



February 8, 2010

Ms. Enza Cancilla
Manager, Public Affairs/Corporate Communications
Hydro One Networks Inc.
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Dear Ms. Cancilla,

Thank you for the opportunity to provide comments on *Hydro One Reference Corridor for the Northwest Transmission Expansion Project* that we are submitting on behalf of Wildlife Conservation Society Canada (WCS Canada)¹ in our capacities as senior-level ecologists² and concerned citizens of Ontario. Our major concern for this proposal centres on the lack of inclusion of alternative routes for evaluation. This is of significant ecological consequence when a new major linear corridor is being considered for an ecologically intact landscape. Therefore we strongly recommend that Hydro One present a transparent

¹ Wildlife Conservation Society Canada was established in May 2004 as a Canadian non-profit organization with a mission to conserve wildlife and wildlands by improving our understanding of and seeking solutions to critical problems that threaten key species and large wild ecosystems throughout Canada. We implement and support comprehensive field studies that gather information on wildlife needs and then seek to resolve key conservation problems by working with a broad array of stakeholders, including local community members, conservation groups, regulatory agencies, and commercial interests.

² As both the Director and Senior Scientist for WCS Canada, Dr. Justina Ray has been engaged in field research in the Far North and is one of the few biologists to spend significant time in this remote region over the last decade. Specifically, she has conducted aerial surveys targeting caribou, wolverine, moose and wolves across the Far North, including the specific area of this proposal. Dr. Ray also serves on the MNR Minister's caribou science advisory panel and the Far North Science Advisory Panel, and the Ontario Wolverine Recovery team. She is a co-principal investigator of the Ontario Wolverine Project (in partnership with OMNR) – the first ecological study of wolverines in lowland boreal forest. Dr. Jenni McDermid is a Fish Conservation Research Associate with WCS Canada and a fisheries biologist addressing threats to lake trout and lake sturgeon imposed by road access, mining, hydro development, and climate change. Dr. Cheryl Chetkiewicz is an Associate Conservation Scientist with WCS Canada who was recently hired to support broad-scale and community-based conservation planning in the Far North, specifically wildlife research, monitoring and cumulative effects impacts. Her experience includes the application of habitat selection and movement models to land-use planning, specifically wildlife corridors for large carnivores in fragmented landscapes and co-management of fish and wildlife.

analysis of the environmental and socio-economic impacts and benefits associated with alternative routes for this transmission corridor, with explicit consideration of the cumulative impacts that this new development will have on the region's ecological integrity.

It is in our respective capacities that we respectfully summarize our objections to Hydro One's reference corridor proposal.

The development of a new major linear feature into the Far North

The area proposed for the "Reference Corridor" is distinctive in that it currently has few roads, few vehicles, and few people. Unlike the construction and operation of transmission corridors in southern Ontario, previously undisturbed natural ecosystems would surround every kilometre of transmission line and the vehicles that will travel the accompanying road network. Consequently, the ecological effects of the transmission line and its infrastructure exceed the proposed 2-km wide corridor described here, leaving these two important issues unacknowledged and unaddressed in the current proposal.

There is abundant evidence that roads are a major means of introducing development to an area. Although absolute road density has many ecological effects, the first road and its associated disturbance into a natural landscape area has the largest relative effect. This proposed corridor represents a threshold after which effects will most certainly cascade and multiply. As such, it is Hydro One's responsibility to consider the cumulative impacts of this novel development on the maintenance of natural processes.

Therefore we strongly discourage the "business as usual" approach this proposal takes and encourage explicit acknowledgement of the known negative ecological impacts of both the proposed corridor itself and the roads necessary to support its construction and maintenance.

Lack of information on ecological, social, and economic costs and benefits associated with alternative routes.

In spite of the mounting evidence for the negative impacts they can have on fish and wildlife populations, power transmission lines and service roads are being constructed across North America at a rapid pace. Generally speaking, proponents only consider how to mitigate site-specific environmental impacts. This proposal is no exception with Hydro One offering only one route for comment. At the scale of this proposal, scenario analyses of alternative routes that carefully consider the social, economic and ecological costs and benefits should be available for public review and comment to allow the public to fairly evaluate the impacts of new power transmission lines. It is likewise important to understand the full range of effects of this proposal in conjunction with the one that follows and expands existing linear developments and community economic interests associated with operations like Little Jackfish. At a sub-regional scale, the proximity of this development to the "Ring of Fire" means that it is highly likely this power transmission line will contribute to and support development in that area. Scenario analyses that describe possible linkages to mining activities and development in this area also demand a proactive and coordinated approach to limiting cumulative effects of development *across* resource sectors instead of the current piecemeal approach.

Ecological integrity of Wabakimi Provincial Park

As we have already noted, although a particular corridor may be built to serve a single purpose or development project, the usual trajectory is that it will in fact facilitate more development, more road networks, and power transmission lines that ramify from it. The ecological impact of this expanding footprint of the transmission lines, roads, and associated infrastructure is well-documented for fish,

plants, and wildlife and their populations. Impacts include habitat fragmentation and habitat loss. These specific effects have population-level implications for animals such as a woodland caribou, wolverine, and lake sturgeon. Even those in parks are not protected as many individuals cross park boundaries, and experience direct mortality through collision, increased hunting electrocution (for birds and bats). These linear features and the roads that accompany them often facilitate the introduction and movement of exotic species, especially non-native plants. Despite the plans to skirt Wabakimi Provincial Park, the proximity of the transmission corridor to this wilderness area seems unjustified and contrary to the principles of ecological integrity mandated within the Provincial Parks and Conservation Reserves Act. Wilderness class parks such as Wabakimi provide the only legal mechanism in the region for maintaining a roadless condition and a linear feature like this one would effectively create an island restricting the flow of species and ecological processes across its northern boundaries. For example, a new transmission line would require fire protection resources essentially restricting the flow of fire and related processes in Wabakimi, a vital component of ecological integrity in the boreal.

WCS Canada Recommendations:

In conclusion, we have the following recommendations for Hydro One:

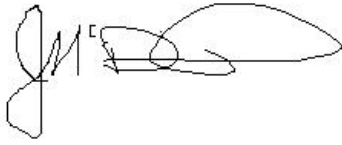
- 1) Present alternative routes that build on existing linear developments and avoid the northern region of Wabakimi Park. We recommend that options for alternative routing include the following:
 - sites where native vegetation has already been disturbed and/or removed making them less attractive as habitat for wildlife.
 - sites where access roads and other infrastructure already exist to both support the transmission corridor development, future maintenance, and links to Little Jackfish hydroelectric development.
 - routes near communities that could actually benefit from the economic and social advantages of transmission corridors. These communities also likely have the most experience and interest in working with energy-related businesses that could benefit because of their current locations in proximity to developments.
 - consider at least one route that follows the current road from Pickle Lake south and the railroad line across the southern portion of Wabakimi to access both Little Jackfish and possible wind opportunities on the east side of Nipigon.
- 2) Explicitly consider the likely cumulative impacts of creating a new road network, infrastructure, and transmission line on the integrity of lands in and around Wabakimi Provincial Park, particularly as it relates to the movement of species of fish, mammals, and birds and connectivity of populations and ecological processes like fire. As such, we urge you to consider the actual scale and scope of this proposal beyond the 2-km wide corridor created by the transmission line. Ultimately, we would expect Hydro One to be a more proactive leader in addressing cumulative effects across energy sectors at various scales since the need for power associated with these novel developments are reasonably anticipated and this transmission corridor constitutes the first critical step in that direction.

We are grateful for the opportunity to comment on this development.

Yours sincerely,



Justina C. Ray, Ph.D.



Jenni McDermid, Ph.D.



Cheryl Chetkiewicz, Ph.D.

cc: The Honourable Linda Jeffrey, Minister of Natural Resources
Ms. Virginia West, Deputy Minister of Natural Resources
The Honourable John Gerretsen, Minister of the Environment
The Honourable Michael Gravelle, Minister of Northern Development, Mines and Forests
The Honourable Brad Duguid, Minister of Energy and Infrastructure
Mr. Gord Miller, Environmental Commissioner of Ontario