

# **APPENDIX 19-IV**

## **Project Activities in Provincial Parks and Conservation Reserves**

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# 1. INTRODUCTION

NextBridge Infrastructure LP (NextBridge) is proposing to construct, own and maintain the East-West Tie Transmission Project (the Project or undertaking). The Project is a new, approximately 450 kilometre (km) long double-circuit 230 kilovolt (kV) transmission line that connects the Lakehead Transformer Station (TS) in the Municipality of Shuniah near the City of Thunder Bay to the Wawa TS located east of the Municipality of Wawa. The Project has been identified as a priority project by the Province of Ontario, and a needed project by the IESO to meet future electricity demand in northwestern Ontario.

The Project is subject to Ontario's Individual Environmental Assessment (EA) process based on the voltage and length. A Terms of Reference (ToR) for the Individual EA was submitted to the Ministry of the Environment and Climate Change (MOECC) in February 2014 and approved in August 2014. Subsequently, an EA Report has been prepared in accordance with the approved ToR.

As noted in the approved ToR, other provincial EA requirements, such as the Ministry of Natural Resources and Forestry's (MNRF) Class EA for Resource Stewardship and Facility Development Projects and the MNRF's Class EA for Provincial Parks and Conservation Reserves, are intended to be met through the Individual EA process. Recommendations from the MNRF on the draft EA Report have been taken into account in the development of this appendix document.

## 1.1 Context

Ontario's provincially protected areas are conserved through the *Provincial Parks and Conservation Reserves Act, 2006* (PPCRA), which provides tools for the identification and protection of the Province's parks, recreational spaces and trails (Government of Ontario 2006). The PPCRA sets out the legislative framework for the formal protection of provincial parks and conservation reserves, allowing the MNRF (generally through Ontario Parks) to manage these areas. Development is generally prohibited or limited in Ontario's parks and protected areas; however, Section 20(2) of the PPCRA does permit utility corridors, stating that "subject to the policies of the Ministry and the approval of the Minister, with or without conditions, utility corridors, including but not limited to utility corridors for electrical transmission lines, are permitted in provincial parks and conservation reserves" (Government of Ontario 2006). Section 21 of the PPCRA states that in approving a utility corridor under Section 20, the Minister must be satisfied that "there are no reasonable alternatives; that the lowest cost is not the sole or overriding justification; and that environmental impacts have been considered and all reasonable measures will be undertaken to minimize harmful environmental impact and to protect ecological integrity" (Government of Ontario 2006).

Through the EA process, NextBridge has identified the preferred route as the most appropriate route for the transmission line that will balance environmental, social, cultural and economic impacts and benefits. Where possible, the preferred route avoids protected areas; however, as described in Section 19.5.2.1 of the EA Report (Table 19-3), some Project components are proposed to cross provincial parks and conservation reserves designated under the PPCRA. Specifically, Project components of the preferred route cross through portions of Ouimet Canyon, Black Sturgeon River, Ruby Lake, Kama Hills, Gravel River, Pukaskwa River, and Nimoosh provincial parks, which all have existing utility and/or transportation corridors. As well, some of the preferred route's Project components will cross portions of the Kama Cliffs, Gravel River and Kwinkwaga Ground Moraine Uplands

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Conservation Reserves, as well as the Kwinkwaga Ground Moraine Uplands Forest Reserve. Section 2.0 of this appendix describes which Project components are proposed to cross through each of the identified protected areas.

### **Conservation Reserves**

The three conservation reserves that will be crossed by Project components are the Kama Cliffs, Gravel River and Kwinkwaga Conservation Reserves. Conservation Reserves are areas of provincial Crown land set aside by regulation under the *Public Lands Act* to complement provincial parks in protecting representative natural areas and specific landscape features. Where explicitly permitted in the applicable management statements, these areas host recreational activities (e.g., hiking, skiing, tourism related uses, nature appreciation) and some non-industrial commercial activities (e.g., fur harvesting, bait fishing and commercial fishing). Recreational hunting and fishing are permitted uses within these conservation reserves. Commercial timber harvesting, mining, aggregate extraction and hydroelectric development are prohibited in conservation reserves.

### **Provincial Parks**

Seven provincial parks will be crossed by components of the Project, including one operating nature reserve class park (Ouimet Canyon Provincial Park) and six non-operating wilderness and/or waterway class parks. The recreational activities permitted in provincial parks are dependent on park classification and management direction in accordance with MNRF and Ontario Parks Policy. Where explicitly permitted in the applicable management plans or management statements, they host recreational activities (e.g., hiking, fishing, skiing, tourism related uses, nature appreciation). Non-industrial commercial activities, such as fur harvesting, bait fishing and commercial fishing, and recreational hunting are generally not permitted in provincial parks; however, there are exceptions. Commercial timber harvesting, mining, aggregate extraction and hydroelectric development are also prohibited in provincial parks.

## **1.2 Purpose**

The PPCRA states that utility corridors are permitted in provincial parks and conservation reserves, subject to the policies of the MNRF and the approval of the Minister of the MNRF. In most cases, new utility corridors in the protected areas require approval under Sections 20 and 21 of the PPCRA.

For each protected area, the provincial park management plan or conservation reserve management statement outlines the compatibility of transmission lines and utility corridors with the provincial parks or conservation reserves. Section 19 of the EA Report (Table 19-4), summarizes the current provisions and existing conditions regarding transmission lines and utility corridors in the management planning documents for each protected area. Where policies do not permit the use, an amendment to the policy must be sought and approved by the Minister of the MNRF before the Project can proceed through the protected areas.

On February 7, 2017, a Policy Proposal Notice on the Environmental Bill of Rights, Registry Number 012-9685, was posted by the MNRF to propose the amendment to the management direction for the Ouimet Canyon, Black Sturgeon River, Ruby Lake, Kama Hills, Gravel River, Pukaskwa River, and Nimoosh provincial parks, to allow tenure to be issued for utility corridors associated with the Project. The amended management direction would allow the MNRF to provide tenure for a utility corridor to accommodate the development of the new East-West Tie electrical transmission line, subject to completion of an EA, approval by the Minister, and any conditions

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necessary to protect park values. New land disposition for commercial use may be considered in the form of land use permit or lease, provided that the proposed commercial use is consistent with conditions of the PPCRA and the project has been approved through an EA process.

This appendix has been prepared to provide additional details to fulfill the conditions of the PPCRA for new transmission lines and utility corridors. This appendix details how the conditions for approval under the PPCRA are met for each protected area that is crossed by the Project footprint. These conditions are listed below.

- 1) There are no reasonable alternatives.
- 2) Lowest cost is not the sole or overriding justification.
- 3) Environmental impacts have been considered and all reasonable measures will be undertaken to minimize harmful environmental impact and protect ecological integrity.

Based on recommendations from the MNRF, this appendix provides a list of all the activities that are expected to take place in each provincial park and conservation reserve, as well as the reasoning behind the proposed means to implement the Project within the protected areas identified and a demonstration of the alternative methods considered. Section 19 the EA Report describes the baseline for each protected areas, the potential Project effects on access to and use of parks and protected areas (including changes in access and use, and changes in experience due to changes in environmental conditions such as noise, air quality, and visual resources). It also identifies the mitigation measures that will be undertaken to minimize environmental and social impact and protect ecological integrity. These aspects of the assessment of environmental effects are not duplicated here.

As part of previous work completed for the Project, an assessment of alternative route segments that avoided provincial parks and conservation reserves was completed by NextBridge. The resulting *Draft Alternative Route Assessment for the East-West Tie Transmission Project* (NextBridge 2015) was submitted to the Ministry of Natural Resources and Forestry (MNRF) for review in December 2015. In March 2016, the MNRF provided review comments on the alternative route report. Appendix 3-1-B of the EA Report provides an update and augmentation to replace Sections 3.5 and 3.6 of the alternative route report (NextBridge 2015), specifically for the evaluation of alternative route segments around provincial parks and conservation reserves. As a result, the assessment of alternative routes is not duplicated in this appendix.

## 2. PROJECT ACTIVITIES AND ALTERNATIVES

Appendix 3-1-B of the EA Report presents a quantitative routing analysis for the alternative routes around the provincial parks and conservation reserves identified. While Appendix 3-1-B presents alternatives to the preferred route, this Appendix presents a discussion of the alternative methods to constructing the preferred route and provides justification for the project activities.

For the development of the Project, the transmission structures, access roads, temporary storage yards, laydown yards, and construction camps were planned using best efforts to avoid and minimize adverse effects to protected

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areas. Environmental effects were considered when determining the route, with the objective being to minimize adverse environmental effects and to protect ecological integrity. Many factors were considered when determining the appropriate methods to construct the transmission line in specific areas. The following provides an overview of the considerations when determining the most appropriate alternative method or activities on a site-specific basis.

### **2.1 Transmission Structure Types, Placement and Spacing**

Approximately 20.6 km (4.6% of the total length of the preferred route ROW) is proposed to cross provincial parks, conservation reserves, and one forest reserve. A number of factors pertaining to the transmission structures (i.e., towers) were considered when proposing the transmission line components in and around these protected areas. These factors included the type of structure, the number of towers required, and the spans between the towers. These factors have an effect on terrestrial components such as need for clearing and visibility, ROW width requirements, and safety. They are also impacted by technical factors such as the physical environment (e.g., terrain and unique features such as canyons or ravines) and climate.

As described in Section 4.2.2 of the EA Report, the typical Guyed-Y lattice tower foundation will likely be a drilled pier or capped micropile foundation (Figure 4-4 and Figure 4-5, respectively). The Guyed-Y structure and pin connection allow for smaller more efficient tower types, requiring a single approximately 1 metre (m) diameter pier and four approximately 6-inch diameter anchors for the guy wires. The self-supporting tower structure will require four approximately 1 m diameter piers. As a result, there is a trade-off between the distance between towers and the width of the ROW, such that fewer towers require a wider ROW. Consequently, where there is a preference to minimize the width of ROW, there is a need for an increase in the number of towers in the ROW. Alternatively, where there is a preference for longer spans between towers, there is a need for a wider ROW.

These factors had to be considered on a case-by-case basis. Where possible, NextBridge has avoided placing towers in watercourses and wetlands by proposing longer span lengths between towers to avoid construction or visual impacts in sensitive areas. Alternatively, to avoid or minimize the disturbance and area of land that the ROW occupies in conservation reserves, more towers, with shorter spans between the towers, are proposed for a narrower ROW. As discussed in Section 2.1 of this appendix, these decisions have been made on a case-by-case basis, taking into account the input from the MNRF. Where recommendations have been made more recently, the engineering team is exploring opportunities to modify the tower spacing. As an example, NextBridge is reviewing whether the towers on either side of the Pukaskwa River can be spaced farther from the river banks to minimize visual impacts to those using the river. Where placement of towers in Critical Land Value Areas (CLVAs) were unavoidable, mitigation measures were developed and provided in Section 4 of Appendix 4-II of the EA Report.

#### **2.1.1 Towers versus Buried Line**

NextBridge considered burying the transmission line for aesthetic concerns in some locations, but determined that burying the line would have to be completed for full segments of approximately 6 km rather than at site-specific features such as a river crossing. It was determined that burial would have more environmental effects from trenching and large equipment along the Project footprint, and could require more blasting and other feasibility issues. As a result, burying the line was not identified as a preferred method in any of the protected areas.

## **2.2 Access Roads**

As described in Section 4.2.3 of the EA report, temporary and permanent access roads will be required for the construction, operation and maintenance of the Project. Construction will require temporary access to the preferred route ROW for clearing and site preparation, to each tower location with heavy equipment for tower installation, and for clean-up and reclamation activities. Existing roads and trails will be used where practicable to limit disturbance resulting from construction of new access roads. Construction of new access roads will be limited to areas where required and where terrain prevents the use of the travel lane. For instance, in some cases, suitable roads or trails do not already exist within the provincial parks or conservation reserves, and alternative roads around the protected areas do not exist or do not provide connected access to areas required. Similarly, in some areas there are terrain barriers (e.g., large water bodies, steep terrain or unique physical features such as ravines), therefore new construction access is required in some locations. In these cases, NextBridge has proposed to build access roads for construction.

Operations will require permanent access to the preferred route ROW for lighter vehicles conducting inspections, maintenance, emergency repairs, and vegetation management. A subset of the construction access roads will be built and maintained for operation and maintenance of the Project. Construction or upgrade of the permanent access roads will follow MNRF guidelines for access roads, including the *Environmental Guidelines for Access Roads and Water Crossings* document (MNR 1990). Gates and fencing for both temporary and permanent access roads may be used for safety purposes. NextBridge will require approval(s) from MNRF to place gates or fencing on provincial Crown land.

### **2.2.1 Helicopters versus Terrestrial Access**

The use of helicopters to bring in equipment, materials and labour into protected areas for construction was considered as an alternative to needing access roads. Use of helicopters to install towers was also considered. Helicopters may be used to air-lift materials in to challenging terrains and may help to avoid terrestrial disturbance created by upgrading or construction access roads; however, activities such as clearing, grading and excavations will be required for the ROW and the footings for the towers. While some of these activities could be undertaken manually (e.g., hand clearing), in most cases the use of equipment is preferred as the more reasonable option to complete the work within schedule given the length of the route and terrain. For example, it was calculated that mechanical clearing has approximately six times the efficiency of hand clearing and would result in unrealistic timelines for Project completion. Likewise, some activities such as excavations for footings could not be completed manually. As a result, large equipment is required for the Project activities and this equipment cannot be brought in by helicopter; therefore, access roads would still be required.

In addition, the noise and area disruption by continuous use of helicopters over the parks or conservation reserves for a lengthy period (i.e., to bring workers in and out on a regular basis) could have impacts on visitor enjoyment of the protected areas and sensory disturbance to wildlife.

## **2.3 Water Body Crossings**

Water body crossings (e.g., culverts, clear-span bridges, and rig mats) for access roads will be required.

The type of crossing structure proposed is a key mitigation measure; therefore, water body crossing structures were identified for each water body. The number of water body crossings will be minimized to the extent practicable by using existing water body crossings or working around the water bodies (without crossing) where possible during construction.

Temporary water body crossings will be installed on the travel lane, as well as the new and improved access roads. The temporary water body crossings will involve the installation of rig mats (i.e., temporary bridges), ice bridges/snow fills (for winter construction), temporary clear-span bridges, and temporary culvert installation. The type of crossing and construction method has been determined on a case-by-case basis depending on fish habitat potential, bank-full width of the water body, whether crossing was temporary or permanent, construction timing, other physical properties of the water body (e.g., bank stability) where known, and consultation with regulators. Permanent water body crossings will be installed on the permanent access roads and will involve the placement of bridges or culverts. Details for selection of the water body crossing structures are discussed in Section 13.6.1 (Fish and Fish Habitat) of the main body of the EA Report.

Crossing types and construction methods will be finalized as part of ongoing Project engineering and design, in consultation with Project stakeholders, and where required, regulatory approvals will be obtained from the applicable regulatory agencies prior to installation of the water body crossing structures, as required. Permanent and temporary water body crossings will be constructed and operated to conform with DFO *Measures to Avoid Causing Harm to Fish and Fish Habitat Including Aquatic Species at Risk* (DFO 2016) and MNR *Environmental Guidelines for Access Roads and Water Crossings* (MNR 1990), including the application of sediment and erosion control measures. Clearing of riparian vegetation will be limited to the extent practicable, and to the requirement of the access road width only.

## **2.4 Storage Yards, Laydown Yards and Construction Camps**

No temporary storage yards, construction offices, laydown yards, construction camps or fuelling areas are proposed to be located in provincial parks, conservation reserves or forest reserves. All laydown areas will be placed outside of the protected areas, in locations that will have limited effects on park viewscales, as discussed in further detail in Section 3.

## **2.5 Blasting**

Explosives may be required during construction for the installation of tower foundations in specialized areas (i.e., installation on challenging terrain) or for construction of new permanent access roads. Contingent upon access and terrain, it is expected that the mobilization of the blasting equipment and materials will either occur using reasonable conventional ground access or be air-lifted into the area. Prior to blasting, NextBridge will review blasting locations and make sure regulatory requirements are being followed with respect to residents, wildlife and fish. Specifically, blast operations will be carried out in accordance with DFO guidelines and Ontario Provincial Standard Specification 120 *General Specification for the Use of Explosives*. NextBridge is committed to developing a blasting plan for the Project for avoiding and mitigating serious harm to fish and engaging with DFO on the plan, as appropriate. Blast or waste rock will be spread on the ROW or removed from the ROW, as appropriate. Blast wastes will be dealt with according to regulatory requirements

## **3. PROJECT ACTIVITIES BY PROTECTED AREA**

The designated protected areas that will be crossed by components of the Project footprint are listed in the following sections. Each section provides a description of the alternatives considered and demonstrates why, after considering a number of factors, the Project components proposed are the most reasonable options. Appendix 5-I includes maps of the environmental features crossed by the Project and the associated proposed mitigation for the features (Appendix 5-IA Environmental Alignment Sheets and Appendix 5-IB Access and Construction Environmental Maps).

### **3.1 Ouimet Canyon Provincial Park**

Ouimet Canyon Provincial Park is the only operating day-use park crossed by the Project components. It is located west of Dorion and northeast of Thunder Bay. It has a picnic area located near the main parking lot and trailhead, and features a 1 km trail to two viewing platforms along the canyon's rims. The park was designated as nature reserve because the canyon formation, together with the occurrence of distinct arctic-alpine flora, represent a distinctive natural habitat and landform of the Province (MNR 1985). As such, the area is protected for education purposes and as gene pools for research to benefit present and future generation. The park is a prime tourist attraction, as a loop trail offers visitors an opportunity to experience the scenic Ouimet Canyon. The park contains visiting pods, a walking trail, bridge, and interpretive display panels that provide visitors with additional information about nearby points of interest. Quiet pastimes such as scenic viewing, nature study, photography, art, snowshoeing and cross-country skiing are encouraged in this park (MNR 1985). Non-compatible activities in the park include rock climbing, snowmobiling, ATVs, horseback riding, camping and organized team sports. The park has an access road and parking lot, as well as a picnic area at Gulch Lake and a lower trailer parking lot. Sport fishing is permitted in Gulch Lake; however, sport hunting and commercial trapping are not permitted (MNR 1985). The Ouimet Canyon Provincial Park Management Plan does not identify any existing transmission lines or utility corridors in relation to the park (MNR 1985).

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At the closest point to the Ouimet Canyon Provincial Park, the preferred route ROW parallels and is adjacent to the existing Hydro One transmission line on the north-west corner of the park, at a distance of approximately 2 km away. The preferred route ROW will not cross the park and no transmission structures will be placed in the park.

It is proposed that an existing two-lane paved road that currently runs south to west through the southern portion of the park be used as a temporary access road, to access the construction footprint. This road currently provides access to the viewing platforms in the park, but does not connect to adjacent land outside the west boundary of the park. Although it is proposed that this road will be upgraded, widening the road is not proposed. For access to the ROW, it is proposed that the road be extended approximately 17 m to the western edge of the Park to connect to an existing road on the adjacent land outside the west boundary of the park. An existing road along the southern portion of the park would also be used, but is not identified as requiring improvement or widening. A second road is currently proposed to be used running north-south to the west of the park, connecting the proposed laydown areas; however, the southern portion of this is through extremely steep terrain and is in undisturbed greenfield area; therefore, given the existing paved road in the park, consideration is being given to avoiding the use of this road to the west to the extent possible.

Alternatives to the use of these access roads through the park have been considered, but there are no other well-developed roads or reasonable alternatives that exist in reasonable proximity outside the park. The proposed access in the park uses pre-existing roads that require minor maintenance and less than 20 m of new construction. Utilizing the existing roads within the park will minimize environmental impact by not requiring the construction or widening of roads in greenfield areas, also avoiding need to bring in gravel from aggregate sources and disturbance of other undeveloped areas, which would have greater impact than performing minor road maintenance. Although the use of the roads through the park could temporarily impact recreational users, this would be infrequent and short-term. Since the proposed approach was selected based on having the least impact and no reasonable alternatives, cost was not the sole or overriding justification in its selection.

No laydown yards or other infrastructure components are proposed within the park. Up to five laydown yards are currently proposed outside park boundaries on the west and south sides; however, to mitigate concerns about views from the viewing platforms being impacted by visibility of closest laydown yard, NextBridge is considering removing the laydown yard on the south-east corner of the park from the Project's footprint. With this change, it is not anticipated that the Project will impact the views of the park.

### **3.2 Black Sturgeon River Provincial Park**

The Black Sturgeon River Provincial Park is a non-operating park located northwest of the Township of Nipigon. It hosts a recreational waterway that is used for fishing, hunting and canoeing. The park is designated a waterway class park in recognition of its representative natural features and potential to provide high quality water-based recreational opportunities.

The park provides day-use opportunities for angling on its many lakes and rivers, paddling opportunities along its entire length, rock climbing northwest of Nonwatin Lake, and beach areas for family picnics and swimming. During the winter, the park provides cross-country skiing and snowshoeing opportunities. The Canadian Outward Bound Wilderness School uses sections of the park during dogsledding and winter camping programs. Part of the Trans-Ontario Provincial System snowmobile trail also passes through the park. Camping occurs along most of the access points to the park, as well as in the interior, along the Black Sturgeon River. Within the park,

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nature reserve zones, development zones, access zones and natural environment zones have been designated (MNR 2003a). The Black Sturgeon River is also recognized as a priority for protection of lake sturgeon habitat. Table 31 of the Policy Report in the Black Sturgeon River Provincial Park Management Plan identifies that existing bait fishing, existing commercial fur harvesting, Crown disposition commercial use, native species fish stocking, existing and new road development, vegetation management, wildlife population management, on-trail snowmobiling and all-terrain vehicle (ATV) use, hunting, mountain biking, private motor boat use, non-motorized recreation travel, sailing, sailboarding, scuba diving, sport fishing and trail development are all permitted in the park (MNR 2003a).

According to Section 10.6 of the Park Management Plan, there are two natural gas pipeline corridors that cross Black Sturgeon River Provincial Park, one at the south end of the park, and the other between Eskwanonwatin Lake and the camp 42 bridge. There are also two hydro transmission corridors that cross the south end of the park and another line crossing the middle of the park associated with a pipeline (MNR 2003a). While these will continue to be a permitted non-confirming use, new utility corridors require a plan amendment (NextBridge 2015).

The preferred route ROW that crosses the park is approximately 1.1 km in length. It is proposed to be directly adjacent to the existing transmission line, across one of the narrowest portions of the park (i.e., using the shortest path across) to minimize adverse environmental and recreational effects. Reducing the ROW width was recommended by the MNRF as the preferred route ROW is within the nature reserve zone of the park, protecting talus slopes and wetland communities; thus efforts have been made to avoid widening the ROW. The preferred route ROW width is based on health and safety considerations for conductor blow-out (i.e., to provide a safe distance to prevent flashover to trees and potential for forest fires) and cannot be reduced beyond best practice clearances. Reducing the number of transmission structures in the park was also considered; however, this would require increasing the spans between towers, the width of the ROW, and the total area of each tower's footprint. Due to the length of area to be crossed on either side of the Black Sturgeon River, it was not feasible to avoid towers in this area; therefore, three towers are planned to be constructed within the park. These towers will be designed to take into account the existing dam (i.e., to not impede dam works) and potential for changing water levels. NextBridge is also exploring whether it can further setback the towers from the water's edge on each side of river to reduce visibility.

A small portion of new temporary access road construction is proposed along the preferred route ROW on the southern side of the park, but will not cross the Black Sturgeon River. No access roads are proposed within the park on the north side of the river. The MNRF has indicated that it supports using the existing ROW travel lane to enter the park from the west side and the east side of the river for clearing during construction and maintenance. This route for the transmission line has been chosen not due to the lower cost, but because there are no reasonable alternatives that maintain a route that is contiguous with existing transmission line and that minimize environmental effects to the park to the extent possible using the most direct (i.e., shortest) route.

No laydown yards or other infrastructure are proposed within or directly adjacent to the park.

### **3.3 Ruby Lake Provincial Park**

The Ruby Lake Provincial Park is a non-operating park that is used recreationally for hiking, cross-country skiing and snowshoeing, and has trails with viewpoints. The park is located east of the Township of Nipigon and the Township of Red Rock. It is classified as a natural environment park because of the park's provincially and regionally significant natural features, as well as its regional historical legacy and recreational values. The park's extensive trail system offers park visitors opportunities for day-use that includes hiking, scenic and wildlife viewing and nature interpretation. Due to the area's topography, the park offers numerous excellent scenic lookouts, including panoramic views of the distinctive mesa-cuesta landforms, such as Doghead Mountain and the Kama Hill Formation. The park is also accessible by boaters and sea kayakers from Lake Superior. Backcountry/interior camping associated with hiking and/or hunting is not permitted within the park, except for camping along the shoreline of Lake Superior. Informal cross-country skiing and snowshoeing occur in the winter. Motorized vehicle use on hiking trails within the park is prohibited; however ATVs and snowmobiles are allowed on existing hauling roads during hunting seasons for moose, deer and grouse, and to access the trap lines and baitfish operations. Commercial uses not permitted within the park include: timber harvesting; prospecting, staking mining claims, developing mining interests, working mines; extraction of sand, gravel, topsoil or peat; commercial hydroelectric power development and/or electricity generation; and commercial fishing.

According to Section 9.4 of the Park Management Plan (MNR 2009), there is a small portion of the park that is crossed by the Ontario Power Generation Northwest Power Group transmission corridor on the north boundary.

The preferred route ROW is proposed to cross only 350 m (approximate) of the narrowest portion of the park. The new transmission line will be directly adjacent to the existing Hydro One transmission line to minimize adverse environmental and recreational effects. One transmission structure is currently planned within the crossing. Because the tower location was sited within a wetland area, NextBridge is considering removing the proposed tower from within the park to decrease the level of environmental impact within the park. However, this will be determined in consultation with the MNRF as it would result in a wider ROW (e.g., 75 to 90 m in width) because a longer span between towers would be required. The preferred route ROW may be visible through the northern trail in the park, but the Project will not affect the majority of the viewsapes and will not cross the trail system.

A short segment of new temporary access road is currently planned to cross the park boundary on the southwestern side in order to construct the proposed tower. Removing the tower from the park would eliminate the need for constructing this extension of new temporary road. These changes may also minimize adverse effects to recreational activities and reduce concerns about viewpoints.

The project activities crossing this park are being proposed not due to the lower cost, but because there are no reasonable alternatives that maintain a route that is contiguous with the existing Hydro One transmission line and that minimize environmental effects to the region to the extent possible using the least infrastructure and shortest route.

No laydown yards or other infrastructure are proposed within or directly adjacent to the park.

### **3.4 Kama Hills Provincial Nature Reserve (Provincial Park)**

The Kama Hills Provincial Nature Reserve is located within the Kama Cliff Conservation Reserve, east of the Township of Nipigon and the Township of Red Rock. It hosts recreational opportunities for hiking and wildlife viewing. The nature reserve was established for the protection of an earth science feature, specifically the type section of the Kama Hill Formation. The only land use or recreational activity permitted within the nature reserve is wildlife viewing, which is encouraged. The nature reserve is also identified as a prime candidate for educational purposes (MNR 1991). No commercial activities are permitted within the nature reserve (i.e., an existing trapline was removed from the nature reserve, and the Interim Management Statement identifies that steps would be taken to exclude the nature reserve from overlapping forest management agreements). Road construction is not permitted within the nature reserve (MNR 1991).

The Interim Management Statement (MNR 1991) neither references existing utility corridors within the park boundaries, nor precludes or prohibits the development of future corridors.

While the park is not proposed to be crossed by the preferred route ROW or other infrastructure, approximately 100 m of temporary construction easement will cross the park. To decrease potential recreational and environmental impacts, NextBridge has committed to consider modifying the current footprint to completely avoid overlap of the temporary workspace with the park. The avoidance alternative would be chosen not due to the lower cost, but because it addresses MNRF concerns and avoids direct environmental impacts to the park.

No laydown yards or other infrastructure are proposed within or directly adjacent to the park.

### **3.5 Kama Cliffs Conservation Reserve**

The Kama Cliffs Conservation Reserve is near the Township of Nipigon, along the north shore of Lake Superior. It hosts recreational opportunities for wildlife viewing, hiking and snowmobiling. It is known for its hiking and canoeing trails, nature appreciation opportunities, and the educational teaching and scientific studies that take place onsite. There are several sites of cultural importance onsite that remain in traditional use (MNR 2001). Through the conservation reserve there is a snowmobile trail and several hiking trails, including the Mazukama Falls Hiking Trails.

Section 6.4 of the Kama Cliffs Conservation Reserve Statement of Conservation Interest (MNR 2001) indicates that there are two existing transmission lines that bisect the conservation reserve.

Approximately 3.68 km of the preferred route ROW is proposed to cross the conservation reserve, though this will be adjacent to the existing Hydro One transmission line to minimize environmental effects. Eleven towers are proposed to be installed within the conservation reserve boundaries. Access roads were placed outside of the protected area to minimize effects on the conservation reserve wherever feasible; however, avoidance of new or improved access roads was not achievable given the extensive size of the conservation reserve. A number of short segments of new temporary access roads are proposed to be constructed to access the construction workspace from other existing trails or roads that are proposed to be upgraded and widened. The new access road of greatest distance is proposed to be created by improving and widening an existing trail to provide temporary access for

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construction of the transmission line. The proposed access road crosses two of the hiking trails in the park. No other existing roads are available for use and no other reasonable alternatives have been identified.

The use of helicopters as an alternative for installing the towers and as a means to avoid developing access roads for construction was considered. This approach would require flying or walking in crews to create safe landing areas, which would require manual clearing, stripping and grading. Without roads, the same activities would have to be completed manually for the 3.68 km length of the ROW. Based on an average of 50 m a day for hand clearing versus 200 to 400 m a day for conventional methods, calculations determined that, due to the distance of the route, hand clearing would take approximately six times as long as conventional methods (i.e., one to one and a half months for hand clearing whereas equipment is expected to complete the work in one week).

Both the clearing and subsequent activities such as stripping, grading and excavations for tower footprints would require numerous daily helicopter trips to bring people and materials in and out on the conservation reserve. Given the time required to complete the work in this manner, frequent helicopters carrying labour and materials would have an adverse effect to the environment through sensory disturbance to wildlife, such as caribou and peregrine falcons which are known to have presence in the region, potentially affecting normal behaviour patterns. Providing daily access or workers by helicopters would extend the timeframes of work on the project, which would put the project schedule at risk and extend the duration of the environmental effects. In addition, the noise generated from the helicopters over an extended period could affect the recreational enjoyment of the area. Furthermore, some large equipment would still need to be brought in using conventional ground transportation to prepare the ROW for the tower installation. As a result of these factors, it has been determined that helicopter use is not a complete substitute for conventional ground transportation and access roads would still be required.

Consequently, the proposed methods have not been chosen due to the lower cost, but because no reasonable alternatives avoid the development of access roads and risk to schedule, while concurrently minimizing environmental and social effects in comparison to the proposed activities.

No laydown yards or other infrastructure are proposed within or directly adjacent to the conservation reserve.

### **3.6 Gravel River Conservation Reserve**

The Gravel River Conservation Reserve has recreational opportunities for canoeing, fishing, hunting, backpacking and camping. The conservation reserve is near the Pays Plat First Nation and the unincorporated community of Rosspport, and is accessible via canoe or backpacking from the Gravel River. Its southern boundary abuts the northern boundary of the Gravel River Provincial Nature Reserve. This reserve is known for its views and vistas, waterfalls, cliffs and opportunities for canoeing, fishing, backpacking, horseback riding, photography and camping (MNR 2013b). There are two canoe routes that run through the conservation reserve, along with a snowmobile trail that follows the existing utility line and four tourist outpost camps.

Section 6.4.2 of the Gravel River Conservation Reserve's Management Statement (MNR 2003b) does not identify existing utility corridors within the reserve.

Approximately 8.74 km of the preferred route ROW is proposed to cross the conservation reserve adjacent to the existing Hydro One transmission line to minimize adverse environmental effects. Eleven towers are proposed to be installed within the conservation reserve boundaries. The preferred route ROW and all other infrastructure have been sited to the north of the meandering Gravel River to avoid potential adverse effects.

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Access roads were placed outside of the protected area to minimize effects on the conservation reserve wherever feasible; however, avoidance of new or improved access roads was not possible given the size of the conservation reserve. As the snowmobile trail and the preferred route ROW both parallel the existing Hydro One transmission line, the snow mobile trail may be affected. The corridor and access roads will not affect the canoe routes or the outposts camps as those activities occur further north in the conservation reserve.

A number of short segments of new temporary access roads are proposed to be constructed to access the construction workspace from other existing trails or roads that are proposed to be upgraded and widened. The new access road of greatest distance is proposed to run from the TransCanada Highway north to the preferred route ROW. This would require improving and widening an existing road to provide temporary access for construction of the transmission line. No other existing roads are available for use and no other reasonable alternatives have been identified.

The use of helicopters was considered as an alternative to developing access corridors, and determined to have a greater adverse environmental effect. As a result of the factors discussed in section 3.5 for the Kama Cliffs Conservation Reserve, it has been determined that helicopter use is not a complete substitute for conventional ground transportation and access roads would still be required. The proposed methods have not been chosen due to the lower cost, but because no reasonable alternatives avoid the development of access roads and risk to schedule, while concurrently minimizing environmental and social effects in comparison to the proposed activities.

No laydown yards or other infrastructure are proposed within or directly adjacent to the conservation reserve.

### **3.7 Gravel River Provincial Nature Reserve (Provincial Park)**

Gravel River Provincial Nature Reserve is a non-operating park that features a meandering river that provides recreational attractions for boating and wildlife viewing. The park is located along Highway 17, east of the Township of Nipigon, and is considered significant due to the high quality and uniqueness of earth science features. Recreational activities within the nature reserve include canoeing, fishing, hiking/walking, nature appreciation and wildlife viewing. A day-use canoe route travels down the Gravel River (MNR 2013). In addition, multi-day canoe trips are possible on the Gravel River, but the route is difficult and is only recommended for experienced paddlers. Gravel Point and Mountain Bay have long been recreation destinations, with many visitors accessing the sand beach on the west side of the peninsula by boat, even before the construction of the railway and Highway 17. Presently, an informal walking trail exists, connecting Mountain Bay Road to the cobble beach on the eastern portion of Gravel Point. This trail is maintained by residents of the nearby cottage subdivision (MNR 2013). There is no existing park infrastructure or commercial tourism infrastructure located in this park, and campgrounds will not be developed. Within the park, sport fishing is permitted, and scuba diving and snowmobiling on-trail may be permitted through planning. Commercial fishing and bait fishing, trapping, tourism operations, and other resource harvesting activities occur surrounding the park, however not within the park.

The Interim Management Statement (MNR 2013) indicates that there is an existing land use permit for a Hydro One transmission line that crosses the northern end of the park, and does not preclude or prohibit the development of future corridors.

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Approximately 940 m of the preferred route ROW crosses the Gravel River Provincial Nature Reserve, though it is proposed adjacent to an existing Hydro One transmission line to minimize adverse environmental effects. The transmission line corridor is proposed to cross through the northern, narrowest, section of the park. Two towers are planned to be constructed within the park. The corridor and all other infrastructure have been sited to the north of the meandering Gravel River to avoid potential for adverse effects.

There are not any formally maintained recreation trails in the park, however there are mapped existing roads, which the MNRF has identified as trails. It is proposed that one of the existing roads/trails that currently runs from the TransCanada Highway will be improved and widened to allow large equipment to access a more northern area of the park, and then two additional new access roads are proposed to start from the existing road/trail to access the preferred route ROW, with one road extending to the northwest and the other to the northeast. Alternatives to these roads were considered and included the existing road to the west of the park within the conservation reserve; however, the natural topography has been a limited factors in this area. The existing road will be used for accessing the ROW to the west; however, a large ravine prevents access to the eastern portion of the ROW within the park where an additional tower must be located. A similar constraint exists on the eastern side of the park where a required tower location is otherwise inaccessible due to a large ravine on the east side of the park. Because this portion of the corridor in this area can only be approached from each side of the ravine; thus, no reasonable road alternatives exist in this area. Use of this access would be temporary, while the access to the west would be considered permanent.

The use of helicopters was considered as an alternative to developing access corridors. As a result of the factors discussed in section 3.5 for the Kama Cliffs Conservation Reserve, helicopter may not be a complete substitute for conventional ground transportation and access roads would still be required. However, recognizing the potential for environmental effects and the potential challenges with improving the existing road/trail, NextBridge has committed to considering the feasibility of using helicopters to bring in the equipment required for hand clearing and installation of the towers requiring the proposed access road within the park. This will be confirmed in conjunction with the groundtruthing exercise with the contractor.

The proposed methods have not been chosen due to the lower cost, but because no reasonable alternative roads exist to access the area in question within the park. NextBridge will continue to explore the feasibility of the use of helicopters to avoid the development of access roads and risk to schedule, while concurrently minimizing environmental and social effects in comparison to the proposed activities.

No laydown yards or other infrastructure are proposed within or directly adjacent to the park.

### **3.8 Kwinkwaga Ground Moraine Uplands Conservation Reserve**

The Kwinkwaga Ground Moraine Uplands Conservation Reserve near the Township of White River hosts recreational opportunities for fishing, hunting, and canoeing. The main tourism use is the White River Canoe Route. The conservation reserve features shoreline campsites, a sandy beach, and canoeing and wildlife viewing opportunities for birdwatchers and naturalists (MNR 2004a).

Section 6.1.1 of the Kwinkwaga Ground Moraine Uplands Conservation Reserve Statement of Conservation Interest (MNR 2004a) indicates that the park is crossed by one existing utility corridor, and while new corridors should avoid the park where possible, they may be permitted in extenuating circumstances.

The preferred route ROW that is beside the Kwinkwaga Conservation Reserve is proposed to run adjacent to the existing Hydro One transmission line to minimize adverse environmental and recreational effects. For the majority of the distance of the conservation reserve, the preferred route ROW is outside the boundary of the conservation reserve, running parallel to the border of the protected area. The exception occurs along the western portion of the conservation reserve, where there is not sufficient space to maintain the buffer between the existing transmission line and the conservation reserve boundary. In this area, approximately 3.56 km of the protected areas will be crossed where an overlap of approximately 10 m of temporary construction easement into the conservation reserve is required. Consideration was given to minimizing the preferred route ROW width further; however, the proposed width must be maintained for health and safety considerations in the case of a conductor blow-out (i.e., to provide a safe distance to prevent flashover to trees); therefore, it cannot be reduced beyond best practice clearances. The alternative of moving to the south side of the existing transmission line was also considered, but was eliminated as it is not feasible to cross over the existing Hydro One transmission line. As a mitigation in this area, self-supporting towers will be used to minimize the width required for the preferred route ROW (i.e., to avoid putting Guyed Y wires in the conservation reserve); no towers or footings will be placed in the conservation reserve.

The majority of the temporary access roads will detour around the conservation reserve, except for one temporary access road within the western portion of the reserve. This road is required to avoid the meandering White River and related water features to the south of the existing corridor.

Best efforts have been made to avoid effects to the conservation reserve and its recreational users. The proposed methods have not been chosen due to the lower cost, but because no reasonable alternatives are available for this portion of the route.

No laydown yards or other infrastructure are proposed within the conservation reserve, although two are proposed to the south of the conservation reserve south of the existing and proposed transmission lines. Given the location on the south side of the existing corridor, these are not anticipated to affect the conservation reserve or recreational users of it.

### **3.8.1 Kwinkwaga Ground Moraine Uplands Forest Reserve**

The Kwinkwaga Ground Forest Reserve offers limited recreational opportunities and represents two mining claims which have been designated as “forest reserve.” Forest reserves are nature reserves where notable vegetative species or habitats are located, within which protection of natural heritage and special landscapes is deemed a priority (MNR 2003a). In accordance with Section 5.7 of the Statement of Conservation Interest (MNR 2004), the intention is for this area to be added to the Kwinkwaga Ground Moraine Uplands Conservation Reserve if the claim or lease is retired.

The forest reserve is directly adjacent to the west of the Kwinkwaga Ground Moraine Uplands Conservation Reserve. The preferred route ROW that crosses the forest reserve is approximately 820 m, which is proposed to be adjacent to the existing transmission line to minimize adverse environmental and recreational effects. Similar to the Kwinkwaga Ground Moraine Uplands Conservation Reserve, there is not sufficient space to maintain the buffer between the existing Hydro One transmission line and the forest reserve boundary. In this area, an overlap of approximately 10 m of temporary construction easement into the forest reserve is required; however, no towers or footings will be installed in the forest reserve. Consideration was given to minimizing the preferred route ROW width further; however, the proposed width must be maintained for health and safety considerations in the case of a conductor blow-out (i.e., to provide a safe distance to prevent flashover to trees); therefore, it cannot be reduced beyond best practice clearances. The alternative of moving to the south side of the existing Hydro One transmission line was also considered, but was eliminated as it is not feasible to cross over the existing line. As a mitigation in this area, self-supporting towers will be used to minimize the width required for the ROW.

Similar to the conservation reserve, best efforts have been made to avoid adverse effects to the forest reserve. The proposed methods have not been chosen due to the lower cost, but because no reasonable alternatives are available for this portion of the route.

No access roads, laydown yards or other infrastructure are proposed within or directly adjacent to the forest reserve.

### **3.9 Pukaskwa River Provincial Park**

Pukaskwa River Provincial Park is a non-operating waterway class park, located south of the Town of White River and northwest of the Town of Wawa. It offers remote recreational opportunities in canoeing and camping. The park is designated as a waterway class park in recognition of its outstanding recreational water routes, which provide high quality recreational and educational experiences. Pukaskwa River Provincial Park contains notable scenery and offers a remote white-water river experiences for persons with advanced canoeing, kayaking and camping skills. The park is remote and relatively inaccessible, and as such, offers an advanced wilderness recreation opportunity, especially to canoeists of the Pukaskwa River canoe route (MNR 2006b). There is no existing park infrastructure or commercial tourism infrastructure located within this park, however there are four unmanaged campsites located on the canoe route (MNR 2006b). The use of motorboats and sport fishing is permitted. Existing authorized wild rice harvesting, existing sport hunting (including existing commercial bear hunting), existing commercial baitfish harvesting, and existing commercial fur harvesting is permitted in the park; however, new wildlife and vegetation harvesting activities are not permitted (MNR 2006b). There are no authorized snowmobile, ATV or hiking trails in the park. Where existing forest access roads are needed to access forestry areas beyond the park, and alternatives do not exist, existing roads will continue to be available for access (MNR 2006b).

Section 5.1.4 of the Interim Management Statement (MNR 2006b) indicates that the park is crossed by one Hydro One utility corridor, and while new corridors should avoid the park where possible, they may be permitted.

The preferred route ROW is proposed to cross approximately 570 m of the Pukaskwa River Provincial Park and includes two towers, one on each side of the Pukaskwa River. The preferred route ROW is currently sited as close as feasible to an existing road and bridge to the west to minimize visual and recreational effects. Having the transmission line near the road minimizes the effect of construction on wildlife and canoers using the river. It was not feasible to locate the preferred route ROW more closely to the road through the park because the existing road curves and it would require more towers for the transmission line to be sited adjacent to the road.

The transmission line will intersect the river perpendicularly at a narrow point to shorten the crossing, and parallel existing infrastructure to minimize visual disturbance, in terms of both viewing area and duration, to park visitors using the river. Constructing the preferred route ROW in proximity to the highway will minimize visual impacts. In addition, to minimize effects on the views from the river, NextBridge has committed to consider setting the towers back farther from the river by using a longer span width; however, this will require a wider ROW (e.g., approximately 90 m) in the area.

As an alternative to crossing the river with the transmission line, NextBridge considered burying the transmission line to address the potential aesthetic concerns, but determined that burying the line would have more environmental effects from trenching and disruption of shore lands, particularly as it would have to be completed for a full segment (e.g., 6 km), not just the one span under the river. As well, equipment for drilling under the river would require much larger temporary workspaces and is likely to require more blasting in this area.

The current proposed access plan requires two small temporary access roads to create access to the proposed tower locations. These temporary access roads are spur roads from the existing road to the west and are required because of the configuration of the existing road. The temporary access roads are expected to be set back farther from the river and decreased in length if the tower locations can be modified.

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No laydown yards or other infrastructure are proposed within or directly adjacent to the park, although one laydown yard is located approximately 600 m to the south east of the park. This area will be reclaimed as per the mitigation in the Environmental Protection Plan (EPP; Appendix 4-II) and in consultation with appropriate regulators.

Best efforts have been made to avoid adverse effects to the park and its recreational users. The proposed methods have not been chosen due to the lower cost, but because no reasonable alternatives that minimize environmental and social effects in comparison to the proposed activities are available for this portion of the route.

### **3.10 Nimoosh Provincial Park**

The Nimoosh Provincial Park is in a non-operating park, located west of Wawa. The park's waterway class designation is in recognition of its recreational water routes, which provide high quality recreational and educational experiences. Nimoosh Provincial Park contains approximately 22 kilometres of the Dog River, which is a demanding white-water canoe route. Given the white-water character of the river, the use of motorboats is limited and while their use is permitted, motorboats are discouraged within the park. In addition to the white-water paddling, another highlight of the Dog River is a 2-km hiking trail at the mouth of the river, which travels upstream to Denison Falls. The hiking trail is only accessible by water, from the Lake Superior coast. Given that Nimoosh Provincial Park is not easily accessible, other than by means of canoe or kayak, recreational use of the park is considered low. Camping, fishing, hunting, exploring, and general nature appreciation may occur in conjunction with paddling activities. Other than water access, the park is accessible from forest access roads extending south from Highway 17, including a forest access road to the north portion of the park, which provides access to an existing hydro corridor and forest harvest adjacent to the park. Designated snowmobile or ATV trails are not present within the park. There is no existing park infrastructure, or commercial tourism infrastructure located within this park. Within the boundary of Nimoosh Provincial Park, sport hunting and sport fishing are permitted. In addition, existing commercial bear hunting operations, existing commercial fur harvesting operations, and existing commercial bait harvesting are permitted.

Section 4.1.4 of the Interim Management Statement (MNR 2006a) acknowledges that the park is transected by three utility corridors. The River Gold Mines Limited transmission line crosses the park twice in St. Germain Township. A Hydro One transmission line crosses the park in Warpula Township. The corridors of these transmission lines are included in the park boundary.

The preferred route ROW that crosses the Nimoosh Provincial Park is approximately 1.1 km, which is sited adjacent to an existing Hydro One transmission line to minimize adverse environmental effects. Four towers are proposed to be placed in the park. Consideration was given into decreasing the number of towers required, but this would increase both span length and ROW width in the park. It was determined that longer span lengths would be unsafe based on a weather study performed in this area that indicated that ice would be a risk to structural integrity of the line. Therefore, fewer towers with increased span lengths are not practicable in this area for safety reasons.

The alternative of moving to the north side of the park was also considered, but was eliminated due to the substantially greater distance of the route, the fact that it did not parallel an existing linear feature, and the environmental disturbance that would result (Appendix 3-IB).

New temporary construction roads are proposed to be placed parallel to portions of the preferred route ROW to minimize effects to aesthetics and wildlife. In addition, an existing road through the park is proposed to be upgraded.

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No laydown yards or other infrastructure are proposed within or directly adjacent to the park, although one laydown yard is located to the east of the park. This area will be reclaimed as per the mitigation in the EPP (Appendix 4-II) and in consultation with appropriate regulators.

Best efforts have been made to avoid adverse to the park and its recreational users. The proposed methods have not been chosen due to the lower cost, but because no reasonable alternatives that minimize environmental and social effects in comparison to the proposed activities are available for this portion of the route.

# 4. POTENTIAL EFFECTS AND MITIGATION

The main body of the EA Report provides the effects assessment for the Project components and activities throughout the construction and operation phases. For example, Section 19.6.1 identifies potential effects on parks and protected areas (provincial and municipal), conservation reserves and trail users, including potential disturbances to areas of use, and access to non-commercial hunting, trapping, fishing, boating, hiking, cycling, camping and other outdoor recreational activities. Section 19.6.1 also describes how changes in environmental conditions (e.g., visual environment, acoustic environment, and air quality) may affect non-commercial recreational experiences. As a result, the effects assessment is not repeated here.

Likewise, the mitigation measures identified in the EA Report and the EPP (Appendix 4-II), are intended to be applied across the Project footprint, and therefore are applicable to all provincial parks and conservation reserves. Additional mitigation measures or conditions of approval that are identified by regulators during the permitting phase may be applied where appropriate, and the EPP (Appendix 4-II) will be updated prior to construction.

Although not an exhaustive list, examples of mitigation measures relevant to provincial parks and conservation reserves include the following.

- Existing roads and trails will be used where feasible.
- Stage construction activities in parks and protected areas to avoid or minimize potential effects on ecologically sensitive areas, life cycle periods, and peak visitor periods, where feasible.
- Implement the following mitigation measures for canoe routes and portages:
  - vegetation clearing within a minimum of 90 metres (m) around the Pukaskwa River canoe route and its associated portage will be limited to where necessary for safety and compatible vegetation (e.g., below 2 m in height) will be retained where practicable (MNRF 2015);
  - vegetation clearing within a minimum of 30 m around the White River canoe route and Michipicoten River canoe route, and their associated portage will be limited to where necessary for safety and compatible vegetation (e.g., below 2 m in height) will be retained where practicable (MNRF 2015);
  - vegetation clearing within a minimum of 30 m around a canoe route will be limited to where necessary for safety and compatible vegetation (e.g., below 2 m in height) will be retained where practicable;
  - retain compatible vegetation (e.g., below 2 m in height) within a minimum of 30 m around a portage, where practical;

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- maintain visibility of portage on either side of the preferred route ROW and access roads for recreational user accessibility;
  - during construction, keep portages cleared of vegetation debris and maintain the existing grade of the portage in a manner that it is safe for the recreational users; and,
  - no disturbance of portages outside of the Project Site and access roads will be permitted.
- Clearly mark known site-specific features (e.g., rare vegetation community, wetland, water body, significant wildlife habitat) and associated setbacks as indicated on the Environmental Alignment Sheets and Access and Construction Environmental Maps. The Owner will confirm the accuracy of the site specific features locations and associated setbacks.
  - Construction activities associated with the Project will be confined to the surveyed and marked areas.
  - Flagging, signage or other markings will be removed immediately after construction.
  - Construct water body crossing structures according to the crossing method identified on the Environmental Alignment Sheets and Access and Construction Environmental Maps and in accordance with regulatory approvals. Alternatives or modifications to the crossing requirements specified in approvals must be approved by the Owner before construction begins.
  - Seed erosion prone areas with a native cover crop and certified native seed mix approved by the applicable regulatory agency, as soon as feasible after construction, wherever possible.
  - Erodible soils will be stabilized as soon as practical by seeding, spreading mulch or installing erosion control blankets.
  - Remove temporary water body crossing structures and associated granular materials from all water bodies.

## **5. SUMMARY**

The preferred route ROW crosses six provincial parks, four conservation reserves, and one forest reserve, representing approximately 4.6% of the total route length. The preferred route ROW has been sited and designed to be adjacent to existing linear infrastructure in these areas rather than designed as a greenfield route (i.e., not adjacent to existing infrastructure). This siting approach aligns with provincial direction to locate the Project adjacent to the existing East-West Tie transmission line. Siting of the preferred route in and adjacent to provincial parks and conservation reserves considered different alternative route segments, and a number of alternative methods for implementation of the preferred route, in an effort to identify the best alternatives.

The portions of the route and the proposed Project components that are located in the protected areas were selected are based on a lack of other reasonable and more beneficial alternatives in these areas. During Project planning, each conservation reserve and park was reviewed individually to determine the appropriate and feasible measures that could be implemented to decrease potential adverse effects on environmental and recreational features of concern. The lowest cost was not the overriding justification, but the preferred route ROW and related Project components were chosen to reduce the amount of adverse environmental and social effects, while also minimizing risk to project schedule. During the construction of the Project, measures will be undertaken to minimize environmental effects and protect ecological integrity, as outlined in the EA Report and the EPP (Appendix 4-II). Project engineering and mitigation measures will be further refined in consultation with regulatory agencies during the permitting and detailed design phase of the Project to ensure that the construction and operation of the Project will be in accordance with the Minister of the MNRF's approval conditions for the provincial parks and conservation reserves.

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