishnaabeg have asserted aboriginal title on the traditional lands for which the Lake Superior Link Transmission Line is proposed. Because of this fact, HONI should acknowledge that the relationship between HONI and BN is unique and that the development of a Consultation Agreement is necessary for meaningful consultation.	It is acknowledged that the relationship between Hydro One and BN is unique and that the development of a Capacity Funding Agreement is necessary for meaningful consultation. As such, Hydro One is committed to entering into Capacity Funding Agreements with Indigenous communities to provide support and capacity for members of the communities to be engaged during the EA, including providing important cultural insight to the	No changes required.

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		monitoring activities and protection of significant environmental features.	
	Red Sky Métis Independent Nation, Dean Whellan, Community Consultation/GIS Specialist, Letter Dated July 27, 2018 to Bruce Hopper, Hydro One Networks Inc. (HONI)		
RSMIN - 1	<p>RSMIN is aware of Environmental, Cultural, Traditional and Non-traditional Land Use impacts within or adjacent to the LSL project Footprint. RSMIN internal Consultation staff has evaluated the Draft Terms of reference and evaluated the contents of the draft terms of reference to ensure that the rationale includes the necessary tools and studies to avoid or mitigate RSMIN’s community impacts.</p> <p>RSMIN has currently identified concerns on the reference and reference route alternative that require further examination and research to reach potential resolution. The impacts identified can be concentrated in to the following categories and will be communicated to Hydro One following Traditional Knowledge and Land Use studies;</p> <ul style="list-style-type: none"> ○ Archaeological ○ Current Land Use practices protected by Section 35 Rights (Hunting and Fishing) ○ Non Traditional Land Use Areas ○ Impacts to Wildlife, Fish and the Environment ○ Cultural Spiritual Sites ○ Socio-economical 	Hydro One is committed to a full and meaningful discussion of all aspects of the Project with RSMIN as detailed in the now completed Capacity Funding Agreement with RSMIN. All concerns and input received will be discussed and addressed through the EA process and regular meetings with RSMIN and their designates.	No changes required.
RSMIN – 2	The LSL Draft Terms of reference lays the appropriate foundation for studying and addressing the above noted concerns through the EA process	Comment noted.	No changes required.

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	<p>and supports the requirements set forth in the duty to consult legislation. Ongoing Engagement of Hydro One combined with the necessary capacity to review the project documentation, identify impacts and the necessary tools implemented into the EA to resolve or mitigate the concerns within the EA process will minimize impacts to the RSMIN community. RSMIN believes conducting thorough studies and identifying impacts in the early stages are instrumental to avoiding conflicts in later stages of the EA.</p> <p>RSMIN has noted that the Draft Terms of Reference initially appears to meet the needs of our community but does not limit further participation in the completed TOR following another analysis phase. As the timelines for establishing capacity resources for the evaluation were concurrent with the review of the Draft TOR, RSMIN will have additional Consultation support and resources to provide feedback on the final version of the TOR.</p>		
Michipicoten First Nation, John Kim Bell, Email Dated August 8, 2018 to Christine Goulais, Hydro One Networks Inc. (HONI)			
MICH – 1	<p>We note that diesel fuel will be used for different activities. There is the mention of the possibility of utilizing low sulphur diesel to reduce impact on air emissions. Can the contractor(s) confirm that they will use low sulphur diesel?</p> <p>ELM Comment:</p> <p>Low sulphur diesel may reduce air emissions. It would be preferred by MFN if this fuel is used by the contractor(s) in compliance with the Diesel Fuel Regulations currently in place.</p>	<p>The draft ToR does not detail specific fuel types. Fuel and emissions management will be addressed in the respective EA chapter. Contractors will abide by regulations and best management practices for emissions including diesel fuel. If possible, low sulphur diesel will be used. Best management practices will be further refined through the EA process.</p>	<p>No changes required.</p>

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MICH – 2	<p>The term “Grey Water” is used for water discharges from the construction camps. May we have a chemical analysis of just how grey water is defined. We are concerned about discharges.</p> <p>ELM Comment:</p> <p>There will likely be water discharges from construction camps however, there should be no discharge of grey water into the environment. We recommend on-site treatment to be used where possible when municipality services are not available.</p>	<p>The term grey water is not used or defined in the draft ToR.</p> <p>Discharges from construction will be subject to Permits under the Section 53 for water taking or discharge, dewatering under the Ontario Water Resources Act. Best management practices for water management will be employed throughout the Project. Permits will be further refined through the EA process.</p>	No changes required.
MICH – 3	<p>How many water crossings are there? Please identify all the water crossings. As a caveat to this question, field inspections during June 2018 revealed a range of crossings in the different sections of the hydro line, often in the range of 10 per linear kilometre. Some of these crossing represent ephemeral drainage while others are established creeks. In contrast, some areas were one large wetland.</p> <p>Waterbody crossings should be sited and mitigation strategies designed in association with MFN comment across the Reserve lands. Decommissioning of temporary workspaces, access roads and waterbody crossings should be completed in association with MFN on Reserve lands.</p> <p>Project site clean-up and reclamation should be completed in association with MFN on Reserve</p>	<p>The number of water crossings is being refined based on the EA studies and local design considerations. Crossings will take into account Environmental Guidelines for Access Roads and Water Crossings.</p> <p>All information collected as part of the natural environment field programs will be used in the EA, to identify potential effects and practicable mitigation measures, and to fine tune the locations of towers, access roads and water crossings (where appropriate), including consultation with MFN.</p> <p>It is recognized that the preparation of an plan is</p>	No changes required.

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
	<p>lands.</p> <p>ELM Comment:</p> <p>Many water crossings were apparent during the June 2018 inspection of the reserve land and proposed corridors. Many of these may be seasonal. The majority of these crossings are not mapped and pose risk to the connecting watershed should something spill or with the increased sediment caused by construction. The term “water body crossing” should be more accurately defined so small or seasonal streams are not missed. Follow up is required.</p>	<p>necessary to ensure impacts to water crossing areas are minimized or avoided. A plan for the construction phase will be developed during the EA and protection and mitigation measures, including those specific to fish habitat, will be defined at that time. The plan is expected to include compilation of environmental protection measures, contingency plans, and management plans with the objective to address known and anticipated environmental conditions or events that could occur during the construction of the Project.</p>	
MICH – 4	<p>Has OPG identified a list of vendors. May we have a copy of the list of vendors please.</p> <p>ELM Comment:</p> <p>A copy of vendors should be shared with MFN, this topic should be discussed from an economic perspective.</p>	<p>OPG (Ontario Power Generation) and Hydro One are two separate entities. Hydro One is the proponent for the Project. Economic participation in the Project will be discussed with MFN through consultation and as the works progress.</p>	No changes required.
MICH – 5	<p>MFN lands will be directly impacted. MFN has to play a direct role in mitigation on these lands</p> <p>ELM Comment:</p> <p>MFN should make use of the resources provided by OPG to assure the needs for mitigation on the</p>	<p>Hydro is committed to entering into consultation with Indigenous communities to provide support, capacity and training throughout the phases of the Project. Hydro One’s Indigenous engagement program is designed to provide</p>	No changes required.

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	<p>reserve and traditional lands are fully served. This could include funding for tree replanting and bat boxes for SAR following the completion of construction activities.</p>	<p>relevant project information to Indigenous communities in a timely manner. The process enables affected Indigenous communities to review the project proposals, provide input on project alternatives, and raise issues, concerns and questions they may have with the Project. Hydro One has, and will continue to meet with Indigenous communities to collect information and discuss any concerns/questions/feedback communities may have on all aspects of the Project.</p>	
MICH – 6	<p>Michipicoten is only now undertaking meaningful consultation with potentially affected citizens. Michipicoten will require time to complete this meaningful consultation on the project that also includes a Traditional Land Use Study.</p> <p>A Memorandum of Understanding (MOU) between Michipicoten First Nation (MFN) and Ontario Power Generation (OPG), for engagement in consultation regarding the proposed Superior Link Project (Project), should be executed.</p> <p>Traditional Ecological Knowledge and Traditional Land and Resource Use data from MFN should be used as part of EA studies.</p>	<p>Hydro One is committed to entering into consultation with Indigenous communities to provide support, capacity and training throughout the phases of the Project. Traditional Ecological Knowledge and Traditional Land and Resource Use will be incorporated into the EA through consultation.</p>	No changes required.

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
	<p>These studies should be completed prior to completion of EA.</p> <p>ELM Comment:</p> <p>Michipicoten should continue to use resources provided by OPG while sharing findings with OPG to create a finalized and amended EA. Experts in Traditional Ecological Knowledge should continue to be involved in further collection of data for the amended EA to address the weaknesses that may exist.</p>		
MICH – 7	<p>We are concerned about soil contamination. OPG only undertook a desk top study within the EA. What work has been under taken for the publication of the EA in terms of field verification regarding soil contamination?</p> <p>ELM Comment:</p> <p>Field observations during June 2018 identified some evidence of soils contamination along the corridor, associated with existing hydro towers. Specifically, soil is likely contaminated around areas where plants have been sprayed with herbicides. This provides additional evidence why no herbicide should be sprayed in the future on MFN lands. This review is not able to assess soil contamination that may arise from construction activities.</p>	<p>OPG (Ontario Power Generation) and Hydro One are two separate entities. Hydro One is the proponent for the Project. The EA will be prepared following the approval of the ToR.</p> <p>The potential for soil contamination will be considered and the Guide on Site Assessment, the cleanup of Brownfield Sites and the Filing of Record of Site Condition will be consulted to determine the most appropriate course of action.</p>	No changes required.
MICH – 8	Identified by MFN as not relevant for this study after follow-up review.	Comment noted.	No changes required.
MICH – 9	We are concerned about the impacts of blasting and would like to study the issue further	The EA will include a spill prevention and response plan, a	No changes required.

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	<p>Given that blasting will be used as part of the construction process, a communication protocol between OPG, its contractor(s) and MFN should be established in coordination with all parties. This protocol should take into consideration not only residents near to blasting activities but also community members that may be making use of lands and waters nearby these activities, both on and off the Reserve. The protocol should also be designed to provide effective methods of notification.</p> <p>ELM Comment:</p> <p>It is expected that Best Practices will be used in cases of blasting. Blasting has the potential to create large amounts of dust and sediment. We recommend the use of silt and sediment fences around water crossings to help limit the impacts to fish and other wildlife species downstream. As discussed in MICH-03, there are many unidentified and unmapped water crossing visible while walking the land, mitigation strategies are expected to be implemented in these cases as well. Blasting is discussed further in MICH-20 and MICH-40.</p>	<p>waste management plan, and a blast management plan. Should blasting be required, best management practices (BMPs) and mitigation measures specific to explosives management and use will be implemented.</p>	
MICH – 10	<p>We are concerned about dust and air emissions from blasting and in general.</p> <p>ELM Comment:</p> <p>Impacts of blasting are discussed in MICH-09, MICH-20 and MICH-40. Additionally, it is inferred that the proper use of equipment will reduce air</p>	<p>See MICH-09. Dust and noise from construction are controlled with appropriate mitigation measures and environmental best management practices. Potential air quality effects from construction activities, especially for the potential receptors near</p>	<p>No changes required.</p>

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	emissions, as described in MICH-01	the transmission line will be considered. Air quality impact assessment will be conducted and included in the environment assessment.	
MICH – 11	<p>We are concerned about chemical or hazardous waste spills. Refueling should typically be restricted to specific refueling areas, with spill prevention and emergency response equipment and appropriately trained staff in close proximity. A distance of at least 30 m should be maintained between surface waters, wetlands and refueling areas.</p> <p>Specific areas should be identified for vehicle/equipment wash off, where discharges can be controlled and carried out in compliance with the conditions and requirements of registration on the Environmental Activity and Sector Registry (EASR), a PTTW, and/or Environmental Compliance Approval (ECA).</p> <p>We are also concerned about the accidental transport of non-native species to the hydro line corridor from equipment used outside of MFN territory.</p> <p>There is the potential for large fuel spills given the quantities to be stored on site (up to 5,000 L for equipment, and up to 25,000 L for helicopters if used/required). Concrete pads and drainage controls (with sump/oil-water separator) may be used. These precautions should definitely be used. For equipment cleaning, also refer to MICH-77.</p>	<p>Specific management plans in relation to fueling, spills, and water discharge will be developed during the EA process. The EA should include a spill prevention and response plan, a waste management plan, and a blast management plan should blasting be required.</p> <p>Hydro One has vegetation management standards that will be applied to the LSL project. These standards include management practices to minimize and/or avoid the use of herbicides with the goal to ensure vegetation does not interfere with the safe and reliable operation and maintenance of the transmission line. Part of the standards will include invasive species and practices will be discussed as part of the EA.</p> <p>Hydro One has not specified fuel quantities or cleaning protocols. These will be further developed</p>	No changes required.

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	<p>ELM Comment: Potential areas for equipment storage and refueling must be identified. In case of spills, these areas cannot have the potential to reach ground water or travel down the watershed causing large scale water contamination. As discussed in MICH-03, there are many unidentified and unmapped water crossing visible while walking the land that have the potential for this to occur. Additionally, the lay down areas of equipment should be identified as these areas will suffer incredible ground compression and will require mitigation in the future to support vegetation regrowth. In addition, we recommend no refueling activities within 30 metres of any surface water in case of spills.</p>	<p>during the EA.</p>	
MICH – 12	<p>Identified by MFN as not relevant for this study after follow-up review.</p>	<p>Comment Noted.</p>	<p>No changes required.</p>
MICH – 13	<p>We are concerned about surface water and question the EA’s assertion that any waste water discharge will have no impact. Water quality monitoring will need to be completed around points of discharge to ensure compliance with the Ontario Water Resources Act and associated permits. MFN may wish to request that the monitoring results/reports for locations within the Gros Cap No. 49 Reserve, and locations outside of the reserve where downstream flows will pass through the reserve, be provided to MFN as completed., or that MFN be notified whenever provincial limits have been exceeded. ELM Comment: The discharge of waste water will have definite impacts to the concentrations of suspended solids</p>	<p>Hydro One was unable to identify the section of the draft ToR that states that wastewater discharge will have no impact as determining effect or impact is not the purpose of the ToR. Discharges from construction will be subject to Permits under the Section 53 for water taking or discharge, dewatering under the Ontario Water Resources Act. Best management practices for water management will be employed throughout the Project. Required permits will be further refined through the EA process.</p>	<p>No changes required.</p>

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	in water bodies. It is also noted that while likely reversible, water quality monitoring in compliance with the Ontario Water Resources Act may occur. However, monitoring should be completed at points of discharge as well as downstream from these discharge points. Mitigation strategies should be implemented to minimize to changes to area and preserve the habitat for fish and other wildlife downstream and overall water quality	Environmental monitoring, including sampling of watercourses, will be further refined during the EA process.	
MICH – 14	<p>We are concerned about particulate matter and suspended solids and chemicals amassing in the water due to construction. OPG has currently made no conclusions.</p> <p>This is related to MIC-13</p> <p>ELM Comment:</p> <p>Construction activities may cause increased amounts of particulate matter, suspended solids and chemicals to accumulate in the waterbodies. This scenario could cause probable impacts to receiving bodies of water. This is further discussed in MICH-09.</p>	Sediment and erosion control measures will be identified and addressed by Hydro One in the EA document. This includes identification of areas where soil or other factors could affect the effectiveness of those measures. Trigger/threshold values will be established for suspended sediment and turbidity be followed where bankside, in-stream and/or dewatering work is required. Sampling will occur in potential sensitive receivers before, during and after such work is undertaken.	No changes required.
MICH – 15	<p>We are concerned about erosion and would like to know more about what mitigation will be employed to prevent erosion.</p> <p>ELM Comment:</p> <p>It is expected that the use of Best Practices such as placement of sediment and silt fencing near</p>	See response to MICH-14.	No changes required.

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	wetlands will reduce the transport of dust and other chemicals. It is important to MFN that water crossings on access roads are treated the same way as water crossings elsewhere, specifically we expect that these water crossing will not suffer from erosion. Follow up should be complete prior to and upon the commencement of construction activities to ensure that fences are in place and functioning as designed. Inspection must be completed after rain storms to ensure functionality. It may be necessary to engage members of MFN to complete inspections of silt fencing.		
MICH – 16	<p>We are most concerned about the taking of water for construction purposes. In the EA, it does not identify the quantity or locations for the proposed taking of water. What is the current baseline for groundwater in the study area. Have background studies been prepared to support the future submission of applications to take water? What are the cumulative impacts on taking water on adjacent wetlands, creeks, or lakes?</p> <p>To our knowledge, no hydrogeology study has been completed to assess potential impacts. Where do estimated changes to groundwater level/radius of impact come from?</p> <p>Changes to groundwater quantity for water well users involve assessment of a 100 m radius to identify potentially impacted wells. This radius should be 500 m, as per the MOECC PTTW application form (5046e02) requirement. This could encompass several additional wells and change the</p>	<p>Hydro One is currently at the Terms of Reference phase of the Project. The EA will provide a description of surface and groundwater resources including groundwater levels, yields and quality based on MECP water well records and Permit to Take Water published information. A questionnaire will be provided which requests information on the location of any wells near the construction areas. Consultation will include information on construction activities which will take place on each individual property. This site-specific information will be used to augment the information provided by MECP in their wells database. Wellhead protection areas, intake</p>	No changes required.

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
	<p>scale of potential impacts.</p> <p>ELM Comment:</p> <p>Based on a review, MFN feels no hydrogeology studies have been completed. Also, this review indicated that past similar studies do show that there may potential impacts and/or changes to the water levels in areas with large taking of ground water. Hence, MFN should be informed of candidate locations and quantities of water that may be possibly taken in the future. This information will help MFN understand the possible local changes to hydrology, even small ones have potential to impact ecosystems during both the short and long term. For example, there were numerous Black Spruce swamps recorded during our inspection of the land. If water is drained from these areas it may impact the habitat of SAR Canada Warbler. Additionally, such water taking also has the capability to affect the quantity and quality of water wells within the area. If water wells are impacted, will there be compensation provided by OPG?</p>	<p>protection zones, highly vulnerable aquifers and significant groundwater recharge areas, source water protection documentation and relevant policies will be reviewed. The description will be conducted via desktop studies and supplemented with field work, where required, for characterization of groundwater quality, or measurements of water levels or drawdown of water wells.</p>	
MICH – 17	<p>Please confirm silt fencing will be used to prevent sediment from entering water bodies along the hydro line corridor.</p> <p>The CEPP notes that temporary sediment barriers will be installed before or immediately after the ground is disturbed.</p> <p>Sediment barriers should be installed before any</p>	<p>Hydro One has not provided a CEPP for this Project as it is still in the ToR development phase.</p> <p>Sediment and erosion control measures will be identified and addressed in the EA document. This includes identification of areas where soil or other factors</p>	No changes required.

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
	<p>construction activity that may disturb the ground occurs, in the appropriate areas. Additional sediment controls should only be installed immediately after the ground is disturbed in cases where the original controls have or may fail, or there is an unexpected disturbance.</p> <p>ELM Comment:</p> <p>We feel the use of silt – sediment erosion fences are essential for large areas. Erosion and the use of silt fencing is also noted in MICH-15.</p>	<p>could affect the effectiveness of those measures. Trigger/threshold values will be established for suspended sediment and turbidity be followed where bankside, in-stream and/or dewatering work is required. Sampling will occur in potential sensitive receivers before, during and after such work is undertaken.</p> <p>Erosion and sediment control are discussed in Section 6.5.</p>	
MICH – 18	<p>Have contractors identified specific areas where discharges can be controlled and carried out in compliance with either EASR, a PTTW, or ECA? MFN may wish to be informed of these locations and the results of water quality monitoring. MFN may wish to be informed about possible changes in water levels from the project.</p> <p>ELM Comment:</p> <p>MFN should be informed of chosen locations for possible discharge, once the areas have been identified. Thus, MFN should have the opportunities to further monitor these chosen areas for discharge, to assess the possible changes to water quality or water levels.</p>	<p>Water usage and dewatering strategies will be developed according to Best Management Practices, permit requirements and local regulations. These will be further developed during the EA process. Permits for discharge are discussed under Section 2.1.5 and Section 6.5.</p>	No changes required.
MICH – 19	<p>Identified by MFN as not relevant for this study after follow-up review.</p>	<p>Comment Noted.</p>	No changes required.
MICH – 20	<p>We are concerned about the quality of ground water especially during blasting. We would like to learn more about potential impacts to the</p>	<p>The EA will include a spill prevention and response plan, a waste management plan, and a</p>	No changes required.

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
	<p>groundwater</p> <p>The EA describes the expected change in water quality to be at or slightly exceed the limits of baseline or guideline values after blasting, within the Local Study Area. This pattern is characterized as medium-term in duration and reversible, as the expected chemical change(s) to the groundwater quality anticipates a return to existing conditions during construction or into the operations period.</p> <p>How was this analysis of risk over time this determined? Is there potential for nitrate from blasting to enter nearby wells? The local study area for groundwater disturbance is actually 1 km from ROW and 500m from other areas. So, were these two larger distances considered in the analysis of risk?</p> <p>ELM Comment:</p> <p>Blasting creates an increase in the total available dust and sediment in the environment. Mitigation techniques to decrease the negative impacts that blasting may have are discussed in MICH-09. We request additional information.</p>	<p>blast management plan should blasting be required. Should blasting be required, best management practices (BMPs) and mitigation measures specific to explosives management and use will be implemented. Blasting is discussed in Section 6.5.</p>	
MICH – 21	<p>No hydrogeology study was undertaken prior to the preparation of the Terms of Reference. Has one been undertaken for the EA? If so, what are the conclusions on impacts?</p> <p>Please also see MICH-16.</p>	<p>Section 5.2.2 outlines the assessment of hydrogeology and groundwater resources to be conducted for the EA.</p>	

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
	<p>ELM Comment:</p> <p>It is essential to have background information on hydrogeology, to frame the TOR. A properly framed TOR will allow for the evaluation of possible effects of the proposed activity on groundwater.</p>		
MICH – 22	<p>What monitoring programs will be implemented?</p> <p>ELM Comment:</p> <p>Please provide more information than what is included in the outlined in Draft Terms of Reference.</p>	<p>Section 8 specifies the framework in which monitoring programs will be further developed during the EA.</p>	<p>No changes required.</p>
MICH – 23	<p>In terms of air emissions, is it possible to eliminate the burning of slash from clearing activities? What are the alternatives/options to burning slash?</p> <p>Can OPG make a commitment to using mulch as a first choice, and using burning only when it is required, to reduce overall smoke production?</p> <p>ELM Comment:</p> <p>Mulching timber may contribute less to air emission than the burning of slash. OPG should mulch what is possible and burn only when required and with required permits.</p>	<p>Specific timber management plans will be developed during the EA as well as in conjunction with the successful contractor and landowners. Assessment and feasibility of mulching will be determined through this plan.</p>	<p>No changes required.</p>
MICH – 24	<p>OPG did not undertake any study or make any estimates regarding Greenhouse Gasses. We think that in today’s Canada, making an estimation on GG is the responsible thing to do.</p> <p>Refer also to MICH-01 for further discussion.</p>	<p>Greenhouse gases are listed in the criteria and indicators table in Appendix 1 as part of the air quality assessment. Best management practices for emissions should be employed</p>	<p>No changes required.</p>

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
	<p>ELM Comment:</p> <p>An estimate of GHG emissions should be provided in the EA report. Best Practices should be followed in order to minimize GG releases.</p>	<p>throughout the project.</p>	
MICH – 25	<p>There is no monitoring program for the many water wells that exist in proximity to the hydro line corridor.</p> <p>Please also see MICH-16 and MICH-20. Will there be monitoring during and post construction works? Where blasting is used will well water be sampled for potential impacts from nitrates?</p> <p>ELM Comment:</p> <p>Surveys of wells within the project site should be completed prior to excavation or blasting begins. It is important to include sampling for potential nitrates that may contaminate the water. Nitrates have the potential to affect the survival fish and other aquatic species.</p>	<p>The EA will include a spill prevention and response plan, a waste management plan, and a blast management plan should blasting be required. If blasting is required, best management practices (BMPs) and mitigation measures specific to explosives management and use will be implemented.</p> <p>The EA will also provide a description of groundwater resources including groundwater levels, yields and quality based on MECP water well records and Permit to Take Water published information. Consultation will include information on construction activities and site-specific information will be used to augment the information provided by MECP in their wells database.</p> <p>Wellhead protection areas, intake protection zones, highly vulnerable aquifers and significant</p>	<p>No changes required.</p>

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
		groundwater recharge areas, source water protection documentation and relevant policies will be reviewed. The description will be conducted via desktop studies and supplemented with field work, where required, for characterization of groundwater quality, or measurements of water levels or drawdown of water wells.	
MICH – 26	<p>We note there was no noise study. We would appreciate an update on noise. Noise from blasting was not assessed.</p> <p>Is there a supporting noise study included within an unlisted appendix?</p> <p>Noise levels have not been provided for the transmission line (corona discharge) nor incremental changes to noise levels at transmission stations. These have been noted as negligible without supporting evidence. These noises should be identified as a separate potential impact for operation.</p> <p>What receptors were used? Where are they? Blasting is not assessed as potential impact for noise.</p> <p>Installation of foundations and cable splicing identified as greatest potential noise generators,</p>	Section 5.2.9 outlines noise assessment planned for the EA portion of the Project. This has been updated in the revised draft version of the ToR to reflect additional scope of acoustic assessments. This section now details receptors. Noise from the Project, including potential blasting and other construction activities will be assessed.	No changes required.

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
	<p>but not quantified.</p> <p>ELM Comment:</p> <p>This should be discussed in the upcoming EA report. It is planned that the EA will characterize baseline or background noise conditions, based on published information or noise surveys, as required. It will also identify sensitive receptors to noise emissions such as recreational areas and communities.</p>		
MICH – 27	<p>The installation of foundations not was assessed or quantified.</p> <p>Please also see MICH-26.</p> <p>ELM Comment:</p> <p>This should be discussed in the upcoming EA report. Refer to MICH-26 for further discussion.</p>	<p>See response to MICH-26.</p> <p>The EA will assess the Project area and impacts associated with the installation of foundations. The ToR provides the outline for the study of the environment.</p>	No changes required.
MICH – 28	<p>We are concerned with the impacts on wetlands as most bogs, swamps and fens are unevaluated in terms of impacts. We note that not evaluating wetlands may be because there are significant wetlands that, if evaluated, would be subject to a full provincial enforcement of environmental buffers etc. We would like clarity and more study on this issue.</p> <p>While mitigation measures outline means to reduce short- and long-term impacts, there will be permanent loss of these ecosystems, and potential impacts from ongoing maintenance work and</p>	<p>Hydro One has not specified riparian setbacks of 30m in the ToR and is not sure from which document Michipicoten First Nation (MFN) is quoting these specifications.</p> <p>Hydro One will consider opportunities for habitat improvements including streamside buffers within the proposed reference route including any selected route</p>	No changes required.

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
	<p>potential use of herbicides. Have compensation wetland areas been considered?</p> <p>The Natural Heritage Reference Manual for the Provincial Policy Statement states that adjacent lands for PSWs extend to 120 m as a minimum to capture the majority of impacts on the wetland from development. Please explain the basis for establishing a 30 m (or 100m) setback from PSWs when there is a reasonable probability that the impacts of development extend well beyond 30 m (or 100m).</p> <p>ELM Comment:</p> <p>Due to past development of the hydro line corridor, wetlands were disturbed. These wetlands have recovered during recent decades. The proposed activity will likely result in additional disturbance to these wetlands. Since the wetlands found in proximity to the existing hydro line were disturbed in the past, it follows that the new hydro line will result in additional disturbance of these wetlands if suitable buffers are not established. Due to the expected disturbance, compensation wetlands should be considered for installation. Alternatively, rehabilitation of disturbed wetlands should also be added to the mitigation actions.</p>	<p>refinements. This will be done in consultation with affected property owners, interested Indigenous communities, conservation authorities, provincial ministries and affected municipalities.</p> <p>Transmission towers will not be constructed in streams, rivers, etc. Similarly, no dewatering, filling in, and/or relocating of watercourses are anticipated. Efforts will be made to prevent any short term stream flow interference (i.e. culvert crossing installations) which could cause adverse effects. The construction plan will minimize or avoid any direct works in water bodies and most construction will occur at appropriate setbacks from water bodies. The potential for these effects will be addressed in the EA and on a site specific basis, through the permitting processes.</p>	
MICH – 29	<p>We are concerned with numerous issues to do with the loss of vegetation and riparian vegetation. Concerns include use of herbicides, damage to the soil, introduction of invasive species, damage to possible spills of toxic chemicals, erosion and loss of</p>	<p>Specific studies and vegetation management strategies within Gros Cap No. 49 will be part of consultation with MFN.</p>	<p>No changes required.</p>

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
	<p>soil altogether in some areas. We need more information on chosen mitigation.</p> <p>Specific impacts to all of the wetlands impacted, including those within Gros Cap No. 49 Reserve have not been identified. Are field studies being completed?</p> <p>Will there be a forthcoming policy from OPG that will commit to major reductions in the potential use of herbicides, restricted to areas which are not near to waterways and where safety is a concern for access? Use of herbicides will also be prohibited on Reserve lands.</p> <p>ELM Comment:</p> <p>Further field work is necessary to determine the severity of impacts that may occur. The TK keepers from MFN should continue to be involved with field work to identify species that may benefit from relocation to new areas. Furthermore, the potential damage herbicides may cause to wetlands and riparian areas is considerable. As mentioned previously, there are a number of small and unmapped water crossing that were apparent during the June 2018 inspections. These water crossings have the potential to move soluble herbicides to larger bodies of water. Due to this, additional buffer zones may be required in areas not originally expected. Furthermore, in the past there has been similar agreements between MFN and other parties concerning the use of pesticide</p>	<p>The development of spill response protocols and erosion control methods are addressed within comment MICH-17.</p> <p>Hydro One has vegetation management standards that will be applied to the LSL project. These standards include management practices to minimize and/or avoid the use of herbicides with the goal to ensure vegetation does not interfere with the safe and reliable operation and maintenance of the transmission line.</p> <p>In general, where herbicides are required the storage, handling, and application will comply with the Ontario Clean Water Act (2006). Details of the vegetation management program and practices will be discussed as part of the EA.</p>	

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
	on reserve lands however during the inspection there is evidence of herbicide spraying (likely 2 4 dinitrophenol) noted. Therefore, follow up may be necessary to ensure there is no use of herbicides on reserve lands throughout and following construction activities. In areas where herbicides may be used, we recommend hand spraying of only chosen vegetation rather than complete spraying of entire areas.		
MICH – 30	<p>The classification of riparian ecosystems seems arbitrary. Please provide a rationale or scientific reference to support the establishment of a riparian zone based on stream order. How was the riparian zone established around lakes and ponds? Are riverine wetlands included in the riparian zone or classified as wetlands. The accuracy of the riparian habitat model is suspect.</p> <p>ELM Comment:</p> <p>All riparian habitats need to be protected with a vegetation buffer. It may be necessary for environmental monitors from MFN to ensure that vegetation buffers are established along riparian habitats. It is possible that future vegetation clearing may encroach on these waterways.</p>	<p>The classification of riparian zones and a riparian habitat model are not discussed in the draft ToR and Hydro One is unsure which document is being referenced.</p> <p>Environmental monitoring protocols will be developed during the EA phase of the Project.</p>	No changes required.
MICH – 31	<p>Can plants be salvaged and transplanted? Is there a plan to preserve the removed plants and will the remaining populations be self-sustaining? Is there a tracking/monitoring plan in place?</p> <p>There are no provisions in the Construction Environmental Protection Plan for harvesting or</p>	<p>Vegetation community assemblages and SAR will be assessed during the EA. Specific mitigations to plants will be part of consultation with MFN.</p> <p>Hydro One has not developed a</p>	No changes required.

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
	<p>salvage of traditional plants in construction zones prior to construction. These activities are only identified as a contingency measure.</p> <p>MFN should have the opportunity to harvest or transplant traditional plants prior to clearing of the right-of-way and access roads.</p> <p>MFN should retain the rights of first refusal to merchantable timber from Reserve lands. A revenue sharing agreement for the proceeds from this timber should also be in place prior to construction/clearing. Further, Michipicoten should be the primary beneficiary of any procurement opportunities on Michipicoten reserve lands.</p> <p>ELM Comment:</p> <p>MFN should be given adequate time to remove and relocate species of cultural or medicinal relevance. Plants being relocated will require a similar ecosystem from which they have been removed from and this will take time to locate. Mitigation plans, such as replanting, should be implemented in areas where species cannot be relocated and a self-sustaining population will not exist. Follow up monitoring plans for these species should be implemented throughout and following construction activities. Additional discussion is required. Is it feasible to relocate plants over a large area? For example, such an activity would require extensive man-power and elevated cost.</p>	<p>CEPP for the Project and is unsure which document is being referenced.</p> <p>Consultation with MFN will identify traditional usage of vegetation and accommodations will be discussed.</p> <p>Compensation for timber will be further discussed with MFN and will be in line with timber valuation protocols throughout the Project area.</p>	
MICH – 32	Michipicoten would shared oversight in monitoring	Environmental monitoring	No changes required.

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
	<p>of vegetation salvage, other activities on the corridor, as well as participate during the post-construction activities.</p> <p>ELM Comment:</p> <p>It is prudent to resolve a plan for environment monitors from MFN to participate in all future work. Following construction, budgets and work plans should be developed.</p>	<p>protocols will be developed in the EA process. Monitoring positions during construction will be available to Indigenous communities.</p>	
MICH – 33	<p>Michipicoten may wish to remove plants associated with traditional medicines or of cultural significance to MFN citizens.</p> <p>Refer also to MICH-31.</p> <p>ELM Comment:</p> <p>MFN should be given adequate time to remove and relocate species of cultural or medicinal relevance. Whether this be fully relocating the plant or just harvesting the necessary components (e.g., seeds, fruit, tubers).</p>	<p>Consultation with MFN will identify traditional usage of vegetation and accommodations will be discussed.</p>	<p>No changes required.</p>
MICH – 34	<p>Michipicoten is concerned that increased traffic in traditional use areas will impact local resources. The proposed Project will expand potential access to land through the Gros Cap No. 49 Reserve. MFN would like to ensure that there is some level of restriction/control, during both construction and operation, which limits access to the MFN community, and OPG and their contractor's staff only.</p>	<p>No laydown yard is proposed within the Gros Cap No. 49 Reserve. Hydro One is unaware of where this information may have been obtained.</p> <p>Access to the any works within the Reserve and personnel restrictions will be subject to consultation with MFN.</p>	<p>No changes required.</p>

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
	<p>MFN was only recently partially informed regarding the current alignment of access roads and location of a laydown yard within the Gros Cap No. 49 Reserve. MFN and/or their representatives should have some input on these items, as well as the siting and design.</p> <p>An access road use agreement will be required with MFN on Reserve lands. Access roads will be sited and designed in association with MFN on Reserve lands.</p> <p>This topic also relates to the clean equipment protocol and need to control the risk of possible introduction of non-native plants and wildlife. See also MICH-77 regarding cleaning equipment, including vehicles, prior to transport to the hydro line corridor or laydown areas.</p> <p>ELM Comment:</p> <p>It is necessary to resolve a road use agreement prior to any site disturbance by OPG or associated contractors. High density of traffic can lead to health and safety concerns to residents and wildlife. Speeds need to be posted and enforced.</p>	<p>Clean equipment protocols will be developed during the EA process.</p>	
MICH – 35	<p>There is no discussion or contemplation of the possible exemption of traditional or culturally sensitive lands</p> <p>MFN has identified, so far, that there is one traditional trap-line within the Project footprint as well as campsites, recreational sites, spiritual sites,</p>	<p>Traditional land use is discussed in Section 5.4.2 and will be assessed during the EA process.</p> <p>Trappers will be consulted and where the impacts to trapping can be demonstrated as a result of the</p>	<p>No changes required.</p>

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
	<p>trap trails and other important cultural sites within the local and regional study areas. All of these have been mentioned in the EA but not studied.</p> <p>The magnitude, duration, irreversibility, and likelihood of occurrence specific to the above areas should be identified, in order to fully understand the Project's effect on sites and areas of cultural importance to MFN. Given that these sites and areas have not specifically been evaluated, it is difficult to determine whether current mitigation strategies, if any, sufficiently offset negative Project effects, warranting further evaluation.</p> <p>As part of ongoing TLU work, mapping of Indigenous land and resource use sites (e.g., cultural site, camp, or trapline equipment) should be completed in advance of construction, allowing for alternate routes/alignments etc. to be established and confirmed with MFN. These potential sites should be afforded the same proactive measures given to post-contact heritage resources, with direct input on locations, impacts, mitigation and monitoring from MFN</p> <p>A section should be included in the Construction Environmental Protection Plan that deals specifically with mitigation measures to be implemented on the MFN Reserve lands.</p> <p>ELM Comment:</p> <p>Traditional lands were discussed in the TOR,</p>	<p>Project, Hydro One will consider a damage/compensation claim or alternative resolution where applicable.</p> <p>Based on consultation with the Indigenous communities, the EA will document concerns and identify opportunities raised with regards to traditional land and resource use, or other relevant socio-economic aspects. The EA will also describe how Hydro One proposes to address these concerns and opportunities.</p> <p>Again, no CEPP has been developed for the Project at this time but mitigation measures will be implemented for work within MFN Reserve Lands.</p>	

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	<p>although exemption was noted.</p> <p>Detailed consideration of culturally sensitive land is dependent upon the completion of the TLU study as well as direct consultation with members of MFN. For example, it was stated during the recent inspection that a burial ground is located in close proximity to the corridor. The exact location is unknown.</p> <p>When will traditional land use be included in the EA?</p>		
MICH – 36	<p>Is there a statement on cumulative impacts? Certainly, there must be cumulative impacts. What is OPG’s statement and conclusion on cumulative impacts?</p> <p>It is recognized that while OPG’s Project may not be the sole cause of impacts to Species at Risk in the area, cumulatively with other nearby projects (of past and present) there is a negative impact. It is MFN’s concern that, without some effort put towards reversing these impacts, identified species at risk will move further towards extirpation. These species most notably include Caribou, Northern and Brown Myotis, Bald Eagles, and Warblers, among others. MFN would like to see a more proactive approach to reversing and or stop these impacts on sensitive species on the traditional territory.</p> <p>ELM Comment:</p> <p>Resources will need to be put towards mitigating</p>	<p>Cumulative impacts will be assessed during the effects assessment process of the EA. The ToR outlines studies to be able to inform potential and cumulative effects assessment. Species at risk, including federal jurisdiction species on Reserve lands, will be part of the EA.</p>	<p>No changes required.</p>

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
	the potential cumulative impacts. This mitigation strategy needs to be consistent with the letter sent from MFN to the Canadian Wildlife Service regarding SAR associated with the hydro line. For example, to limit the cumulative impacts to SAR such as the Canada Warbler. Trees should be cleared during migratory periods and the use of heavy equipment in sensitive areas such as bogs, should occur during the winter months to limit ground compression and overall impact. Other activities may be required for non-SAR wildlife species.		
MICH – 37	<p>There is a fear of magnetic frequencies emanating from the lines. Little research has been undertaken on this subject. What study has OPG undertaken to understand whether or not magnetic frequencies have an impact on human health?</p> <p>ELM Comment:</p> <p>OPG briefly touches on the concerns surrounding human health in the Terms of References with plans to further explore the potential health effects in the EA.</p>	Electric and magnetic fields (EMF) will be assessed as part of the Human Health socio-economic component of the EA. This is outlined in Section 5.3.4	No changes required.
MICH – 38	<p>We would like to review the detailed engineering plans.</p> <p>We would also like to see any bridges and similar permanent or large-scale activities proposed for the future work on the hydro line. Bridges, if proposed, need to conform to the habitat they are located in, as well as meet requirements for fish and wildlife pass and navigation for members of MFN.</p>	Engineering plans will be publicly available as part of the Ontario Energy Board Section 92 leave to construct hearing. Engineering design will take into consideration requirements for fish passage and recreational use.	No changes required.

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	<p>ELM Comment:</p> <p>A general design outline exists in the TOR however it is necessary for MFN to review the detailed design of the route to understand how environmental constraints are being avoided.</p>		
MICH – 39	<p>We are requesting a list of required permits. We would like to review any permits issued to date, and also have the opportunity to provide comment on each permit to the appropriate government agency.</p> <p>ELM Comment:</p> <p>Permits for activities likely will reflect actual environmental conditions. Thus, MFN wishes to review the permits, to ensure appropriate environmental information has been provided. If the permit are predicated on actual environmental features, then the risk of unexpected disturbance will be reduced. If permits are predicated on inferred environmental features, then risk of unexpected environmental damage is expected to be elevated. Permits need to be provided to MFN prior to site disturbance. We note that OPG lists the necessary permits in the Terms of Reference, with plans to list the permit approvals in the final EA.</p>	<p>Potential permits are listed within the Terms of Reference, with plans to list the permit approvals in the final EA. Consultation on permits with Indigenous communities will be coordinated by the appropriate regulatory body. During the consultation process with MFN we will identify specific concerns and mitigate them where possible through the EA process.</p>	<p>No changes required.</p>
MICH – 40	<p>Michipicoten has concerns over the fish and fish habitat. We note the four federally and provincially protected species at risk, Northern Brook Lamprey, Lake Sturgeon, Upper Great Lakes Kiyi, and Shortjaw Cisco. These SAR and other species of</p>	<p>A list of fish has been added to Sections 5.2.7 and 5.2.6 which include Northern Brook Lamprey, Lake Sturgeon, Upper Great Lakes Kiyi, Cisco, Northern Pike,</p>	<p>No changes required.</p>

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	<p>importance to MFN include Northern Pike, Walleye, and Brook Trout represent staples of our indigenous diet and hold special interest. We expect all of these species (and their habitats) to be considered in the analyses included in the EA and these species and habitats to be protected.</p> <p>We note that detailed, multi-season surveys have not been carried out for fish within the study area. Surveys have been carried out more at a reconnaissance level and contingency measures have been identified in the event that valued ecosystem components are encountered during construction. Surveys for fish and species at risk should be carried out following provincially recognized protocols prior to construction and not in a haphazard manner during construction.</p> <p>Please confirm that measurements of water body crossings and identification of fish and fish habitat that may be impacted will be completed as part of summer 2018 field work, and that appropriate mitigation measures will be identified.</p> <p>Several SAR have been identified, including Northern Brook Lamprey, Lake Sturgeon, Upper Great Lakes Kiyi, Shortjaw Cisco, Brook Trout, Northern Pike, and Walleye. Could these species be considered for seasonal restocking at appropriate locations? Several lakes in the same Fisheries Management Zone (FMZ 7) are currently stocked with Brook Trout.</p>	<p>Walleye, and Brook Trout.</p> <p>On May 23, 2018, Hydro One provided MFN a copy of its Natural Heritage Field Work Plans for review and comment which outline fish habitat and SAR work plans. The results of these surveys, as well as those others will be described and documented in the Individual EA Report and supporting technical reports.</p> <p>To date no comments or feedback on the work plans has been received from MFN.</p> <p>It is recognized that the preparation of a plan is necessary to ensure impacts to water crossing areas are minimized or avoided. A plan for the construction phase will be developed during the EA and protection and mitigation measures, including those specific to fish habitat, will be defined at that time. The plan is expected to include compilation of environmental protection measures, contingency plans, and management plans with the objective to address known and</p>	

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	<p>ELM Comment:</p> <p>It is known that SAR fish exist downstream of the project area. It is extremely important to MFN to ensure that environmental practices eliminate and/or mitigate disturbance to these SAR fish. This type of elimination and mitigation of disturbance requires careful planning of work near water. This approach requires the complete description of water crossings that could transport materials downstream. It is this need for a complete description of water crossings and that future survey work include permanent and ephemeral surface water. For example, some water crossings may only be evident for a few months following snow melt. Please provide a detailed explanation how all water crossings will be found.</p>	<p>anticipated environmental conditions or events that could occur during the construction of the Project.</p>	
	<p>Changes to the fish habitat stemming from site work, erosion, surface water management, and the construction of access roads, culverts, piers, abutments, crossing structures, or fills within wetted lands and channels that will alter and potentially harm the fish habitat</p> <p>Please also see MICH-40.</p> <p>ELM Comment:</p> <p>Access roads and the Project footprint will likely involve in-water work, it is important that OPG uses Best Management Practices (BMPs) when working in or within the vicinity of water crossings in order to limit impacts to fish habitat. In addition, there</p>	<p>It is recognized that the preparation of a plan is necessary to ensure impacts to water crossing areas are minimized or avoided. A plan for the construction phase will be developed during the EA and protection and mitigation measures, including those specific to fish habitat, will be defined at that time. The plan is expected to include compilation of environmental protection measures, contingency plans, and management plans with the objective to address known and</p>	<p>No changes required.</p>

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
	<p>are numerous water crossing noted during the June 2018 inspection that are not mapped. It is also important to MFN that water crossings on access roads are treated the same way as water crossings elsewhere, specifically we expect that these water crossing will not suffer from erosion. Thus, we recommend applying additional mitigation techniques, such as the use of silt fencing, to help minimize the harm to fish populations for water crossings on access roads and other work areas. For example, this approach may require the installation of culverts for water crossings on access roads.</p>	<p>anticipated environmental conditions or events that could occur during the construction of the Project.</p>	
	<p>The reduction of fish habitat due to hydrology and changes to the groundwater is a possible consequence of the proposed activity. Please address this topic in the EA.</p> <p>ELM Comment:</p> <p>Information that will be generated from MICH-16 is required to confirm that water levels will not be reduced and result in harm to fishes or impact fish habitat. For example, under the Lakes and Rivers Improvement Act, fish habitat and fish passage must be maintained during these types of projects.</p>	<p>An analysis of flow conditions at waterbody crossings will be undertaken to assess the appropriate sizing and type of structures (bridges, culverts) needed to convey hydraulic conditions in accordance with the MNR guidelines and design criteria for temporary access road crossings of waterbodies.</p>	<p>No changes required.</p>
	<p>Blasting causing fish mortality and injury</p> <p>ELM Comment:</p> <p>OPG does not outline plans to blast during construction of the Superior Link powerline in the TOR, therefore mitigation strategies in regard to fish populations are not discussed. It is necessary</p>	<p>The EA will include a blast management plan should blasting be required. Should blasting be required, best management practices (BMPs) and mitigation measures specific to explosives management and use around fish and aquatic habitat will be</p>	<p>No changes required.</p>

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
	that OPG includes an outline of blasting activities in the EA report. Environmental monitors from MFN will be required to determine if Best Practices are being used near water.	implemented.	
	<p>Increased concentrations of chemicals, particulate matter, dust, and air emissions may occur in conjunction with the proposed activity. These topics only briefly addressed in the TOR.</p> <p>ELM Comment:</p> <p>It is expected that the use of Best Practices such as placement of sediment and silt fencing near wetlands will reduce the transport of dust and other chemicals. In addition, it is inferred that proper use of equipment will reduce air emissions, as described in MICH-01. Please provide additional elaboration for the other endpoints noted.</p>	Dust and noise from construction are controlled with appropriate mitigation measures and environmental best management practices which will be developed during the EA. Potential air quality effects from construction activities, especially for the potential receptors near the transmission line will be considered. Air quality impact assessment will be conducted and included in the environment assessment.	No changes required.
	<p>Impacts on fish abundance</p> <p>ELM Comment:</p> <p>Results from an aquatic study program will be included in the EA report. Environmental monitors from MFN will be required to determine if Best Practices are being used near water during throughout all phases of construction.</p>	Results from the fish and aquatic habitat studies will inform the assessment of any potential effects and associated mitigation measures in the EA.	No changes required.
	<ul style="list-style-type: none"> • Impacts on fish reproduction resulting from changes in the surface water, sediment quality changes from fuel spills, herbicides or other materials entering the water 	Results from the fish and aquatic habitat studies will inform the assessment of any potential effects and associated mitigation measures in the EA. Sediment,	No changes required.

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
	<p>Please also see MICH-40.</p> <p>ELM Comment:</p> <p>This is discussed previously in MICH-40. Results from an aquatic study program will be included in the EA report. Environmental monitors from MFN will be required to determine if Best Practices are being used near water during throughout all phases of construction.</p>	<p>erosion, spill response and herbicide use will all be subject to mitigation measures and will be further developed in the EA.</p>	
	<ul style="list-style-type: none"> • We want to see or offer a fish compensation plan or especially a fish habitat compensation plan <p>Please also see MICH-40.</p> <p>ELM Comment:</p> <p>The EA provide by OPG will need to address SAR fish. Thus, MFN expects a compensation plan for losses of fish production for species including Northern Pike, Walleye and Brook Trout. Such a compensation plan is justified if the Project disturbs habitat used by SAR fish and non-SAR fish.</p>	<p>Results from the fish and aquatic habitat studies will inform the assessment of any potential effects and associated mitigation measures in the EA.</p>	<p>No changes required.</p>
	<p>ELM Comment:</p> <p>If impacts on habitat, SAR fish, non-SAR fish, and other species found near water are observed, then the EA’s assumptions will be incorrect. If it is confirmed that one or more of the assumptions are incorrect, then the cumulative effects analysis needs to be revisited. It may be necessary for OPG to consider financial compensation if impacts cannot have addressed.</p>	<p>Results from the fish and aquatic habitat studies will inform the assessment of any potential effects and associated mitigation measures in the EA.</p>	<p>No changes required.</p>

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
	<p>It is important to list all fish Species At Risk, particularly small species like Brook Lamprey. We did not identify a list of small-bodied SAR fish proposed for study that were excluded from the EA. So, OPG should include small SAR in these analyses of risk. It is common knowledge in fisheries ecology that small-bodied fishes are less tolerant of habitat disturbance than large-bodied fishes. Hence, small SAR may be more at risk from the proposed activity. Please evaluate this scenario in the EA.</p> <p>ELM Comment:</p> <p>Studies of small SAR fish are justified, as they are equally as important as large-bodied SAR like Lake Sturgeon.</p>	<p>A list of fish has been added to Sections 5.2.7 and 5.2.6 which include Northern Brook Lamprey, Lake Sturgeon, Upper Great Lakes Kiyi, Cisco, Northern Pike, Walleye, and Brook Trout.</p>	<p>No changes required.</p>
	<p>In terms of our traditional use of fish resources, we note the increased presence of non-indigenous people working and/or recreating in the area will put pressure and a greater demand on fish resources. Please explain how staff working on the hydro line will be limited in their harvest of fish and wildlife from MFN's traditional territory. Please also see MICH-34.</p> <p>ELM Comment:</p> <p>It is necessary for OPG to describe how access will be restricted and how this additional pressure will be mitigated in the EA. We recommend for environmental monitors from MFN to provide oversight and restrict access to resources and harvest of resources. We are concerned that</p>	<p>Hunting and fishing on the Project site by Hydro One personnel will be prohibited.</p>	<p>No changes required.</p>

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
	workers will harvest plant and animals and in the process, disturb habitats.		
	<p>Michipicoten would like to understand what mitigation OPG will offer based on results of the aquatic study.</p> <p>Please also see MICH-40.</p> <p>ELM Comment:</p> <p>Results from an aquatic study program will be included in the EA report. Following the release of the EA report it is necessary for MFN to thoroughly review and understand the proposed mitigation strategies to help limit the cumulative impacts to local fish populations. We recommend members of MFN be involved with mitigation activities and the monitoring of fish populations following construction. This comment also refers to previous response concerning fish abundance and fish reproduction.</p>	Results from the fish and aquatic habitat studies will inform the assessment of any potential effects and associated mitigation measures in the EA.	No changes required.
	<p>We are also interested in understanding if cumulative effects from mining projects have been factored in relation to possible increases in cyanide or mercury on fish stocks. We note that multiple mining projects intersect the line project area. We are concerned that the runoff from mining projects may follow the hydro line corridor and impact waters and soils within the MFN traditional territory.</p> <p>ELM Comment:</p>	Concerns over contaminant discharge from mining operations should be directed to those mining projects. Water management from mining sites is regulated and mitigation of contaminant transport is the responsibility of the mining operations. Cumulative effects are assessed as part of the Project in a regional scale.	No changes required.

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
	Cyanide and mercury are associated with mining projects that cross the powerline corridor. Please identify how this runoff will be controlled. Transport of harmful materials via the hydro line corridor needs to be explicitly addressed.		
	<p>Michipicoten believes that modification of shorelines can result in changes in fish habitat. Such changes should be considered as a possible effect of this activity. Such changes in habitat can lead to effects evident with the fish community composition and / or biomass production of species within the fish community over time.</p> <p>ELM Comment:</p> <p>No clear statements about how shoreline modifications will be assessed for possible influence on fish habitat or fish community composition in the EA. This aspect needs study.</p>	Hydro One will make its best efforts to limit removal of existing riparian buffers along the Project footprint, where possible. This will be a consideration in assessing the advantages and disadvantages of project route alternatives. Best management practices and mitigations will be employed working within aquatic habitats. These specific mitigations will be developed during the EA.	No changes required.
	<p>A quantitative assessment of the total potential effects should be provided to assist in understanding the magnitude of the potential effects.</p> <p>Please also see MICH-40.</p> <p>ELM Comment:</p> <p>An assessment of the total potential impacts of the Superior Link project should be provided by OPG in the EA report.</p>	An assessment of the total potential impacts of the Lake Superior Link project will be provided by Hydro One in the EA report.	No changes required.
	Comparing measurements of waterbodies to be crossed with structures that will cross the	The assessment of fish and aquatic habitat will further inform	No changes required.

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
	<p>waterbodies should be analyzed to provide a greater understanding of the effects on fish and fish habitat. In other words, the selection process of the locations of tower footprints needs to be included in the EA. This topic needs to resolve candidate locations on the land and not be deferred to the ‘detailed design’ stage. After the candidate footprint locations are resolved, then MFN can review the suitability of these locations. It is not feasible to determine if a footprint is feasible unless the local natural resources are known at the time of the review.</p> <p>Please also see MICH-40.</p> <p>ELM Comment:</p> <p>MFN infers this activity will be likely be provided by OPG in the EA report. Follow-up after forecast footprint locations are completed is necessary, in order to determine the level of potential damage that will be caused to fish populations and determine the best mitigation strategies. We also request to be notified where bridges will be places across water, wetlands and other habitats. The placement of bridges across habitats used by fish, wildlife, members of MFN may impede or obstruct movement. We are concerned about the obstruction of movement from new bridges.</p>	<p>mitigations to be developed during the EA process. Preliminary design takes into consideration potential impacts to the environment.</p> <p>Effort will be made to avoid PSWs, ANSIs, ESAs and areas of traditional importance, where possible. This will be a consideration in assessing the advantages and disadvantages of routing alternatives using natural, socio-economic and technical criteria and indicators. Information from Indigenous communities relating to traditional knowledge and values will be incorporated into evaluation of alternative routing and refinement of the preferred route.</p>	
MICH – 41	<p>Michipicoten has greater concerns on impacts to the numerous wildlife species and wildlife habitat given the size of the project area and the potential for displacement, injury, and mortality.</p>	<p>Where studies have been conducted on the proposed corridor and they apply to the project, Hydro One will not</p>	<p>No changes required.</p>

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
	<p>Have detailed, multi-season surveys have not been carried out for wildlife within the study area? Surveys have been carried out more at a reconnaissance level and contingency measures have been identified in the event that valued ecosystem components are encountered during construction. Surveys for wildlife and species at risk should be carried out following provincially recognized protocols prior to construction and not in a haphazard manner during construction.</p> <p>ELM Comment:</p> <p>There is large potential for wildlife and wildlife habitat to be affected by this Project. This aspect should be mitigated via the completion of work during the winter season near areas of sensitive wildlife habitat. If work near sensitive wildlife habitat must be done outside of winter, careful planning is required along with the use of environmental monitors from MFN.</p>	<p>duplicate these studies, but instead use publicly available information to inform assessment efforts. Hydro One will conduct the appropriate studies where information is needed to satisfy the EA requirements. The current preliminary focus of field surveys includes Pukaskwa National Park, the transmission corridor between Wawa and Marathon, the Dorion area, temporary and permanent access roads, laydown areas, fly yards and any additional areas identified as a concern. Hydro One will continue to engage regulators to ensure the baseline data is adequate for the EA.</p>	
MICH – 42	<p>We wish to explore OPG’s mitigation plans more fully and to fathom the cumulative effects on wildlife and wildlife habitat.</p> <p>The proponent should commit to implementing the mitigation measures identified in the Construction Environmental Protection Plan. All mitigation measures identified that use the terms “should,” “could,” “may” and “would” should be replaced with “shall,” “can,” “must” and “will” to demonstrate commitment.</p>	<p>The mitigation measures in the CEPP referenced are not part of any Hydro One document.</p> <p>A plan for the construction phase will be developed during the EA and protection and mitigation measures will be defined at that time. The plan is expected to include compilation of environmental protection</p>	No changes required.

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
	<p>A section should be included in the Construction Environmental Protection Plan that deals specifically with mitigation measures to be implemented on the Michipicoten FN Reserve lands.</p> <p>ELM Comment:</p> <p>OPG's mitigation plans should be further discussed in the EA.</p>	<p>measures, contingency plans, and management plans with the objective to address known and anticipated environmental conditions or events that could occur during the construction of the Project.</p> <p>Hydro One would be pleased to meet with Michipicoten FN to discuss potential mitigation measures that may be implemented on Michipicoten FN Reserve lands during the EA process.</p>	
MICH – 43	<p>Conventional western thinking concludes that the caribou herd and two species of bats (little brown myotis) will continue to decline regardless of the project or efforts to mitigate impacts on these delicate species. Michipicoten has deep interest in preserving and promoting the caribou herd as well as the two species of bats and requires a significant mitigation effort in concert with Ontario and other proponents who contribute to cumulative effects on these species at risk. Allowing the extirpation of the caribou is unacceptable and irresponsible.</p> <p>Please explain how the proponent will carry out construction activities following the timing windows within 10 km of known or potential caribou high use areas.</p>	<p>The environmental protection plan will guide construction activities and outline mitigations for working in and around sensitive habitat areas. Hydro One will adhere to the <i>Woodland Caribou Best Management Practices in Ontario</i> (MNR) to reduce and/or mitigate direct and indirect impacts to caribou and caribou habitat. In addition, bat and bat hibernaculum assessments will be conducted as part of the wildlife and SAR portions of the EA. These findings will inform mitigations and project design which will be further</p>	No changes required.

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
	<p>See also MICH-44 and MICH-45.</p> <p>ELM Comment:</p> <p>The path forward for management of SAR caribou and SAR bats will be defined through upcoming correspondence with Environment Canada and Canadian Wildlife Service.</p>	<p>developed in the EA process.</p>	
MICH – 44	<p>In terms of SAR such as the caribou, have caribou zones been clearly identified?</p> <p>The Project footprint would remove approximately 140 ha (0.7%) of overlapping nursery and winter use areas. The entire extent of this area overlaps with or is within 500 m of existing anthropogenic disturbance. The Project would also remove approximately 7 ha of (less than 0.1%) of travel corridor habitat identified. With respect to potential caribou habitat, the Project footprint would remove approximately 92 ha (0.3%), 215 ha (0.2%), and 284 ha (0.1%) of winter habitat, refuge habitat, and Category 3 habitat, respectively.</p> <p>The EA does not indicate if or how the loss of these critical habitats will be mitigated/compensated for in accordance with the requirements of the Endangered Species Act. The ability/feasibility of the proponent to compensate for the loss of these areas should be addressed in the EA.</p> <p>ELM Comment:</p> <p>The path forward for management of SAR Caribou</p>	<p>Hydro One will assess Project footprints through the EA process.</p> <p>Where studies have been conducted on the proposed corridor and they apply to the project, Hydro One will not duplicate these studies, but instead use publicly available information to inform assessment efforts. In winter 2018, Hydro One completed Woodland Caribou winter aerial surveys for the Marathon to Wawa corridor. The results of this survey were shared with Michipicoten FN on May 9, 2018.</p> <p>The results of this survey, as well as those others will be described and documented in the Individual EA Report and supporting technical reports. This will include an assessment of effects and a description of the proposed</p>	<p>No changes required.</p>

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
	will be defined through upcoming correspondence with Environment Canada and The Canadian Wildlife Service.	mitigation measures to minimize and/or avoid potential impacts. The EA report will also identify permits and/or authorizations that may be required in relation to species at risk and habitat protections.	
MICH – 45	<p>Bats-(Little Brown and Northern Myotis)-Findings of the hibernaculum field studies have not yet been categorized.</p> <p>Will the EA indicate if or how the loss of critical habitats be mitigated/compensated for in accordance with the requirements of the federal Endangered Species Act? The ability/feasibility of the proponent to compensate for the loss of these areas should be addressed in the EA.</p> <p>The density of bat roosts within the transmission corridor should be determined for this project ahead of construction to determine the number and location for artificial roosts.</p> <p>ELM Comment:</p> <p>The path forward for management SAR bats will be defined through upcoming correspondence with Environment Canada and The Canadian Wildlife Service. During the June 2018 inspection multiple hibernacula were noted near the proposed powerline corridor. Much of this area is already disturbed from previous hydro line activities, and does not adhere to the 400 m buffer zone</p>	<p>An assessment of the effects on SAR bats and a description of the proposed mitigation measures to minimize and/or avoid potential impacts will be described in Hydro One’s EA. The EA report will also identify permits and/or authorizations that may be required in relation to species at risk.</p> <p>Federal <i>Endangered Species Act</i> will be adhered to.</p>	No changes required.

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
	<p>minimum. We also recommend placement of bat roosting boxes on towers to help re-establish potential bat habitat that will be removed or further disturbed across this project. In addition, members of MFN should be involved in monitoring candidate habitats during and following construction activities as seasonal clearing may encroach on these areas.</p>		
MICH – 46	<p>Canada Warbler: we note permanent habitat loss is a possible outcome of the activity.</p> <p>The EA will have to indicate how the loss of these critical habitats will be mitigated/compensated for in accordance with the requirements of the Endangered Species Act. The ability/feasibility of the proponent to compensate for the loss of these areas should be addressed in the EA. If this approach is taken, then the permanent loss of habitat for SAR Canada Warbler can be avoided. This approach is also applicable to other bird SAR found along the hydro line corridor.</p> <p>ELM Comment:</p> <p>The path forward for management of SAR birds will be defined through correspondence with Environment Canada and Canadian Wildlife Service. Canada Warbler habitat will be directly impacted by construction activities, as they rely heavily on swamp habitats. Wetland areas may also be affected by changing water levels and drainage that many occur as a result of construction activities.</p>	<p>An assessment of the effects on SAR birds and a description of the proposed mitigation measures to minimize and/or avoid potential impacts will be described in Hydro One's EA. The EA report will also identify permits and/or authorizations that may be required in relation to species at risk.</p>	<p>No changes required.</p>
MICH – 47	<p>Bald Eagle: We need field studies to confirm there</p>	<p>In winter 2018, Hydro One</p>	<p>No changes required.</p>

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
	<p>are no nests within the project footprint.</p> <p>ELM Comment:</p> <p>Field studies are necessary to determine if Bald Eagles are nesting in the area. We request for members of MFN to act as environmental monitors during the nest sweep protocol.</p>	<p>completed Woodland Caribou and stick nest winter aerial surveys for the Marathon to Wawa corridor. As part of the stick nest survey completed, Eagle’s nests were identified and documented. The results of this survey, as well as those others will be described and documented in the Individual EA Report and supporting technical reports. This will include an assessment of effects and a description of the proposed mitigation measures to minimize and/or avoid potential impacts.</p>	
MICH – 48	<p>Changes to the habitat and reductions of habitat will affect many species of wildlife as well as disrupt the use and connectivity of existing habitat during site preparation, construction and operation of the project.</p> <p>MFN will likely provide input on this process.</p> <p>ELM Comment:</p> <p>The Project is planned to run parallel to the existing hydro line. This area was disturbed in the late 1960s and significant fragmentation already exists. However, the land has recovered somewhat over the last 50 years and natural areas exist with sensitive species.</p>	<p>Effects to habitat and wildlife will be assessed during the EA process.</p> <p>Hydro is committed to entering into consultation with Indigenous communities throughout the phases of the Project. Hydro One’s Indigenous engagement program is designed to provide relevant project information to Indigenous communities in a timely manner. The process enables affected Indigenous communities to review the project proposals, provide input on project alternatives, and raise issues, concerns and questions they may have with the Project. Hydro One has, and will</p>	No changes required.

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
		continue to meet with Indigenous communities to collect information and discuss any concerns/questions/feedback communities may have on all aspects of the Project.	
MICH – 49	<p>Wildlife will be further impacted by changes to the vegetation, soil, surface water management resulting in a permanent and semi-permanent loss of wildlife habitat during site preparation, construction and operation.</p> <p>Please also see MICH-36.</p> <p>ELM Comment:</p> <p>This topic has been addressed within several previous comments. For these reasons, the environmental management discussed in these earlier comments applies to this comment and not discussed further.</p>	<p>Potential environmental effects and mitigation measures will be identified, including predicting the net effects and characterizing the net effects (i.e., after mitigation). Inspection and monitoring programs to assess the effectiveness of mitigation measures during and after construction will also be identified in the EA as required.</p>	No changes required.
MICH – 50	<p>Wildlife reproduction cycles will be greatly altered during site preparation, construction and operation of the line. What study has been undertaken to measure quantifiably and qualitatively the net effects on wildlife population reductions that are already under pressure.</p> <p>Please also see MICH-41.</p> <p>ELM Comment:</p> <p>Studies to outline the cumulative impacts of the</p>	<p>An assessment of the effects on wildlife and a description of the proposed mitigation measures to minimize and/or avoid potential impacts will be described in Hydro One's EA which will include species-specific timing windows for least risk. It will also include species-specific mitigations and potential habitat restorations.</p>	No changes required.

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
	Project on wildlife are necessary in the EA report. This topic has been addressed within several previous comments. For these reasons, the environmental management discussed in these earlier comments applies to this comment.		
MICH – 51	<p>The relationship between predators and prey will be altered resulting in a decline of prey due to construction, site preparation and operation, changes to surface water, erosion control, waste management, injury and mortality caused by vehicles and increased harvesting of wildlife by non-indigenous people. This represents a semi-permanent loss of wildlife resources and habitat as a result of the project.</p> <p>Please also see MICH 34.</p> <p>ELM Comment:</p> <p>Studies to outline the cumulative impacts of the Project on wildlife are needed in the EA. These topics are also discussed earlier in the EA report. Please refer to MICH-41 and MICH-36.</p>	See comment MICH-50.	No changes required.
MICH – 52	<p>Injury and mortality of birds and bats from collision with transmission lines as well as electrocution of birds and bats</p> <p>ELM Comment:</p> <p>Conductors should be placed to minimize the risk for these species, however MFN proposes the placement of bat roosting boxes as one form of habitat compensation.</p>	See comment 50. Transmission lines will be designed to according applicable standards and will include considerations for wildlife.	No changes required.

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
MICH – 53	<p>The destruction of nests and eggs of many species during site preparation, construction and operations</p> <p>ELM Comment:</p> <p>Adherence to timing restrictions (April 15-August 31) should avoid destruction of nests and eggs. Follow up will be required should an active nest site be found prior to April 15 or after August 31. Replanting of trees following construction should also be recommended to help minimize the overall habitat lost by species upon their return from migration.</p>	<p>As part of the EA, standard mitigation measures and operational timing constraints will be identified for clearing activities to protect migratory birds during their nesting period, including also bats, amphibians and other wildlife during their key life cycle periods. To address potential effects to wildlife, it is expected that vegetation clearing activities will likely be scheduled to occur in the winter to avoid impacts to ecological sensitive areas, wildlife and wildlife habitat, and species at -risk.</p>	<p>No changes required.</p>
MICH – 54	<p>Destruction of American Marten Dens</p> <p>Please also see MICH-4.</p> <p>ELM Comment:</p> <p>Construction may cause disturbance to the dens of American Marten. To minimize the impact on the dens, CEPP will recommend mitigation techniques for OPG to follow.</p>	<p>See comment 53.</p>	<p>No changes required.</p>
MICH – 55	<p>Destruction of bat habitat</p> <p>Please also see MICH-45.</p> <p>ELM Comment:</p> <p>The path forward for management SAR bats will be</p>	<p>See comment 53.</p>	<p>No changes required.</p>

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
	<p>defined through upcoming correspondence with Environment Canada and The Canadian Wildlife Service. The project footprint lays largely in candidate habitat area for endangered bat species. Both trees and rocky outcrops with cavities deeper than 1 m were observe during field studies. Since clearing of trees with a DBH greater than 10 cm is likely mitigation strategies that focus on providing new habitat for these species is necessary along with follow up monitoring. Possible mitigation techniques could include the placement of bat boxes on towers near disturbed areas of bat habitat. Please refer to MICH-45.</p>		
MICH – 56	<p>Significant concerns on remaining habitat availability and additional pressures from herbicides, chemicals, soil erosion, changes to water and wetlands habitat, all resulting in a decline of wildlife populations. Michipicoten needs to study and understand the net cumulative impacts and to suggest mitigation efforts to preserve and promote wildlife populations.</p> <p>Please also see MICH-28.</p> <p>ELM Comment:</p> <p>Changes to ecosystems caused by construction activities and the use of herbicides and chemicals may result in wildlife decline. OPG should provide an assessment of the full effects in the EA report. For this project MFN expects no use of chemical herbicides or other additives that could potentially harm fish, wildlife populations or wetlands. Please</p>	<p>An assessment of the effects on wildlife and a description of the proposed mitigation measures to minimize and/or avoid potential impacts will be described in Hydro One’s EA.</p> <p>Hydro One has vegetation management standards that will be applied to the LSL project. These standards include management practices to minimize and/or avoid the use of herbicides with the goal to ensure vegetation does not interfere with the safe and reliable operation and maintenance of the transmission line.</p> <p>Details of the vegetation</p>	No changes required.

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
	also refer to MICH-29, MICH-30 and MICH-49.	management program and practices will be discussed as part of the EA.	
MICH – 57	<p>How will OPG measure, predict and assess if impacts are not significant given the scale and duration of the project, given the footprint and expected displacement of wildlife and wildlife habitat combined with other triggers that include reduction of reproduction in fish and wildlife species.</p> <p>ELM Comment:</p> <p>This topic has been addressed within several previous comments. For these reasons, the environmental management discussed in these earlier comments applies to this comment.</p>	<p>Hydro One will develop an effects assessment approach to satisfy regulatory requirements under the Ontario <i>Environmental Assessment Act</i>.</p> <p>Potential environmental effects and mitigation measures will be identified, including predicting the net effects and characterizing the net effects (i.e., after mitigation). Inspection and monitoring programs to assess the effectiveness of mitigation measures during and after construction will also be identified in the EA as required.</p>	No changes required.
MICH – 58	<p>There is no mention of any risk to reptiles including SAR Common Snapping Turtle and SAR Midland Painted Turtle.</p> <p>ELM Comment:</p> <p>It is our view that SAR turtles will likely be addressed in the EA report. Numerous amphibian species were seen and photographed during the June 2018 inspection of the MFN reserve lands. While no turtles were seen during field work, candidate habitat for this species was noted. Members of MFN stated they have seen turtles in</p>	<p>Where studies have been conducted on the proposed corridor and they apply to the project, Hydro One will not duplicate these studies, but instead use publicly available information to inform assessment efforts.</p> <p>The screening of habitat suitability for species at risk within the study area for the Project will be undertaken followed by field</p>	The Midland Painted Turtle has been added to the SAR list in Section 5.2.7.

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
	<p>the water near the hydro line. Mitigation strategies should be implemented in order to limit the impacts to reptiles and amphibian species. Members of MFN should be involved in monitoring candidate aquatic habitats during and following construction.</p>	<p>surveys to verify presence/absence of species at risk, including potential effect as a result of the Project. The results of field studies will be included within Hydro One's EA report. The snapping turtle is listed on the SAR list.</p>	
MICH – 59	<p>Increased non-indigenous presence and activity will place greater strain on wildlife resources in traditional areas of harvesting and on existing traplines resulting in a semi-permanent loss of traditional wildlife resources</p> <p>One spiritual area and two traditional trapline trails used by Michipicoten First Nation were identified in the Project Footprint.</p> <p>Also see MICH-73.</p> <p>ELM Comment:</p> <p>This process was discussed within an earlier comment. The path forward will involve environmental monitors from MFN to provide oversight and restrict access to resources and harvest of resources</p>	<p>Hydro is committed to entering into consultation with Indigenous communities to provide support, capacity and training throughout the phases of the Project. Hydro One's Indigenous engagement program is designed to provide relevant project information to Indigenous communities in a timely manner. The process enables affected Indigenous communities to review the project proposals, provide input on project alternatives, and raise issues, concerns and questions they may have with the Project. Hydro One has, and will continue to meet with Indigenous communities to collect information and discuss any concerns/questions/feedback communities may have on all aspects of the Project.</p> <p>Hydro One would be pleased to</p>	No changes required.

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
		meet with Michipicoten FN to discuss potential impacts to traplines and spiritual sites to incorporate them into the EA.	
MICH – 60	<p>More work needs to take place on the destruction of bat hibernaculum and what mitigation or hibernaculum replacement is being considered and where?</p> <p>The results of field studies should be included in the EA Report. See MICH-45.</p> <p>ELM Comment:</p> <p>Numerous hibernacula for both SAR bats and snakes were documented during the June inspections in the footprint area. For example, large rocky outcrops with crevices deeper than 1 metre and cavity trees were both observed. These areas are likely to be cleared for construction. The creation of new habitat for these species following blasting and construction activities should be implemented to mitigate the stress put on these species. Additional insight will be provided by Environment Canada and Canadian Wildlife Services concerning SAR species. Refer to MICH-45.</p>	See comment MICH-45.	No changes required.
MICH – 61	<p>In terms of archaeological impacts, Michipicoten has buildings and structures on its reserve that are proximate to the ROW and may not have been considered given little or no substantive study has been undertaken on Michipicoten’s reserve lands.</p> <p>Any low potential locales within the study corridor</p>	On June 29, 2018, Hydro One’s archaeological consultant, Archaeological Research Associates Ltd. (ARA), sent an introduction and invitation to participate letter to each of the eighteen (18) Indigenous	No changes required.

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
	<p>to be subject to construction impacts should be examined to confirm their status as areas of low potential. First Nations Monitors should be included in these inspections. Please also see MICH-06. ELM Comment:</p> <p>This topic should be examined in an archaeological perspective.</p>	<p>communities. Each community was invited to participate in the planned archaeological assessments by providing information, at their discretion, regarding cultural heritage resources for inclusion in the Stage 1 report and/or participation in the Stage 2 fieldwork surveys within their Treaty and Traditional Territory. ARA and Hydro One will work with Indigenous communities to incorporate any information provided and to accommodate participation in fieldwork surveys. No construction work will begin until it has been confirmed that work areas have no archaeological potential or all required archaeological assessments have been completed following applicable legislation and guidelines and accepted by the Ontario Ministry of Tourism, Culture and Sport.</p>	
MICH – 62	<p>Mostly desktop studies have been undertaken on Archaeological Issues without field work, consultation with First Nations, and/or the inclusion of First Nations in the Phase I aspect of the study. A greater examination of potential archaeological impacts should include an examination along the main corridor routes with First Nations being</p>	<p>Phase 2 studies have been conducted for much of the project corridor and information gaps identified for Stage 2 studies are being addressed through the archaeological assessment. See comment 61.</p>	<p>No changes required.</p>

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
	<p>included in the examination.</p> <p>Please also see MICH-61.</p> <p>ELM Comment:</p> <p>This topic should be examined in an archaeological perspective.</p>		
MICH – 63	<p>First Nations were not consulted on the Archaeological studies and no concerns were provided or captured in the original study to place the 1960s-era hydro line. This study will address the archaeological concerns, and such is an essential activity.</p> <p>Please see MICH-61.</p> <p>ELM Comment:</p> <p>This topic should be examined in an archaeological perspective.</p>	See comment 61.	No changes required.
MICH – 64	<p>There is a concern over the loss of wetlands, upland forest, and riparian ecosystems.</p> <p>Please also see MICH-28</p> <p>ELM Comment:</p> <p>This topic has been addressed within several previous comments. Please refer to MICH -28 and MICH-30.</p>	An assessment of the effects on wetlands, upland forest and riparian ecosystems; and a description of the proposed mitigation measures to minimize and/or avoid potential impacts will be described in Hydro One’s EA.	No changes required.
MICH – 65	<p>What compensation will there be for the loss of wetlands of 279 hectares?</p>	Specific areas of potentially impacted wetlands have not been	No changes required.

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
	<p>Please also see MICH-28.</p> <p>ELM Comment:</p> <p>Ontario is currently exploring the possibility of a No Net Loss Policy for wetlands, it is unclear if there will be compensation if wetlands are lost on this project. Follow up will be required if the wetland compensation framework is put in place.</p>	<p>identified in the terms of reference and Hydro One is unsure where the number (279 hectares) is referenced.</p> <p>An assessment of the effects on wetlands and a description of the proposed mitigation measures to minimize and/or avoid potential impacts will be described in Hydro One's EA.</p>	
MICH – 66	<p>We are concerned with the use of herbicides especially near water and the impacts on fish, drinking water and riparian vegetation. Will there be a prohibition on the use of herbicides in your permit that states that you cannot use herbicides within 30 metres of a water body unless application is conducted by the ground application equipment or approved by a relevant regulatory agency</p> <p>Please also see MICH-29.</p> <p>ELM Comment:</p> <p>The potential damage herbicides may cause to the listed areas is considerable. As mentioned previously, there are a number of identified and unmapped small water crossing that were apparent during the June 2018 inspection, these have the potential to move soluble herbicides to larger bodies of water. Due to this, additional buffer zones may be required in areas not originally expected. Furthermore, in the past there has been similar</p>	<p>Hydro One has vegetation management standards that will be applied to the LSL project. These standards include management practices to minimize and/or avoid the use of herbicides with the goal to ensure vegetation does not interfere with the safe and reliable operation and maintenance of the transmission line.</p> <p>Details of the vegetation management program and practices will be discussed as part of the EA.</p>	No changes required.

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
	<p>agreements between MFN and other parties concerning the use of pesticides on reserve lands, however during June 2018 inspections there is evidence of herbicide spraying (likely 2,4-dinitrophenol). Therefore, follow-up may be necessary to ensure there is no use of herbicides on reserve lands throughout and following construction activities. In areas where herbicides may be used we recommend that hand spraying chosen vegetation rather than complete spraying of areas.</p>		
MICH – 67	<p>First Nations Archaeological potential from our point of view has not been captured in the EA</p> <p>Please also see MICH-61.</p> <p>ELM Comment:</p> <p>This topic must be examined from an archaeological perspective.</p>	See comment MICH-61.	No changes required.
MICH – 68	<p>Michipicoten acknowledges that pre-existing land use studies and work has been undertaken regarding the traditional use of lands and resources by First Nations. However, apart from providing a GIS database to OPG, MFN has only recently executed a long overdue MOU for actual consultation and a Traditional Land Use Study. Most Traditional Knowledge Studies and Land Use Studies, in our experience, are undertaken years ahead of construction to inform a project's design and to build a respectful relationship to each Indigenous community. Given that Michipicoten is now only commencing on ecological consultation, a</p>	<p>Hydro is committed to entering into consultation with MFN to provide support, capacity and training throughout the phases of the Project. Hydro One's Indigenous engagement program is designed to provide relevant project information to Indigenous communities in a timely manner. The process enables affected Indigenous communities to review the project proposals, provide input on project alternatives, and</p>	No changes required.

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
	<p>traditional land use study, OPG has questionable and inadequate information and data regarding what could be sensitive issues related to the permanent loss of lands that contain traditional harvesting habitats. No information has been conveyed regarding issues related to “Intuitive Archaeology” or spiritual beliefs. Therefore, specific and detailed land use information and especially any sensitive cultural, spiritual and land use issues have not been conveyed and are not incorporated in the planning and routing of the proposed line. Michipicoten consultations on mining projects that are smaller in scale than the Superior Link generally require one to two years of consultation. It is very questionable that a construction date of November is feasible while consultation at Michipicoten is only commencing now.</p> <p>Please also see MICH-06 and MICH-35</p> <p>ELM Comment:</p> <p>The approach to be taken here will depend on the findings of the 2018 traditional land use study.</p>	<p>raise issues, concerns and questions they may have with the Project. Hydro One has, and will continue to meet with Indigenous communities to collect information and discuss any concerns/questions/feedback communities may have on all aspects of the Project.</p> <p>TEK/TU studies will be discussed as part of the Project consultation and capacity provided for this information to be incorporated in the EA.</p>	
MICH – 69	<p>Michipicoten requires input through the TK Study and with physical participation and presence on field studies.</p> <p>MFN should have appropriately trained/qualified monitors participating in field work, particularly within Reserve lands.</p> <p>Please also see MICH-06 and MICH-35.</p>	<p>Hydro One is working toward securing Capacity Funding Agreements (CFA) with the 18 identified Indigenous communities. A component of the CFA is the sharing of Traditional Knowledge (TK) and Traditional Land Use (TLU) data that can inform the baselines studies,</p>	No changes required.

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
	<p>ELM Comment:</p> <p>MFN will continue to use TK keepers and integrate with the TLU study. Knowledge offered by these experts will be key in determining if there is need for further mitigation or compensation. It will be necessary to train MFN individuals, to complete the monitoring of the proposed activities.</p>	<p>evaluation of alternatives and impact assessment, including the identification of avoidance, protection and/or mitigation measures. Hydro One will work closely with Indigenous communities to incorporate TK and TLU data to the extent possible, provided this data is shared with Hydro One.</p> <p>Through the CFA process, Hydro One seeks permission to utilize any available Traditional Knowledge studies that are available to help with the assessment. Hydro One will also provide assistance to Michipicoten FN in the development and/or completion of these studies if they are not complete at this time.</p>	
MICH – 70	<p>The hydro line is proposed to cross MFN reserve lands. There has yet to be an environmental study on these reserve lands and we note the presence of citizens and homes existing near the ROW, on Cemetery Road, have been identified but potential impacts are unknown. These aspects need to be included in the TOR.</p> <p>Direct consultation, given proximity and scale of impacts, should be undertaken prior to finalizing EA.</p> <p>ELM Comment:</p>	<p>Hydro is committed to entering into consultation with Indigenous communities to provide support, capacity and training throughout the phases of the Project. Hydro One’s Indigenous engagement program is designed to provide relevant project information to Indigenous communities in a timely manner. The process enables affected Indigenous communities to review the project proposals, provide input on</p>	No changes required.

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
	<p>MFN should continue to be involved with environmental field studies, TK and TLU studies on reserve lands. This will be helpful for gathering information and identifying impacts that must be recognized in the final EA report.</p>	<p>project alternatives, and raise issues, concerns and questions they may have with the Project. Hydro One has, and will continue to meet with Indigenous communities to collect information and discuss any concerns/questions/feedback communities may have on all aspects of the Project.</p>	
MICH – 71	<p>No truly indigenous perspectives on traditional knowledge or traditional land use has been articulated by Michipicoten at this time. Also See MICH-06, MICH-35, MICH-70</p> <p>ELM Comment:</p> <p>The 2018 Traditional land use studies should be used to provide OPG with salient information on environmental matters. Information collected by TK keepers should be shared with OPG, as appropriate. Numerous medicinal and traditional use plants were identified during June 2018 inspections of the hydro line corridor. These plants are valuable, and some should be salvaged prior to disturbance for the hydro line.</p>	<p>See comment 69.</p>	<p>No changes required.</p>
MICH – 72	<p>MFN have not been informed of the candidate easement-access areas and laydown areas through Michipicoten reserve lands.</p> <p>Temporary workspaces should be sited and designed in association with the MFN on Reserve lands.</p>	<p>No discussions between Hydro One and Michipicoten FN have yet occurred on siting and design within the Gros Cap No. 49 Reserve and no laydown areas are proposed within the reserve.</p>	<p>No changes required.</p>

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
	<p>Decommissioning of temporary workspaces, access roads and waterbody crossings should be completed in association with MFN on Reserve lands.</p> <p>MFN was only recently partially informed regarding the current alignment of access roads and location of a laydown yard within the Gros Cap No. 49 Reserve. MFN and/or their representatives should have some input on these items, as well as the siting and design.</p> <p>Refer also to MICH-77.</p> <p>ELM Comment:</p> <p>The identification of candidate access roads and laydown areas on reserve land is of importance, as heavy equipment has the potential to cause severe land compression. These areas need to be identified as soon as feasible, so mitigation strategies may be implemented. In addition, the removal of trees and vegetation for these laydown areas has the potential to increase erosion and the movement of silt and sediment into water crossings.</p> <p>As noted in other comments, it is prudent to ensure a clean equipment protocol is followed, when equipment is moved to MFN territory. Prevention of introduction of non-native plants and wildlife is much easier than the control of these species after</p>	<p>New or existing access roads may be required within the reserve to access the corridor, but have not yet been confirmed during the ToR phase. Hydro One would be pleased to meet with Michipicoten FN to discuss siting and design within the Gros Cap No. 49 Reserve. Decommissioning of Project infrastructure will be in accordance with mitigation plans to be developed in the EA.</p>	

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
	they establish in a new habitat.		
MICH – 73	<p>Michipicoten would like to be consulted on and have dialogue with OPG on the two Michipicoten traplines and a spiritual site that will be affected by the Project. We need to understand the impact on our rights and whether the project results in a semi-permanent or permanent loss of these resources. Specific meetings with appropriate support staff should be set and confirmed.</p> <p>ELM Comment:</p> <p>Follow up will be required in order to discuss mitigation and compensation should the impacts result in semi-permanent or permanent loss of resources. Additional oversight should be provided by environmental monitors from MFN.</p>	<p>Hydro is committed to entering into consultation with Indigenous communities to provide support, capacity and training throughout the phases of the Project. Hydro One’s Indigenous engagement program is designed to provide relevant project information to Indigenous communities in a timely manner. The process enables affected Indigenous communities to review the project proposals, provide input on project alternatives, and raise issues, concerns and questions they may have with the Project. Hydro One has, and will continue to meet with Indigenous communities to collect information and discuss any concerns/questions/feedback communities may have on all aspects of the Project.</p> <p>Hydro One would be pleased to meet with Michipicoten FN to discuss potential impacts to traplines and spiritual sites.</p>	No changes required.
MICH – 74	Michipicoten is concerned about the Project’s impact on MFN citizens who participate in blueberry and cranberry picking and willow harvesting near the project footprint.	Traditional use of the Project area will be examined during the EA and will take into account consultation on specific activities	No changes required.

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
	<p>The blasting schedule needs to respect the traditional use of the land by MFN. OPG should consider avoiding blasting and other potentially hazardous construction activities during these periods, or have additional staff on-hand to maintain a secured perimeter during these periods.</p> <p>Refer also to MICH-09 and MICH-31.</p> <p>ELM Comment:</p> <p>OPG should agree to refrain from activities during key resource harvest times for plants and wildlife. Also, activities should be avoided on holidays and weekends. Finally, OPG should provide notice prior to all periods of activity.</p>	<p>with Indigenous communities.</p> <p>Should blasting be required, best management practices (BMPs) and mitigation measures specific to explosives management and use will be implemented. This will include the development of a blasting plan and schedule which will be shared with the community prior to construction.</p>	
MICH – 75	<p>Michipicoten is concerned about any negative socio-economic impacts on its citizens and the loss or strain on local resources.</p> <p>Some of the impacts that were not included in the Amended EA Report include:</p> <ul style="list-style-type: none"> - Displacement of businesses and residents; and, - Encroachment on residences and other structures. <p>It is not clear whether and to what extent the above will affect MFN. For example, Gross Cap No. 49 Reserve includes residences along Cemetery Road, a few kilometers south of the Project Footprint, which may be impacted.</p>	<p>Hydro One is currently in the development of the Terms of Reference phase. Hydro One has not produced an Amended EA Report at this time. Potential socio-economic impacts to residences nearby proposed work areas throughout the project footprint will be considered and evaluated as necessary in Hydro One’s EA.</p>	No changes required.

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
	<p>ELM Comment:</p> <p>Economic matters require consideration in light of the expected disturbance of the land, wildlife, plants, and water.</p>		
MICH – 76	Identified by MFN as not relevant for this study after follow-up review.	Comment noted.	No changes required.
MICH – 77	<p>A clean equipment protocol should be applied for work on MFN territory. This topic is not addressed sufficiently in the TOR or EA.</p> <p>Clean equipment is needed, to avoid accidental transport of non-native plants to MFN territory.</p> <p>Also refer to MICH-11.</p> <p>ELM Comment:</p> <p>Direct evaluation of the risk from non-native species, particularly plants, is not adequately addressed. Evidence exists that the introduction of non-native plants and animals can occur during construction projects in remote areas. Thus, MFN expects that a clean equipment protocol will be established, to wash down all equipment in an urban setting such as gravel parking lot, before this equipment is moved to the hydro line corridor. This protocol requires inspection by monitors from MFN, to ensure it is being followed.</p>	<p>Hydro One will develop a clean equipment protocol which will be included within Hydro One’s EA. The clean equipment protocol will be followed across all project work areas.</p>	No changes required.
	Red Rock Indian Band (CIC comments)		
RRIB - 1	We would like to see a section within the ToR outlining how trappers will be consulted during the EA.	Comment noted.	Section 9.4 of the ToR has been updated to identify trappers as a key stakeholder to be engaged

	Indigenous Community Comment	Hydro One Response Provided	ToR Section Revision
			throughout the EA. The Section has been updated to include meetings with trappers to discuss potential impacts the project may have on traplines, as well as mitigation and avoidance measures.
Red Sky Métis Independent Nation (Meeting Comments)			
RSMIN - 1	We would like the ToR to discuss how invasive species will be considered in the EA and what measures will be implemented to prevent their spread.	Hydro One has developed a Vegetation Management Program for its transmission facilities that will be applied to the LSL project. This program includes management practices to minimize and/or avoid the use of herbicides with the goal to ensure vegetation does not interfere with the safe and reliable operation and maintenance of the transmission line. Part of the Vegetation Management Program will include invasive species. Details of the vegetation management program and practices will be discussed as part of the EA.	No Changes required.

6 Outstanding Concerns and Issues

ToR Outstanding Concerns and Issues

Sections 4 and 5 of the ToR RoC identify responses to each of the comments received on the draft ToR. All comments received have been addressed and changes, where appropriate, have been made within the ToR. Hydro One shared responses to comments received with all those stakeholders and Indigenous communities who provided comments during the initial 30 day review period. No stakeholders or Indigenous communities identified outstanding concerns or issues with the responses provided, outside the additional comments received by Parks Canada on August 21st, 2018 and MECP on August 27th, 2018. The additional MECP and Parks Canada comments provided for the revised draft ToR have been addressed within the final ToR.

During the revised draft ToR review period local residents, cottagers and interest groups from the Dorion, Thunder Bay and Shuniah municipalities expressed opposition to the inclusion of an alternative route evaluation through the Dorion/Loon Lake area. Resolution of the comments received, as indicated in the correspondence documented in Table 4.3-2, would require the removal of the Dorion/Loon Lake alternative route from the ToR and the EA to fully address concerns raised. Similarly, a request to remove the preferred reference route through PNP from the ToR and the EA, as well as the existing transmission line was also received. Alternatives to the Project and alternative methods to carrying out the undertaking are required under the *Environmental Assessment Act* and MECP Code of Practice, and therefore it is Hydro One's intent to conduct a systematic evaluation of all reasonable alternative design methods and routes of carrying out the project. It is anticipated these concerns and issues with the alternative routes identified will be evaluated during the course of the EA. Additionally, Hydro One recognizes that further consultation and engagement will be required to ensure stakeholder and Indigenous community concerns are identified and considered within the alternative routing evaluation to be completed during the EA.

EA and Construction Related Outstanding Concerns and Issues

Many of the Indigenous community comments received on the draft ToR pertained primarily to matters to be evaluated during the Individual EA and construction phase of the project. Comments received focused on effects evaluation, baseline studies, specific mitigation measures, impacts to traditional land use (i.e. trapping) and Indigenous community participation (i.e. monitors). Hydro One recognizes that additional engagement will be required to ensure Indigenous community concerns are identified and considered throughout the EA process and in the development of effective mitigation and monitoring measures for the Project.

7 References

Ontario Ministry of the Environment and Climate Change (MOECC). (2014). *Code of Practice: Preparing and reviewing terms of reference for environmental assessments in Ontario*. Retrieved from the MOECC website: <https://www.ontario.ca/page/preparing-and-reviewing-terms-reference-environmental-assessments-ontario>