

Wabagishik Rapids Waterpower Project – Table for EAB

MOE NR Comments regarding Wabageshik Final ER, dated September, 2013 (Letter of November 25, 2013 to Xeneca)

Background/Comments:

- *EAB has indicated they are considering denying the Part II Order requests with conditions, noting that it may be possible to impose detailed conditions to ensure all outstanding concerns are addressed. EAB has noted that if they take this approach, they will need assistance from NR technical staff to develop detailed conditions.*
- *The draft table below is an expanded version of a table developed and provided for comment by EAB.*
- *EAB has asked that we go through our comments on the Wabageshik ER and indicate, for each of our outstanding concerns, whether further action is required by the proponent and if so, when (at the EA stage or not until the permitting stage). Where further action is required at the EA stage, they've asked us to indicate if the concern can be addressed through detailed conditions, should EAB decide to deny the Part II Order requests with conditions. They've indicated that if they take this approach, assistance will be needed from both MNR and MOE staff to develop the detailed conditions.*

Questions/Concerns:

- *NR's review of the ER indicated that in several instances, the proponent has not met the requirements of the Waterpower Class EA. Where this is the case, is it appropriate for the Ministry to impose conditions setting out detailed requirements and in some cases methodologies requiring proponents to fulfill requirements of the Class EA? (Or is it more appropriate to advise the proponent to re-do its project planning?)*
- *If it is determined that imposing detailed conditions is an appropriate approach where requirements of the Class EA have not been met, is it appropriate, given that this is a proponent-driven process, for MOE to be providing detailed direction to proponents on how to satisfy requirements of the Class EA? (Note that in some cases, MOE staff may already have recommendations on how gaps are to be addressed, but in some cases, they may not have this information.)*
- *If MOE provides detailed direction to the proponent, as described above, does this expose the Ministry to any risk (ie: other proponents seeking the same level of direction during the proponent-drive EA process, or liability issues if the approach taken leads to unforeseen negative impacts on the environment or other users).*

Letter of November 25, 2013				
Page Number and Reference	Issue/Comment	Required Action (Address during EA Process or Other?)	Can be addressed through Condition ? (Yes/No)	Comments
<p>TECHNICAL COMMENTS p. 4. Upstream Zone of Influence (ZOI)</p>	<p>The Upstream ZOI has been described in the ER to include the entirety of Wabageshik Lake. It was however, previously identified by CPL (Annex I; Ontario South Hydro HEC-RAS Inundation Mapping) to have effects on the Lorne Falls generating station.</p> <p>Given the potential for the proposed facility to impact on the existing facility at Lorne Falls operated by Vale, there was a need for Xeneca to identify how it would mitigate effects. Proposed mitigation included drafting an agreement with Vale, and committing to follow natural lake levels. The proponent has proposed controlling the level of Wabageshik lake so as to mimic natural lake levels, allowing for a maximum daily deviation of +/- 5 cm; however, pre-project data indicates that under current conditions the lake may fluctuate over the daily fluctuation commitment during the spring freshet. Given the magnitude of daily fluctuations under current conditions, it is not understood how the commitment to ensure daily fluctuations of no more than +/- 5 cm can be met.</p> <p>Prior to submitting a Permit to Take Water (PTTW) application for either construction or operation, the proponent will need to provide further information outlining how a 10 cm range in daily headpond fluctuation will be technically possible, and how compliance with the commitment to be run-of-river during the freshet will be met. Additionally, the finalized agreement between Xeneca and Vale will need to be a part of any</p>	<p>Further information required prior to submitting application for PTTW (either construction or operation).</p> <p>Finalized agreement between Xeneca and Vale to be provided with application for PTTW</p>	<p>Yes</p> <p>Yes</p>	<ul style="list-style-type: none"> Note that the Lorne Falls generating station is further upstream from Wabaeshik Lake (therefore, the ER has described the upstream ZOI as ending at Wabageshik Lake, while supporting technical information as contained in Annex I of the ER identifies that the project will result in effects upstream of Wabageshik Lake). Provide further information to MOE addressing how a 10 cm range in daily headpond fluctuation will be technically possible, given the magnitude of daily fluctuations in lake levels under current conditions. Provide further information to MOE addressing how proponent will be able to meet compliance commitment to be run-of-river during the spring freshet. Application for PTTW (either construction or operation) to be accompanied by final agreement between Xeneca and Vale, in accordance with commitments in the ER.

	future PTTW application for construction or operation of this facility.	(ether construction or operation).		
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p. 4. Downstream ZOI	<p>The ER indicates that the downstream zone of influence would end at the confluence of the Spanish and Vermilion Rivers, and that downstream of this point effects are “anticipated not to be distinguishable from current conditions”. However, the ER also identifies that potential impacts could include increased spillage by Domtar and increased manpower requirements at their facility, as well as alteration of the aquatic habitat downstream of the Domtar dam (page 262). This would suggest that direct effects from the proposed project would potentially occur outside of what has been described as the ZOI. In addition, it was previously communicated to the Ministry of the Environment that the effects would extend to the Domtar Dam (August 26, 2013 meeting minutes).</p> <p>The proponent must clearly define the downstream ZOI. Any potential impacts to other stakeholders (e.g. Domtar), or to natural ecosystem function resulting from flow modifications at the proposed facility must be clearly identified and quantified in the analysis presented. Although this information will be required as an integral part of any application for PTTW, it is also important to provide this information during the EA process and include it in the ER top clearly demonstrate consideration of the potential impacts of this proposal during the public review process.</p>	<p>Yes . Identification and assessment of potential effects of the project are required elements of the Class EA.</p> <p>The ER and supporting documents must contain enough information to demonstrate the potential impacts of the Project, and identify mitigation measures to a level that allows the public,</p>	Yes	<ul style="list-style-type: none"> Although the ER states that the downstream Zone of Influence ends at the confluence of the Spanish and Vermilion Rivers, information provided elsewhere in the ER identifies potential impacts downstream of this point. Potential impacts downstream of the Spanish/Vermilion River confluence have been identified as including: the need for Domtar to spill water; increased manpower requirements at the Domtar facility; and alteration of aquatic habitat downstream of the Domtar dam. As noted on p. 39 of the Class EA, “A key purpose of applying this Class EA is to help proponents identify and avoid, prevent or mitigate effects that may be potentially negative.” “This Class EA requires the proponent to assess the potential effects as well as any net effects after mitigation and focuses on those effects common to waterpower projects. This includes consideration of both direct and indirect effects.” (p. 34 of Class EA) “The resultant ER should be complete and detailed enough to demonstrate the potential impacts of a project, and identify any potential proposed impact management measures.” (p. 38 of Class EA)

		<p>Aboriginal communities and agencies to clearly understand the anticipated impacts.</p> <p>The proponent must clearly define the downstream ZOI during the EA process.</p> <p>During the EA process, potential impacts to other stakeholders, such as Domtar, must be clearly identified and quantified in the analysis presented.</p> <p>During the EA process, potential impacts to natural ecosystem function must be clearly identified and quantified in the analysis presented.</p> <p>In addition to being required during the Class EA process, the information identified above will also be required as part of any application for PTTW for the proposed facility.</p>	<p>Yes</p> <p>Yes</p> <p>Yes</p> <p>Yes</p>	<ul style="list-style-type: none"> • In keeping with the public consultation principles set out in the Class EA, in particular the principle of transparency, where there is new information regarding matters such as the extent of the ZOI and potential impacts of the project, further consultation opportunities should be provided. • As noted in the Class EA (p. 61), "The purpose of public consultation is to provide those who may wish to participate the opportunity to contribute and inform decisions relating to a project." • Proponents should provide sufficient information for meaningful and constructive participation and consideration of values".
Page Number and Reference	Issue/Comment	Required Action (Address during EA Process or Other?)	Can be addressed through Condition ? (Yes/No)	Comments
p. 5 Downstream Variable Flow Reach	The area downstream of the facility influenced by flow releases by the facility is called the downstream variable flow reach. To minimize downstream effects resulting from the project, the company has proposed mitigation commitments. However, our analysis indicates some of the operating scenarios provided by			<ul style="list-style-type: none"> • As noted on p. 5 of our comments, commitments made within the ER are not supported by the results of the analysis completed.

	<p>Xeneca appear to contradict the broader commitments made in the report. For example, in a typical June, proposed operations result in flow fluctuations ranging from 20.7 m³/s to 57.6 m³/s. In the hydraulics report included with the ER, the closest scenario showing a similar range of flow fluctuations is from 19.2 m³/s to 64 m³/s, and results in a 68 centimetre (cm) maximum range of water level fluctuation at approximately 400 m downstream. It has also been proposed that daily fluctuations be limited to 30 cm approximately 400 m downstream as mitigation against impacts to a private landowner. It is expected that the proposed scenario would not meet the 30 cm commitment at 400m downstream.</p> <p>MOE recommends that the operating scenarios presented in the ER be revised to reflect the commitments made in the ER and the proposed Operating Plan. In addition, the proponent needs to revise the flow variations downstream of the proposed facility at Domtar by comparing pre- and post-project flow fluctuations, and considering Vale's existing operations on the Spanish River.</p> <p>It is recommended that the current hydraulic model be used to assess the effects and determine the relative frequency that the proposed flows would exceed Domtar's operating capacity. If flow data is not available from Vale, proportionally associating flow to the Spanish confluence (using Domtar flow data) into the hydrologic model could be used. Additionally, it is recommended that other constraints such as low lying roads and nearby users be considered when examining the results of this analysis, as there has been indication that Domtar's full compliance band cannot be used. This should also be incorporated into the analysis and proposed</p>	<p>Yes</p> <p>As indicated in Section 4.4.1 of the Class EA, Technical reports supporting the findings of the assessment are a required element of the ER.</p> <p>Identification and assessment of potential effects of the project are required elements of the Class EA.</p> <p>Yes</p> <p>Yes</p>	<p>Yes</p> <p>Yes</p> <p>Yes</p>	<ul style="list-style-type: none"> • If all relevant aspects of the existing environmental context have not been fully and accurately described, it will not be possible to accurately demonstrate potential impacts or determine associated mitigation measures. • MOE NR technical comments regarding a possible methodology for completing the requested analysis may assist EAB in developing detailed conditions to address these requirements. Further detailed discussion between EAB and NR technical support staff is recommended. • In keeping with the public consultation principles set out in the Class EA, in particular the principle of transparency, where there is new information regarding matters such as the extent of the ZOI and potential impacts of the project, further consultation opportunities should be provided.
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	<p>compliance commitments. These recommendations are consistent with previous comments, such as those provided on your draft ER (September 24, 2012) in which MOE identified similar concerns that have not yet been adequately addressed in this ER.</p> <p>MOE has indicated that, to address water quality concerns downstream, flows of no less than 6.5cms must be provided at all times in lieu of an agreement with Domtar, this does not address potential effects at Domtar due to operational changes. It is expected that the modelling suggested above could be evaluated and used to determine mitigation should Domtar's operating capacity be exceeded. This analysis should be completed during the EA process and included in the ER. In conjunction with an agreement between the proponent and Domtar, it will also be required as part of any application for PTTW.</p>	<p>Yes</p> <p>In addition to being required during the Class EA process, this analysis will also be required as part of any application for PTTW for the proposed facility.</p> <p>A finalized agreement between Xeneca and Domtar will also be required as part of any application for PTTW for the facility. <i>Do I need to expand on this description to reflect some of the details of our earlier comments? (agreement generally addressing what?)</i></p>	<p>Yes</p> <p>Yes</p> <p>Yes</p>	<ul style="list-style-type: none"> Potential effects on Domtar, due to operational changes required to accommodate flows from the proposed facility have not been identified and assessed in the ER. Associated mitigation measures have also not been addressed in the ER. This should be required during the EA process.
p. 5 Water Resources				
p. 6 Methyl Mercury Generation				<p>NOTE: <i>Table section on Methyl Mercury not completed yet. (MOE reviewer generally agreed with conclusions of the ER with respect to mercury, and concurred with proposed monitoring program, which was in accordance with MOE guidance. Further information addressing existing consumption advisories and potential cumulative effects was requested.)</i></p> <p><i>Due to recent developments related to waterpower and mercury and requirements for mercury modelling for some projects, need to revisit this with water unit to determine if we will be asking proponent to conduct modelling for this project.</i></p>

p. 7 Acid Rock Drainage Potential	There may be the potential for ARD due to the exposure of blasted rock during the construction phase. Although the proponent has agreed to commence a rock testing program prior to construction to address this issue, no assessment of the potential for ARD at this site has been completed to date. In keeping with the Waterpower Class EA, which requires that potential impacts be assessed, and if required, that mitigation be proposed, we continue to recommend the completion of a field reconnaissance of the proposed site, as previously described, to further address this issue. For further detail, please refer to our letter of July 18, 2013 on this matter.	Yes	Yes	NOTE: <i>Table section on ARD not fully completed yet. Detailed direction from our July 18/13 letter to Xeneca could assist EAB in preparing condition related to ARD. (provided guidance on addressing ARD potential and mitigation during the EA process).</i>
p. 7 Cumulative Impacts				NOTE: <i>This table section not completed yet.</i>

Table 1 – Mandatory Requirements for the Environmental Report

Page Number and Reference	Issue/Comment	Required Action (Address during EA Process or Other?)	Can be addressed through Condition? (Yes/No)	Comments
p. 1 Required Element: Background information (project description, purpose)	Information provided in ER (see MOE comments for details)	No further action required unless there have been changes to this information		
p. 1. Required Element: Map of study area	We were unable to locate a map identifying limits of the study area for the purposes of the ER. (Natural Environment Characterization and Impact Assessment Report (NRSI August, 2013) included in Annex III (Natural Heritage Assessments) includes a map of the study area for this component of the ER.	Yes (required content of ER)	Yes	
p. 1. Required Element:	We have concerns that some aspects of the	Yes (required content of	Yes	

Description of the study area and the existing environmental context	existing environmental context have not been thoroughly investigated or described in the ER (please refer to our earlier comments regarding consideration of flow variations associated with Vale's existing operations on the Spanish River).	ER) If all relevant aspects of the existing environmental context have not been fully and accurately described, it will not be possible to accurately demonstrate potential impacts or determine associated mitigation measures.		<ul style="list-style-type: none"> Note that other agency and public comments may address additional aspects of environmental context that have not been thoroughly investigated/described in the ER
p. 1. Required Element: Completed Potential Effects Identification Matrix	<p>Tables 33 and 36 included in Appendix B of the ER represent effects assessed to date.</p> <p>There are issues where additional work is required to demonstrate all potential effects and to propose mitigation, such as potential impacts of flow modifications on natural ecosystem functions and other stakeholders.</p> <p>In addition, it is not clear if the following issues identified previously as requiring additional efforts to identify potential effects and propose mitigation have been adequately addressed:</p> <ul style="list-style-type: none"> Consultation with MNR/Local boaters to determine periods of use and minimum low flow and water level requirements to maintain downstream access; Consultation with cottage owners regarding potential impacts to water supply; Consultation with railway company regarding access road crossing of railway 	<p>Yes (required content of ER)</p> <p>Until this additional analysis has been completed, the determination of residual effects is premature.</p>	Yes	<ul style="list-style-type: none"> A complete and accurate identification of potential effects requires an accurate description of the existing environmental context (see previous comment). Later stages of the assessment (ie: identifying mitigation, determining residual effects) will be premature if all potential effects have not first been identified. Note that other agency or public comments may identify other issues where further work is required to demonstrate potential effects.
p. 2. Required Element: A description of potential effects	<p>There are issues remaining where additional work is required to demonstrate all potential effects and to propose mitigation. As a result, the identification and assessment of residual effects related to these matters has not yet been completed.</p> <p>In addition, a review of documentation provided</p>	<p>Yes (required content of ER)</p> <p>Until this additional analysis has been completed, the determination of residual effects is premature.</p>	Yes	<ul style="list-style-type: none"> A complete and accurate identification of potential effects requires an accurate description of the existing environmental context (see previous comment). Later stages of the assessment (ie: evaluation/assessment of potential effects, identifying mitigation, determining residual effects) will be premature if all potential effects have not first been identified. Note that other agency or public comments may identify other issues where further work is required to demonstrate potential effects.

	suggests that Aboriginal consultation may not be complete. It should be recognized that further consultation could lead to the identification of additional potential effects.			
p. 2. Required Element: The results of the analysis, evaluation, and assessment conducted for the subject effects, concerns or issues	Some information has been provided in ER. As noted below, in some cases technical studies and detailed analysis provided in the ER and Annexes do not support the findings, commitments, or other statements made within the ER. Examples include Upstream Zone of Influence and Downstream Variable Flow Reach (see details below under "Technical reports supporting the findings").	Yes (required content of ER)	Yes	<ul style="list-style-type: none"> This step is dependent on the completeness and accuracy of earlier steps in the assessment (ie: accurate description of existing environmental context; complete/accurate identification of potential effects). The identification of additional potential effects may reveal the need for detailed analysis/assessment of those effects. Later stages of the assessment (ie: identifying avoidance/prevention/mitigation; describing net effects after mitigation; evaluating the significance of net effects; and reviewing overall advantages/disadvantages of project) will be premature if assessment of potential effects is not complete. Note that other agency or public comments may identify other issues where further work is required to demonstrate potential effects.
p. 2. Required Element: Information on public and agency consultation including: <ul style="list-style-type: none"> A description of the public and agency consultation program and consultation activities/events; A list of agencies contacted; Summary of public and agency concerns or issues; and How concerns or issues have been or have been attempted to be addressed. 	Some information provided in the ER (see MOE comments for details) It appears that some components of the consultation record have not been included in the ER. Where further research, analysis, or other investigation is required to demonstrate potential impacts and allow for the identification of mitigation measures, further consultation will be needed on these matters.	Yes (required content of ER)	Yes	
p. 3. Required Element: Information on Aboriginal community involvement, including: <ul style="list-style-type: none"> A description of the engagement program and activities/events; A list of communities contacted; 	Some information provided in the ER (see MOE comments for details) Although significant efforts have been taken to engage Aboriginal communities and organizations, a review of the documentation suggests that consultation may not be complete. As noted above, where further research, analysis,	Yes (required content of ER)	Yes	

<ul style="list-style-type: none"> • Summary of community concerns or issues; and • How concerns or issues have been or have attempted to be addressed. 	<p>or other investigation is required to demonstrate potential impacts and allow for the identification of mitigation measures, further consultation will be needed on these matters.</p>			
<p>p. 4. Required Element: Changes to the original proposal, if any, resulting from the environmental evaluation and/or consultation and engagement processes.</p>	<p>While several proposed changes to the project are noted in various locations through the ER, we found no comprehensive, easily accessible account or summary of changes that have been made throughout the EA process as a result of the environmental evaluation nor consultation and engagement processes conducted to date.</p>	<p>Yes (required content of ER)</p>	<p>Yes</p>	<ul style="list-style-type: none"> • Additional analysis, evaluation, and consultation needed may result in further changes to the project.
<p>p. 4. Required Element: Description of the net effect(s) (after mitigation), if any, including identification of the significance of the net effect (s)</p>	<p>Net effects and their significance are addressed in Tables 33 and 35.</p> <p>Table 33 (Identified Issues, Summary of Mitigation, Potential Residual Effects)</p> <p>Table 35 of the ER (Residual Environmental Effects and Significance)</p> <p>As noted above, Table 33 includes examples where additional work and further consultation are required to demonstrate potential effects and propose mitigation. It is therefore premature to identify and assess residual effects prior to this work being completed.</p>	<p>Yes (required content of the ER)</p>	<p>Yes</p>	<ul style="list-style-type: none"> • This step is dependent on the completeness and accuracy of earlier steps in the assessment (ie: accurate description of existing environmental context; complete/accurate identification of potential effects; evaluation and assessment of identified potential effects; identification of mitigation/impact management measures). • Later stages of the assessment (ie: review of overall advantages/disadvantages of project; identification of monitoring) will be premature and/or inaccurate if description of net effects (after mitigation) is not complete and accurate.
<p>p. 4. Required Element: Planned avoidance/prevention/mitigation and/or other impact management measures for any potential negative effects.</p>	<p>Planned avoidance, prevention, mitigation, and/or other impact management measures are discussed in Section 7 and Table 35 of the ER.</p> <p>As noted above, additional analysis and consultation are needed to fully identify potential effects and/or propose mitigation or other impact management measures.</p>	<p>Yes (required content of the ER)</p>	<p>Yes</p>	<ul style="list-style-type: none"> • This step is dependent on the completeness and accuracy of earlier steps in the assessment (ie: accurate description of existing environmental context; complete/accurate identification of potential effects; evaluation and assessment of identified potential effects). • Later stages of the assessment (ie: description of net effects after mitigation; review of overall advantages/disadvantages of project, identification of monitoring) will be premature and/or inaccurate if mitigation/impact management is not identified for all potential effects.
<p>p. 4. Required Element: A review of overall advantages and disadvantages of the project, including a discussion of any benefits that might offset disadvantages.</p>	<p>Advantages and disadvantages are discussed in Sections 7 and 10, and in Tables 33 and 35.</p> <p>As previously indicated, additional work is required to demonstrate all potential effects and propose mitigation. A review of the overall advantages and disadvantages of the project is therefore premature.</p>	<p>Yes (required content of the ER)</p>	<p>Yes</p>	<ul style="list-style-type: none"> • As noted with other required elements of the ER, this step is dependent on the completeness and accuracy of earlier steps in the assessment.
<p>p. 4. Required Element:</p>	<p>Section 12 identified proposed construction and</p>	<p>Yes (required content of</p>	<p>Yes</p>	<ul style="list-style-type: none"> • New/additional monitoring requirements may also be identified as a result of the identification

<p>A summary of planned construction and post-construction monitoring programs, as required, including mechanisms for their implementation and reporting.</p>	<p>post-construction monitoring programs.</p> <p>We could find no comprehensive detailed summary of planned construction monitoring programs within the ER. Section 12 contains only an extremely general list of four items that will be monitored during construction. As required by the Class EA, the ER should include a summary of planned construction monitoring programs, including mechanisms for their implementation and reporting. We would expect to see a more detailed account of this information.</p> <p>Table 36 lists and describes post-construction monitoring actions.</p> <p>Section 4.5.3 of the Class EA (Effects Monitoring) identifies several aspects that should be considered and documented, including the Rationale (reason for monitoring) and Methods. While other required aspects of post-construction monitoring have been identified, further information is required to describe these elements of the monitoring program.</p>	<p>the ER)</p>		<p>and assessment of additional potential effects and the identification of related mitigation/impact management measures.</p> <ul style="list-style-type: none"> • New/additional monitoring requirements may also be identified as a result of further consultation.
<p>p. 5. Required Element: Technical reports supporting the findings, as appropriate.</p>	<p>We have concerns that, in some cases, technical studies and detailed analysis provided in the ER and Annexes do not support the findings, commitments, or other statements made within the ER. Examples include:</p> <ul style="list-style-type: none"> • Upstream Zone of Influence (given the magnitude of daily fluctuations to the lake under current conditions, it is not clear how commitments to limit fluctuations to +/- 5 cm daily can be met). • Downstream Variable Flow Reach (operating scenarios provided appear to contradict commitments made in the ER with respect to levels downstream). 	<p>Yes (required content of the ER)</p>	<p>Yes</p>	<p>See MOE NR Technical Support section staff for further detail.</p>
<p>p. 5. Required Element: Anticipated timelines for project implementation</p>	<p>Section 1.2.2 includes a tentative project development schedule.</p> <p>Table 9 provides a tentative construction schedule, by project component.</p>	<p>Yes (required content of the ER)</p> <p>Updates may be required.</p>	<p>Yes</p>	<p>Note that additional work on other required elements of the ER may lead to changes in project timelines. Any changes should be reflected in the final documentation provided for public review.</p>
<p>p. 5. Required Element: A listing of any other known</p>	<p>Section 13, Table 37 provides a list of permits, approvals, and authorizations required for the</p>	<p>Yes (required content of the ER)</p>	<p>Yes</p>	<p>Note that additional work on other required elements of the ER may lead to changes in known required permits and approvals.</p>

required approvals and permits.	project to proceed.			Any changes should be reflected in the final documentation provided for public review.
Table 2 – Technical Comments				
Page Number and Reference	Issue/Comment	Required Action (Address during EA Process or Other?)	Can be addressed through Condition? (Yes/No)	Comments
2. Existing Conditions				
p. 1 Section 2.8 (River Hydrology)	Hydrology memos prepared during the EA process could be better incorporated into the document.	Yes	Yes	General condition
p. 1 Section 2.9.2 (Aquatic Habitat and Species)	Fish sampling data for mercury provided in Annex IV of the ER	Ongoing monitoring as per commitments in the ER	N/A	<i>Consider deleting this one, and not including any issues where we are merely acknowledging info provided.</i>
p. 1 Section 2.10 (Archaeological Potential and Built Heritage)	MTCS letter of Nov 1, 2013 notes that Stage 1 report addressing proposed transmission line, new road corridors, and temporary construction components is under review. MTCS has outstanding concerns until archaeological assessment is completed and report(s) are reviewed by MTCS. ER should have included MTCS acknowledgement letter for this work.	Yes	Yes	General condition
p. 1, Section 2.10.2 (Buildings and Structures)				