

APPENDIX 18

Comment/Response Tables

5.2.4.1 Indigenous Communities & Organizations Comments Received on Draft EPR

Table 5-4: Indigenous Communities & Organizations Draft EPR Comments and Responses

Item No.	Issue	Comment/Issue Raised by Indigenous Community or Organization	How Comment was Considered by Ontario Northland
Métis Nation of Ontario			
1	July 19, 2024	We have received the information and don't have any concerns at this time. Please keep us in the loop for any future developments.	Acknowledged, thank you for confirming.

5.2.4.2 Federal Review Agency Comments Received on Draft EPR

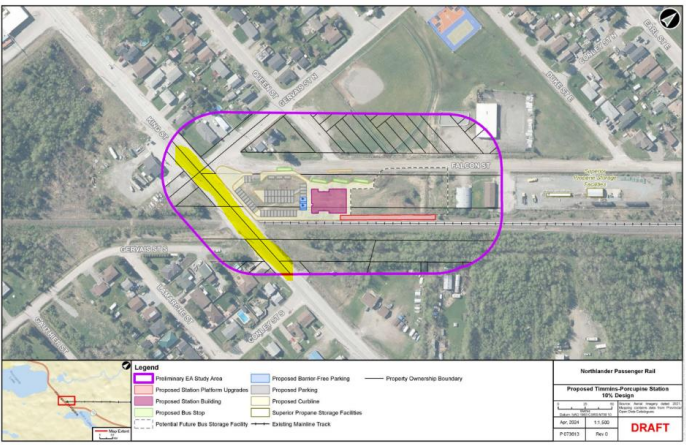
Table 5-5: Federal Review Agency Draft EPR Comments and Responses

Item No.	Issue	Comment/Issue Raised by Review Agency	How Comment was Considered by Ontario Northland
Fisheries and Oceans Canada			
1	Request for Review Form Required	Thank you for the notification of draft environmental project report for Timmins-Porcupine Station. The Department reviews projects (works, undertakings, or activities) being conducted in or near waterbodies that support fish. We also review project proposals for impacts to Species at Risk. We do not review notifications for administrative processes. Please visit our website at: https://www.dfo-mpo.gc.ca/pnw-ppe/index-eng.html to determine whether your project requires a review by the Department. If you determine that your project needs a review please complete and submit a Request for Review Form to: FisheriesProtection@dfo-mpo.gc.ca. If you have any questions feel free to contact us at: 1-855-852-8320.	Based on the assessment undertaken, the drainage feature identified on site conveys intermittent flows after storm events and does not have a connection to Bob's Lake. Based on review of the aforementioned website, and considering no fish habitat is anticipated to be impacted by the project, it was determined that no request for review form is required.
Canadian Transportation Agency			
1	Automatic Reply	Thank you for contacting the Canadian Transportation Agency. We will get back to you as soon as possible.	No response required.
2	August 1, 2024	Thank you for the update. I can confirm that we do not have any comments at this time. Also, the Agency no longer requires to be updated on this project.	Acknowledged, thank you for confirming.
Parks Canada			
1	Automatic Reply	Thank you for contacting Parks Canada. This is an automatic response to confirm that we have received your email. There is no need to reply to this email. We will reply to your inquiry as soon as possible (typically within three (3) business days). If you would like immediate assistance about your inquiry, please do not hesitate to contact Parks Canada's National Information Service (toll-free within North America) at 1-888-773-8888 or 1-613-860-1251 (International). We are open 7 days/week from 10 am to 6 pm EST.	No response required.
Transport Canada			
1	Automatic Reply	Thank you for contacting Transport Canada. This automated response is to assure you that your message has been received and will be reviewed as soon as possible.	No response required.

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2	Additional Correspondence Required	<p>Transport Canada does not require receipt of all Individual or Class EA related notifications. We request that project proponents self-assess whether their project:</p> <ol style="list-style-type: none"> 1. Will interact with a federal property and/or waterway by reviewing the Directory of Federal Real Property, available at www.tbs-sct.gc.ca/dfrp-rbif/; and 2. Will require approval and/or authorization under any Acts administered by Transport Canada* available at http://www.tc.gc.ca/eng/acts-regulations/menu.htm. <p>Proposed projects that will occur on federal property (including reserve lands or lands owned by federal departments other than Transport Canada) will be subject to an Impact Assessment per Section 82 of the <i>Impact Assessment Act, 2019</i> prior to exercising a federal power (including full or partial funding), and/or performing a function or duty (e.g. regulatory approval or issuance of a lease) in relation to that project.</p> <p>If the criteria above do not apply, Transport Canada’s Environmental Assessment program should not be included in any further correspondence, and future notifications will not receive a response. If there is a role under the program, correspondence should be forwarded to: EnviroOnt@tc.gc.ca with a brief description of Transport Canada’s expected role. [Summary of the most common Acts that apply to projects in an Environmental Assessment context provided, including Canadian <i>Navigable Waters Act, Railway Safety Act, Transportation of Dangerous Goods Act, Aeronautics Act</i>].</p> <p>Please advise if additional information is needed.</p>	<p>Based on the review undertaken, the project does not interact with federal property or waterway. Therefore, no request approval or authorization is deemed required under the <i>Navigable Waters Act, Railway Safety Act, Transportation of Dangerous Goods Act, or Aeronautics Act</i>.</p>
Impact Assessment Agency of Canada			
		<i>No comment provided.</i>	
Environment and Climate Change Canada			
		<i>No comment provided.</i>	

5.2.4.3 Provincial Review Agency Comments Received on Draft EPR

Table 5-6: Provincial Review Agency Draft EPR Comments and Responses

Item No.	Issue	Comment/Issue Raised by Review Agency	How Comment was Considered by Ontario Northland
Ministry of Transportation			
1	General Inquiry	There is a reference to an MTO right of way in the EPR. Can you provide more details on this (e.g., location, etc.)? I want to ensure that we are proactively engaging our colleagues in Highways on this as you work to finalize the EPR, etc., if needed.	<p>The MTO ROW refers to King Street (also known as Highway 101). As shown in Figure 2-1, it's the section highlighted in yellow.</p> 
2	Permit	<p>An MTO building/land use permit will be required for the placement of any building/structure on the subject lot, as well as any site grading/paving that will occur. In order to properly review and issue a building/land use permit, the MTO will require the submission of multiple technical documents/studies for our review and approval.</p> <p>Placement of any building or structure within 45.0 meters of the MTO right-of-way or within 395.0 meters of intersections with Hwy 101 and any public road will require an MTO building / land use permit. The following documents must be submitted to the MTO for review and approval, which will include, but may not be exclusive to:</p> <ul style="list-style-type: none"> • Building and Land Use Permit application form for all buildings, structures and entrances. Please follow the link below and complete the application form online. • Detailed site plans, to scale, showing setbacks of parking areas, grading and drainage plans, new or alterations to buildings, structures, wells, septic systems, exterior illumination, landscaping (including plantings), and fencing. • MTO will not issue any permits for blasting or foundation works prior to the review and approval of a stormwater management plan / report. • The MTO endeavours to coordinate permit review processes with the municipality's site plan review and building permit process. The municipality cannot issue building permits until the MTO has issued building and land use permits. • Proof of ownership (i.e. copy of deed/tax bill) and confirmation of zoning from the municipality. The property must be zoned appropriately for the proposed use. • Payment of the appropriate fee prior to final issuance of the permit. 	<p>It is acknowledged that a Building/Land Use Permit will be required as the Timmins-Parcupine Station is within the MTO Building/Land Use Permit Control Area. Ontario Northland looks forward to further discussions with MTO on permit requirements during detailed design to support the Timmins-Parcupine Station.</p>

Item No.	Issue	Comment/Issue Raised by Review Agency	How Comment was Considered by Ontario Northland
3	Permit	<p>MTO sign permits will be required for any sign visible to the travelled portion of Hwy 101, within 400 meters of the Highway 101 right-of-way. It should be noted that sign permits will not be required for smaller signs associated with the station platform. The above comment is intended to focus on larger signs, such as directional signs adjacent to the highway.</p> <ul style="list-style-type: none"> • Submission of completed Sign Permit application for all signage within 400 metres and visible from Highway 101. • Each commercial property is allowed a maximum of 46 square meters of signage. Signs may name or identify the property, occupant(s) or owner(s) or a business conducted on the property, and products or service available on the property. The sign may not advertise goods or services that are not available on the property. The property must be zoned "Commercial". • The following documents must be submitted to the MTO for review and approvals prior to installation, which will include, but may not be exclusive to: <ul style="list-style-type: none"> ○ A completed Sign Application form. ○ Proof of commercial zoning. ○ A sketch of each sign, showing the message (i.e., wording, logos, pictures, etc.), dimensions, and height from the ground. ○ A site plan showing the location and accurate setbacks of each sign from the highway property line, if not already indicated on the site plan. ○ If the sign is to be illuminated, we will require the manufacturer's specifications, type of lighting, wattage of bulbs, etc. All illumination must be dark sky compliant. ○ Payment of the appropriate fee prior to final issuance of the permit. The current fee for location sign permit fees are calculated at \$23.00 per square metre. This is a one-time fee, unless changes are made to the signs. A new application and fee may be required at that time. One sign and the area of both sides of a sign, if both sides are visible to the highway, need to be calculated in the fee. 	<p>It is acknowledged that a Sign Permit will be required as the proposed Timmins-Porcupine Station is within the MTO Sign Permit Control Area. Ontario Northland looks forward to further discussions with MTO on permit requirements to support the Timmins-Porcupine Station as part of detailed design.</p>
4	Permit	<p>If it is anticipated that any work will enter the Hwy 101 right-of-way, an MTO encroachment permit will also be required in order to ensure there is no impact to the highway or the travelling public.</p>	<p>Acknowledged. Ontario Northland is in discussions with MTO. Permits will be obtained at the detailed design phase of the project.</p>
5	Agreement	<p>MTO also requests the submission of a list of highway-rail crossings along the proposed northlander route; noting if any highway improvements are required as a result of rail service reinstatement.</p> <p>In the event highway improvements are required a Legal Agreement is required between the landowner and the MTO. The Agreement would include, but is not limited to, the following terms:</p> <ul style="list-style-type: none"> • The required highway improvements must be agreed upon before Ministry permits are issued, and completed before the development opens for business. • The landowner agreeing to assume financial responsibility for the design and construction of all associated highway improvements. • The requirement for an irrevocable standby Letter of Credit for the full cost of the required highway works. <p>The 'Guideline for Highway Improvements Associated with Development' outlines the respective responsibilities of MTO and proponents, where development necessitates highway improvements. In</p>	<p>Ontario Northland will provide a list of rail crossings along the proposed Northlander route. Ontario Northland looks forward to further discussions with MTO related to agreements to support the reinstatement of the Northlander Passenger Rail Service.</p>

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		addition, the Guideline clarifies the responsibilities (financial and otherwise) and procedures to be followed by proponents who must directly or indirectly undertake the construction of highway improvements on a provincial highway right-of-way.	
6	Permit	<p>MTO requires the submission of multiple technical documents for our review, prior to the issuance of any permits, including a Site Plan, Traffic Impact Study, Illumination Plan, and Stormwater Management Report. [Additional guidance on technical report components provided].</p> <p>Please submit all technical documents through the Highway Corridor Management Services (HCMS) <i>Land Development Review (LDR) Portal</i> online at the following link: https://www.hcms.mto.gov.on.ca/</p> <p>Upon review and approval of technical documents, permit applications can be made through the same link as the LDR Portal (see above).</p> <p>Any questions regarding permitting or setbacks can be directed to Sylvie Leonard, Corridor Management Officer at sylie.leonard@ontario.ca.</p>	Acknowledged. Thank you for the list of permit submission requirements.
Ministry of Transportation – Draft EPR			
1	Section 4.13.9 Soil & Groundwater Monitoring/Future Work Commitments column (2nd and 3rd bullets)	<p>Are the second and third bullets supposed to be separate or should they be part of the same bullet?</p> <p>In addition, if they are part of the same bullet, does the contractor normally file a notice for each receiving site? That is typically the receiver's responsibility.</p>	<p>Yes, the wording should have been included in the same bullet point.</p> <p>Wording changed in Section 4.13.9 to highlight what needs to be included in the registry which is the responsibility of the contractor. Excerpt of the wording can be found below.</p> <p>"If the filing of a Notice for the Study Area is required in the Excess Soil Registry based on O. Reg. 406/19, the Contractor shall file and update the Notice(s) in the Registry per O. Reg. 406/19, as required, with information pertaining to the Study Area, source site and receiver site within the Lands."</p>
2	Section 4.13.9 Soil & Groundwater Monitoring/Future Work Commitments column (5th bullet)	Any backfill brought to the site (provided it falls under the definition of excess soil and does not meet any exemption criteria) should also meet the requirements of O. Reg. 406/19.	<p>Wording changed to reference O. Reg. 406/19 as well and is as follows:</p> <p>"Any backfill material which may be brought to the site to replace contaminated soil must meet the current applicable MECP standard and O. Reg. 406/19 for proposed future land use and the information will be properly documented for future risk management perspective."</p>
3	Section 4.13.9 Soil & Groundwater Monitoring/Future Work Commitments column (2nd bullet)	Indicates that O. Reg. 406/19 was made law on July 1, 2020. E-laws website indicates it was published on December 4, 2019.	Wording changed to "Ontario Regulation 406/19 (On-Site and Excess Soil Management, as amended)" rather than referencing the inception date.
4	Table of Contents	There does not seem to be a description/rationale for alternatives. Understanding TRPAP does not include alternatives to rail, were there no station alternatives evaluated? If not, this needs to be explained in the EPR (e.g., why was this site, in its configuration, chosen as the alternative moving forward and why wasn't any other station locations considered).	<p>O. Reg. 231/08 does not explicitly require proponents to provide an assessment of alternatives. The TRPAP enables proponents to start the assessment process with a preferred undertaking (i.e., "preferred method of carrying out the transit or rail project"). Therefore, the EPR was not updated to include a section discussing evaluation of alternatives. Additionally, the reason Section 1.1 is included in the EPR is to provide context for the preceding decision-making process for the Northlander Project (and Timmins Station) and general rationale for the project, including Timmins Station.</p> <p>It should also be noted that:</p> <ul style="list-style-type: none"> the siting for the new Timmins Station is constrained by the fact that it needs to be situated along the existing rail corridor.

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			<ul style="list-style-type: none"> the site for the proposed Timmins Station is situated on land owned by Ontario Northland and therefore minimizes property impacts. The location of Timmins-Porcupine Station was selected due to its potential to conveniently facilitate transfers from the Ontario Northland bus network, provide additional bus stop infrastructure, and improved inter-community travel time to Cochrane.
5	Section 1.3 EA Process	Suggest removing "EA Process" and just keeping the TRPAP Process. O reg 231/08 is a regulation made under the EAA but it is not an EA process as the regulation is exempt under the EAA subject to conditions identified in the regulation. Also, remove reference to "EA process" throughout the document and stick to TRPAP Process.	The title of Section 1.3 was revised to "Regulatory Process".
6	Section 1.3.1 EA Process	Align reference to issuance of report at Notice of Completion with ONTC's plan for sharing report.	Minor updates to flow chart were made – it should be noted the intent of this graphic is to provide a high level overview of the main steps of the TRPAP. There are multiple references already included in the EPR indicating that Ontario Northland is following the requirements of O. Reg. 231/08 (which entails providing the EPR at the time the Notice of Completion is published).
7	Section 2.2 Northlander Service Plan	Note that service plan of one trip per day is the anticipated schedule. The service plan is subject to change and approvals which won't occur until 2025/2026.	<p>The following text in Section 2.2. was removed:</p> <p><i>A described in the Updated Initial Business Case, the Northlander service will provide one trip per direction per day, travelling overnight in the northern section to allow passengers to maximize daytime at the destination. The planned service is summarized below:</i></p> <p>The following new text in Section 2.2 was added:</p> <p><i>"The Northlander service will provide one trip per direction per day, travelling overnight in the northern section to allow passengers to maximize daytime at the destination. The service plan is subject to change and approvals and will be finalized in 2025/2026. At the time of preparing this EPR, the planned service is as follows:"</i></p>
8	Section 2.3 Engineering Design Process	Remove reference to UIBC - configuration/design/project scope has evolved significantly since publication of this document	<p>The following text was removed from Section 1.1:</p> <p><i>Business case analyses are required by the government for all projects that exceed \$50M in capital costs. As projects develop in scope and construction.</i></p> <p>In addition, Section 2.3 has been revised as follows:</p> <p><i>"As part of the TRPAP, a Reference Concept Design was prepared for the proposed Timmins-Porcupine Station that satisfies the following objectives:</i></p> <ul style="list-style-type: none"> <i>The infrastructure configuration necessary to provide sufficient capacity to operate the Northlander service, and</i> <i>The strategy for how infrastructure will be optimized for operational efficiency."</i>
9	Section 2.4.2 Property	General note: Try to stay away from potential property impacts language. TRPAP requirements are for a "final project description" and if the EPR is too ambiguous, it may create issues with approving a project at a Preliminary Design level of detail. It is OK to complete this project to Preliminary Design but you should have confidence in the level of design and firm up specific requirements, including specific footprint impacts.	Carrying out a TRPAP based on conceptual or preliminary design is common industry practice. Disagree with the suggestion to 'stay away from property impacts language'. Identifying potential property impacts and considering effects on property owners is recommended as per the TRPAP Guide (February 2024) as part of the impact assessment process. No changes made to the EPR.
10	Section 3.1 Project Study Area	The Project Study Area needs to be better defined. It should include a rationale and justification for all field studies. You have identified a Project Study Area but then note investigations were undertaken beyond the Project Study Area. The Project Study Area should include all field investigation limits, which helps justify the Project Study Area boundaries.	The Project Study Area is well defined – as per Section 2.4.1 and as shown in Figure 2-1 of the EPR. It is best practice to undertake field investigations within the Study Area boundaries and slightly beyond in order to take a conservative and complete approach to data collection.

Item No.	Issue	Comment/Issue Raised by Review Agency	How Comment was Considered by Ontario Northland
11	Section 4.1 Impact Assessment	Please clarify updated Project Study Area. It appears to just list the existing conditions Project Study Area, which is fine, but perhaps just note the impact assessment was refined to include the footprint of the impact vs. the buffer areas?	This section was removed from the updated EPR. Also refer to response #10 above.
12	Section 4.4.3 SAR	Were any targeted SAR surveys completed or just secondary source and opportunistic field investigations? Specifically, any targeted SAR surveys for EM/Bobolink or Myotis bats since vegetative impacts may support habitat? If not, note that the ecologists review of the studies did not warrant targeted surveys or impacts to SAR are low.	<p>A SAR screening study and habitat assessment was completed as part of the project to determine the likelihood of SAR presence. Based on the results of the SAR screening, habitat assessment, proposed design, and mitigation measures provided, no additional SAR surveys are anticipated.</p> <p>The current design does not include any tree removal or impacts east of the rail corridor in the woodland. No suitable roost trees were identified west of the train tracks in the proposed facility location during wildlife habitat surveys; however, mitigation is included to specify that vegetation clearing is to occur outside of the bat roosting season. If it is determined that trees east of the train tracks may be removed or impacted in future design stages, further surveys may be required to characterize bat habitat during detailed design.</p> <p>It should be noted that there is no planned vegetation clearing south of the rail corridor in this area as part of the project. This note has also been added to Section 4.3.3 of the EPR.</p>
13	Section 4.7 Archaeology	Was the Stage 1 AA accepted in the register? It should be detailed that a Stage 1 was completed and identify the specifics from that report.	The Stage 1 Archaeological Assessment Report will be submitted into the register as soon as all comments from the Draft EPR GRT review are addressed and responded to.
14	Section 4.8.1 Noise and Vibration	The noise section remains unclear was a noise report completed in accordance with some standard guideline? If so, which one(s)? This should be detailed in the section (any reports completed should be detailed in the respective sections). Suggest tightening up the noise mitigation - the study would tell you what mitigation is warranted within the policy.	<p>The results of the Noise study are clearly documented in detail in Sections 3.2.5, 3.3.5, 4.7, 4.15.5, and 6.7 of the EPR. Also refer to Appendix xx.</p> <p>The proposed noise mitigation is further summarized in Table 4-12.</p> <p>The Noise and Vibration Impact Assessment evaluated the project's noise and vibration effects for the following components: i) Station Operations Noise (station, buses) and ii) Train Operations Noise and Vibration (arrival and departure of trains and train idling), iii) Noise and vibration during the construction of the project.</p> <p>The noise and vibration from the stationary sources and the trains are assessed based on the following criteria and guidance documents:</p> <ul style="list-style-type: none"> • MOEE/GO Transit Draft Protocol • NPC-300 <p>Furthermore, sound levels were calculated using the CadnaA computer program which allows for 3D acoustical modelling using a variety of prediction procedures. Operational sound levels were calculated using the Federal Transit Administration (FTA) algorithm implemented in CadnaA. Station operations sound levels were calculated using the ISO 9613-2 procedure implemented in CadnaA.</p>
15	Section 6.2.1.6 ESA	ESA wording is ambiguous. The SAR impacts should be confirmed as part of the EPR submission. Instead of saying potential impacts to be confirmed in DD, say at that this time NO SAR impacts are anticipated and that should anything change (e.g. introduction of new species, new uplisting, etc.) an ESA Permit or authorization will be obtained prior to construction.	<p>SAR and SAR habitat were identified as part of the Natural Environment Report contained in Appendix A. With regard to the Timmins-Porcupine Station project, no impacts to SAR or SAR habitat are anticipated within the Study Area; therefore, permits under the ESA are not anticipated.</p> <p>However, should SAR or SAR habitat be identified by Ontario Northland (or their Contractor) at the Timmins-Porcupine Station site after the TRPAP is completed and prior to construction, an ESA permit may need to be obtained. This shall be confirmed during detail design. Section 1.1.1.1 was updated to indicate this.</p>

Item No.	Issue	Comment/Issue Raised by Review Agency	How Comment was Considered by Ontario Northland
16	Section 6.2.1.7 MNRF	Remove this - we do not need anything from MNRF re: SAR.	The MECP identified the potential for SAR bat habitat in the forested lands south of the rail corridor. Given that this is in close proximity to the Timmins-Porcupine Station Site, Ontario Northland (or their Contractor) will further engage with MNRF/NHIC staff as a component of identifying and securing SAR registrations and approvals (as required, and if necessary) should any SAR be identified on site prior to construction. The EPR remains as is.
17	Section 6.2.1.9 MCM	The commitments need to better speak to the impact assessment. If you said there are no heritage features within the Project Study Area, why add a comment about removing heritage attributes? Instead, note that no features were observed and should footprint changes occur, you will follow the EPR addendum process and assess enviro impacts.	The following was removed from Section 6.2.1.7 : <i>Should any heritage attributes be removed or demolished as part of the Timmins-Porcupine Station undertaking, approval from the MCM will be required.</i>
18	Section 6.3.1 Property	Noted previously: the TRPAP is a final project description. Try to avoid saying things like property will be confirmed. Instead, assume you have it covered to a PD level of detail. If things change in DD, you will cover it through the addendum process. "Should a change to the approved project be proposed in the future, the MECP will be consulted pursuant to Section 15 (1) of the Transit Projects Regulation to define the assessment process that would apply". At that point, the proponent can decide if its a significant or insignificant change.	The section discussing property was considered preliminary at the time of writing the Draft EPR and has now been updated with specifics about the anticipated property requirements for the project. Ontario Northland is aware and acknowledges the EPR Addendum process and the Section 6.14 of the EPR speaks to commitments on same.
19	Glossary of Terms	Fisheries Act definition needs to be revised to match that from Fisheries and Oceans Canada (DFO).	Glossary of terms was revised to reflect the following: <i>The purpose of the Fisheries Act is to provide a framework for:</i> <i>(a) the proper management and control of fisheries; and</i> <i>(b) the conservation and protection of fish and fish habitat, including by preventing pollution.</i> Reference: https://laws-lois.justice.gc.ca/eng/acts/f-14/page-1.html#h-231177
20	Section 3.2.1 Natural Environment	Include a map that shows the Natural Environment information for terrestrial, fisheries and drainage.	Natural Environment mapping is included in the Natural Environment Existing Conditions & Impacts Assessment Report contained in Appendix A .
21	Section 3.2.1 Natural Environment	Provide Appendix A for review.	Appendix A was provided.
22	Section 3.3.1.6 Fish and Fish Habitat	First sentence: DFO mapping? Regular mapping? Revise sentence as watercourses are not identified by DFO.	Watercourses were identified using LIO during the background screening and SAR fish and critical habitat is provided by DFO. The sentence has been corrected.
23	Section 1.1 Business Case	Business case analysis is required for projects that exceed \$20M in capital costs. Please revise \$ figure.	This sentence was deleted from the EPR as it is not necessary.
24	Section 1.1 Business Case	Suggest entire section be removed as in-depth discussion of the business case is not necessary for this document. Suggest as an alternative an additional paragraph be added to the introduction providing high level messaging on the history of the project in alignment with public messaging. Narrative should focus on identification of preferred route with termination in Timmins, requiring a station build.	Respectfully disagree with the suggestion to remove this section as it provides the necessary background and rationale for the Timmins-Porcupine Station undertaking. No changes to the EPR made. Refer to comments #4 and #8 above.
25	Section 1.2.1 Purpose of the Project	Instead of referring to Timmins as "part of the reinstated Northlander Passenger Service" refer to it as the new terminus station.	References to "terminus" station have been added to Section 1.2 of the EPR.
26	Section 1.3.1 Ontario Regulation 231/08: Transit and Rail Projects Assessment Process	This reference is incorrect. Please revise to reflect the regulatory changes that went into effect February 22, 2024.	Section 1.3.1 of the EPR has been updated to reflect the changes to O. Reg 231/08 that went into effect February 22, 2024.

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27	Archaeology	What is the project area - figure 2-1/3-1 or 2-2? The project area within the larger Project Study Area needs to be refined. The document lacks clarity regarding what the TRPAP area refers to. Project area needs to be clarified throughout the report.	A conservative Study Area was established for purpose of collecting existing conditions data as part of the TRPAP. Based on the conceptual design information available at the time of preparing this EPR, the Study Area for the impact assessment phase was refined to the area shown in Figure 2-1 for purposes of assessing potential effects. Consistency of 'Study Area' terminology and references have been checked and updated as required throughout the EPR.
28	Section 3.2.4 Archaeology	Unclear why getting PIFs which is an administrative process with MCM - is under methodology/field investigations	Removed statement from EPR per comment #21 from the MCM.
29	Section 3.3.4 Archaeology	Mentioning the forested lands that has archaeological potential is confusing since the TRPAP project area is scoped and latter sections of the EA report indicate no potential of this scoped project area. Is there a more refined design that encompasses only the footprint of the design within the current Project Study Area?	Refer to comment #27 above. The parts of the Study Area proposed for construction and operations/maintenance activities, including the land that may be required for future construction of a Bus Storage and Maintenance Facility, do not retain archaeological potential on account of deep and extensive land disturbance or permanently saturated conditions. These lands therefore do not require further archaeological assessment. If the project design changes during detail design (post TRPAP) and encroachment on the lands identified to retain archaeological potential is expected, Ontario Northland will complete a Stage 2 Archaeological Assessment survey prior to any disturbance or construction activities. Section 4.6 of the EPR (as well as the Stage 1 Archaeological Assessment Report) has been updated accordingly to reflect this language.
30	Section 4.7 Archaeology Impact Assessment	Section indicates no impacts due to low archaeological potential - need the project area to be clear in earlier sections of the report as the larger Project Study Area does have areas of archaeological potential that will require Stage 2 assessment prior to impact.	Please see response to comment #27 above.
31	Section 4.13.4 Archaeology	There is potential within the larger Project Study Area until preliminary design is refined; Under "mitigation measures/commitments" column, suggest moving bullet 2 to the end; when human remains are encountered, the steps should be as follows: 1) First, MTO PM/EP should be contacted, 2) MTO will approve a licensed archaeologist to confirm the finds as human remains, 3) Police/coroner to be called in if finds are determined to be human remains, 4) If police/coroner determine that the finds are archaeological, then the licensed archaeologist will notify the Registrar of Burials at MPBSD and a Burial Site Investigation process will be initiated, 5) BAO is only involved if it is a confirmed cemetery after all of the above steps have been carried out	Table 4-11 of the EPR has been updated to include the following Mitigation language: <ul style="list-style-type: none"> • <i>If any suspected human remains are found, the Ministry of Transportation (MTO) Project Manager/Environmental Planner should be contacted. MTO will approve a licensed archaeologist to confirm the finds as human remains.</i> • <i>The Funeral, Burial and Cremation Services Act, 2002, S.O. 2002, c.33 requires that any person discovering human remains must cease all activities immediately and notify the police or coroner. If the coroner does not suspect foul play in the disposition of the remains, in accordance with Ontario Regulation 30/11 the coroner shall notify the Registrar, Ontario Ministry of Public and Business Service Delivery (MPBSD), which administers provisions of that Act related to burial sites.</i> • <i>If police/coroner determine that the finds are archaeological, then the licensed archaeologist will notify the Registrar of Burials at MPBSD and a Burial Site Investigation process will be initiated</i> • <i>In situations where human remains are associated with archaeological resources, the MCM should also be notified (at archaeology@ontario.ca) to ensure that the archaeological site is not subject to unlicensed alterations which would be a contravention of the Ontario Heritage Act.</i>

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32	Section 6.2.1.9 MCM	MCM doesn't "sign-off" on archaeological assessments - they review the archaeological license reports for compliance with the provincial S&Gs and the OHA and if compliant, concurs with the recommendations of the report.	<p>Section 6.2.1.7 was revised to state the following:</p> <ul style="list-style-type: none"> “Ensuring compliance of archaeological assessment documentation with Standards and Guidelines and the <i>Ontario Heritage Act</i>”
33	Section 6.5.2 Discovery of Human Remains	Remove reference to Cemeteries act; see comments for section 4.13.4	References to the <i>Cemeteries Act</i> have been removed within the EPR.
34	Section 6.5.4 Further Archaeological Assessment Studies	Is this referring to future work within the larger Project Study Area or beyond?	<p>The parts of the Study Area proposed for construction and operations/maintenance activities, including the land that may be required for future construction of a Bus Storage and Maintenance Facility, do not retain archaeological potential on account of deep and extensive land disturbance or permanently saturated conditions. These lands therefore do not require further archaeological assessment. If the project design changes during detail design (post TRPAP) and encroachment on the lands identified to retain archaeological potential is expected, Ontario Northland will complete a Stage 2 Archaeological Assessment survey prior to any disturbance or construction activities.</p> <p>Section 4.6 of the EPR (as well as the Stage 1 Archaeological Assessment Report) has been updated accordingly to reflect this language.</p>
35	Section 3.3.5 Noise and Vibration	Typically, representative noise receptors are selected in each cardinal direction from the project/site. Suggest including more noise receptors to the north and south (e.g. north of Duke St. and south of King St.). At the very least, an additional receptor should be included to represent noise impacts at the residences located south of King St.	The receptors were selected based on the predictable worst-case impact in accordance with NPC-300. Other receptors are not expected to be impacted by the station's noise sources as they are located farther away and/or are subject to higher ambient/guideline sound levels.
36	Section 4.3 Impact Assessment Criteria Table 4-2 Impact Assessment Criteria	For the environmental factor of Noise and Vibration, the criteria must also include the potential effects due to normal operation of the proposal, not just during construction.	Operational phase impacts are documented in Section 4.7.1 of the EPR.
37	Section 4.8 Noise and Vibration	The readability and flow of this section would be improved with a paragraph here describing the various aspects of operational/construction noise/vibration that were evaluated.	<p>Section 4.7 was augmented to include the following text:</p> <p>“The Noise and Vibration Impact Assessment reviewed the potential impacts and applicable mitigation measures for the following aspects of the project:</p> <ol style="list-style-type: none"> 1. Train operations noise and vibration from the trains including idling at the station. 2. Station operations noise, including mechanical equipment on the station and buses using the bus terminal. 3. Maintenance noise and vibration for the station and associated trackwork. 4. Noise and vibration during the construction of the project and potential mitigation measures to minimize construction noise and vibration impacts.”
38	Section 4.8.1 Operations and Maintenance Effects Train Operations Noise Impacts	Ambient levels are stated, and the guideline limit is stated, but what is the predicted impact? More information should be provided here as it is counter-intuitive to a typical reader that noise from a train would be insignificant.	The EPR is a summary of the technical report. The requested information can be found in the supporting Noise and Vibration Report contained in Appendix E .
39	Section 4.8.1 Operations and Maintenance Effects Station Operations Noise Impacts	The way this section is written makes it unclear as to the differentiation between the train station and the future bus terminal.	The train station future bus maintenance/storage facility are both part of the defined Study Area as outlined in the report and provided mapping.

Item No.	Issue	Comment/Issue Raised by Review Agency	How Comment was Considered by Ontario Northland
			As explained in the EPR already, should the future bus maintenance and storage facility move forward in the future, Ontario northland will carry out an EPR Addendum which will include a new Noise & Vibration impact assessment study to address this facility.
40	Section 4.8.1 Operations and Maintenance Effects Station Operations Noise Impacts	Consideration should be given to the design and layout of the train station, parking lot and future bus terminal that can provide significant noise mitigation to nearby receptors.	Refer to response below to comment #43. As explained in the EPR already, should the future bus maintenance and storage facility move forward in the future, Ontario Northland will carry out an EPR Addendum which will include a new Noise & Vibration impact assessment study to address this facility.
41	Section 4.8.1 Operations and Maintenance Effects	Noise and Vibration due to maintenance activities are not mentioned in this section at all, but the topic appears in the summary Table 4-7 under the heading of Monitoring/Future Work Commitments. There should be some explanation in this section.	Maintenance of such a facility is not expected to be a significant source of noise and vibration, notwithstanding this, the following additional language has now been included in the EPR Section 4.7.1 : "Maintenance activities for the station and associated trackwork are not expected to be a significant source of noise and vibration. However, maintenance of the infrastructure is an important element in minimizing operational noise and vibration levels throughout the life of the project. The commitment to future work was to complete regular maintenance inspections and implement corrective measures wherever needed to minimize noise and vibration. This ongoing maintenance will help ensure the facility continues to operate within the applicable noise and vibration criteria."
42	Section 4.8 Noise and Vibration	The same sentence appears three times in the two sections, "A summary of Noise and Vibration impacts, mitigation measures and future work commitments is presented in Table 4-7 below." Is this a typo, or intentional repetition?	This statement was included intentionally – no changes required.
43	Section 4.14.5 Noise & Vibration Table 4-7	It is recommended that acoustics be considered in the site design and layout so that noise and vibration effects can be mitigated by the strategic location of structures such as the station or future bus terminal. This will reduce the need for additional noise mitigation measures.	The station will be subject to detailed design and as part of that process, factors such final locations of bus bays, mechanical equipment, and mechanical equipment sound data will be taken into consideration. It should be noted however that the layout and general orientation of the station design is not expected to substantially change from what is presented in this EPR document.
44	Section 5.2.1.2 Public Information Centre #1 Summary of Public Meeting Noise and Vibration	Whistle cessation - While it is understandable that train whistles at crossings are disruptive, there is also concern about beginning use on any previously unused portions of the rail corridor. It may be a matter of years before the local public get accustomed to the new railway usage and additional signs before and at crossings may help to alert the public to the change. Any consideration of whistle cessation should be very carefully done given the safety risks.	Whistle cessation is requested by the Municipality through Transport Canada, not Ontario Northland. It should also be noted that there are several Ontario Northland freight customers along this portion of the corridor and therefore freight traffic exists today and is considered an existing condition. Additional measures of note: <ul style="list-style-type: none"> • Appropriate regulatory signage will be provided and Ontario Northland intends to run a public crossing safety campaign. • Ontario Northland is undertaking level crossing assessments along the corridor.
45	Noise and Vibration	What consideration was given to alternative sites for this project? This location is not ideal in terms of new noise and vibration impacts on existing receptors (residences). Many old train stations are located in the middle of towns because the towns built up over many years around the station. As far as noise and vibration impacts are concerned, it is ideal to situate a new station away from sensitive receptors.	Refer to response comment #4 above.
46	Section 2.4 Timmins-Porcupine Station	"... is situated along the Northlander route (Ramore Subdivision) between Matheson Station and Cochrane Station." is a misleading description as Timmins is considered a terminus station. The route is Toronto to Timmins, with a connection to Cochrane. Suggest rephrasing to more accurately align with existing messaging on the route.	The EPR has been updated as applicable to refer to "terminus station".

Item No.	Issue	Comment/Issue Raised by Review Agency	How Comment was Considered by Ontario Northland
47	Section 3.2.3 Data Gathering	Guidance from MCM includes using their Criteria for Evaluating Potential Built Heritage Resources and Cultural Heritage Landscapes but it is unclear whether the screening form was used to screen for BHRs and CHLs within the Project Study Area.	The Cultural Heritage Report: Existing Conditions and Impact Assessment Report is contained in Appendix C to this EPR. During the cultural heritage assessment process, a property is identified as a potential BHR or CHL based on research, the MCM screening tool, and professional expertise and best practice. This is described in Section 3.1.3 of the Cultural Heritage Report: Existing Conditions and Impact Assessment Report.
48	Section 3.2.3 Data Gathering	Guidance from MCM states that a rationale/justification needs to be provided for the Project Study Area. It does not need to be included here but should be in the Cultural Heritage Report.	The Cultural Heritage Report: Existing Conditions and Impact Assessment Report is contained in Appendix C to this EPR. The Study Area is defined as the area where the proposed Timmins-Porcupine Station components are proposed to be constructed plus a conservative 50 metre buffer area for completing technical and environmental studies. This buffer was selected as it was determined to be inclusive of lands that may contain BHRs and CHLs that may be subject to direct or indirect impacts as a result of the Project. This is described in Section 2.4 of the Cultural Heritage Report: Existing Conditions and Impact Assessment Report.
49	Section 3.2.3.2 Identification of Built Heritage Resources and Cultural Heritage Landscapes	Screening for cultural heritage value or interest (CHVI) is supported by field review, stakeholder engagement and background research in conjunction with MCM's screening form, Criteria for Evaluating Potential for Built Heritage Resources and Cultural Heritage Landscapes. Again, it is unclear whether the screening form was used.	The Cultural Heritage Report: Existing Conditions and Impact Assessment Report is contained in Appendix C to this EPR. During the cultural heritage assessment process, a property is identified as a potential BHR or CHL based on research, the MCM screening tool, and professional expertise and best practice. This is described in Section 3.1.3 of the Cultural Heritage Report: Existing Conditions and Impact Assessment Report.
50	Section 3.3.3 Cultural Heritage	Remove second sentence. It is enough to say that no known or potential BHRs or CHLs were identified within the Project Study Area.	Removed as suggested.
51	Section 6.2.1.8 MCM	This section is inaccurate. MCM does not issue approvals under the OHA. Approvals for properties that fall under Part IV and Part V are the purview of the municipality. The consent of the Minister of MCM is required for PHPPS under Section F.5 of the S&Gs. However, ONTC is not a PPB under the S&Gs so the S&Gs would not apply.	Acknowledged. Revised Section 6.2.1.9 to now state the following: <ul style="list-style-type: none"> • "Ensuring compliance of archaeological assessment documentation with Standards and Guidelines and the <i>Ontario Heritage Act</i>"
52	Section 1.3.1 Ontario Regulation 231/08: Transit and Rail Projects Assessment Process	The EA Act that ONTC is exempted from is Part II.3 - Comprehensive Environmental Assessments, not Part II.	Section 1.3.1 has been updated.
53	Section 1.3.1 Ontario Regulation 231/08: Transit and Rail Projects Assessment Process	It is not clear to me who will be circulated the pre-submission Draft EPR. The bullet following pre-submission circulation of Draft EPR says "Consideration of stakeholder comments received and follow-up efforts"; please clarify who is "stakeholder" for this bullet. Take note that the TRPAP guide says under "Before issuing the Notice of Commencement" - some approaches that may assist in completing the TRPAP: "Prepare a preliminary draft of the Environmental Project Report and provide to persons who may be interested, and Indigenous communities, adjacent property owners, regulatory agencies, municipalities."	The Draft EPR was circulated to all government review agencies, municipalities, and Indigenous Communities and Organizations on the TRPAP contact list.
54	Figure 1-3: Transit & Rail Project Assessment Process	It would be helpful to indicate who will be given the "Draft EPR", "Updated EPR".	See response to comment #53 above.

Item No.	Issue	Comment/Issue Raised by Review Agency	How Comment was Considered by Ontario Northland
55	Section 1.6 Studies and Technical Documents Reviewed	Before the detailed project description section, the TRPAP also mentions to conduct studies in respect of the project by identifying other alternative methods that are/were considered (e.g., different design alignments). It is not clear to me where this is located in the report.	<p>O. Reg. 231/08 does not explicitly require proponents to provide an assessment of alternatives. The TRPAP enables proponents to start the assessment process with a preferred undertaking (i.e., “preferred method of carrying out the transit or rail project”). Therefore, the EPR was not updated to include a section discussing evaluation of alternatives. Additionally, the reason Section 1.1 is included in the EPR is to provide context for the preceding decision-making process for the Northlander Project (and Timmins-Porcupine Station) and general rationale for the project, including Timmins-Porcupine Station.</p> <p>It should also be noted that:</p> <ul style="list-style-type: none"> the siting for the new Timmins-Porcupine Station is constrained by the fact that it needs to be situated along the existing rail corridor. the site for the proposed Timmins-Porcupine Station is situated on land owned by Ontario Northland and therefore minimizes property impacts. the location of Timmins-Porcupine Station was selected due to its potential to conveniently facilitate transfers from the Ontario Northland bus network, provide additional bus stop infrastructure, and improved inter-community travel time to Cochrane.
56	Section 3.3.2.2 Planned Land Use Zoning	Will the zoning need to be changed from Residential First Density to accompany the Timmins-Porcupine station? Does this project coincide with the zoning requirements?	<p>Under the City of Timmins Zoning By-Law 2011-7100, lands at the proposed Timmins-Porcupine Station are zoned as Residential First Density (NA-R1). Recognizing that the existing use of the site is vacant, the presence of the Station is not anticipated to impact planned land uses in the area. Instead, the proposed infrastructure seeks to facilitate public transit ridership. Additionally, the Official Plan promotes public utilities and municipal services, infrastructure and facilities on all lands within the City of Timmins. See Section 4.4 of the EPR for further details.</p>
57	Section 4.5.1 Operations and Maintenance Effects	Under sensitive facilities, it says that there are no sensitive facilities within 100 metres of the proposed Timmins-Porcupine Station. This seems like a short distance. It was identified that the closest school is 450 metres. The nearest church is 750 metres away. If ONTC plans to share a draft EPR with interested stakeholders, are the school and church also part of this review?	<p>A conservative approach was taken as part of the exiting conditions phase of the project. As such, socio-economic conditions were defined in the context of sensitive facilities within and in proximity to the Study Area; specifically these were defined as schools, hospitals, long term care facilities, community centres, and child-care facilities within one kilometre (km) of the proposed Timmins-Porcupine Station.</p> <p>Given the UIBC train schedule (i.e., train departs Timmins-Porcupine Station at approximately 2400 (midnight) and arrives at Timmins-Porcupine Station by 0530), it is assumed that the arrival/departure time of trains will not occur during the same hours of operation as these sensitive facilities. It was determined that 100 metres was a reasonable area to assess potential impacts given the train schedule and frequency. No impacts to these sensitive facilities are anticipated.</p> <p>Upon issuing the Notice of Completion, the Final Environmental Project Report (EPR) and Supporting Appendices (environmental and technical studies) will be made available for 30-day review by the Public - including any interested person.</p> <p>The Draft EPR was circulated for comment to the <i>Government Review Team</i> consisting of all review agencies, municipalities, Indigenous communities on the TRPAP Contact list.</p>
58	Indigenous Community & Organization Engagement	Uses 'Indigenous stakeholder' recommend changing to 'Indigenous communities & organizations' for consistency and correct terminologies (Indigenous communities and organizations have indicated they do not consider themselves stakeholders). Suggest checking full document to ensure consistency.	Revised to Indigenous Communities and Organizations throughout EPR.

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MTO Comments on Appendix Reports			
59	Cultural Heritage: Executive Summary Land Use & Socio-economic: Executive Summary Natural Environment: Executive Summary	References incorrect. Please revise to reflect the regulatory changes that went into effect February 22, 2024.	Environmental studies have been updated to reflect the changes to O. Reg 231/08 that went into effect February 22, 2024.
60	Cultural Heritage: Executive Summary Land Use & Socio-economic: Executive Summary Natural Environment: Executive Summary	... is situated along the Northlander route (Ramore Subdivision) between Matheson Station and Cochrane Station is a misleading description as Timmins is considered a terminus station. The route is Toronto to Timmins, with a connection to Cochrane. Suggest rephrasing to more accurately align with existing messaging on the route.	References to 'terminus station' have been provided in Sections 1.2 and 2.4 of the EPR; these same changes have also been made to the supporting studies included in the EPR Appendices.
61	Cultural Heritage: Section 1.3 Land Use & Socio-economic: Section 1.3 Noise & Vibration: Section 1.3 Natural Environment: Executive Summary	References incorrect. Please revise to reflect the regulatory changes that went into effect February 22, 2024.	Text within the environmental and technical studies has been updated to reflect the changes to O. Reg 231/08 that went into effect February 22, 2024.
62	Cultural Heritage: Section 2.1 Land Use & Socio-economic: Section 2.1 Natural Environment: Executive Summary Noise & Vibration: Section 2.1 Archaeology: Section 2.1	... is situated along the Northlander route (Ramore Subdivision) between Matheson Station and Cochrane Station is a misleading description as Timmins is considered a terminus station. The route is Toronto to Timmins, with a connection to Cochrane. Suggest rephrasing to more accurately align with existing messaging on the route.	Repetitive comment. See response #2 above.
63	Natural Environment Section 3.2.1.6	First Sentence: DFO Mapping? Regular Mapping? See same comment from EPR.	Watercourses were identified using LIO during the background screening and SAR fish and critical habitat is provided by DFO. The sentence has been corrected.
64	Natural Environment Section 3.2.2.3	Last sentence: Add in not fish habitat.	Revised the last sentence to state "Given the lack of connectivity to permanent watercourses and the ephemeral nature of the channel, there is little likelihood of fish habitat."

Item No.	Issue	Comment/Issue Raised by Review Agency	How Comment was Considered by Ontario Northland
65	Natural Environment Section 4.3	Include Figure 5.	Figure 5 will be provided in the updated final Natural Environment: Existing Conditions & Impacts Assessment Report contained in Appendix A .
66	Appendix B - Noise and Vibration Existing Conditions & Impact Assessment Report Executive Summary	Under the red heading of "Potential Impacts, Mitigation Measures & Monitoring, Activities" the following statement is made, "The noise impact from train operations is predicted to be insignificant at the receptors. As such, mitigation measures are not required." This statement is counterintuitive to the general public. It should be explained and given some context.	This section within the Executive Summary will be updated to reflect all other updates to the Noise and Vibration Report and EPR sections concerning noise within the updated EPR. For a summary of Noise impacts, mitigation and commitments, refer to Table 4-12 of the EPR.
67	Appendix B - Noise & Vibration Section 4.3.1.2 - Noise Sources	This does not appear to include the daily train connections to Cochrane as well. (Compare with information in Section 2.2 from Draft EPR, April 9, 2024). The Noise and Vibration study should be updated accordingly.	There is only one departure and one arrival per day from Timmins Station. The connection to Cochrane was accounted for in the assumptions made as part of the Noise study.
68	Appendix B - Noise & Vibration Section 4.2.3 - Approach	The FTA algorithm that is implemented in CadnaA is not an approved model for prediction of transit noise in Ontario. What are the implicit assumptions made regarding train types, noise data, source heights, directivity effects, etc. and what justification is there for using this model? Was any consideration given to the type of trains (locomotive and passenger cars) and their predicted noise emissions? It is difficult to comment on the accuracy of the numerical analysis because the engineering data and assumptions have not been included in the report.	The FTA implementation in CadnaA has been accepted by provincial agencies included Metrolinx and the MECP for numerous transportation and transit projects. As this is an accepted approach with the MECP and has been used on several approved transit projects, updates to the assessment method are not deemed to be required. Further details on the parameters can be found within the FTA manual as well as the CadnaA manual.
69	Appendix B - Noise & Vibration Section 6.2 - Provincial	This section indicates that no provincial permits will be required for noise and vibration. However, Section 4.2.2.1 discusses that there are MECP noise limits for the operation of the station under NPC-300. It is likely that an air/noise/vibration ECA or an Air Emissions EASR may be required for the station unless there are specific exemptions, which should be included here, if any.	It is not expected that the equipment provided for the station's ventilation will require an EASR or ECA, similar to other train stations in Ontario. Emergency generators etc. are not currently proposed. MECP has reviewed the report and does not have any comments with this section.
70	Appendix B - Noise & Vibration Section 7.0 - Future Work	It is recommended that an experienced acoustical consultant be engaged in the design and layout of this project. If noise barriers are required then the site layout should be done in a manner to ensure the feasibility of such measures. For example, there cannot be a noise barrier wall where buses enter or exit the site. This early engagement of acoustical expertise can also help to ensure that proposed buildings (such as the station building or future proposed maintenance building) can be situated in a location that can provide noise shielding effects.	An experienced acoustical consultant was retained to complete a noise and vibration impact assessment of the project in support of the TRPAP. The assessment found modest noise impacts as a result of the bus terminal, as outlined in the EPR and Noise Report. Mitigation measures were recommended to meet the criteria which were to be further refined during detailed design. The detailed design is ongoing and will proceed post TPAP.
71	Appendix C - Cultural Heritage 2.2 TRPAP Study Area	The Study Area is defined as all lands that may be affected by a proposed undertaking. The Study area should be of sufficient size to allow for an assessment of all impacts from an undertaking. The rationale provided should explain how the Study Zone meets this objective of identifying all lands that may be affected by the proposed undertaking.	The Study Area is defined as the area where the proposed Timmins-Porcupine Station components are proposed to be constructed plus a conservative 50 metre buffer area for completing technical and environmental studies. This buffer was selected as it was determined to be inclusive of lands that may contain BHRs and CHLs that may be subject to direct or indirect impacts as a result of the Project. This is described in Section 2.3 of the Cultural Heritage Report: Existing Conditions and Impact Assessment Report. No updates to the report are required.
72	Appendix C - Cultural Heritage 3.5 Consultation with Regulatory Authorities	In addition to regulatory authorities, Community input should be sought from other individuals/groups provide them with opportunities to participate in understanding and articulating the property's cultural heritage value. Sources include, but are not limited to, municipal heritage committees, local ACO, historical societies, museums, archives, etc.	Community input was sought by ASI, information has been included in Sections 3.1 and 3.1.5 in the Cultural Heritage Report: Existing Conditions & Preliminary Impact Assessment. The following groups were contacted during preparation of the Cultural Heritage Report: Existing Conditions & Preliminary Impact Assessment: <ul style="list-style-type: none"> The Little Claybelt Homesteaders Museum (email communication 6 July 2023). A request was made for any archival images or information on the construction of the T&NO in Timmins. A response on 6 July 2023 provided archival images of the T&NO Timmins Station outside of the Project Study Area.

Item No.	Issue	Comment/Issue Raised by Review Agency	How Comment was Considered by Ontario Northland
			<ul style="list-style-type: none"> Timmins Museum and Archives (7 July 2023). A request was made for any available historical maps of the Project Study Area. No response was received at the time of draft report preparation, therefore available maps from other sources were used in the report. <p>Documentation of how community and Indigenous input was sought is included in Section 3.1.5 of the Cultural Heritage Report: Existing Conditions & Preliminary Impact Assessment.</p>
73	Appendix C – Cultural Heritage 3.5 Consultation with Regulatory Authorities	Engagement with Indigenous communities should include a discussion about known or potential cultural heritage resources that are of value to them. It is not clear whether Indigenous communities were contacted to only provide input about the new rail service or whether they were given the opportunity to share knowledge that would assist in the identification of heritage resources.	Documentation of how community and Indigenous input was sought is included in Section 3.1.5 of the Cultural Heritage Report: Existing Conditions & Preliminary Impact Assessment.
74	Appendix D - Archaeology Executive Summary	Reference made to two study areas which appear to be the Station study area and TRPAP study area (Station study area plus 50 m buffer); however, there is references to "study area" in this section and it needs to be clear which study area is being referred to. Commitment to future work - this needs to include that if future work is done in the 50 m buffer zone, then archaeological assessment may be required (the woodlot is within the buffer zone).	Figure 2 depicts the project study area. The project study area for the TRPAP is defined as the area where the station components are proposed to be constructed plus a conservative 50m buffer area. Project study area reviewed throughout the Stage 1 Archaeological Assessment Report to ensure consistency.
75	Appendix D - Archaeology 3.2.5 Consultation with Regulatory Authorities	Submission of PIFs to MCM is an administrative requirement of archaeological licenses - this does not constitute consultation with regulatory authorities.	Removed statement from the Stage 1 Archaeological Assessment Report.
76	Appendix D - Archaeology 4.3 Operations and Maintenance Effects	Both sub-sections 4.3.1 and 4.3.2 refer to the TRPAP Station study area as having no potential. The majority of the appendix refers to the larger TRPAP study area (Station study area plus 50 m buffer) which includes areas of archaeological potential (woodlot). The report needs to clarify two separate study areas as it is confusing to the reader.	<p>The Stage 1 Archaeological Assessment Report has been updated to reflect the revised text suggested by MCM. In addition, the report has been updated to clarify that the parts of the Timmins-Porcupine Station TRPAP Station Study Area/Project Study Area proposed for operations and maintenance activities, including the land that may be required for future construction of a Bus Storage and Maintenance Facility, does not retain archaeological potential.</p> <p>The parts of the Study Area/Project Study Area proposed for construction and operations/maintenance activities, including the land that may be required for future construction of a Bus Storage and Maintenance Facility, do not retain archaeological potential on account of deep and extensive land disturbance or permanently saturated conditions. These lands therefore do not require further archaeological assessment.</p> <p>If the project design changes during detail design (post TRPAP) and encroachment on the lands identified to retain archaeological potential is expected, Ontario Northland will complete a Stage 2 Archaeological Assessment survey prior to any disturbance or construction activities.</p> <p>Section 4.6 of the EPR (as well as the Stage 1 Archaeological Assessment Report) has been updated accordingly to reflect this language.</p> <p>The Stage 1 Archaeological Assessment Report will be submitted into the register as soon as it is finalized.</p>
77	Appendix D - Archaeology Table 3: Summary of Archaeology Potential Impacts, Mitigation and Monitoring Commitments	<p>There is potential within the larger study area until preliminary design is refined; Under "mitigation measures/commitments" column, suggest moving bullet 2 to the end; when human remains are encountered, the steps should be as follows:</p> <ol style="list-style-type: none"> 1) First, MTO PM/EP should be contacted; 2) MTO will approve a licensed archaeologist to confirm the finds as human remains; 	<p>The Stage 1 Archaeological Assessment Report has been updated with the following text:</p> <ul style="list-style-type: none"> If any suspected human remains are found, the Ministry of Transportation (MTO) Project Manager/Environmental Planner should be contacted. MTO will approve a licensed archaeologist to confirm the finds as human remains. The <i>Funeral, Burial and Cremation Services Act, 2002, S.O. 2002, c.33</i> requires that any person discovering human remains must cease all activities immediately and notify the police or

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		3) Police/coroner to be called in if finds are determined to be human remains; 4) If police/coroner determine that the finds are archaeological, then the licensed archaeologist will notify the Registrar of Burials at MPBSD and a Burial Site Investigation process will be initiated; 5) BAO is only involved if it is a confirmed cemetery after all of the above steps have been carried out.	coroner. If the coroner does not suspect foul play in the disposition of the remains, in accordance with Ontario Regulation 30/11 the coroner shall notify the Registrar, Ontario Ministry of Public and Business Service Delivery (MPBSD), which administers provisions of that Act related to burial sites. <ul style="list-style-type: none"> • If police/coroner determine that the finds are archaeological, then the licensed archaeologist will notify the Registrar of Burials at MPBSD and a Burial Site Investigation process will be initiated • In situations where human remains are associated with archaeological resources, the MCM should also be notified (at archaeology@ontario.ca) to ensure that the archaeological site is not subject to unlicensed alterations which would be a contravention of the <i>Ontario Heritage Act</i>.
78	Appendix D - Archaeology 7.0 Future Work	This section states that the Station study area does not have archaeological potential - as previous comments - the document needs to clarify the differences in TRPAP study area and the Station Study area. Areas beyond the Station study area has archaeological potential that requires Stage 2 assessment.	See response to item #18 above.
79	Appendix D - Archaeology	The report is not formatted in the typical format for archaeological assessments. There is general confusion throughout the report about what the "study area" entails -- whether it is the station study area or the TRPAP study area (station study area and 50 m buffer). ASI's sections and their map of recommendations (Figure 9 of the appendix) refers to the larger TRPAP study area which includes the buffer which has areas of archaeological potential. So for the book-end sections of the appendix to suggest that there is no archaeological potential or impact to resources is confusing. MTO would prefer to see originals of draft reports prepared by consultants – is it possible to see the draft report that was prepared by ASI. The appendix as it is now is not one that would be submitted to MCM by the licensed archaeologist.	The report will be renamed as a Stage 1 Archaeological Assessment Report; no other changes to the format are deemed required.
80	Terrestrial Report Executive Summary	General comment: Try not to refer TRPAP as an environmental assessment. Refer to the study as being subject to Ontario Regulation 242/08	The reference to O. Reg 242/08 is incorrect in the comment - the correct reference is O. Reg 23108. Notwithstanding this, this particular comment is deemed semantics and does not materially change the results of the EPR.
81	Terrestrial Report	Can you confirm if the methodologies for terrestrial ecosystems was completed in accordance to the MTO Environmental Reference for Highway Design (ERHD)? It does not appear to be included in this document. This is a great resource to use when collecting secondary source data and confirming fieldwork.	The report was prepared in accordance with the requirements of O. Reg. 232/08 and was based on a combination of desktop assessments (including a comprehensive review of secondary source background information and legislation and guidance documents) and subsequent field investigations following industry standard methodologies for surveys and assessments to characterize the existing conditions on-site. The characterization of existing conditions was completed for the Timmins-Porcupine Station and the area adjacent to the proposed development to identify natural heritage constraints and to identify appropriate mitigation from a natural environment perspective to minimize any impacts.
82	Terrestrial Report Section 3.1.5	Isn't ONTC exempt from the Conservation Authorities Act (under Section 28) as they are a crown agency? If so, should be stated that ONTC will not obtain regulation permits under this regulation.	Ontario Northland as a Crown Agency of the Province of Ontario is not subject to the <i>Conservation Authorities Act</i> . However, Ontario Northland will engage with the MRCA to incorporate their requirements as a best practice, where practical, and may obtain associated permits and approvals, where applicable.
83	Terrestrial Report Table 4	Might be worth adding another column and description for any migratory birds under Schedule 1 of Migratory Bird Regulations as you would need a relocation permit for these species, or wait for nest removal within designated times. It does not appear to be an issue with the observations but stating this would clarify for the reader.	This is not necessary as there were no bird species observed during field investigations that are regulated under the ESA, SARA or the MBCA. Section 3.2.2 of the Natural Environment Existing Conditions & Impact Assessment Report now states the following for added clarity: "None of the bird species observed are regulated under ESA, SARA, or Schedule 1 of the MBCA."

Item No.	Issue	Comment/Issue Raised by Review Agency	How Comment was Considered by Ontario Northland
			Additionally, the following mitigation measure has been added to the Natural Environment Existing Conditions & Impact Assessment Report and Table 4-8 of the EPR to ensure vegetation removals occur outside of the breeding bird window: "Vegetation clearing to occur outside of the breeding bird window of April 1- August 31. If tree clearing is required during the breeding bird window, a nest sweep will be completed by a qualified biologist no more than 48 hours prior to vegetation removal..."
84	Terrestrial Report	MTO is exempt from the FWCA. I thought that also included agencies that report to MTO but this may be a legal question.	Acknowledged – no updates made to the report at this time.
85	Terrestrial Report General - Impact Assessment	Would be helpful to show the preferred design in an image superimposed on aerial photography to see where the impacts are in relation to the overall study area.	See Figure 5 which is now included in the Natural Environment Existing Conditions & Impact Assessment Report.
86	Land Use Socio-economic Report Executive Summary	Check that the correct part of the EA Act is being referenced. It should be Part II.3 of the EA Act, not just Part II.	Updated.
87	Land Use Socio-economic Report Section 1.3	Check that the reference to O. Reg.231/08, Schedule 2.1 Subsection 2(1) is correct. I could not find this reference in either the regulation nor the EA Act. Look at O. Reg.50/24 - Part II.3 Projects - Designations and Exemptions for more details on the projects under this part of the EA Act.	The Land Use & Socio-economic Report has been updated to reflect the changes to O. Reg 231/08 that went into effect February 22, 2024.
88	Land Use Socio-economic Report Section 4.3.2.5 Zoning	Clarify if the area would need to be rezoned since the current zoning is for Residential First Density (NA-R1).	Under the City of Timmins Zoning By-Law 2011-7100, lands at the proposed Timmins-Porcupine Station are zoned as Residential First Density (NA-R1). Recognizing that the existing use of the site is vacant, the presence of the Station is not anticipated to impact planned land uses in the area. Instead, the proposed infrastructure seeks to facilitate public transit ridership. Additionally, the Official Plan promotes public utilities and municipal services, infrastructure and facilities on all lands within the City of Timmins. See Section 4.3.2 of the Land Use Socio-economic Report for further details.

Item No.	Issue	Comment/Issue Raised by MECP	How Comment was Considered by Ontario Northland August 8, 2024	Comment/Issue Raised by MECP September 4, 2024	How Comment was Considered by Ontario Northland September 9, 2024
Ministry of Environment, Conservation and Parks					
1	Air Quality	MECP requires assessment of potential impacts of the proposed project on local air quality including greenhouse gas emissions, as well as potential air quality issues such as human health impacts. The draft Environmental Project Report didn't provide any information regarding the potential air quality effects of the proposed project. A detailed technical study should be conducted to assess the potential air quality effects including greenhouse gas emissions from the proposed project for construction and operations phases. The technical study should include but is not limited to assessment boundaries (temporal and spatial), sensitive receptors within the Study Area, traffic data including train traffic and road traffic for the operations phase, description of the existing environment (baseline air quality), assessment of the potential air quality effects (including the	An Air Quality Assessment is underway and will be provided to MECP once a draft report is available.		

Item No.	Issue	Comment/Issue Raised by MECP	How Comment was Considered by Ontario Northland August 8, 2024	Comment/Issue Raised by MECP September 4, 2024	How Comment was Considered by Ontario Northland September 9, 2024
		<p>support information, i.e. emission sources, contaminants of concerns, emission rates, air dispersion modelling, and a comparison of modelled concentrations and cumulative concentrations (modelled plus background) to applicable Ontario’s Ambient Air Quality Criteria (AAQC) or Canadian Ambient Air Quality Standards (CAAQS), specific mitigation measures can be used to eliminate or reduce the environmental effects and the follow-up monitoring, contingency, and impact management plans, etc.</p> <ul style="list-style-type: none"> • For greenhouse gas emissions, calculate greenhouse gas emissions from the construction and operations phases and their contributions to provincial and national GHG totals, and provide possible measures to reduce GHG emissions. • Below are some guide documents for emission rate estimates and air dispersion modelling from the ministry: <ul style="list-style-type: none"> ○ Guideline A-10: Procedure for Preparing an Emission Summary and Dispersion Modelling (ESDM) Report ontario.ca ○ Guideline A-11: Air Dispersion Modelling Guideline for Ontario ontario.ca • In addition, MTO has a guideline document for assessing and mitigating the air quality impact and greenhouse gas emissions for provincial transportation projects: <ul style="list-style-type: none"> ○ MINISTRY OF TRANSPORTATION ENVIRONMENTAL GUIDE FOR ASSESSING AND MITIGATING THE AIR QUALITY IMPACTS AND GREENHOUSE GAS EMISSIONS OF PROVINCIAL TRANSPORTATION PROJECTS (prod-environmental-registry.s3.amazonaws.com) <p>Keep in mind that all emission sources should be included in the technical study. The 90th percentile of measurements from local and/or regional air monitoring stations is usually used to establish background air quality for a time resolution of 24 hours or less. In addition to the maximum point of impingement concentration, the modelled maximum and cumulative concentrations at nearby receptors should also be presented and assessed. A frequency analysis of the exceedances should be conducted if the modelled concentrations are above the applicable AAQC or CAAQS. It is expected the modelled results are shown in tables and isopleth/contour plots.</p>			
2	Section 6.2.1.5 MECP – <i>Clean Water Act</i>	This section of the EPR misrepresents the purpose of and responsibility for Source Protection Plans. The <i>Clean Water Act, 2006</i> (CWA) aims to protect existing and future sources of drinking water. To achieve this, Source Protection Authorities develop Assessment Reports wherein several types of vulnerable areas are delineated for every municipal residential drinking water system located in a source protection area. From this, Source Protection Authorities develop Source Protection Plans and the policies	Section 4.9.4 was added to the EPR to address Source Protection. In addition, refer to the revised content within Section 6.2.1.4.		

Item No.	Issue	Comment/Issue Raised by MECP	How Comment was Considered by Ontario Northland August 8, 2024	Comment/Issue Raised by MECP September 4, 2024	How Comment was Considered by Ontario Northland September 9, 2024
		<p>within them, which are approved and made effective by the MECP Minister per the CWA.</p> <p>The Mattagami Source Protection Region operates in the Timmins – Porcupine project area, therefore the Source Protection Plan is applicable to this station in the proposed project area which enters the Mattagami Source Protection Region. Policies outlined in the Source Protection Plan may impact how or where that activity is undertaken. Policies may prohibit certain activities, or they may require risk management measures for these activities if they are located in identified vulnerable areas. Municipal Official Plans, planning decisions, and prescribed instruments must conform with policies that address significant risks to drinking water and must have regard for policies that address moderate or low risks. Please review the Mattagami Source Protection Plan at Source Protection Plan - (dwsp.ca) or connect with the Mattagami Source Protection Region Project Manager to determine which policies may apply to the proposed project activities.</p> <p>It is recommended that the proponent also consider how drinking water sources may be affected by the project proposals and any alternatives considered. Consider impacts to sensitive hydrologic features including current or future sources of drinking water that are not explicitly addressed in the source protection plan (i.e., private systems – individual or clusters, and designated facilities within the meaning of O. Reg. 170/03 under the <i>Safe Drinking Water Act</i> – i.e., camps, schools, health care facilities, seasonal users, etc.).</p> <p>The proposed project area is outside of any vulnerable areas, however, MECP's Best Management Practices for Source Protection is a useful resource which proponents can consider to support the actions outlined in Section 6.3.6 and others.</p>			
3	Acronyms	<p>In the 'Acronyms, Abbreviations & Measurements Units' table and several other places of the draft EPR (e.g., Section 1.2.2 Project Proponent), the process and regulation are referred to as the 'Transit and Rail Projects Assessment' when it should be 'Transit and Rail Project Assessment'. Please correct typo.</p>	<p>Revised to 'Transit and Rail Project Assessment' throughout EPR.</p>	<p>Several references to 'transit and rail projects assessment' were still found in the revised EPR dated August 8, 2024. Please correct typo.</p>	<p>Revised to 'Transit and Rail Project Assessment' throughout EPR.</p>
4	Glossary of Terms	<p>In the 'Glossary of Terms' table, under the term 'Statement of Completion', it states 'MECP Environmental Approvals Branch', the correct branch name is Environmental Assessment Branch. Please revise.</p>	<p>Revised to 'Environmental Assessment Branch' in Glossary of Terms.</p>	<p>This has been revised. No further comments.</p>	<p>N/A</p>
5	Incomplete Sections	<p>Various relevant sections are incomplete throughout the draft EPR. For example, Sections 3.2.6, 3.3.6, 3.3.7, 4.9, 4.10, 4.11, 4.13.6, 4.13.7, 4.13.8, 5.2.3, 5.2.5, and 5.3. These sections will need to be completed for ministry's review before finalizing the EPR.</p>	<p>These sections will be finalized as part of revising the EPR and will be provided to MECP once complete.</p>	<p>Additional information and sections have been added to relevant sections. Sections in the revised draft EPR have been reorganized. No further comments.</p>	<p>N/A</p>

Item No.	Issue	Comment/Issue Raised by MECP	How Comment was Considered by Ontario Northland August 8, 2024	Comment/Issue Raised by MECP September 4, 2024	How Comment was Considered by Ontario Northland September 9, 2024
				Additional comments may be submitted from the ministry's technical reviewers for the sections that have been added.	
6	Air Quality	As communicated in the ministry's April 24, 2024, email, an air quality assessment report is required for the project. Please share a draft report with the ministry as soon as it is available and update the EPR accordingly to discuss the findings of the study. Please also revise Sections 3 and 4 of the draft EPR to include a discussion on the air quality assessment study.	An Air Quality Assessment is currently being prepared and a copy of the draft report will be provided to MECP once available. Results of the air quality report will be summarized in the EPR.	The ministry's Air Quality Analyst had substantial comments on this study which was shared with the proponent – still waiting for a response and revised air report.	Ontario Northland's responses to MECP's comments on the Air Quality report along with the revised AQ Report are in progress and are targeted for submission to MECP by September 12, 2024.
7	Climate Change	The draft EPR is missing a discussion on climate change considerations both in the context of the potential effects of the project on climate change (climate change mitigation) and the potential effects of climate change on the project (climate change adaptation). You may refer to the ministry's guideline on climate change for additional information here. Please revise the EPR accordingly to include climate change considerations.	A discussion of climate change considerations has now been included in the EPR. Please see Section 4.13.8 .	Sections 4.11.6 and 4.14 discusses climate change. No further comments.	N/A
8	Source Water Protection	Projects that are subject to the <i>Environmental Assessment Act</i> (EAA) that fall under a Class EA, or one of the Regulations, have the potential to impact sources of drinking water if they occur in designated vulnerable areas in the vicinity of other at-risk drinking water systems (i.e., systems that are not municipal residential systems), and source protection plan policies could apply. The draft EPR does not include a discussion on source water protection, and this should be included.	Section 4.9.4 was added to the EPR to address Source Protection. In addition, refer to the revised content within Section 6.2.1.4 .	Source protection comments have been added to the EPR. Source Protection has no further comments.	N/A
9	Project Study Area	The terms Project Study Area, "TRPAP Project Study Area", 'Timmins-Porcupine Station Project Study Area', and 'Project Study Area' are used interchangeably throughout the draft EPR. Do they refer to the same area as the 'preliminary EA Project Study Area' as depicted in Figure 2-1? The term used to describe the Project Study Area should be consistent throughout the EPR and correspond to the boundaries delineated in mapping when referring to the Project Study Area.	The terminology has been revised to 'Study Area' throughout document to ensure consistency. A conservative Study Area was originally established at the outset of the project for purposes of collecting existing conditions data as part of the TRPAP. Based on the conceptual design, the Project Study Area for the impact assessment phase was refined to the area shown in Figure 2-1 for purposes of assessing potential effects.	This has been corrected and study area is defined. No further comments.	N/A
10	Section 1.3.1 Ontario Regulation 231/08: Transit and Rail Project Assessment Process	Section 1.3.1 refers to Schedule 1 of the Transit and Rail Process Regulation. The Transit and Rail Process Regulation (as amended in February 2024) no longer includes 'Schedule 1'. Transit projects are now designated under Part III of Ontario Regulation 50/24 (Part II. 3 – Designations and Exemptions Regulation) of the EAA. Please update this section of the EPR with reference to the new regulation under the EAA.	Revised Section 1.3 .	This has been corrected. No further comments	N/A

Item No.	Issue	Comment/Issue Raised by MECP	How Comment was Considered by Ontario Northland August 8, 2024	Comment/Issue Raised by MECP September 4, 2024	How Comment was Considered by Ontario Northland September 9, 2024
11	Figure 1-3: Transit & Rail Project Assessment Process	<p>Figure 1-3: Transit & Rail Project Assessment Process shows that the final EPR is posted after the 30-day review period following the issuance of the Notice of Completion. As per the Transit and Rail Process Regulation, the final EPR is posted together with the Notice of Completion. Please refer to section 3.2.5 of the Transit Guide. If changes are required after the final EPR, please discuss with ministry as changes can only be made through an erratum or as agreed to by the ministry. Figure 1-3: Transit & Rail Project Assessment Process does not depict the process as per the Transit and Rail Process Regulation. The process depicted in this figure is customized for the project and attempts to demonstrate some aspects of the regulated process. It is strongly suggested that the figure clarify this distinction. If the proponent wishes to include a figure that describes the regulated process, it may do so by directly adding Figure 1 found in the Transit Guide into the EPR.</p>	<p>The figure is intended to be a general overview of the steps in the TRPAP process, and outline where there are opportunities for public consultation and feedback. As part of updating the EPR, Ontario Northland will consider also including Figure 1 found in the Transit Guide into the EPR. It is also acknowledged that following the 30-Day public review period, should any of the comments received from Indigenous Communities & Organizations, the public, review agencies, etc., require updates to the EPR, consultation with the Ministry will be undertaken and an Errata will be prepared as/if required.</p>	<p>With the posting of the Notice of Completion, the proponent is posting a final EPR. The EPR is not finalized after the 30-day comment period. Any changes required is done so through an Errata. This flow chart of the transit process is still incorrect. Please revise.</p>	<p>Figure 1-3 will be omitted or updated in the Final EPR.</p>
12	Future Bus Storage and Maintenance Facility	<p>In 'Table 1-1: Proposed Timmins-Porcupine Station Elements' it lists a bus storage and maintenance facility as part of the 'Project Component' and the 'Description' states the following: Protecting for land that may be required for potential future construction of a Bus Storage & Maintenance Facility.</p> <p>The project title is the Timmins-Porcupine Station and the purpose of the project, as per the draft EPR, is to build a new rail station in the city that will operate as part of the reinstated Northlander Passenger Service. The purpose in the draft EPR does not refer to a bus storage and maintenance facility. A bus station and the maintenance facility are different facilities with different purposes, so it is unclear to the ministry why it is considered as an element of the Timmins-Porcupine Station. Furthermore, the draft EPR provides for an impact assessment and mitigation on the Timmins-Porcupine Station, however, the impact assessment for the bus storage and maintenance facility is incomplete. Please revise the EPR accordingly.</p>	<p>Although an engineering design is not currently available for the potential future bus maintenance and storage facility, all environmental and technical studies that were prepared as part of the TRPAP (with the exception of Noise and Air Quality) have accounted for the physical footprint of this particular area of land to be developed in the future, as part of the Study Area. For example, the Natural Environment Report examined this area as part of identifying existing natural heritage features and this area was included in their field reconnaissance, as well as the subsequent impact assessment work. Similarly, the Stage 1 Archaeological Assessment Report includes these lands in the study and determined archaeological potential in this context.</p> <p>As discussed and agreed with MECP as part of the meeting held on May 22, 2024, the following additional narrative has been added to Table 1-1 in Section 1.2 of the EPR to describe the anticipated components of the bus maintenance and storage facility in more detail:</p> <p>"Components and features of the proposed Bus Storage and Maintenance Facility may include:</p>	<p>The EPR has been revised to clarify that the future bus storage and maintenance facility will require an impact assessment and future EPR addendum. No further comments.</p>	<p>N/A</p>

Item No.	Issue	Comment/Issue Raised by MECP	How Comment was Considered by Ontario Northland August 8, 2024	Comment/Issue Raised by MECP September 4, 2024	How Comment was Considered by Ontario Northland September 9, 2024
			<ul style="list-style-type: none"> • Replacement of the old facility currently in use in Timmins (currently located at 895 Monta Ave., Timmins); • Two (2) parking bays, one (1) bus wash bay, and one (1) service and fueling bay, and the capacity to service four (4) buses at any time; • Regular maintenance activities including wash bays and service bays; • Employee washrooms, locker rooms, and a lunchroom, as well as bus and employee parking; and, • An approximate size of 1,200 m²." <p>Additional wording added to Section 1.2.3 Project Scope is as follows:</p> <p>"The scope of the TRPAP examines the potential environmental effects associated with the new Timmins-Porcupine Station. In addition, the environmental impact assessment studies also consider the area of land adjacent to the proposed station where a future bus maintenance and storage facility may be built. At the time of preparing this EPR, the decision to build the bus facility was not yet definitive, and therefore an engineering design was not completed. Should the bus facility go forward in the future, the environmental impact assessment studies undertaken as part of this Timmins-Porcupine Station TRPAP will need to be revisited and updated, as required. In addition, Noise & Vibration and Air Quality studies will need to be carried out to address the potential operations and construction phase impacts associated with the bus facility. These updated/additional impact assessment studies will be carried out as part of completing an EPR Addendum process (as per O. Reg. 231/08), which would also entail Ontario Northland carrying out public, stakeholder, and Indigenous Communities/Organizations consultation (as required) and preparation of an EPR Addendum document."</p>		

Item No.	Issue	Comment/Issue Raised by MECP	How Comment was Considered by Ontario Northland August 8, 2024	Comment/Issue Raised by MECP September 4, 2024	How Comment was Considered by Ontario Northland September 9, 2024
			In addition, a commitment has been added to Section 6.3.1 of the EPR to state that Ontario Northland will prepare an EPR Addendum, undertake consultation, and prepare updated impact assessment studies if the new facility moves forward in the future.		
13	Future Bus Storage and Maintenance Facility	To do an addendum to the EPR, the bus storage and maintenance facility should be part of the Timmins-Porcupine Station project. It is noted that under the EAA, a bus storage and maintenance facility is a designated project and therefore the process as per the Transit and Rail Process Regulation must be followed. The EPR, in addition to showing the proposed location of the facility, facility components should be described as well. The EPR should also provide an overview of some the expected potential effects and standard mitigation measures of the bus storage and maintenance facility. The EPR should include a commitment to undertake an Addendum for this facility. Please note, the addendum consultation process is limited, so the proponent should consider whether additional consultation for this facility may be necessary. Ministry staff would like to meet with the proponent to learn more about the future bus storage and maintenance facility.	A call was held with MECP on May 22, 2024. Please refer to the response to comment #16 above. The updated EPR (Section 6.0) now includes a specific commitment to undertake an Addendum for the future facility, as required.	The EPR now makes references to a future Addendum. No further comments.	N/A
14	Section 2.4.2 Property Requirements	Section 2.4.2 and Table 2-3 of the draft EPR states "property requirements will be further reviewed as the design progresses. If required, the proponent will proceed with property acquisition." This section is meant to describe potential project impacts and it is incomplete. The proponent will have to share this section of the report for ministry review before finalizing the EPR.	The property requirements for the project have been further refined since issuance of the Draft EPR and Section 2.4.3 has been updated accordingly.	No further comments.	N/A
15	Section 2.4.2 Property Requirements	Section 2.4.2 also states "It should be noted that properties with negligible encroachments were not listed, as it is anticipated that reasonable engineering solutions can be established at detailed design to address/avoid property impacts wherever feasible." Please define the criteria used to determine 'negligible' encroachment and the activities that will occur in these areas.	The property requirements for the project have been further refined since issuance of the Draft EPR and Section 2.4.3 has been updated accordingly.	No further comments.	N/A
16	Section 3.2.1.3 Consultation with Mattagami Region Conservation Authority	Section 3.2.1.3 states that the Project Study Area is within an area regulated by the Mattagami Region Conservation Authority (MRCA) and consultation with this conservation authority may be required. The ministry understands that the proponent did share a draft EPR with MRCA. The ministry would like to obtain a copy of MRCA's comments on the draft EPR as soon as they provide comments. As per page 45 of the Transit Guide, proponents should address issues raised by any regulatory agency before releasing the final EPR for review (when the Notice of Completion is published). The Conservation Authority's comments are particularly important as they deal with matters of provincial importance and the ministry needs to confirm there are no outstanding issues in this regard.	Acknowledged. Please note that no comments have been received to date from MRCA.	We have not seen sign-off from the conservation authority. Please confirm and follow up if nothing have been received yet.	Mattagami Region Conservation Authority confirmed they have no comments or concerns regarding the Timmins-Porcupine Station TRPAP on July 12, 2024. A copy of the correspondence has been provided in conjunction with this comment/response table.

Item No.	Issue	Comment/Issue Raised by MECP	How Comment was Considered by Ontario Northland August 8, 2024	Comment/Issue Raised by MECP September 4, 2024	How Comment was Considered by Ontario Northland September 9, 2024
		As such, the EAB will be requesting 'sign-off' from all commenting regulatory agencies from the proponent before posting the Notice of Completion.			
17	Section 3.2.4.2 Field Investigations	Please include the conclusions and recommendations of the Stage 1 archaeological assessment in Section 3.2.4.2 of the draft EPR.	Conclusions and recommendations of the Stage 1 Archaeological Assessment are included in Section 4.6 .	Sections 4.6 and 4.6.1 added. No further comments. Still waiting on sign-off from MCM.	A copy of written MCM sign off will be provided to MECP once received.
18	Section 3.3.3 Cultural Heritage	Section 3.3.3 of the draft EPR states "The Project Study Area does not feature any structure or areas believed to have CHVI." Please provide MCM comments that support this conclusion. As per comment 13 above, we will require sign-off from MCM for heritage and archaeology before the EPR is finalized.	Acknowledged. Cultural Heritage Report is currently with the MCM for review and comment.	Still waiting on sign-off from MCM.	A copy of written MCM sign off will be provided to MECP once received.
19	Section 3.3.4 Archaeology	Section 3.3.4: This section indicates the Timmins-Porcupine station Project Study Area exhibits evidence of disturbance. The section further states that "forested lands east of the railway north of Highway 101/King Street retain archaeological potential and will require Stage 2 test pit survey if impacted by the project designs." It is unclear why a Stage 2 archaeological assessment is optional when the wooded area is within the 'preliminary EA Project Study Area'. Please clarify and revise the report accordingly.	<p>A conservative Study Area was established for purpose of collecting existing conditions data as part of the early stages of the TRPAP. Based on the conceptual design information available at the time of preparing this EPR, the Study Area for the impact assessment phase was refined to the area shown in Figure 2-1 for purposes of assessing potential effects.</p> <p>The parts of the Study Area proposed for construction and operations/maintenance activities, including the land that may be required for future construction of a Bus Storage and Maintenance Facility, do not retain archaeological potential on account of deep and extensive land disturbance or permanently saturated conditions. These lands therefore do not require further archaeological assessment.</p> <p>If the project design changes during detail design (post TRPAP) and encroachment on the lands identified to retain archaeological potential is expected, Ontario Northland will complete a Stage 2 Archaeological Assessment survey prior to any disturbance or construction activities.</p> <p>Section 4.6 of the EPR (as well as the Stage 1 Archaeological Assessment Report) has been updated accordingly to reflect this language.</p>	MCM made some comments on this as well. Need MCM sign off.	In MCM's September 4 th comments, they confirmed that this comment is now resolved. A copy of written MCM sign off will be provided to MECP once received.
20	Section 4.3 Impact Assessment Criteria	Section 4.3: The Impact Assessment Criteria table does not include any air quality criteria as an environmental factor for evaluating potential effects associated with the project. Please provide a summary and discussions on air quality impacts from both construction activities (dust and air	An Air Quality Assessment is underway and will be included in the Final EPR. In addition, a copy of the draft Air Quality Report will be provided to MECP for review.	Section 4.2 and air quality criteria was added. Waiting for revised AQ report and need sign off.	Ontario Northland's responses to MECP's comments on the Air Quality report along with the revised AQ Report are in progress

Item No.	Issue	Comment/Issue Raised by MECP	How Comment was Considered by Ontario Northland August 8, 2024	Comment/Issue Raised by MECP September 4, 2024	How Comment was Considered by Ontario Northland September 9, 2024
		emission), operations and associated mitigation measures, and monitoring activities in the EPR.			and are targeted for submission to MECP by September 12, 2024.
21	Section 4.7 Archaeology	Section 4.7 in the draft EPR states "Based on review and field review, the proposed Timmins-Porcupine Station does not retain any archaeological potential." However, according to Section 3.3.4 of the draft EPR, Stage 2 archaeological assessment is recommended. Please clarify and revise the report accordingly.	<p>The parts of the Study Area proposed for construction and operations/maintenance activities, including the land that may be required for future construction of a Bus Storage and Maintenance Facility, do not retain archaeological potential on account of deep and extensive land disturbance or permanently saturated conditions. These lands therefore do not require further archaeological assessment.</p> <p>If the project design changes during detail design (post TRPAP) and encroachment on the lands identified to retain archaeological potential is expected, Ontario Northland will complete a Stage 2 Archaeological Assessment survey prior to any disturbance or construction activities.</p> <p>Section 4.6 of the EPR (as well as the Stage 1 Archaeological Assessment Report) has been updated accordingly to reflect this language.</p>	No further comments.	N/A
22	Indigenous Communities & Organizations Engagement	The draft EPR did not include the names of the Indigenous communities that have been consulted or engaged for this project. At minimum, the EPR should include a list of Indigenous communities that have been consulted/engaged, a discussion of why they were included on the list (i.e., treaty rights, interest-based) and a summary of their comments or concerns, if any. The EPR should also include a discussion on whether there are impacts on the Indigenous communities' hunting, fishing, or harvesting rights of Indigenous communities given the surrounding wildlife and wildlife habitat. Please refer to section 10 of Transit and Rail Process Regulation that describes the consultation record requirements for the EPR. Please note that the ministry would like to see all records of consultation (public, stakeholders, or Indigenous communities) before the EPR is finalized.	<p>The following list of the Indigenous communities were consulted by Ontario Northland as part of the project:</p> <ul style="list-style-type: none"> • Beaverhouse First Nation • Matachewan First Nation • Brunswick House First Nation • Mattagami First Nation • Flying Post First Nation • Taykwa Tagamou Nation • Apitipi Anicinapek Nation • Nishnawbe Aski Nation • Wabun Tribal Council • Mushkegowuk Council • Timmins Metis Council • Timmins Native Friendship Centre • Ontario Federation of Indigenous Friendship Centers • Ontario Native Women's Association 	The comment and response table lists the communities consulted for the project, but it is not included the section that speaks to Indigenous consultation. Please revise and elaborate in section of EPR.	<p>Ontario Northland is committed to building positive and meaningful relationships with Indigenous peoples and communities, in alignment with its strategic objectives in the development of Timmins-Porcupine Station. Section 5.2.2 of the EPR outlines Indigenous Communities & Organizations Engagement during the Pre-Planning Phase of the TRPAP, which included the following activities:</p> <ul style="list-style-type: none"> • Ontario Northland hosted a Community Connection Event on September 29, 2023 within the City of Timmins. • Following the Community Connection Event, letters to invite Indigenous Communities and Organizations to participate in community discussions regarding the Northlander were circulated in the Fall/Winter of 2023.

Item No.	Issue	Comment/Issue Raised by MECP	How Comment was Considered by Ontario Northland August 8, 2024	Comment/Issue Raised by MECP September 4, 2024	How Comment was Considered by Ontario Northland September 9, 2024
			<ul style="list-style-type: none"> • Métis Nation of Ontario • Chiefs of Ontario <p>Indigenous Communities & Organizations that were provided a copy of the Draft EPR for review and comment are listed in Table 5-3. Please note that no comments were received on the Draft EPR.</p> <p>Consultation and Engagement efforts in support of the Timmins-Porcupine Station TRPAP are contained in Consultation Record (Appendix I).</p>		<ul style="list-style-type: none"> • Invitations to the Timmins-Porcupine Station PIC #1 were sent to Indigenous Communities and Organizations on March 7, 2024 via Mailchimp. No responses were received. • An Invitation Letter to an Indigenous Transportation Roundtable discussion, scheduled for May 22, 2024 was circulated. • The Draft EPR was shared with Indigenous Communities and Organizations for review, to obtain any comments and feedback on April 9, 2024. <p>Additionally, the following meetings were held with Indigenous Communities & Organizations in and effort to understand the key challenges and opportunities from an Indigenous perspective and build positive relationships, trust and understanding:</p> <ul style="list-style-type: none"> • Beaverhouse First Nation Meeting on December 15, 2023 • Ontario Native Women’s Association Meeting on December 18, 2023 • Chippewas of Rama First Nation Meeting on January 16, 2024 • North Bay Indigenous Friendship Centre’s Community Action Circle on May 15, 2024 • Indigenous Transportation Roundtable on May 22, 2024 <p>Section 5.2.2 of the EPR further describes Indigenous Communities & Organizations Engagement during the TRPAP Phase, which has included the following activities:</p> <ul style="list-style-type: none"> • PIC #2 notices with a link to the website were sent to Indigenous Communities and Organizations on May 30, 2024. • Invitations to the Timmins-Porcupine Station PIC #2 was sent to

Item No.	Issue	Comment/Issue Raised by MECP	How Comment was Considered by Ontario Northland August 8, 2024	Comment/Issue Raised by MECP September 4, 2024	How Comment was Considered by Ontario Northland September 9, 2024
					<p>Indigenous Communities and Organizations on May 30, 2024, with a follow-up e-mail invitation shared on June 7, 2024.</p> <ul style="list-style-type: none"> A follow-up e-mail was sent to each Indigenous Community and Organization on July 17, 2024 to confirm that there are no outstanding comments or interests related to the Timmins-Porcupine Station Project/TRPAP, along with a request for information related to any existing aboriginal or treaty rights that may be negatively impacted by project. <p>Ontario Northland hosted meetings with the following Indigenous Communities & Organizations:</p> <ul style="list-style-type: none"> Nipissing First Nation Meeting on June 28, 2024 Wabun Tribal Council/Matachewan First Nation Meeting on July 18, 2024 <p>Please refer to Section 5.2.2 and Section 5.3.3 of the EPR for further details.</p> <p>Records of engagement efforts with Indigenous Communities & Organizations are contained in Appendix I -Consultation Record.</p>
23	Transit and Rail Project Assessment Process	<p>Thank you for the opportunity to comment on the draft EPR for the Northlander Passenger Rail Service – Timmins-Porcupine Station.</p> <p>The ministry’s comments should be addressed prior to submitting a final EPR to the ministry, by way of a comment response table. The proponents’ responses to ministry comments will also include the location of any revisions in the final EPR and/or supporting technical reports that were made to address ministry comments, where applicable.</p> <p>Please note that the ministry’s comments (EA-related and technical), along with any comments received by other government agencies, Indigenous communities and the public should be considered by the proponents as it prepares the final EPR for submission.</p> <p>Please provide to the ministry as soon as possible, comments with respect to natural and cultural heritage features provided by relevant agencies</p>	<p>Acknowledged.</p> <p>How comments received on the Draft EPR were considered by Ontario Northland are contained in Table 5-4 to Table 5-9 in Section 5.2.4. No comments were received on the Draft EPR from Indigenous Communities or Organizations.</p>		

Item No.	Issue	Comment/Issue Raised by MECP	How Comment was Considered by Ontario Northland August 8, 2024	Comment/Issue Raised by MECP September 4, 2024	How Comment was Considered by Ontario Northland September 9, 2024
		<p>such as the local conservation authority, the Ministry of Natural Resources and Forestry and Ministry of Citizenship and Multiculturalism.</p> <p>Please also advise if there have been any significant comments from any Indigenous communities on the draft EPR.</p> <p>We look forward to continuing to work with you on addressing our comments identified in the draft EPR. If you have any questions, please feel free to contact me at 437-248-0058 or by email at Cindy.Batista@ontario.ca</p>			
24	Climate Change	<p>The report does not consider future changes in climate and the potential impacts of a changing climate on the project. These considerations should be made throughout the report where appropriate.</p> <p>To assist the proponent with addressing this issue, MECP is pleased to suggest the following resources:</p> <ul style="list-style-type: none"> • Ontario’s MECP’s guide on considering climate change in the environmental assessment process, 2017 to integrate considerations of climate change in identifying environmental components, identifying consideration of alternatives, and describing potential effects of the undertaking • Ontario Provincial Climate Change Impact Assessment (PCCIA) Technical Report, 2023, a regional and sector-based climate change impact assessment to support informed decisions that address regional and sector-specific impacts of climate change. <p>Other resources and data sources include:</p> <ul style="list-style-type: none"> • Ontario Climate Change Data Portal • Environment and Climate Change Canada’s Climate Atlas of Canada and • Canadian Climate Data and Scenarios. 	<p>This information was not included in the Draft EPR as it was not yet available. Notwithstanding this, a discussion on Climate Change has now been added to the EPR in Section 4.13.8.</p>		
25	Section 2.4.1 Site Servicing	<p>This section indicates anticipated localized runoff volumes. When calculating the specific runoff volumes for different localized areas within the site, consider using data from the Ontario Climate Change Data Portal. This could help incorporate climate change impacts into the evaluation of pre- and post-development runoff volumes to assess the potential impacts of stormwater runoff.</p>	<p>The Stormwater Management (SWM) analysis conducted for the site identified that a combination of minor systems and bioswales will be implemented to adhere to the required quality and quantity standards.</p> <p>The engineering design for the station has been developed to preserve the property’s natural hydrological characteristics. This includes maintaining the capacity of the on-site drainage ditch. Stormwater runoff from the site will be directed towards an existing ditch located at the northeast corner, utilizing a network of pipes</p>		

Item No.	Issue	Comment/Issue Raised by MECP	How Comment was Considered by Ontario Northland August 8, 2024	Comment/Issue Raised by MECP September 4, 2024	How Comment was Considered by Ontario Northland September 9, 2024
			<p>and bioswales. The flow within the bioswales will be regulated by a series of check dams to ensure the existing ditch's capacity is upheld.</p> <p>Rainfall data obtained from the Ministry of Transportation's (MTO) IDF tool is being utilized to inform the design, ensuring it meets the necessary standards. Additionally, future IDF curves will be utilized to assess the Climate Change impact on the hydraulic system.</p> <p>Furthermore, Ontario Northland intends to incorporate green infrastructure as a proactive measure to mitigate increased runoff. This may involve the implementation of bio-retention swales and/or Low Impact Development (LID) strategies.</p>		
26	Section 2.5.1 Timmins-Porcupine Station	<p>This section discusses the need for regular platform maintenance, including the inspections to determine how platform deteriorates over time because of environmental factors such as rain, snow, ice, wind, and effects of salting.</p> <p>The proponent is encouraged to consider the increased impact of climate change (i.e., changes in temperature, precipitation, extreme weather event frequency) on the environmental factors that will contribute to all aspects of the project including platform deterioration.</p>	<p>Please see response to comment 28 above and refer to Section 4.13.8 of the EPR for discussion of how climate change was considered as part of the project. Please also note that the design will be mindful of the escalating effects of climate change and will integrate durable materials and construction components wherever feasible.</p>		
27	Section 3.2.1.1 Methodology of Natural Environment, Data Gathering	<p>Consider supplementing this section with climate data sources (listed in comment 1) to support the report with climate change considerations.</p>	<p>MECP's Guide on considering climate change in the environmental assessment process, 2017 has been reviewed and a Climate Change discussion is now included in the EPR in Section 4.13.8.</p>		
28	Section 4.10 Stormwater Management/Drainage	<p>This section recognizes that the proposed project will result in increases to impervious areas, with potential effects to water quantity and quality, and potential alterations to local drainage systems. A SWM assessment with mitigation measures (if required) is being completed. Proponent is encouraged to base the related analysis on data that considers of the impacts of climate change.</p>	<p>Following the Stormwater Management (SWM) analysis conducted for the site, a combination of minor systems and bioswales will be implemented to adhere to required quality and quantity standards.</p> <p>The engineering design for the station has been meticulously developed to preserve the property's natural hydrological characteristics. This includes maintaining the capacity of the on-site drainage ditch. Stormwater runoff from the site will be directed towards an existing ditch located at the northeast corner, utilizing a network of pipes and bioswales. The flow within the bioswales will be regulated by a series of</p>		

Item No.	Issue	Comment/Issue Raised by MECP	How Comment was Considered by Ontario Northland August 8, 2024	Comment/Issue Raised by MECP September 4, 2024	How Comment was Considered by Ontario Northland September 9, 2024
			<p>check dams to ensure the existing ditch's capacity is upheld.</p> <p>Rainfall data obtained from the Ministry of Transportation's (MTO) IDF tool is being utilized to inform the design, ensuring it meets the necessary standards. Additionally, future IDF curves will be utilized to assess the Climate Change impact on the hydraulic system.</p> <p>Furthermore, the Ontario Northland intends to incorporate green infrastructure as a proactive measure to mitigate increased runoff. This may involve the implementation of bio-retention swales and/or Low Impact Development (LID) strategies.</p>		
29	Natural Environment Existing Conditions & Impact Assessment Report, Photo Appendix	<p>It does not appear that field surveys were undertaken that were specific to any particular species at risk. Photo 12 and Photo 13 appear to show mature trees that species at risk bats such as little brown myotis and northern myotis may select for roosting during the active season (May 1 to Aug 31).</p> <p>It is not clear from the report whether these trees will be removed during site clearing, but if they are, MECP SARB is recommending that clearing occur outside of the active season. If this cannot be avoided, it is possible that further surveys specific to SAR bats and a possible authorization under the ESA may be required.</p> <p>Similarly, Photo 4 appear to contain trees that may be larger than 10 cm diameter at breast height making them possible candidate trees for SAR bat roosting habitat. It is not clear from the report whether these trees will be removed during site clearing, but if they are, MECP SARB is recommending that clearing occur outside of the active season. If this cannot be avoided, it is possible that further surveys specific to SAR bats and a possible authorization under the ESA may be required.</p>	<p>A SAR screening study and habitat assessment was completed as part of the project to determine the likelihood of SAR presence. Based on the results of the SAR screening, habitat assessment, proposed design, and mitigation measures provided, no additional SAR surveys are anticipated.</p> <p>The current design does not include any tree removal or impacts east of the rail corridor in the woodland; photos 12 and 13 are taken within the woodland east of the rail corridor. No suitable roost trees were identified west of the train tracks in the proposed facility location during wildlife habitat surveys; however, mitigation is included to specify that vegetation is to occur outside of the bat roosting season. If it is determined that trees east of the train tracks may be removed or impacted in future design stages, further surveys may be required to characterize bat habitat during detailed design.</p> <p>It should be noted that there is no planned vegetation clearing south of the rail corridor in this area as part of the project. This note has also been added to the EPR.</p> <p>In addition, the following mitigation measures have been added to the Table 4-8 of this EPR and the Natural Environment</p>		

Item No.	Issue	Comment/Issue Raised by MECP	How Comment was Considered by Ontario Northland August 8, 2024	Comment/Issue Raised by MECP September 4, 2024	How Comment was Considered by Ontario Northland September 9, 2024
			<p>Existing Conditions & Impact Assessment Report:</p> <ul style="list-style-type: none"> Vegetation clearing to occur outside of the bat roosting season of May 1- August 31. Should removal of potential SAR bat habitat be required, SAR bat surveys will be completed by a qualified specialist in advance of the removal activities to confirm SAR bat habitat presence. If removal of confirmed SAR bat habitat is required, all requirements under the ESA will be met, including any registration, compensation, replacement structures and/or permitting requirements. All requirements of the ESA and/or SARA Species-specific mitigation measures will be implemented, in consultation with MECP as required. <p>Based on the current station design, there are no impacts anticipated east of the rail corridor in the woodland. No suitable roost trees were identified west of the rail corridor in at the proposed station location during wildlife habitat surveys. If it is determined that trees east of the rail corridor may be removed in future design stages, further surveys may be required to characterize bat habitat.</p>		
30	Natural Environment Existing Conditions & Impact Assessment Report, Table 6	<p>It is currently understood that the Proponent plans to undertake vegetation removal outside of the breeding bird sensitive time period (May 1 to Aug 31). However, there are references to performing nest sweeps if vegetation and tree clearing must occur within the breeding bird sensitive time period. If vegetation/tree removal occurs within the breeding bird sensitive time period, nest sweeps prior to vegetation/tree removal activities are generally not considered sufficient mitigation to avoid the need for an ESA authorization if SAR are present.</p> <p>If the proponent must clear vegetation/trees within the breeding bird sensitive time period, MECP SARB recommends that short-eared owl (SEOW) and eastern whip-poor-will (EWPW)* be considered in more detail for this project site. These species have a medium likelihood of being present on site based on multiple observations east and west of the site available on eBird and iNaturalist. See comment below about EWPW and</p>	<p>There is no tree removal proposed for complex habitat (i.e., the adjacent woodland east of the rail corridor). Sparse open grown trees located within the cultural meadow may be removed; tree removal will be conducted outside of the breeding bird sensitive time period.</p> <p>The following mitigation measures have been updated in the Natural Environment Existing Conditions & Impact Assessment and Table 4-8 of this EPR:</p> <ul style="list-style-type: none"> Vegetation clearing to occur outside of the breeding bird window of April 1- 		

Item No.	Issue	Comment/Issue Raised by MECP	How Comment was Considered by Ontario Northland August 8, 2024	Comment/Issue Raised by MECP September 4, 2024	How Comment was Considered by Ontario Northland September 9, 2024
		the potential changes to its status on the Species at Risk in Ontario (SARO) list in context of project timelines (i.e. project commencement after Jan 31, 2025, EWPW may not be relevant from an ESA perspective).	<p>August 31. If tree clearing is required during the breeding bird window, a nest sweep will be completed by a qualified biologist no more than 48 hours prior to vegetation removal.</p> <ul style="list-style-type: none"> If an active nest is found, then a protective buffer will be established around the nest. The extent of the buffer will be determined in consultation with a qualified biologist and if applicable, additional consultation with the agencies having jurisdiction (e.g., MECP) may be required to determine extent of protection and mitigations. <p>The Natural Environment Existing Conditions and Impact Assessment Report Appendix A has been revised to add the following SEOW and EWPW consideration.</p> <p>Habitat Potential:</p> <ul style="list-style-type: none"> Despite SEOW observations in the vicinity, the small size of this site (approx. 0.7 ha) is unlikely to provide suitable nesting habitat (50-100 ha) (COSEWIC status and assessment report on the Short-eared Owl). The cultural meadow where the station is proposed provides low likelihood of foraging habitat for EWPW due to its small size (<3 ha) (COSEWIC status and assessment on the Eastern Whip-poor-will). Nesting may occur in the woodland east of the rail corridor; however, that area is not anticipated to be impacted and higher quality nesting habitat is located further north and south of the Timmins-Porcupine station. 		
31	Natural Environment Existing Conditions & Impact Assessment Report	A note that the 2023 Annual Report by the Committee on the Status of Species at Risk in Ontario (COSSARO) is now available as required under the <i>Endangered Species Act, 2007 (ESA)</i> , and a bulletin has been posted to the Environmental Registry of Ontario. Included in COSSARO's 2023 Annual Report is the downlisting of Eastern Whip-poor-will to Special Concern and the listing of three bat species (Eastern Red Bat, Hoary Bat,	Acknowledged. The Environmental Registry of Ontario will be reviewed for notices of SARO amendments through future project stages. At the time of writing this EPR, bat roost trees for species that may be uplisted are not anticipated to be impacted. No further revisions to the		

Item No.	Issue	Comment/Issue Raised by MECP	How Comment was Considered by Ontario Northland August 8, 2024	Comment/Issue Raised by MECP September 4, 2024	How Comment was Considered by Ontario Northland September 9, 2024
		<p>Silver-haired Bat) as Endangered. In accordance with the ESA, the Species at Risk in Ontario (SARO) List (O. Reg. 230/08) will be amended to reflect the species assessments included in the COSSARO report, within one year from the date the report was received by the Minister, on or before January 31, 2025. In accordance with the provisions of the ESA, species that have been reclassified as Special Concern will no longer receive protections under the ESA and newly listed Endangered species will receive automatic species and general habitat protection under the ESA upon listing. However, it should be noted that although the COSSARO report includes recommendations for (re)classification of species under the ESA, there is no guarantee these recommendations will be accepted until the SARO list is officially amended to reflect the changes.</p> <p>MECP SARB recommends that the proponent check the Environmental Registry of Ontario for notices of SARO amendments in January 2025 as this may influence an ESA authorization, if any, for the project with respect to impacts to members of a SAR bat species, impacts to bat maternity roost habitat, and/or other SAR.</p>	<p>Natural Environment Existing Conditions & Impact Assessment Report are required.</p>		
32	Surface Water Review	<p>The construction and operation of this site will increase the quantity of sanitary sewage being treated and subsequently discharged by the City of Timmins from their Whitney Wastewater Treatment Plant (WWTP) site.</p> <p>A previously completed surface water review (Dubois, 2011) indicates that the Porcupine River is the receiver for effluent discharge from the WWTP, and that the portion of the river downstream of Porcupine Lake is considered a Policy 2 receiver with respect to total phosphorus (TP), as concentrations exceed the provincial water quality objective (PWQO).</p> <p>A mixing zone, as defined in the Ministry's Water Management Policies, is not applicable to a Policy 2 receiver. Unless significant additional dilution is available in the downstream environment (i.e., tributaries contributing substantial flow to the system), contaminant concentrations downstream of an effluent discharge cannot meet PWQOs or background conditions if the effluent contains higher than background concentrations of a contaminant.</p> <p>If the Environmental Approvals Branch (Approvals) and the Wastewater Engineers therein determine the possible flow increase resulting from the construction and operation of this facility is acceptable, the possible impacts of increased flows and phosphorus loading to the Porcupine River should be considered.</p> <p>At this time there is not sufficient information in the form of possible flow increases to provide further guidance from a surface water perspective, however additional discussion can be had with Approvals and the District Office as needed.</p>	<p>The proposed station building is a standalone, single-story structure. The sanitary flow generated from the station, sourced from the City of Timmins water supply system, is insignificant (i.e., washroom discharge) and will be addressed through the ECA for wastewater servicing during detailed design.</p>	<p>Although Ontario Northland (the Proponent) is of the opinion that sanitary flow generated from the station is "insignificant", due to the fact that the receiving river (Porcupine River) is already considered a Policy 2 receiver respecting total phosphorus (TP), an estimate of the potential maximum increase in sanitary flow and TP load to the WWTP should be calculated, and a discussion should be had with the City of Timmins to confirm that the City's WWTP is capable of accepting this additional flow and load. It is anticipated that these comments will be addressed during the detailed design phase of the project.</p> <p>General Requirements for Development in Ontario The Proponent did not offer acknowledgement of, or responses to MECP's comments pertaining to possible permits and approvals that may be required during the construction of the station. Responses are outstanding.</p>	<p>Acknowledged regarding the requirement for confirmation and acceptance from the City of Timmins for the sanitary flow and TP loading generated from the station. This comment and work will be addressed during the detailed design phase of the project. Consultation meetings will be held as part of the ECA process with both MECP and City of Timmins.</p> <p>Surface water ECA requirements will be coordinated, and approvals obtained from the MECP, where required.</p> <p>It is also acknowledged that an EASR or PTTW may need to be obtained during detailed design, as/if required. Specific commitments pertaining to this are outlined in detail in Section 6.9 of the EPR.</p>

Item No.	Issue	Comment/Issue Raised by MECP	How Comment was Considered by Ontario Northland August 8, 2024	Comment/Issue Raised by MECP September 4, 2024	How Comment was Considered by Ontario Northland September 9, 2024
		<p>General Requirements for Development in Ontario Any prospective water taking must be carried out in compliance with the conditions for registration on the Environmental Activity and Sector Registry (EASR) or a Permit to Take Water (PTTW) as applicable. If dewatering for foundations is required, excavation dewatering must not be discharged into any surface water feature. Mitigation measures such as filter fabric on inlet pump head and/or straw bale/filter fabric device or equivalent should be utilized to minimize sediment transport during excavation/construction dewatering.</p> <p>Consideration should be given far enough in advance to allow enough time to prepare and submit applications to the MECP for PTTWs and/or ECAs if required. This is especially important where surface water and hydrogeological technical studies are required.</p> <p>Mitigation measures must remain in place until final rehabilitation of temporary work areas is completed. Similarly, mitigation measures are required at construction and/or laydown sites until they are remediated or reclaimed to minimize the potential for off-site movement of sediment-laden water and any contaminant toward any surface water feature. Stormwater management during the construction phase must also be designed to effectively mitigate stormwater runoff.</p>		<p>These are discussed within the third column of this table.</p> <p>In addition to the earlier provided comments, the Proponent must also consider the requirements for a long-term ECA for the collection, transmission and treatment of stormwater runoff in the site's entirety, to address TSS, oil, grease, and possibly metals.</p>	
33	Noise & Vibration	MECP reviewed the documents and had no comments at this time.	No response required.		
34	Wastewater	In the approval phase a separate (1) industrial stormwater management plan and design and (2) a sanitary sewage system of the Project Areas will be required at a minimum.	Please refer to the updated Sections 4.9 and 4.11 within the revised EPR. We note that MECP approvals for the stormwater management design and the sanitary sewage connection of the facility is required. Commitments have been included in the updated EPR under Section 6.2 outlining the requirements for obtaining the necessary approval(s) from the MECP.	<p>As discussed in the Aug 26 meeting with the ministry's Sr. Wastewater Engineer, the following should be included as records during the pre-submission consultation:</p> <ul style="list-style-type: none"> The catchment area for the station must include rail line and associated required set back in all calculations of SWM Facility BMP elements design Considering the rail line and train operation and associated passenger Parking; appropriate BMP elements shall be provided in multielement train approach for achieving the required suspended solids removal and oil, grease and metals removal. As an example Oil and grit separator, oil and water separator or combination of the 	Acknowledged, the drainage and stormwater management detailed design will incorporate the noted comments. Rail line setbacks and associated calculations to be added as part of the detailed design. Appropriate BMP measures will be provided during detailed design to achieve the required water quality targets (i.e., OGS or other methods in a treatment train).

Item No.	Issue	Comment/Issue Raised by MECP	How Comment was Considered by Ontario Northland August 8, 2024	Comment/Issue Raised by MECP September 4, 2024	How Comment was Considered by Ontario Northland September 9, 2024
				other methods shall be provided.	
35	Hydrogeology	Both supplied documents are silent on existing groundwater conditions within the Project Study Area. Existing soil conditions are similarly not discussed in detail.	The EPR has been augmented since the draft version – please refer to Section 3.3.7 and Section 4.9		
36	Hydrogeology	Neither report supplies a meaningful description of the local groundwater regime’s current role in supporting pre-existing users and the natural functions of the ecosystem, or how these factors might constrain or otherwise affect the proposed activity.	The EPR has been augmented since the draft version – please refer to Section 3.3.7 and Section 4.9		
37	Hydrogeology	In lieu of this key information, I cannot confirm that future groundwater takings associated with the project are unlikely to cause serious harm to human health or serious and irreversible harm to plant life, animal life or the natural environment.	The EPR has been augmented since the draft version – please refer to Section 3.3.7 and Section 4.9 . Also refer to Section 6.9		
38	Environmental Activity and Sector Registry (EASR) or Permit to Take Water (PTTW)	The Ministry should not make assurances that it will consider water taking requests under the Environmental Activity and Sector Registry (EASR) or Permit to Take Water (PTTW) programs until this information gap is corrected.	Refer to Section 4.9 and Section 6.9 of the Revised EPR.		
39	Section 3.3.7 Stormwater Management/Drainage	Recommendation: The proponent must supply the currently omitted Section 3.3.7 of the Environmental Project Report (discussion of the existing soil and groundwater conditions).	Refer to Section 4.11, Section 4.15.7, and Section 6.11 within the revised EPR.		
40	Section 3.3.7 Stormwater Management/Drainage	Recommendation: The above-noted section must be prepared and authenticated by either a registered member of the Association of Professional Geoscientists of Ontario or a professional engineer who meets the requirements set out in paragraph 2 of subsection 3 (3) of the Professional Geoscientists Act, 2000.	Refer to response comment #39 above. This section was prepared by a Professional Engineer.		
41	Groundwater	Recommendation: The proponent must supply sufficient soil and hydrogeological information to substantiate that the project will not affect groundwater resources to a degree that would 1) cause serious harm to human health or 2) serious and irreversible harm to plant life, animal life or the natural environment.	Acknowledged. Refer to response comment #35 above.		

Item No.	Issue	Comment/Issue Raised by Review Agency	How Comment was Considered by Ontario Northland
Ministry of Environmental, Conservation and Parks – Air Quality (Received August 22, 2024)			
1	Contaminants of Concern	Key pollutants related to transportation air quality impact assessments are carbon monoxide (CO), nitrogen oxide (NO _x) with a focus on NO and NO ₂ , particulate matter (TSP, PM ₁₀ and PM _{2.5}), selected volatile organic compounds (VOCs) (benzene, 1-3 butadiene, formaldehyde, acetaldehyde and acrolein) and benzo(a)pyrene. However, the air quality impact assessment included only some pollutants, i.e., NO _x , TSP, and benzene. The list of key pollutants related to transportation mentioned above should all be included in the air quality impact assessment.	See Appendix Sections A.3 and B.3, in updated report. The information contained in the referenced appendices demonstrate that the controlling contaminants have been presented in the body of the report by comparing the emission factors of the key pollutants (carbon monoxide (CO), nitrogen oxide (NO _x) with a focus on NO and NO ₂ , particulate matter (TSP, PM ₁₀ and PM _{2.5}), selected volatile organic compounds (VOCs) (benzene, 1-3 butadiene, formaldehyde, acetaldehyde and acrolein) and benzo(a)pyrene) to their respective limits. The particulate matter

Item No.	Issue	Comment/Issued Raised by Review Agency	How Comment was Considered by Ontario Northland
			concentrations are low enough that the TSP and / or PM ₁₀ concentrations are less than the PM _{2.5} limits. This is highlighted in the particulate Figures in the body of the report.
2	Study Area	According to the information from the Ministry of Transportations' Environmental Guide for Assessing and Mitigating the Air Quality Impacts and Greenhouse Gas Emissions of Provincial Transportation Projects (MINISTRY OF TRANSPORTATION ENVIRONMENTAL GUIDE FOR ASSESSING AND MITIGATING THE AIR QUALITY IMPACTS AND GREENHOUSE GAS EMISSIONS OF PROVINCIAL TRANSPORTATION PROJECTS (prod-environmental-registry.s3.amazonaws.com), "The local air quality impacts are assumed to be limited to a distance of approximately 500 m from the transportation facility, in each direction." Therefore, the study area should cover the local air quality impacts range, around 500 m from the facility.	See Appendix Section A.5 and B.4 in updated report, where the local air quality impacts are depicted to a distance of approximately 500 m from the transportation facility, in each direction.
3	Section 1.8	The predicted results from the proposed project including cumulative effects are usually compared with applicable Ontario Ambient Air Quality Criteria (AAQC) and/or Canadian Ambient Air Quality Standards (CAAQS) to assess the air quality impacts from the project. Update Table 4 to include all applicable criteria/standards for all key pollutants with all applicable averaging periods. In addition, the ministry has updated criteria and standards for SO ₂ . Please refer to the following link for the updated AAQC: AMBIENT AIR QUALITY CRITERIA (ontario.ca). In addition to the annual AAQC of 0.45 µg/m ³ , the ministry also has a 24-hour AAQC of 2.3 µg/m ³ for benzene.	The Table has been updated. The method used in MECP Guideline A-11 (2017) was used to address the 2.3ug/m ³ limit on Figures 7a and 7b.
4	Background Air Quality	<p>Ambient air quality monitoring data from the Ministry of the Environment, Conservation and Parks (MECP) and National Ambient Pollution Surveillance (NAPS) program ambient air monitoring stations in Sudbury, Sault Ste. Marie, North Bay and Toronto were reviewed and maximum concentrations were used as background concentrations. These stations are far away from the project site, which may not be an appropriate representative for the study area. Provide a rationale to explain why ambient air quality monitoring data from these stations can be used to estimate background air quality for the study area.</p> <p>As provided in the ministry's previous comment on the Draft Environmental Project Report, the 90th percentile of measurements from local and/or regional air monitoring stations are usually used to establish background air quality for a time resolution of 24 hours or less. Please add a table to show a statistical summary of ambient air monitoring data and comparison with applicable criteria/standards.</p>	Page 13 states that the "nearest locations to Timmins are: Sudbury, North Bay, and Sault Ste Marie, where Ontario has data, with Sudbury being the closest". The rationale is that these are the closest stations with air quality data. See Appendix C for 90 percentile data, in updated report.
5	Modelling	<p>Benzene concentration at the Porcupine Public Health Unit from a Carex Canada Study in 2011 and the assumption of a 50% reduction over 10 years were used to estimate the maximum background benzene concentration for the study area based on the information from the report. It should be noted that the decrease trends varied by location, from 21% at Ottawa Downtown station to 42% at Sania station, with an average reduction of 41% based on the measurements from 2010 to 2019 (10-year trends and annual results Air Quality in Ontario 2019 Report ontario.ca). From 2012 to 2021, the annual mean benzene concentration has decreased by 36% on average (Air Quality in Ontario 2021 Report ontario.ca). A reasonable reduction rate should be used to estimate background benzene concentration if benzene concentration at the Porcupine Public Health Unit from a Carex Canada Study in 2011 is used.</p> <p>In addition to the annual AAQC, the ministry also has 24-hour AAQC, 2.3 µg/m³ for benzene as mentioned in the previous comment. The Carex Canada Study (2011) provided predicted annual mean benzene concentrations. 24-hour background benzene concentration is also required to assess the cumulative effects.</p>	See Appendix C, in updated report. The MECP data for the larger of 2010 or 2012 is an average of 67% of the values the Carex Study found for Benzene for 2011. The average reduction from the MECP 2012 data to the MECP 2019 data was 65%. As such, (on average) the MECP 2019 values were 43.5% of the Carex Study values. Therefore using 50% of the Carex Study values (estimated in Figure 3) is conservative. 24 hour benzene concentrations have been added to Figures 7a and 7b in the body of the report.

Item No.	Issue	Comment/Issued Raised by Review Agency	How Comment was Considered by Ontario Northland
6	Sensitive Receptors	It seems the report didn't provide detailed information of sensitive receptors in the study area, which could be impacted by the proposed project. Sensitive receptors within the study area should be identified and presented in the report.	Report pages 4, 19 and 21 describe the Train Station itself as the location with sensitive receptors within the of influence of the emission sources modelled. The public and catholic schools (Figure 1a) are outside the zone of influence of the train station's potential emissions and concentrations at the closest residences are low. In our professional opinion, the GLC grid conservatively captures the sensitive receptors in the vicinity of the proposed train station. To demonstrate, Appendix B.4 provides the worst-case concentrations for sensitive receptors while Figures 5a through 7b provide the concentrations from the GLC grid.
7	Sections 1.4, 1.7 and 3.3	Emissions from industries in the vicinity of the site, such as Sarjeant Propane, City of Timmins Public Works, Porcupine Machining, City of Timmins Bob's Lake Lagoon sewage collection system and City of Timmins 815 Gervais Street North sewage collection system were identified, and noise, odour, and dust impacts from these industries were reviewed based on land use compatibility guideline (D-6). Emissions from these industrial sources were excluded from the modelling assessment for the proposed project based on information from the report. If possible, provide more information to support impacts from these industries are insignificant, for example, emissions/modelled concentrations from Emission Summary and Dispersion Modelling (ESDM) reports, and/or complaint reports from these facilities.	None of these industries have ECAs or EASRs, so no emission rates or modelling is available. Appendix D contains literature discussing the sewage collection systems.
8	Modelling	Emissions from nearby roads for the year 2021 and year 2046 were estimated using the U.S. EPA's Motor Vehicle Emission Simulator (MOVES4) and modelled using CALRoads View as indicated in the report. It is unclear whether the predicted concentrations shown in the report are for the existing situation (2021) or the future situation (2046). Considering the Annual Average Daily Traffic (AADT) near the proposed site, especially the AADT for King Street based on the information from the Traffic Assessment Report, it is recommended emissions from nearby roads for the year 2046 be included when modelling air quality impacts from the proposed project (modelling emissions from both nearby traffic and the proposed project). In addition, MOVES inputs, outputs and traffic conditions should be included and presented in the report.	We confirm that emissions from nearby roads for the year 2046 were already included as part of modelling air quality impacts from the proposed project as outlined on page 17 where we state "The NPR TRPAP Traffic Assessment Report, from June 2024 was used for an estimate of peak traffic flows in 2046." See Appendix B.2 for MOVES4 inputs.
9	Assessment Approach	As the report didn't provide enough detailed information, it is unclear whether the proponent followed the MTO's guide for transportation projects when assessing impacts from nearby roads, for example, conducting one-hour and 24-hour worst-case analysis and using worst-case meteorological inputs, etc., even though more detailed traffic information was provided in the Traffic Assessment Report.	For the Figures 5a through 7b, in the body of the report, our experience was used to provide a conservative result. Appendix B.4 demonstrates that the worst-case concentrations, when using MTO's guide, are slightly less conservative than those shown in the body of the report. Appendix B.1 tabulates the differences between the parameters from Theakston's typical analysis and those suggested in the MTO guide. AERMOD calculates 5 years of hourly data and chooses the worst-case. AERMOD has the option of eliminating meteorological anomalies. The highest concentrations were reported in the original Report.
10	Modelling	In addition to emissions from nearby roads, the emission rates estimation for the key pollutants for the railway station including methods and results should be described and presented in the report.	Sample calculations for the controlling pollutants for the railway station, namely the train, the emergency generator, and the comfort heating equipment have been provided in Appendix A.4 - Emission Rate Sample Calculations.
11	Modelling	The report doesn't provide sufficient information about air dispersion modelling, i.e., meteorological data, terrain data, emission heights, information on receptors, etc. In addition, NO ₂ concentrations were reported, it is unclear what method was used as there are several options available for the conversion of NO _x to NO ₂ in the AEROMOD.	The OLM method also requires values for the "In Stack NO ₂ /NO _x Ratio". The following values were used: <ul style="list-style-type: none"> • Diesel Locomotive = 0.083 • Unit Heaters and AHU = 0.100 • Generac Generator = 0.187 See Appendix A.2, in updated report.
12	Modelling	In addition to the maximum point of impingement concentration, modelled results for sensitive receptors should also be provided. In addition to the isopleth/contour plots, the modelled results including cumulative effects for all key pollutants should be presented in the tables and compared with applicable criteria/standards.	See Appendix Sections A.3 and B.3, within the updated report. These appendices demonstrate that the controlling contaminants have been presented in the body of the report by comparing the emission factors of the key pollutants (carbon monoxide (CO), nitrogen oxide (NO _x) with a focus on NO and NO ₂ , particulate matter (TSP, PM ₁₀ and PM _{2.5}), selected volatile organic compounds (VOCs) (benzene, 1-3 butadiene, formaldehyde, acetaldehyde and acrolein) and benzo(a)pyrene) to their respective limits.

Item No.	Issue	Comment/Issued Raised by Review Agency	How Comment was Considered by Ontario Northland
			Further, in our professional opinion, the GLC grid conservatively captures the sensitive receptors in the vicinity of the proposed train station. To demonstrate, Appendix B.4 provides the worst-case concentrations for sensitive receptors while Figures 5a through 7b provide the concentrations from the GLC grid.
13	Potential Effects	In addition to the operation phase, potential effects from the construction activities associated with the proposed project should be discussed in the report, including but not limited to: sources, emissions, potential effects and mitigation measures, etc.	Table 6 of the report addresses potential effects from the construction activities associated with the proposed project. Further, see Appendix E, in updated report.
14	Natural Environment Existing Conditions & Impact Assessment Report	The Natural Environment Existing Conditions & Impact Assessment Report doesn't mention the potential air quality effects from the construction activities of the proposed project. Potential adverse effects to air quality including mitigation measures during construction should be discussed and included in the Natural Environment Existing Conditions & Impact Assessment Report.	Table 6 of the report addresses potential effects from the construction activities associated with the proposed project. Further, see Appendix E, in updated report.
15	Greenhouse Gas (GHG) Emissions	Greenhouse gas (GHG) emissions from the construction of the Timmins-Porcupine Station were estimated. The report doesn't mention a reduction in carbon sinks due to vegetation removal. The impacts of vegetation removal on GHG emissions from the proposed project should be discussed in the report. In addition, Timmins-Porcupine Station GHG emissions from the operations phases including train service should also be estimated. The estimated GHG emissions should be compared with the provincial and national totals.	Added to report within Section 6, "The grass and shrubs on the existing site may be sequestering more carbon dioxide than is emitted from mowing and maintaining the area. Conservatively, B. Jason West and Danelle Haake (https://www.litzsinger.org/research/west-haake.pdf) measured 11.7Mg C per year sequestered by 7.2 acres by a restored tallgrass prairie. The result at this site, is sequestering carbon dioxide at a rate of 3.5 Mg C per year, if sequestering is at the rate of a restored Missouri tallgrass prairie."
16	General	There is a typo in the sentence "These industries are considered from a Guideline D-6 perspective, described in section 1.4, below." It should be sections 1.7 and 3.3 instead of section 1.4.	Corrected in updated Report.
Ministry of Environmental, Conservation and Parks – Air Quality (Received September 20, 2024)			
1	General	It is expected that some summary tables are added to main sections of the report, for example, summary tables for background concentrations with applicable AAQC/CAAQS, emission rates, modelled results with and without background concentrations with applicable AAQC/CAAQS based on the ministry's previous comments, however, no summary tables were added to the report.	Summary tables for background concentrations with applicable AAQC/CAAQS, emission rates, modelled results with and without background concentrations with applicable AAQC/CAAQS have been added to the body of the revised report.
2	Ontario Ambient Air Quality Criteria (AAQC) and/or Canadian Ambient Air Quality Standards (CAAQS)	The background concentrations and modelled results should be compared to applicable AAQC and/or CAAQS as mentioned in the ministry's previous comment. Applicable CAAQS were not included in the report. Please include the applicable CAAQS in the report in addition to the applicable AAQCs. In addition to annual AAQC, benzo(a)pyrene also has a 24-hr AAQC. SO2 has an AAQC based on 10-min averaging period in addition to annual and 1-hour AAQCs. Also, 1-hour SO2 standard is 100 ug/m3 and annual standard is 10 ug/m3.	The background concentrations and modelled results have been compared to applicable AAQC and/or CAAQS.
3	Background Concentrations	For the appendix C, copies of summary for some contaminants from ministry's 2021 report were added. It should be noted that the background concentrations are generally summarized from the most recent 3-5 years' data when data from nearest MECP AQHI and/or NAPS stations are used instead of site-specific measurements. Provide tables showing a summary of 3-5 year's data, for example, minimum, maximum, average, and 90th percentile, etc. and a summary table with background concentrations of contaminants of concern (COC) and applicable AAQCs and/or CAAQS. 24-hour background benzene concentration is also required to assess the cumulative effects as mentioned in the ministry's previous comment.	Tables showing a summary of 3 year's data, for mean, maximum, and 90 th percentile have been added to the body of the revised report.
4	Emission Rates	A summary table with emission rate for each contaminant should be reported and presented in the report.	A summary table with emission rate for each contaminant has been reported and presented in the report.
5	Section 1.6	PM _{<44um} concentrations from the proposed project were not reported based on the comparison of the ratios of NO _x /PM _{<44um} between applicable limits and emission factors as indicated in the report.	The predicted PM ₁₀ and PM _{2.5} concentration have been reported and presented in the report.

Item No.	Issue	Comment/Issued Raised by Review Agency	How Comment was Considered by Ontario Northland
		It should be noted that PM _{<44um} , PM ₁₀ and PM _{2.5} emissions from the proposed project are almost the same. Consider about the relative low limits for PM ₁₀ and PM _{2.5} compared to PM _{<44um} , the predicted PM ₁₀ and PM _{2.5} concentration should be reported and presented in the report, which also applied to emissions from the nearby roads.	
6	Modelling	The air dispersion modelling should include emissions from both nearby roads and the proposed project as suggested by the ministry. It appears air quality impacts from the nearby roads and the proposed project were modelled separately. If that is the case, the predicted concentrations from the nearby road should also been included as part of background concentrations to assess the cumulative impacts form the proposed project.	There will be no overlap of the idling train and the peak traffic hours.
7	Modelling	Ozone Limiting Method (OLM) was used to convert NO _x to NO ₂ , and the annual O ₃ concentration from AQHI station in Sudbury was used. It is recommended that 90 th percentile of 1-hour or 24-hour background O ₃ values be used to obtain conservative results. In addition, it is unclear where the initial in stack NO ₂ /NO _x ratios shown in the report come from.	The 90 th percentile of 1-hour or 24-hour background O ₃ values be used to obtain conservative results. The OLM method requires values for the "In Stack NO ₂ /NO _x Ratio". The following values were used Diesel Locomotive = 0.083, Unit Heaters and AHU = 0.100, and Generac Generator = 0.187. These values are from GUIDANCE FOR NO ₂ DISPERSION MODELLING IN BRITISH COLUMBIA, (Guidance for NO ₂ Dispersion Modelling (gov.bc.ca)) were used for the in-stack ratios, page 30.
8	Modelling	Some key contaminants were selected for modelling based on the ratios between emission rates and applicable limits. In addition to NO ₂ , PM ₁₀ , PM _{2.5} and benzene should also be included as one of the controlling contaminants to assess the impacts of the project.	Benzene has been included as one of the controlling contaminants to assess the impacts of the project.
9	Modelling	It is hard for readers to verify the statements about the modelling results in the summary of the report as no modelled results were presented in a summary table. Modelled results with and without background concentrations should be summarized and presented in a table and compared with the applicable AAQCs and/or CAAQS as previously suggested by the Ministry.	Modelled results with and without background concentrations have been summarized and presented in a table and compared with the applicable AAQCs and/or CAAQS.
10	Controlling contaminants	Some key contaminants were selected for modelling based on the ratios between emission rates and applicable limits as mentioned before. It is unclear how the proponent calculated the high ratios of E-rate/24 h limit for NO _x and NO ₂ as shown in the A.3.	This was a typo and has been corrected.
11	Modelling	Benzene concentrations from the nearby roads were modelled and presented in the report, however, benzene concentrations from the proposed project were not reported and presented even though benzene was one of the key contaminants.	Benzene has been included as one of the controlling contaminants to assess the impacts of the project.
12	Modelling	It is unclear why 1/10000 was used when presented the modelled benzene concentrations from the nearby roads. Provide an explanation for adding 1/10000 for the modelled results.	When modelling Benzene with CALRoads, the Benzene concentrations were 0 at the emission rates given by the MOVES4 program, and as such, the emission rates were multiplied by 10,000 to increase resolution and the displayed concentrations were subsequently divided by 10,000.
13	Figures 5a and 5b	The modelled NO ₂ concentrations were shown in mg/m ³ . To better shown the results, it is recommended the modelled concentrations be presented in ug/m ³ or ppb instead of mg/m ³ .	<p>We have researched your request and attempted to provide the desired units with each of the CALROADS modeling suites from Lakes. Of these: CALINE4 predicts concentrations of carbon monoxide (CO), nitrogen dioxide (NO₂), suspended particulate, and inert gases near roadways. CAL3QHC predicts concentrations of carbon monoxide (CO), suspended particulate, and inert gases near roadways. CAL3QHCR is an enhanced version of CAL3QHC that can process up to a year of meteorological data.</p> <p>Of the above models, only CALINE4 includes provisions to predict NO₂ concentrations. It includes the ability to use background concentrations for O₃, NO, and NO₂. The output results for NO₂ concentrations are in ppm. We approached the tech support people at Lakes Environmental and were advised the POI concentrations for NO₂ cannot be displayed in ug/m³ within the model. We understand your preference for ug/m³ over ppm but regrettably we cannot comply. The best we can do is convert the maximum concentration value.</p>

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14	Greenhouse gas (GHG) emissions	It is recommended the Intergovernmental Panel on Climate Change (IPCC) methodology (2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories) be used in the estimation of greenhouse gas emissions as a results of land use changes. In addition to GHG emissions from construction, GHG emissions from the operation phase should also be estimated. The estimated GHG emissions should be compared with the national and provincial GHG emissions as mentioned in the ministry's previous comment.	The Intergovernmental Panel on Climate Change (IPCC) methodology (2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories) was used in the estimation of the one-time loss of carbon storage as a results of land use changes.
Ministry of Environmental, Conservation and Parks – Air Quality (Received November 14, 2024)			
1	Table 1	It is unclear why the modelled maximum NO ₂ concentrations were not shown in the table when assessing air quality impacts from nearby roads and air quality impacts from the training station project. The modelled NO ₂ concentration should be included in addition to the modelled concentration plus background concentration.	We interpret this request to mean NO ₂ should be shown separately (without background concentrations). This has been done. From there, we have then added background concentrations, to derive the cumulative result. The report and tables have been updated accordingly.
2	Table 1	90 th percentile of measurements from local and/or regional air monitoring stations are usually used to establish background air quality for a time resolution of 24 hours or less as mentioned in the ministry's previous comment on the Draft Environmental Project Report. It appears only 1-hr and annual background NO ₂ background concentrations were provided, but 24-hr NO ₂ background concentration was not included in the report for the modelling of impacts from training station. Also, only 1-hr background NO ₂ concentrations were included in the modelling the potential impacts from the nearby roads.	24 hour concentrations have been included in Table 5 of the revised report.
3	Table 1	Explain why the modelled concentration plus background concentration (3.1 ppb) is less than annual background NO ₂ concentration (5.7 ppb) for the nearby roads as shown in the report.	Based on MTO/MECP direction from 12/16/2024, the report has been updated using AERMOD only to model the emissions from the traffic related to the proposed train station.
4	Table 1	Background concentrations of total suspended particulate matter and PM ₁₀ may be estimated based on the background PM _{2.5} concentration when the measurements of TSP and PM ₁₀ are not available.	PM _{2.5} has been modelled and results have been presented in the revised report. See Section 5 / Table 5.
5	Table 1 & Table 6	Use Canadian Ambient Air Quality Standards (CAAQS) instead of Canadian AAQC	Thank you for pointing this out. This typo has been corrected in a revised report.
6	Section 5, Page 8	Platform area was used as a sensitive receptor to assess the potential impacts from the station project. It should be noted that sensitive receptors are defined as residential dwellings based on the MTO guideline document. Since the predicted concentrations were below applicable criteria/standards for the study area including nearby residences, it may not change the conclusion of the assessment.	The platform has been removed as a sensitive receptor within the revised report. The report has been updated accordingly. See Section 3.2, Figure 4, within the revised report for a summary of the selected sensitive receptors.
7	Page 12	The report states that the MECP regulates the ambient air quality through the Ambient Air Quality Criteria It should be noted that an AAQC is not a regulatory value. AAQCs are used to assess the ambient air quality, i.e., the potential air quality impacts from the proposed project.	Thank you for pointing this out. This typo has been corrected in a revised report.
8	Table 5	There is a typo for Ontario interim AAQC for PM ₁₀ , it should be 50 ug/m ³ instead of 10 ug/m ³ for 24-hr averaging period. The ministry also has 1-hr NO ₂ AAQC of 400 ug/m ³ in addition to the 24-hr AAQC of 200 ug/m ³ .	Noted Thank You. This typo has been corrected in a revised report.
9	General	Units of modelled concentrations should be included/shown in the figures.	Based on MTO/MECP direction from 12/16/2024, the report has been update using AERMOD only to model the emissions from the traffic related to the proposed train station.
10	A.3 Controlling Contaminants, Page 46.	The note (*) is confused. I don't think there is any conversion method outline in modelling guideline applied to calculate the E-rate/Annual limit, and annual AAQCS of 12 ppb (or 24 ug/ ³).	The (*) was a remnant from the September 2024 submission which should have been removed. Report updated accordingly.

Item No.	Issue	Comment/Issued Raised by Review Agency	How Comment was Considered by Ontario Northland
11	General	The report used modelled TSP or PM ₁₀ concentrations as estimates for PM _{2.5} . It should be noted that settling velocity and deposition velocity are different in the modelling for TSP, PM ₁₀ and PM _{2.5} , which will affect the modelled concentrations. Depending on the modelling option, the modelled PM _{2.5} concentration may be higher with lower settling velocity and deposition velocity compared to TSP and PM ₁₀ when the emission rates of TSP, PM ₁₀ and PM _{2.5} are similar, like this case. Provide modelled PM _{2.5} concentrations to support the assumption used in the report for this case.	PM _{2.5} U.S. National Ambient Air Quality Standard (NAAQS) was used in the AERMOD modeling for this analysis. PM _{2.5} NAAQS was selected to ensure alignment with the Canadian Ambient Air Quality Standards' 3-year average of the 98 th percentile criteria. The report has been updated accordingly.
12	General	It appears the modelled NO ₂ concentrations can be shown as ug/m ³ . Check the link for detailed information: CALRoads View - Modifying Model Output Units Lakes Environmental Software	Based on MTO/MECP direction from 12/16/2024, the report has been update using AERMOD only to model the emissions from the traffic related to the proposed train station.
Ministry of Environmental, Conservation and Parks – Air Quality (Received February 7, 2025)			
1	General	NO ₂ , PM _{2.5} and benzene were selected as the controlling contaminants for the air quality assessment consider the emission to criteria/standards ratio and background concentration.	Acknowledged.
2	General	Air monitoring data from Sudbury and New Market stations were used to estimate background concentrations for the controlling contaminants and ozone concentrations, and 90 th percentile concentrations were used for estimation of 1-hr and 24-hr background concentrations as recommended by the MECP.	Acknowledged.
3	General	Nine receptors near the project site were selected and represent the most sensitive and closest locations as indicated in the report.	Acknowledged.
4	General	Road emissions from the predicted increase in vehicular traffic from 2026 to 2046 and emissions from train station operation including train idling, heating, comfort, and emergency equipment were included in the modelling.	Acknowledged.
5	General	AERMOD was used to assess the air quality impacts from the proposed project and MECP preprocessed meteorological data were used.	Acknowledged.
6	General	Greenhouse gas (GHG) emissions from the construction of the project were estimated.	Acknowledged.
7	General	Potential impacts and mitigation measures during the construction phase were discussed.	Acknowledged.
8	General	The report indicated that the modelled cumulative concentrations (modelled plus background) for selected contaminants were lower than applicable strict criteria/standards and the project has minor impacts on air quality.	Acknowledged.
9	General	The estimated result of GHG emissions is roughly 5.9% of the threshold of being required to report CO ₂ emissions in Ontario and 0.00030% of CO ₂ emissions from transport in Canada in 2022 based on the information from the report.	Acknowledged.
10		NO ₂ , PM _{2.5} and benzene were selected as the controlling contaminants for the air quality assessment consider the emission to criteria/standards ratio and background concentration as indicated in the report. The emission to criteria/standard ratio for benzo(a)pyrene is also high, even higher compared to those for PM _{2.5} and benzene. It is unclear why benzo(a)pyrene was not selected and included in the air quality assessment.	B(a)P was not chosen because it is not known to have relatively high background concentrations in the Porcupine / Timmins area. In addition, there is no monitoring station with representative B(a)P concentration data in the last decade. The two closest NAPS stations (which are located more than 500km away from Timmins) that have data from the last decade are: <ul style="list-style-type: none"> • 125 Resources Road in west Toronto. This monitoring station is situated in generally proximity to the travelled portion of Highway 401 (410,900 AADT in 2021) – therefore, this station is not representative of the Porcupine / Timmins area. • Toronto North Downsview at 4905 Dufferin Street, Toronto. The data from the Toronto North Downsview station is not viable (there is data published for 2018 only, with just 13 readings). This station is not representative of the Porcupine / Timmins area.

Item No.	Issue	Comment/Issued Raised by Review Agency	How Comment was Considered by Ontario Northland
			<p>In our professional opinion, none of the B(a)P data sets available in Canada, are representative of Timmins.</p> <p>It is noted that Oxides of Nitrogen were chosen because they have the highest emission rate-to-concentration limit ratio. PM_{2.5} and Benzene were chosen because they have relatively high background concentrations. Refer to pages 4, 13, 32 & 58 of the report.</p>
11	Modelling	<p>a) For emission rates estimates, the road emissions due to traffic increase were estimated using MOVES and the majority of the emission estimates from train station operation were based on the supplier information and/or USEPA AP-42 emission factors except for the proposed natural gas boiler. It is unclear where the emission factors come from for the proposed natural gas boiler as no reference was provided in the report.</p> <p>b) In addition, the report indicated that the equations used to calculate flue gas exit properties represent a liner best fit to the boilers that Theakston has been involved in. Please provide more information to support these equations.</p>	<p>a) The emissions rates / reference for the natural gas boiler is based on industry standard boiler equipment that emits maximum NOX output of 30ppm. US EPA AP-42 emission factors were used for particulate and benzene.</p> <p>b) In regard to the equations used to estimate the flue gas exit velocity, a combustion emission flow rate calculation was undertaken that accounted for the volume of air required per volume of natural gas, an excess air requirement, and flue gas recirculation). The result of the equation was subsequently adjusted to represent the best linear fit to similar comfort heating combustion equipment that provides a combustion emission mass flow rate in their technical data sheets.</p> <p>To illustrate the functionality and accuracy of this equation, the following is an example of a piece of comfort heating equipment (that listed a combustion emission mass flow rate in its technical data): Input capacity = 1.8 MMBH, and Flue gas mass flow = 1,587 lb/h, at the rated input. Using the formula for input capacity (MMBH), results in a Flue gas mass flow = 1,533.8 lb/h, which is within 3.5% of that stated in the specifications for Boiler model Vitocrossal 200, CM2 500 (which is representative of similar type of heating equipment).</p> <p>In addition, please note that the heated station area is very small; therefore the emissions associated with comfort heating is expected to be negligible. We included such equation above and details within the report as a means of demonstrating the extra level of due diligence and rigour that was carried out to ensure the accuracy of the modelling results.</p>
12	General	Fugitive dust can be emitted from vehicle traffic on paved or unpaved roads. It appears fugitive dust from vehicles travelling on the roads was not included in the assessment. It is unclear why fugitive dust from vehicle re-entrainment was not mentioned and included in the air quality assessment.	Traffic emissions of dust including break and tire wear, are included in the MOVES emission factors, and therefore was included in the assessment. Table 7 as well as Appendix C contain details regarding how fugitive dust impacts were considered as well as the recommended mitigation measures that will be employed to control construction dust, which will include any unpaved roads.
13	Modelling	The report indicated that Ozone Limiting Method (OLM) was used to convert NO _x to NO ₂ , but in the Control Pathway – NO ₂ from A5, AERMOD Summary report, the OLM option was not selected.	We confirm that the Ozone Limiting Method was applied in the conversion of NO _x to NO ₂ as outlined in the report; however, this selection was not displayed in the Control Pathway Dispersions Options printout from AERMOD – this is due to an error/oversight in "Lakes Program". As a result, an e-mail was sent to Lakes Software alerting them to this - a copy of the email has been attached for your reference.
14	Modelling	A5, AERMOD Summary Report. NAAQS option was selected for both NO ₂ and PM _{2.5} . It should be noted that the output is based on a multi-year average. The report should state clearly that the predicted maximum concentrations at these receptors are multi-year averages.	<p>The note at the bottom of Table 2 on page 12 of the report states:</p> <p>"*3-year average of the 98th percentile. It should be noted that the U.S. National Ambient Air Quality Standard (NAAQS) was used for 1-hour NO₂, and PM_{2.5} NAAQS was used in the AERMOD modeling for this analysis. NAAAQS was selected to ensure alignment with the Canadian Ambient Air Quality Standards' 3-year average of the 98th percentile. Due to Ontario's AAQC's PM_{2.5} limit, the highest concentrations (rather than the 98th percentile) are presented in the results."</p> <p>In addition, the report states the following on page 29: "Note: The 1-hour CAAQS limit for NO₂ is based on the 98th percentile of the 3-year average of the hourly NO₂ concentrations. As such, the AERMOD result presented represents the 98th percentile of the 3-year average."</p> <p>We trust this sufficiently addresses your comment regarding noting multi-year averages in the report.</p>

Item No.	Issue	Comment/Issued Raised by Review Agency	How Comment was Considered by Ontario Northland
15	Modelling	A5, AERMOD Summary Report. Non-default options were selected for all three contaminants. Provide more information regarding what non-default options used in the modelling for these contaminants.	For AERMOD we used flat terrain. This is a reasonable assumption since the terrain varies by 7m at most, over 1000m in the north south axis (0.7%). The terrain proximate to the site is effectively flat. When the "FLAT" Option is selected in AERMOD, it invokes the "Non-default" Model options. This was the only non-default option used.
Ministry of Environmental, Conservation and Parks – Air Quality (Received February 27, 2025)			
1	General	Follow up comment on previous Items #1 - 9 are a summary of the assessment, not comments. No further action required.	<i>No response required.</i>
2	Controlling Contaminants	Follow up comment on previous Item #10. Background concentrations for all controlling contaminants were estimated from AQHI and NAPS stations as no on-site ambient air monitoring was conducted. In addition to two NAPS stations with B(a)P data as mentioned in the response, there are a few more stations with B(a)P data available before the year of 2020, for example Experimental Farm in Simcoe located near Agricultural land in a small town. It appears this monitoring station is similar as proposed site/area although it is far away from the proposed site. Compared to PM2.5 and benzene concentrations, 90 th percentile of 24-hr B(a)P concentrations are about 60% to 80% of AAQC, and annual concentration are around 1.6 to 1.9 times of annual AAQC based on the data from the Experimental Farm station for the year of 2017-2019. Provide a rationale as to why B(a)P was not included in the assessment.	<p>As previously stated in our February 18th response, B(a)P was not chosen because it is not known to have relatively high background concentrations in the Porcupine / Timmins area. In addition, there is no monitoring station with representative B(a)P concentration data in the last decade. The two closest NAPS stations (which are located more than 500km away from Timmins). Similarly, it should be acknowledged the Simcoe Experimental farm is 631km away from Timmins.</p> <p>The Simcoe Experimental farm is not suitable a monitoring station given that it is influenced by the proximity of Windsor, Detroit and Toledo (which are within approximately 300km of Simcoe); all of which are industrial areas which contribute to B(a)P emissions. Additional information is provided as follows:</p> <p>Wind directions:</p> <ul style="list-style-type: none"> • Simcoe: Dominant wind direction is southwest (Canadian climate normals). • Timmins: Dominant wind direction is south (Canadian climate normals). <p>Proximity of cities and related populations:</p> <ul style="list-style-type: none"> • Windsor, Detroit, and Toledo are within 300km of Simcoe and lie to the southwest. The combined population of Windsor, Detroit, and Toledo is approximately 1,132,370. • Sudbury is south of Timmins and within 300km, the population of Greater Sudbury is 166,000. <p>Potential Emission Sources:</p> <ul style="list-style-type: none"> • Windsor, Detroit, and Toledo are urban and industrial areas that could contribute to B(a)P emissions. • Sudbury has a history of industrial activities, particularly mining and smelting, which could contribute to B(a)P emissions. <p>Given these factors, it is reasonable to conclude that background B(a)P emissions in Simcoe and Timmins are influenced by significantly different sources, and at different source intensities, due to the respective populations and types of industries upwind of the dominant wind directions. Therefore, it is not reasonable to assume that background B(a)P emissions in Simcoe are representative of those in Timmins. For all of the reasons summarized above, B(a)P was not captured in the assessment.</p>
3	Modelling	Follow up comment on previous Item #12. PM emissions from vehicles on paved roads include emissions in the form of exhaust, brake wear, and tire wear as well as resuspended road surface material. The particulate emissions in the form of vehicle exhaust, brake wear, and tire wear were estimated using MOVES as mentioned, however, particulate emissions from resuspended road surface material were not mentioned and included in the assessment. Provide a rationale/justification as to why emissions from resuspended road surface material were not included in the modelling.	<p>For clarification, MECP's previous comment was related to clarifying how fugitive dust from vehicle re-entrainment was considered/ included in the air quality assessment. Our response to this was provided on February 18th. In MECP's latest February 28th comment, the question is about emissions from resuspended road surface material.</p> <p>Emissions from resuspended road surface material were not captured in the assessment because they are negligible.</p> <p>It is also worth noting that Falcon Street is comprised of deteriorated asphalt, which is in disrepair and will be resurfaced after construction of Timmins Station.</p> <p>The following supplementary information has also been provided to support our response:</p>

Item No.	Issue	Comment/Issued Raised by Review Agency	How Comment was Considered by Ontario Northland
			<p>Receptor #6 (101 Gervais Street North) is the receptor most affected by the emissions from the roads. It is 0.021ug/m3 (24-h) for the max predicted concentration for AADT increase from 2026 to 2046 (Table 5). This represents 0.14% of the cumulative concentration.</p> <p>Employing the daily basis equation from US EPA AP-42 13.4.2 (for King Street – Highway 101) for emissions from resuspended road surface material, using the values in Table 13.2.1-1 for k, table 13.2.1-1 for the silt loading, Ontario fleet data for W, and Canadian climate normal for the days per year of precipitation, results in an emission rate of 0.026 grams / road km / day (0.0000000227 grams / road km / second). This is 0.16% of the emission predicted by MOVES for King Street – Highway 101.</p> <p>In summary, the King Street (101) road emissions account for a maximum of 0.14% of the cumulative pm2.5 (24-h) concentrations in Table 5, and the emissions from resuspended road surface material would be 0.16% (0.0016 as a fraction) of that 0.14% (0.0014 as a fraction), or 0.00022% (0.00000224 as a fraction). As such, the emissions from resuspended road surface material for King Street are negligible at Receptor #6 (101 Gervais Street North), which is the receptor most affected by potential emissions from the roads.</p>
4	Modelling	Follow up comment on previous Item #14. The comment is about predicted maximum concentrations mentioned in the report, not the NAAQS, 3-year average of the 98 th percentile. I believe the highest concentrations mentioned in the note are multi-year averages as NAAQS option was chosen for the modelling. The note should mention that the highest concentrations are multi-year averages. Please add.	Acknowledged. An additional note in the particulate section of page 29 will be added to the updated report as follows: "Due to Ontario's AAQC's PM _{2.5} limit, the highest 3-year average concentrations (rather than the 98 th percentile) are presented in the results."
5	Modelling	Follow up comment on previous Item #15. For particle deposition, I believe Method 2 was used in the assessment. The Method 2 option is considered a non-default option based on the information from the AERMOD Users Guide (US EPA, November 2024). Non-default options used in the modelling should be mentioned in the report. Please add.	<p>As per our previous February 18th response, the non-default option for flat terrain was employed and a note has now been added to Appendix A.2, report page 52 of the updated report to state this accordingly. A screen capture from AERMOD has also been provided as an attachment to our response.</p> <p>In addition, we confirm that Method 2 was used. Within the AERMOD version 22112 that was employed, Method 2 is considered a non-default option. Therefore, the report will be updated within Appendix A.2, report page 52 to state that non-default options were used for modelling as follows: for Flat Terrain and Method 2 for PM_{2.5}.</p>
Ministry of Environmental, Conservation and Parks – Air Quality (Received March 14, 2025)			
1	Controlling Contaminants	Follow up comment on previous Item #10. For this proposed project, the background concentrations for all selected contaminants were estimated based on the ambient air monitoring data from AQHI and NAPA stations in Sudbury and Newmarket as no on-site ambient air quality monitoring was conducted for this case. Newmarket station is close to the City of Toronto, and measured benzene concentrations from Newmarket station were used for background concentrations for the study area. Among the limited available PAH monitoring stations, the Simcoe station is considered more representative as it is located in a non-urban area as I mentioned before and also not impacted by any significant emission sources nearby (Windsor, Detroit and Toledo as mentioned by the proponent's response are far away from this station). The proponent needs to do on-site measurements if they would like to know whether the actual background concentrations for the study area higher or lower compared to those estimated ones. Not knowing whether the study area has relatively high background B(a)P cannot be the excuse for not choosing B(a)P as a contaminant for the assessment. Please provide a reasonable rationale and discuss why B(a)P was not included in the assessment.	<p>In response to your latest comments regarding B(a)P, below is supporting information to justify why levels at the station are considered negligible. It's based on the train operating at notch 2, which consumes fuel at approximately 140L/h. We've looked at two scenarios: one with Uncontrolled B(a)P emissions and one with 95% reduction with the Diesel Oxidation Catalyst (DOC) and Diesel Particulate Filter (DPF) that come with Tier 4 engines (note the literature describes this 95% reduction). Since the idling engine is the station's primary source of PM_{2.5} and B(a)P, a reasonable estimate of B(a)P concentration at the most affected receptor can be scaled based on the PM_{2.5} and B(a)P emission rates.</p> <p>The results are summarized below:</p>

Item No.	Issue	Comment/Issued Raised by Review Agency	How Comment was Considered by Ontario Northland																																																														
			<div data-bbox="1672 304 1690 324" style="float: left; margin-right: 5px;">+</div> <table border="1" data-bbox="1889 324 2582 364" style="margin-bottom: 10px;"> <tr> <td style="background-color: yellow;">@ notch 2</td> <td style="background-color: yellow;">10.0%</td> <td style="background-color: yellow;">140.8</td> <td style="background-color: yellow;">L/h</td> <td style="background-color: yellow;">34210 Btu/L</td> </tr> </table> <table border="1" data-bbox="1690 399 2582 532"> <thead> <tr> <th>Engines [lb/MMBtu]</th> <th>MMBtu/h</th> <th>g/h</th> <th>1-h g/s</th> <th>24-h g/s *</th> </tr> </thead> <tbody> <tr> <td>B(a)P (Uncontrolled) AP-42 3.4</td> <td>0.000000257</td> <td>4.82</td> <td>0.0005615033</td> <td>0.00000015597</td> <td>2.17E-08</td> </tr> <tr> <td>B(a)P (Tier 4) *</td> <td>1.285E-08</td> <td>4.82</td> <td>0.0000280696</td> <td>0.000000007797</td> <td>0.0000000108293</td> </tr> </tbody> </table> <p data-bbox="1690 536 2697 580">Tier 4 engines employ both Diesel Oxidation Catalyst (DOC) and Diesel Particulate Filter (DPF). These emission control devices reduce B(a)P emissions by >95%.</p> <p data-bbox="1690 596 2697 713">References – 1) <i>Journal of Health Science</i>, 56(1) 31–40 (2010) “Reduction in the Emissions and Toxicity of Polycyclic Aromatic Hydrocarbons from a Heavy-duty Diesel Engine with the Latest Aftertreatment Devices”, https://www.jstage.jst.go.jp/article/jhs/56/1/56_1_31_pdf/-char/en, 2) <i>White Paper - A Review of Polycyclic Aromatic Hydrocarbon and Polycyclic Aromatic Hydrocarbon Derivative Emissions from Off-Road, Light-Duty, Heavy-Duty, and Stationary Sources</i>, California Air Resources Board, June 2020, https://ww2.arb.ca.gov/sites/default/files/2020-08/PAH_White_Paper_ADA.pdf</p> <p data-bbox="1690 737 2458 758">* The train is therefore expected to idle at the proposed Timmins station for 3 hours and 20 minutes per day.</p> <table border="1" data-bbox="1908 818 2194 915" style="margin-bottom: 10px;"> <tr> <td style="background-color: yellow;">Max Receptor (#9) PM2.5 (24-h)</td> </tr> <tr> <td style="background-color: yellow;">0.554 ug/m3 from Station</td> </tr> </table> <table border="1" data-bbox="1696 919 2635 1084"> <thead> <tr> <th>B(a)P emission rate % of PM2.5 emission rate</th> <th>Estimated 24-h B(a)P Conc (ug/m3)</th> <th>24-h B(a)P Limit (ug/m3)</th> <th>Fraction of B(a)P Limit (ug/m3)</th> <th>% of 24-h B(a)P Limit</th> <th></th> </tr> </thead> <tbody> <tr> <td>0.0042732%</td> <td>2.36737E-05</td> <td>0.00005</td> <td>0.47347</td> <td>47.347%</td> <td>B(a)P (Uncontrolled)</td> </tr> <tr> <td>0.00021362%</td> <td>1.18345E-06</td> <td>0.00005</td> <td>0.02367</td> <td>2.367%</td> <td>B(a)P (Tier 4)</td> </tr> </tbody> </table> <table border="1" data-bbox="1908 1104 2194 1201" style="margin-bottom: 10px;"> <tr> <td style="background-color: yellow;">Max Receptor (#9) PM2.5 (annual)</td> </tr> <tr> <td style="background-color: yellow;">0.079 ug/m3 from Station</td> </tr> </table> <table border="1" data-bbox="1696 1205 2635 1370"> <thead> <tr> <th>B(a)P emission rate % of PM2.5 emission rate</th> <th>Estimated Annual B(a)P Conc (ug/m3)</th> <th>Annual B(a)P Limit (ug/m3)</th> <th>Fraction of B(a)P Limit (ug/m3)</th> <th>% annual of B(a)P Limit</th> <th></th> </tr> </thead> <tbody> <tr> <td>0.00427324%</td> <td>0.000003375857</td> <td>0.00001</td> <td>0.33759</td> <td>33.759%</td> <td>B(a)P (Uncontrolled)</td> </tr> <tr> <td>0.00021362%</td> <td>0.000000168759</td> <td>0.00001</td> <td>0.01688</td> <td>1.688%</td> <td>B(a)P (Tier 4)</td> </tr> </tbody> </table> <p data-bbox="1659 1433 2822 1463">Therefore, it can reasonably be concluded that the B(a)P emissions from the idling train are insignificant.</p> <p data-bbox="1659 1483 2971 1645">If MECP does not agree with this rationale, we will endeavor to update the report to include modeling of B(a)P. AERMOD will model separately the emissions from the station and then the emissions from the roads. Each of these concentrations will be put into Table 5, for each of the receptors, in their respective columns, along with the background B(a)P data from Simcoe. These three concentrations (background from Simcoe, the contribution from the station, and the contribution from the additional traffic) will be added together and compared to the limit.</p> <p data-bbox="1659 1665 2971 1725">We request concurrence from MECP that using background concentrations from Simcoe is acceptable, if this is the preferred path forward.</p>	@ notch 2	10.0%	140.8	L/h	34210 Btu/L	Engines [lb/MMBtu]	MMBtu/h	g/h	1-h g/s	24-h g/s *	B(a)P (Uncontrolled) AP-42 3.4	0.000000257	4.82	0.0005615033	0.00000015597	2.17E-08	B(a)P (Tier 4) *	1.285E-08	4.82	0.0000280696	0.000000007797	0.0000000108293	Max Receptor (#9) PM2.5 (24-h)	0.554 ug/m3 from Station	B(a)P emission rate % of PM2.5 emission rate	Estimated 24-h B(a)P Conc (ug/m3)	24-h B(a)P Limit (ug/m3)	Fraction of B(a)P Limit (ug/m3)	% of 24-h B(a)P Limit		0.0042732%	2.36737E-05	0.00005	0.47347	47.347%	B(a)P (Uncontrolled)	0.00021362%	1.18345E-06	0.00005	0.02367	2.367%	B(a)P (Tier 4)	Max Receptor (#9) PM2.5 (annual)	0.079 ug/m3 from Station	B(a)P emission rate % of PM2.5 emission rate	Estimated Annual B(a)P Conc (ug/m3)	Annual B(a)P Limit (ug/m3)	Fraction of B(a)P Limit (ug/m3)	% annual of B(a)P Limit		0.00427324%	0.000003375857	0.00001	0.33759	33.759%	B(a)P (Uncontrolled)	0.00021362%	0.000000168759	0.00001	0.01688	1.688%	B(a)P (Tier 4)
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2	Modelling	Follow up comment on previous Item #12. My understanding is fugitive dust from vehicle re-entrainment is the same thing as fugitive dust from resuspended road surface. It appears the	Acknowledged.																																																														

Item No.	Issue	Comment/Issued Raised by Review Agency	How Comment was Considered by Ontario Northland
		proponent misunderstood the concept of the fugitive dust from vehicle re-entrainment. That is why I used the term directly from the US EPA AP-42 document when I commented on the proponent's response last time. No further actions required on this item.	
3	Modelling	Follow up comment on previous Item #14. Instead of due to Ontario's AAQC PM2.5 limit, the highest multi-year average concentrations shown in the report are due to NAAQS option chosen for the modelling. Please revise the note to include the wording.	Wording in the report was revised accordingly.
4	Modelling	Follow up comment on previous Item #15. The report will be updated to include Method #2 as pointed out in the comment. No further comments on this item.	Acknowledged.
Ministry of Environmental, Conservation and Parks – Air Quality (Received March 21, 2025)			
1	Controlling Contaminants	Follow up comment on previous Item #10. Based on the information from the proponent's response, PM _{2.5} and B(a)P emissions and modelled PM _{2.5} results were used to estimate B(a)P concentrations from the proposed project. It should be noted that B(a)P concentrations will be higher compared to the estimated results shown in the proponent's response due to the particle deposition option and multi-year averages used for PM _{2.5} modelling. The estimated B(a)P concentrations were low when Tier 4 engines (with 95% emission control efficiency) were used, and the new trains will meet the latest EPA Tier 4 emission standards as indicated in the report. It is expected that B(a)P contribution from the proposed project would also be low with the consideration of the impacts from the particle deposition option and multi-year averages used for PM _{2.5} modelling and B(a)P contribution from nearby traffic. It will not change the conclusions of the assessment. No further actions required.	Acknowledged.
2	Transit and Rail Project Assessment Process	With item #1 now resolved, the ministry has no further outstanding comments from an air quality perspective, which means ONTC can resume back into the project assessment process by way of a Notice of Resumption. It is the ministry's understanding that, there are 7 calendar days left of the 120-day period to incorporate all comments about the project and to finalize the EPR. The Notice of Completion must be given within 120 days of the distribution of the Notice of Commencement. The Notice of Resumption must be given before a Notice of Completion is issued. Please see the Notice of Resumption Template in Appendix A of the Transit Guide for reference.	Acknowledged.

Item No.	Issue	Comment/Issued Raised by Review Agency	How Comment was Considered by Ontario Northland
Ministry of Natural Resources and Forestry			
1	Section 5, Table 6	If vegetation removal/tree clearing has to take place during the breeding bird window, the results of the nest sweep should be provided to the MNR for review prior to the commencement of work. Additionally, if nests or dens are encountered at any time during construction, work in their vicinity should cease and MNR notified prior to any action being taken.	<p>Table 4-6 of the EPR has been updated to reflect the following mitigation and monitoring commitments for loss of vegetation and disturbance of wildlife species and habitat:</p> <ul style="list-style-type: none"> Vegetation clearing is to occur outside of the breeding bird window of April 1-August 31. If tree clearing is required to be completed during the breeding bird window, a nest sweep will be completed by a qualified biologist no more than 48 hours prior to vegetation removal. The results of the nest sweep will be documented in a technical memo and provided to the MNR for review prior to the commencement of work. If an active nest or den is found, work in the vicinity will cease and MECP/MNR be notified prior to any action being taken. Consultation with a qualified biologist and the agencies having jurisdiction (e.g., MECP, MNR) will be required to determine the extent of protection and mitigation measures (e.g., protective buffer established around the nest).

Item No.	Issue	Comment/Issued Raised by Review Agency	How Comment was Considered by Ontario Northland
2	September 18, 2024	My apologies on not responding to the first email. We don't have any further comments on the EPR for the Station. Thank you for providing MNR with the opportunity to comment on this project.	Acknowledged, thank you for confirming.
Ministry of Municipal Affairs and Housing			
		<i>No comment provided.</i>	
Ministry of Northern Development			
1	September 6, 2024	<p>Thank you again for sharing the Notice of Commencement with us and apologies for the delayed response. Our ministry has no issues with the proposed Project Assessment Process for the Timmins-Porcupine Station. Below are some general comments about the project from our ministry perspective.</p> <ul style="list-style-type: none"> MND understands that the Northlander, and the proposed station in Timmins, will encourage economic and regional development in the north by connecting the economies of Northern Ontario and the Greater Golden Horseshoe (GGH). Improved connections would also provide greater access for GGH residents to the businesses and services of Northern Ontario, such as the tourism industry, encouraging the growth and development of the northern economy. MND supports the promotion of environmental sustainability by providing an inter-community passenger transportation alternative for long distance trips between northern communities and the GGH. We understand the Northlander has the potential to divert trips that would have otherwise been completed using personal vehicles, lowering the total vehicle-kilometres travelled and may result in overall reduction in transportation-related emissions if enough auto trips are diverted to inter-community passenger transportation. MND continues to support the Draft Northern Transportation Plan, which proposes 67 actions to help build a modern and sustainable transportation system for people in Northern Ontario. MND agrees with the identified challenges in the passenger transportation options in Northern Ontario, and the opportunity for improvements. 	Acknowledged, thank you for confirming.
Infrastructure Ontario			
		<i>No comment provided.</i>	
Ontario Heritage Trust			
		<i>No comment provided.</i>	

5.2.4.4 Conservation Authority Review Agency Comments Received on Draft EPR

Table 5-7: Conservation Authority Review Agency Draft EPR Comments and Responses

Item No.	Issue	Comment/Issue Raised by Review Agency	How Comment was Considered by Ontario Northland
Mattagami Region Conservation Authority			
1	July 12, 2024	Please be advised that the Mattagami Region Conservation Authority has no comments or concerns regarding the Timmins-Porcupine Station TRPAP.	Acknowledged, thank you for confirming.

5.2.4.5 Municipal Review Agency Comments Received on Draft EPR

Table 5-8: Municipal Review Agency Draft EPR Comments and Responses

Item No.	Issue	Comment/Issue Raised by Review Agency	How Comment was Considered by Ontario Northland
City of Timmins			
1	Section 4.5.2 Planned Land Use, Subsection Official Plan Designations	<p>Refer to Section 7.2 Circulation of New Application to MNDMF. Circulating development applications to MNDMF will help mitigate some of the uncertainties pertaining to mine hazard locations and potential conflicts with future mine/mineral development. Current guidelines recommend that MNDMF's Regional Land Use Geologist be contacted when a mining related hazard as indicated in the Abandoned Mines Information System (AMIS) database is within 1km of a proposed development.</p> <p>Within Timmins there are literally hundreds of these points and the information about these points varies considerably. There is uncertainty that every single mine hazard feature is captured in the AMIS database or plotted as accurately reported. MNDF does not guarantee that the locations are precise and some research and/or ground proofing may be required by MNDMF staff to verify the type and location of mine hazard(s) in question and make recommendations accordingly.</p> <p>7.2.2 Types of Applications to be Circulated to MNDMF</p> <ol style="list-style-type: none"> i. New developments within 1 km of an AMIS point or within a mineral extraction zone; ii. Re-zoning applications within 1 km of AMIS point or within a mineral extraction zone; iii. Any development which is on or abutting to an existing Mine Tailings Hazard as identified in Schedule 'C'. <p>Pierre Bousquet, P. Geo. Regional Land Use Geologist Northeast Region Resident Geologist Program Ontario Geological Survey Mines and Minerals Division Ministry of Mines Ontario Government Complex 5520 Hwy 101 East, E-Wing South Porcupine, ON P0N 1H0 Cell: 705-465-0369 Fax: 705-235-1620</p>	<p>Acknowledged. Thank you for the information pertaining to new application requirements for developments within 1 km of a Mine Hazard feature.</p> <p>Text in Section 4.5.2 Planned Land Use, Subsection Official Plan Designations has been revised to state "Therefore, as prescribed in the Section 7.2 of the OP, consultation with the Regional Land Use Geologist during detail design may be required in order to determine if the proposed station will require an application to the MNDMF."</p>
2	Section 4.5.2 Planned Land Use, Subsection Zoning	<ol style="list-style-type: none"> 1. The provisions of this By law shall not apply to the use of any land or the erection or use of any building or structure for the purpose of public service by the Municipality or any department of the Government of Ontario or Canada, including Ontario Power Generation, 	Ontario Northland as a Crown Agency of the Province of Ontario is exempt from certain municipal processes and requirements. In these instances, Ontario will engage with the City of

Item No.	Issue	Comment/Issue Raised by Review Agency	How Comment was Considered by Ontario Northland
		Hydro One, or any Telephone, Telegraph, Telecommunications Company or Gas Company including Trans Canada Pipelines, and such use or erection may be permitted provided that: <ol style="list-style-type: none"> The lot size, height, coverage and yard regulations required for the zone in which such land, building or structure is located are complied with; No goods, materials or equipment are stored in the open in a Residential Zone or in a lot adjacent to a Residential Zone; Any building erected in a Residential Zone under the authority of this paragraph is designed and maintained in general harmony with the residential buildings of the type permitted in the zone; Any parking and loading regulations prescribed for these uses are complied with; Areas not used for parking or other features incidental to the development or any lot used in a Residential Zone or in a Rural Zone under the authority of this paragraph shall be landscaped in general harmony with the surrounding properties. 	Timmins to incorporate municipal requirements as a best practice, where practical, and may obtain associated permits and approvals. It is acknowledged that under the City of Timmins Zoning By-Law 2011-7100, lands at the proposed Timmins-Porcupine Station are zoned as Residential. Ontario Northland will consider provisions of the Zoning By-Law and incorporate these requirements in the station's design, where practical.
3	Municipal Bus Stop	A municipal bus stop may not be required as we transition to micro transit in this part of the city.	Acknowledged. If this is confirmed in the future, the bus stop will be removed from the project scope.
4	Section 4.5 Land Use and Socio-Economic	The address given for Whitney Volunteer Fire Hall is incorrect and placed in the wrong location on Figure 3-4 Excerpt of City of Timmins Community Map – Sensitive Facilities.	Acknowledged. Please note that this information came from the City of Timmins Community Map (https://www.cgis.com/cpal/?map=Timmins). The Whitney Volunteer Fire Hall has been removed from the list of sensitive facilities as the current location (Address: 4845 ON-101, Porcupine, ON P0N 1K0) is outside of the Study Area.
City of Timmins – Received via E-mail on February 29, 2024			
1	Station Name	The only question is why it keeps getting referred to as the Timmins-Porcupine Station and not the Timmins Station. It doesn't make sense for to resurrect a parochial name 50 years after amalgamation.	After careful consideration, Ontario Northland arrived at the decision to proceed with the name Timmins-Porcupine Station. Our decision was informed by several key factors, including recognition, wayfinding, local context, and public input. We conducted a survey during the Northlander Public Information event held in March 2024. The results were as follows: <ul style="list-style-type: none"> Timmins-Porcupine Station: 27 votes Timmins Station: 16 votes Timmins East-End Station: 5 votes Other (Porcupine Station): 30 votes While there was a preference for Porcupine Station among respondents, we ultimately concluded that incorporating "Timmins" into the name was crucial for effective wayfinding and maintaining consistency with previously published communications materials.
City of Timmins – Received August 29, 2024			
1	EPR Table 5-8, Item 1	The City of Timmins will circulate the site plan control application to the Ministry of Mines, when submitted for approval. It is suggested that ONTC preconsult with the Ministry of Mines, to determine if any studies are required. The City has previously provided the contact information to ONTC, for the Ministry of Mines.	The Ministry of Mines was included in the distribution of the Notice of Commencement on July 19, 2024 where feedback was requested. No response has been received to date. Ontario Northland will continue to consult with the Ministry of Mines as the project progresses, beyond the TRPAP.

Item No.	Issue	Comment/Issue Raised by Review Agency	How Comment was Considered by Ontario Northland
2	Appendix A: Natural Environment Existing Conditions & Impact Assessment Report – Subsection 3.1.2	Second bullet point should read Provincial Policy Statement (2020).	Acknowledged. Correction made.
3	Appendix A: Natural Environment Existing Conditions & Impact Assessment Report – Subsection 4.2.2.1, third paragraph, first sentence.	May want to include moose and bear when referring to large mammals.	Acknowledged. Reference to large mammals does not exclude moose, bears, etc. Deer is used as an example. No report edits required.
4	Appendix B: Land Use & Socio-economic Existing Conditions & impact Assessment Report – Existing Conditions	May want to use the term "Sensitive Land Uses" as per the Provincial Policy Statement (2020) instead of "sensitive facilities." Not known where the term "sensitive facilities" is from.	Socio-economic conditions were defined in the context of sensitive facilities within the vicinity of the study area and were defined as schools, hospitals, long term care facilities, community centres, and child-care facilities within 1 km of the rail corridor for the purpose of this report.
5	Appendix B: Land Use & Socio-economic Existing Conditions & impact Assessment Report – Subsection 4.2.1.1, second paragraph, last sentence.	Has the ONTC consulted with the local snowmobile club to determine any required mitigation or offset measures as it relates to the snowmobile trail route?	The Snowmobile Club has been notified about the Timmins Station project via a number of project communications (i.e., Notice of PIC #1, Draft EPR Review, Notice of Commencement & PIC #2, and follow-up e-mails). No response has been received to date. Ontario Northland will continue to consult with the Snowmobile Club as the project progresses during detailed design to identify any necessary mitigation measures.
6	Appendix B: Land Use & Socio-economic Existing Conditions & impact Assessment Report – Subsection 4.2.1.2 Sensitive Facilities	May want to use the term "Sensitive Land Uses" as per the Provincial Policy Statement (2020) instead of "sensitive facilities."	Please see response to comment #4 above.
7	Appendix B: Land Use & Socio-economic Existing Conditions & impact Assessment Report – Subsection 4.2.2.2, Third paragraph from the end of this section, last sentence.	The City of Timmins will circulate the site plan control application to the Ministry of Mines, when submitted for approval. It is suggested that ONTC preconsult with the Ministry of Mines, to determine if any studies are required. The City has previously provided the contact information to ONTC, for the Ministry of Mines.	Please see response to comment #1 above.
8	Appendix B: Land Use & Socio-economic Existing Conditions & impact Assessment Report – Subsection 4.2.2.2, Last paragraph	The following is stated in the last paragraph: Based on the conceptual design for the proposed Timmins-Porcupine Station at the time of writing this report, the station requires approximately 397 square metres of lands owned by the City of Timmins (i.e., Falcon Street). Ontario Northland will obtain encroachment permits with the City of Timmins. Easements will not be required. The City of Timmins is seeking clarification on this statement.	Ontario Northland will continue to work with the City of Timmins through the Site Plan Application process to address all identified property impacts and obtain associated/necessary approvals, as required. Appendix B and Section 2.4.3 of the EPR will be updated accordingly.
9	Appendix B: Land Use & Socio-economic Existing Conditions & impact Assessment Report –	This bullet point, at the end, states there may be work done at night. The City of Timmins has a Noise By-law, being By-law No. 2006-6339. ONTC should review this by-law to see if any exemptions, which will need to be approved via Council resolution, will need to be applied for.	Ontario Northland as a Crown Agency of the Province of Ontario is exempt from certain municipal processes and requirements, such as Municipal Noise By-laws. In these instances, Ontario will engage with the City of Timmins to incorporate municipal requirements as a best practice, where practical, and may obtain associated permits and approvals.

Item No.	Issue	Comment/Issue Raised by Review Agency	How Comment was Considered by Ontario Northland
	Section 4.3.3, third bullet point.		
10	Appendix B: Land Use & Socio-economic Existing Conditions & impact Assessment Report – Section 6.1 Site Plan Control	For municipal site plan control approval, there are a number of studies that will need to be completed. The City of Timmins Engineering Department has identified the following: Storm Water Management Plan, Lot Grading Plan, Site Servicing Plan and the need for confirmation on bus turning radii for merging onto Queen Ave. This is a preliminary list and there may be other studies required as ONTC moves through the site plan control approval process. The City will require a final copy of the Traffic Study that has been prepared as well. A future bus maintenance and storage facility may be built in the future, and an amendment to site plan control will be required, if this future development moves forward. Further studies may be required.	Acknowledged. Ontario Northland will continue to consult with the City of Timmins regarding required studies to support the Site Plan Approval process as the project progresses, beyond the TRPAP. A copy of the Traffic Study has been provided to the City for comment - please refer to comment/response #13 within this table. It is also acknowledged that if a bus maintenance and storage facility may be built in the future, and an amendment to site plan control will be required. Section 6.2.2 of the EPR will be updated to reflect this statement.
11	Appendix D: Stage 1 Archaeological Assessment Report – Table 1: Project Components	With regards to the Municipal Bus Stop, include the following footnote: Municipal Bus Stop may no longer be required by the City of Timmins. One/if confirmed, this component will be removed from the project scope.	The Stage 1 Archaeological Assessment Report is currently with the MCM for review. It is acknowledged and stated throughout the EPR that the Municipal Bus Stop may no longer be required by the City of Timmins. Once/if confirmed, this component will be removed from the project scope.
12	Appendix E: Noise & Vibration Existing Conditions & Impact Assessment Report – Section 6.3 Municipal	The report states the following: Municipal permits related to noise and vibration are not expected to be required as Ontario Northland is not required to abide by the City of Timmins's noise by-law. As such, noise exemption permits for construction activity outside the permitted hours is not required. If ONTC has an exemption from the noise by-law, please provide this to the City of Timmins. If not, ONTC will need to abide by the municipal noise by-law. Any exemptions will require approval through a Council resolution.	Ontario Northland as a Crown Agency of the Province of Ontario is exempt from certain municipal processes and requirements, such as Municipal Noise By-laws. Notwithstanding this, Ontario Northland will engage with the City of Timmins to incorporate municipal requirements as a best practice, where practical. With this in mind, Ontario Northland will continue to consult with the City of Timmins during detailed design to discuss and confirm the approach to noise control during construction. Section 6.2.2 of the EPR will be updated to reflect this. You may also refer to Table 4-10 within the EPR that contains Noise & Vibration Mitigation Measures & Commitments.
13	Appendix F: Traffic Assessment Report – Table 13: Potential Impacts, Mitigation and Monitoring Commitments	In the fourth column, bullet point eight, where it references Paramedic services, please include City of Timmins Fire Department, Timmins Police Service and Ontario Provincial Police (South Porcupine Detachment).	The TIA Report was revised as requested.
14	September 18, 2024	Please note the City has reviewed the responses to our comments. At this time, City staff do not have any comments to add.	Acknowledged, thank you for confirming.

5.2.4.6 Community/Interest Group Comments Received on Draft EPR

Table 5-9: Community/Interest Group Review Agency Draft EPR Comments and Responses

Item No.	Issue	Comment/Issue Raised by Review Agency	How Comment was Considered by Ontario Northland
Snowmobile Club			
		No comment provided.	

Table 5-12: Summary of MCM Comments and Ontario Northland Responses

Item No.	Issue	Comment/Issues Raised by MCM June 11, 2024	How the Comment was Considered by Ontario Northland August 8, 2024	Comment/Issues Raised by MCM September 4, 2024	How the Comment was Considered by Ontario Northland September 10, 2024	Comment/Issues Raised by MCM September 18, 2024	How the Comment was Considered by Ontario Northland September 19, 2024
Ministry of Citizenship and Multiculturalism							
1	Cultural Heritage	Thank you for providing the Ministry of Citizenship and Multiculturalism (MCM) with the draft EPR for the above-referenced project, which is following the Transit and Rail Project Assessment Process (TRPAP) as defined in Ontario Regulation 231/08 under the <i>Environmental Assessment Act</i> . O. Reg 231/08 identifies the MCM's interest in cultural heritage resources. Cultural heritage resources include: <ul style="list-style-type: none"> • Archaeological resources, including land and marine; • Built heritage resources, including bridges and monuments; and, • Cultural heritage landscapes. 	Acknowledged.	N/A	No response required.	N/A	N/A
2	TRPAP	Under the TRPAP, the proponent is required to consider whether its proposed transit project could have potential negative impact on the environment. Under the process an objection can be submitted to the Ministry of the Environment, Conservation and Parks (MECP) about a matter of provincial importance that relates to the natural environment or has cultural heritage value or interest. The MECP expects a transit project proponent to make reasonable efforts to avoid, prevent, mitigate or protect matters of provincial importance. The MECP's Guide to Environmental Assessment Requirements for Transit Projects (Transit Guide) provides guidance to proponents on how to meet the requirements of O. Reg 231/08. The Transit Guide encourages proponents to obtain information and input from appropriate government agency technical representatives before starting the TRPAP to assist in meeting the timelines specified in the regulation, including the submission of a draft Environmental Project Report (EPR) for review	Acknowledged. A detailed project description is contained in Section 2.0 , existing environmental conditions are contained throughout Section 3.0 , and expected environmental impacts and mitigation measures are contained throughout Section 4.0 of this EPR.	N/A	No response required.	N/A	N/A

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		<p>and comment prior to issuing a Notice of Commencement.</p> <p>Among the pre-planning activities outlined in Section 4.1 of the Transit Guide, a proponent is advised to conduct studies to:</p> <ul style="list-style-type: none"> • identify existing baseline environmental conditions; • identify project-specific location or alignment (including construction staging, land requirements); and, • identify expected environmental impacts and proposed measures to mitigate potential negative impacts. <p>This letter provides advice on how to incorporate consideration of cultural heritage in the above mentioned pre-planning activities, and also expands on section 3.4 of the Transit Guide by outlining the technical studies and level of detail required to address the cultural heritage component for transit projects that are covered by O. Reg 231/08. The outcomes and recommendations of the studies will be reported in the draft EPR and form the basis for any future commitments outlined in the EPR.</p>					
3	MCM Procedures	<p>MCM will comment on the draft EPR prior to the Notice of Commencement for the project, but to do so, we request that the Cultural Heritage Report be sent to the Heritage Planning Unit for review, and that the archaeologist submit the Stage 1 AA directly to the ministry for review. Please see our more detailed comments on these aspects of the project reporting below. These comments are consistent with the advice we provide on all TPAP projects.</p>	<p>Copies of the Draft Stage 1 Archaeological Assessment Report and the Draft Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment were provided to the MCM via e-mail on May 17, 2024.</p>	<p>While the referred reports were sent to Heritage Planning Unit on May 17, 2024, the Draft Stage 1 Archaeological Assessment Report (under Project Information Form number P094-0359-2023) was submitted to the Archaeology Program Unit at MCM on August 2, 2024. Upon the suggestion of MCM, a request for expedited review was submitted by the proponent's licensed archaeologist on August 21, 2024.</p> <p>Before issuing a decision or proceeding with any ground disturbing activities, approval</p>	<p>Ontario Northland acknowledges the comment and confirms our commitment to not undertaking any ground disturbing activities until we are in receipt of MCM's letter. The expedited review request indicated a respond by date of December 2, 2024 which does not align with the TRPAP Notice of Completion timeline (currently targeted for September 26th). With this in mind, and considering that there is no archaeological potential in the portion of the study area where the Station is to be constructed, and that MCM has confirmed that all previous comments on the</p>	<p>Please, refer to MCM email response regarding the Archaeology Assessment Review process.</p>	

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				<p>authorities and/or proponents should wait for MCM's letter confirming that the archaeological assessment report has been entered into the Ontario Public Register of Archaeological Reports (Section 65 of the Ontario Heritage Act). The letter will also indicate either that there are no further concerns for impacts to archaeological resources or articulate next steps to mitigate those concerns. MCM's letter needs to be included in the Final EPR.</p>	<p>Stage 1 AA Report have been adequately addressed, Ontario Northland proposes that we will proceed as follows:</p> <ul style="list-style-type: none"> The Final EPR that will be submitted along with the Notice of Completion will include the current version of the Stage 1 AA Report. If MCM's letter requires further revisions to the Stage 1 AA Report (and/or the EPR), once it is received, the EPR/AA report will be updated post Notice of Completion via the Errata process, in coordination with MECP and MCM. Similarly, once MCM's letter is received, it will be appended to the EPR – via an Errata. No ground disturbing activities will occur until Ontario Northland receives MCM's letter – the commitments in Section 6.6 of the EPR will be updated to reflect this. 		
4	Cultural Heritage	<p>Please note that the Standards and Guidelines for Conservation of Provincial Heritage Properties (S&G), prepared pursuant to Section 25.2 of the <i>Ontario Heritage Act</i> (OHA), came into effect on July 1, 2010. All Ontario government ministries and public bodies that are prescribed under Ontario Regulation 157/10 must comply with the S&Gs. They apply to property that is owned or controlled by the Crown in right of Ontario or by a prescribed public body.</p> <p>Ontario Northland is not currently prescribed under Ontario Regulation 157/10. If this status</p>	Acknowledged.	N/A	No response required.	N/A	No response required.

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		changes, MCM may have updated advice on this project.					
5	Project Scope	The purpose of the Timmins-Porcupine Station Project is to build a new rail station in the City of Timmins that will operate as part of the reinstated Northlander passenger rail service between Toronto (Union Station) and Timmins, with a rail connection to Cochrane. The new Timmins-Porcupine Station will include a train platform, station building, parking facilities, a pedestrian walkway, bus bays, and a municipal bus stop.	Acknowledged.	N/A	No response required.	N/A	No response required.
6	Cultural Heritage	<p>While some cultural heritage resources may have already been formally identified, others may be identified through screening and evaluation.</p> <p>Community input should be sought to identify locally recognized and potential cultural heritage resources. Sources include, but are not limited to, municipal heritage committees, historical societies and other local heritage organizations.</p> <p>Cultural heritage resources are often of critical importance to Indigenous communities. Indigenous communities may have knowledge that can contribute to the identification of cultural heritage resources, and we suggest that any engagement with Indigenous communities includes a discussion about known or potential cultural heritage resources that are of value to them.</p>	<p>Acknowledged.</p> <p>Community input was sought by ASI, information has been included in Sections 3.1 and 3.5 in the Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment. The following groups were contacted during preparation of the Cultural Heritage Report:</p> <ul style="list-style-type: none"> The Little Claybelt Homesteaders Museum (email communication 6 July 2023). A request was made for any archival images or information on the construction of the T&NO in Timmins. A response on 6 July 2023 provided archival images of the T&NO Timmins Station outside of the Study Area. Timmins Museum and Archives (7 July 2023). A request was made for any available historical maps of the Study Area. No response was received at the time of draft report preparation, therefore available maps from other 	Information was included in the Cultural Heritage Report (dated July 26, 2024). Note that there is no Section 3.5 in the Cultural Heritage Report, the content relates to Section 3.1.5. We note that the bullet list in Section 3.1.5 of the Cultural Heritage Report mirrors text from Section 3.2.3.1 of the EPR. The date of the engagement sessions needs to be updated as indicated in comment 19 and 31.	<p>Acknowledged – content relates to Section 3.1.5 of the Cultural Heritage Report.</p> <p>Dates of engagement have been revised for consistency and accuracy in Section 3.1.5 of the Cultural Heritage Report to October 19, 2021, September 13, 2021, and November 15, 2021.</p>	Acknowledged. MCM will confirm once it has reviewed the final Revised EPR.	The relevant EPR excerpts were sent to MCM on September 23 and 25, 2024. MCM provided confirmation via e-mail on October 9, 2024 that the changes made to Section 3.2.3.1 were acceptable. We note that the bullet list in Section 3.1.5 of the Cultural Heritage Report mirrors text from Section 3.2.3.1 of the EPR.

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			<p>sources were used in the report.</p> <p>Documentation of how community and Indigenous input was sought is included in Section 3.5 of the Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment.</p> <p>Also refer to Section Error! Reference source not found. of the EPR.</p> <p>Please also refer to response to comment #19 below.</p>				
7	Archaeological Resources	<p>MCM recommends that, as a best practice, a combined Stage 1-2 archaeological assessment (AA) be completed for the entire Project Study Area during the pre-planning phase.</p> <p>At a minimum, a Stage 1 AA will be undertaken for the entire Project Study Area during the pre-planning phase. The results of the Stage 1 AA will inform the TRPAP and will be summarized in the draft EPR. If the Stage 1 AA recommends further AA(s), then MCM recommends that further stages of AA be completed as early as possible during the planning or design phase of the project, and prior to the completion of detailed design.</p> <p>Archaeological assessments are required to be undertaken by an archaeologist licensed under the <i>Ontario Heritage Act</i>, who is responsible for submitting the report directly to MCM for review.</p> <p>The EPR must include specific information from the AA report(s). The Executive Summary of each AA report provides a brief summary of the work completed and the recommendations for next steps, whether for further archaeological assessment, in which case the report will include a map that identifies those areas, or for no further assessment. The EPR must also include clear commitments to undertake the</p>	<p>A Stage 1 Archaeological Assessment Report was completed as part of the Timmins-Porcupine Station TRPAP and will be included as an Appendix to the EPR. A summary of the results for this assessment is included in Section 4.6 of this EPR. The Stage 1 Archaeological Assessment Report will be submitted to the ministry for review and incorporation into the archaeological register by a licensed Archaeologist.</p>	<p>See comment 3 above. At this time, the findings of the Stage 1 AA report should be considered preliminary. Note that the EPR may need to be revised once the Stage 1 AA is entered into the Register. The Stage 1 AA report and MCM's letter indicating that the report has been entered into the Register shall be included as an Appendix.</p>	<p>Please see response to comment #3.</p>	<p>Please, refer to MCM email response regarding the Archaeology Assessment Review process.</p>	

Item No.	Issue	Comment/Issues Raised by MCM June 11, 2024	How the Comment was Considered by Ontario Northland August 8, 2024	Comment/Issues Raised by MCM September 4, 2024	How the Comment was Considered by Ontario Northland September 10, 2024	Comment/Issues Raised by MCM September 18, 2024	How the Comment was Considered by Ontario Northland September 19, 2024
		recommended AA and a timeline for their completion. MCM is aware that a Project Information Form Number (PIF#) for a Stage 1 AA has been issued for this project, and that the AA report has not yet been submitted to the ministry. MCM recommends that this report is submitted as soon as possible so that it may be reviewed, and the information incorporated into the draft EPR.					
8	Cultural Heritage	A Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment will be undertaken for the entire Project Study Area during the pre-planning phase to inform the TRPAP. This study will: <ol style="list-style-type: none"> 1. Identify existing baseline cultural heritage conditions within the Project Study Area. The consultants preparing the Cultural Heritage Report will need to define a Project Study Area and explain their rationale. MCM recommends that the Project Study Area for the report include, at minimum, the project footprint and adjacent properties. Alternatively, the Project Study Area may include the project footprint and a study zone that is located immediately beside the footprint and extends a certain distance. The report will include a historical summary of the development of the Project Study Area and will identify all known or potential built heritage resources and cultural heritage landscapes in the Project Study Area. MCM has developed screening criteria that may assist with this exercise: Criteria for Evaluating for Potential Built Heritage Resources and Cultural Heritage Landscapes. 2. Identify preliminary potential project-specific impacts on the known and potential built heritage resources and 	A Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment has been prepared for the Timmins- Porcupine Station TRPAP and will be included as an Appendix to the EPR. A summary of the results of this assessment is included in Section 4.5 of this EPR.	See comments 27 to 31 below related to the Cultural Heritage Report.	Please see responses to comments #27-31 below.	Addressed.	No response required.

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		<p>cultural heritage landscapes that have been identified. The report should include a description of the anticipated impact to each known or potential built heritage resource or cultural heritage landscape that has been identified.</p> <p>3. Propose and recommend measures to avoid or mitigate potential negative impacts to known or potential built heritage resources and cultural heritage landscapes. The proposed mitigation measures are to inform the next steps of project planning and design.</p>					
9	Cultural Heritage	Where a known or potential built heritage resource or cultural heritage landscape may be directly and adversely impacted, and where it has not yet been evaluated for Cultural Heritage Value or Interest (CHVI), completion of a Cultural Heritage Evaluation Report (CHER) is required to fully understand its CHVI and level of significance. The CHER must be completed within the TRPAP. If a built heritage resource or cultural heritage landscape is found to be of CHVI, then a Heritage Impact Assessment (HIA) will be undertaken by a qualified person. The HIA will be completed in consultation with MCM and the proponent as early as possible during detail design, following the TRPAP.	Section 4.5 of this EPR states that there no known or potential BHRs or CHLs identified in the Study Area, and therefore, a CHER and/or HIA is not recommended.	See comments 27 to 31 below related to the Cultural Heritage Report.	Please see responses to comments #27-31 below.	Addressed.	No response required.
10	Cultural Heritage	While some cultural heritage landscapes are contained within individual property boundaries, others span across multiple properties. For certain cultural heritage landscapes, it will be more appropriate for the CHER and HIA to include multiple properties, in order to reflect the extent of that cultural heritage landscape in its entirety.	Section 4.5 of this EPR states that there no known or potential BHRs or CHLs identified in the Study Area, and therefore, a CHER and/or HIA is not recommended.	See comment 28 below related to the Cultural Heritage Report.	Please see response to comment #28 below.	Addressed.	No response required.
11	MCM Procedures	More detailed advice on how to document some of the information above is attached to this letter.	Acknowledged.	N/A	No response required.	N/A	N/A
12	Cultural Heritage	Proponents that are subject to the S&Gs should refer to Information Bulletin 3 - Heritage Impact Assessments for Provincial Heritage Properties.	A qualified person has prepared the Cultural Heritage Report: Existing Conditions and Preliminary Impact	N/A	No response required.	N/A	N/A

Item No.	Issue	Comment/Issues Raised by MCM June 11, 2024	How the Comment was Considered by Ontario Northland August 8, 2024	Comment/Issues Raised by MCM September 4, 2024	How the Comment was Considered by Ontario Northland September 10, 2024	Comment/Issues Raised by MCM September 18, 2024	How the Comment was Considered by Ontario Northland September 19, 2024
		<p>Proponents that are not subject to the S&Gs may still find this document helpful.</p> <p>Technical cultural heritage studies will be undertaken by a qualified person who has expertise, recent experience, and knowledge relevant to the type of cultural heritage resources being considered and the nature of the activity being proposed.</p>	<p>Assessment contained within Appendix C.</p>				
13	Reporting Procedures	<p>The findings of the above-mentioned studies should be summarized as part of the EPR discussion of existing conditions, impact assessment, mitigation, and future commitments. Commitments for further studies should clearly state what is to be done, who is responsible for implementation, and when.</p>	<p>Section 6.0 of the EPR outlines in detail the commitments that Ontario Northland will comply with and implement as part of the Project.</p>	N/A	No response required.	N/A	N/A
14	Cultural Heritage	<p>Ideally, the Cultural Heritage Report should be shared with MCM before the draft EPR is provided, so that any feedback on the Cultural Heritage Report can be incorporated into the draft EPR. At a minimum, the Cultural Heritage Report should be shared with the draft EPR.</p>	<p>A copy of the Draft Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment was provided to the MCM via e-mail on May 17, 2024.</p>	<p>See comments 27 to 31 below related to the Cultural Heritage Report.</p>	<p>Please see responses to comments #27-31 below.</p>	<p>Addressed.</p>	<p>No response required.</p>
15	MCM Procedures	<p>MCM will comment on the draft EPR for the project, but we are not in a position to do so until we review the above-mentioned technical studies.</p> <p>Please note that the responsibility for administration of the <i>Ontario Heritage Act</i> and matters related to cultural heritage have been transferred from the Ministry of Tourism, Culture and Sport (MTCS) to the Ministry of Citizenship and Multiculturalism (MCM). Individual staff roles and contact information remain unchanged. Please continue to send any notices, reports and/or documentation to both Karla Barboza and me.</p> <p>Thank you for consulting MCM on this project and please continue to do so throughout the TRPAP process. If you have any questions, require clarification, or would like additional</p>	<p>Copies of the Draft Stage 1 Archaeological Assessment Report and the Draft Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment were provided to the MCM via e-mail on May 17, 2024.</p>	<p>See comment 3 above.</p>	<p>Please see response to comment #3 above.</p>	<p>Please, refer to MCM email response regarding the Archaeology Assessment Review process.</p>	

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		<p>examples to assist with project reporting, do not hesitate to contact me.</p> <p>Sincerely, Laura Hatcher Heritage Advisor laura.e.hatcher@ontario.ca Heritage Planning Unit</p>					
16	MCM Procedures	<p>MCM's Heritage Planning Unit will have additional comments on the Draft EPR and the Cultural Heritage Report. Our standard service offer is to provide comments within 30 days from the time a document is submitted to us for review. As I am sure you know, the Archaeological Assessment follows its own review process, once the archaeologist submits it to the MCM Archaeology Program Unit for review.</p>	Acknowledged.	N/A	No response required.	N/A	N/A
17	Draft EPR: 3.2 Methodology 3.2.3 Cultural Heritage 3.2.3.1 Data Gathering	<p>'Cultural heritage resources' include archaeological resources, built heritage resources, and cultural heritage landscapes. We recommend changing the title of 3.2.3 to 'Built Heritage Resources and Cultural Heritage Landscapes' as archaeological resources are discussed in another section.</p> <p>The bulleted list on pages 33-34 which itemizes all data sources is not necessary as this information is outlined in the Cultural Heritage Report in Appendix C. This list could be deleted or summarized further.</p> <p>On pages 34-35, where the report describes the Ministry of Citizenship and Multiculturalism's (MCM) guidance on TRPAP reporting, we recommend that this language be updated and be made more concise to say that the Cultural Heritage Report followed this guidance. Where appropriate, explain how the guidance was applied to this project (e.g., in paragraph 1, state that the CHR used a buffer a certain distance from the project footprint to define the Project Study Area). We recommend that the following text be included at the beginning of</p>	<p>The suggested edits have been reflected in the applicable sections of the updated EPR, as well as within the Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment.</p>	<p>Partially addressed.</p> <p>The description of MCM guidance on TRPAP reporting was deleted from the EPR, but it remains the same in the Cultural Heritage Report and was not updated as suggested.</p> <p>The information that there is no known or potential built heritage resources and cultural heritage landscapes is not found under Section 3.2.3 of the EPR. This information is only found in Section 3.3.3. In order to clearly inform readers about this, we recommend adding a reference to Section 3.3.3 or moving up the information to Section 3.2.3.</p> <p>The paragraph in the beginning of section 3.2.3 does not identify the heritage consultant that prepared the Cultural Heritage Report, instead Gannett Fleming is mentioned. As the Cultural Heritage Report was prepared by</p>	<p>The EPR will be edited as follows:</p> <p>Section 3.2.3 will be revised to acknowledge that there are no known or potential built heritage resources and cultural heritage landscapes; will also include reference to ASI as firm responsible for completed Cultural Heritage report.</p> <p>The Table of Contents/page numbering to be reviewed and updated as required to correct any errors.</p>	<p>Acknowledged. MCM will confirm once it has reviewed the final Revised EPR.</p>	<p>The relevant EPR excerpts were sent to MCM on September 23 and 25, 2024. MCM provided confirmation via e-mail on October 9, 2024 that the changes made to Section 3.2.3 were acceptable.</p>

Item No.	Issue	Comment/Issues Raised by MCM June 11, 2024	How the Comment was Considered by Ontario Northland August 8, 2024	Comment/Issues Raised by MCM September 4, 2024	How the Comment was Considered by Ontario Northland September 10, 2024	Comment/Issues Raised by MCM September 18, 2024	How the Comment was Considered by Ontario Northland September 19, 2024
		<p>section 3.2.3, to summarize the outcome of the Cultural Heritage Report:</p> <p>A Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment was undertaken on [date] by [heritage consultant] for [name of project or Project Study Area]. The assessment for this report consisted of data collection, background historic research, review of secondary source material and field review. No known or potential built heritage resources and cultural heritage landscapes were identified within or adjacent to the Project Study Area. The Cultural Heritage Report is included in Appendix C.</p> <p>Please also note that the Cultural Heritage Report should be considered preliminary until the Indigenous communities, municipal planning staff and other interested parties have had an opportunity to review and provide comments.</p>		<p>ASI, we recommend to also include their name in the paragraph.</p> <p>We note that MTO comment 47 and 49 suggest adding a reference to the Criteria for Evaluating Potential Built Heritage Resources and Cultural Heritage Landscapes. MCM does not recommend that this reference is included in the EPR as it has been included in the Cultural Heritage Report. The EPR will include an overview of the purpose of the Cultural Heritage Report as recommended in our comments dated June 11, 2024, and not extensive and detailed information about the methodology.</p> <p>Also, there is a problem in the Table of Contents pages numbers, page 35 is repeated. Section 3.2.5 is on page 35 (PDF page 74) and Section 3.3.3 is also on page 35 (PDF page 91).</p>			
18	Draft EPR: 3.2 Methodology 3.2.3 Cultural Heritage 3.2.3.2 Field Investigations	We recommend deleting the paragraph that starts with "Background historical research..." as it contains unnecessary detail and some language that is not consistent with the Cultural Heritage Report. It may be more appropriate to refer the reader to the Cultural Heritage Report (see recommended language above).	This paragraph was deleted in the EPR, as well as the Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment.	Addressed.	No response required.	N/A	N/A
19	Draft EPR: 3.2 Methodology 3.2.3 Cultural Heritage	The report states: "There has been no correspondence from First Nations and Provincial Territorial Organizations about known or potential BHRs and CHLs at the time of preparing this report." Please clarify whether the project team asked First Nations and Provincial Territorial Organizations about this	<p>The term "Provincial Territorial Organizations" was included in error in the Draft EPR and therefore removed.</p> <p>Information sessions were held with three of the Indigenous communities and/or organizations</p>	<p>Partially addressed.</p> <p>Ontario Northland comment dated August 8, 2024, state that information sessions with Indigenous communities who demonstrated interest in the project were held in 2021.</p>	EPR will be edited as follows: Section 3.2.3.1 – dates of information sessions will be updated (see response to comment 6 above.	Acknowledged. MCM will confirm once it has reviewed the final Revised EPR.	The relevant EPR excerpts were sent to MCM on September 23 and 25, 2024. MCM provided confirmation via e-mail on October 9, 2024 that the changes made to Section 3.2.3.1 were acceptable.

Item No.	Issue	Comment/Issues Raised by MCM June 11, 2024	How the Comment was Considered by Ontario Northland August 8, 2024	Comment/Issues Raised by MCM September 4, 2024	How the Comment was Considered by Ontario Northland September 10, 2024	Comment/Issues Raised by MCM September 18, 2024	How the Comment was Considered by Ontario Northland September 19, 2024
	3.2.3.4 Consultation with Regulatory Authorities	<p>component of the environment. Please clarify what is meant by "Provincial Territorial Organizations" in this context and include a list of organizations that were contacted.</p> <p>Additionally, the title of this subsection "Consultation with Regulatory Authorities" does not capture the above-mentioned communities and the nature of their potential comments, which may fall outside of a strictly regulatory role. The activities described in this section do not appear to be "consultation", but rather "information gathering". We suggest revising the sub-title accordingly – e.g., to "Information Gathering and Engagement with Municipal and Provincial Authorities, First Nations, and Provincial Territorial Organizations" (or similar wording).</p>	<p>who expressed interest in this project. As part of those sessions, no additional information was provided specifically about known BHRs/CHLs in the Study Area that may be of known or potential cultural heritage value or interest. The information sessions were held with the Moose Cree First Nation on October 19, 2021, with Nipissing First Nation on September 13, 2021, and with the Ontario Federation of Indigenous Friendship Centres on November 15, 2021.</p> <p>Section title for Error! Reference source not found. has been updated.</p>	<p>However, the bullet text in Section 3.2.3.1 state the same sessions were in 2023. Please revise and update accordingly. This information should also align with the Cultural Heritage Report (see comment 31 below).</p> <p>Section title for 3.2.3.1 remains the same and was not updated as stated. Please revise. We note that the equivalent title of the Cultural Heritage Report was updated to "Information Gathering and Engagement with Municipal and Provincial Authorities, First Nations, and Provincial Territorial Organizations".</p>	<p>Section title for 3.2.3.1 will be updated to "Information Gathering and Engagement with Municipal and Provincial Authorities, First Nations, and Provincial Territorial Organizations."</p>		
20	Draft EPR: 3.2 Methodology 3.2.4 Archaeology	<p>We note that the licensed archaeologist has yet to submit the Stage 1 Archaeological Assessment Report for this project (under Project Information Form (PIF) P094-0359-2023) for MCM review. We understand that the proponents hope to begin the TRPAP study period soon.</p> <p>This being the case, we strongly recommend that the report be submitted to MCM as soon as possible to allow for the Ministry's review and for any revisions to be made. We also recommend that the archaeologist submit to MCM a request for expedited archaeological report review.</p> <p>Please note that archaeological concerns have not been fully addressed until reports have been entered into the Ontario Public Register of Archaeological Reports ('the Register') where those reports recommend that:</p> <ol style="list-style-type: none"> the archaeological assessment of the project area is complete and all archaeological sites identified by the assessment are either of no further cultural heritage value or interest (as 	<p>The Draft Stage 1 Archaeological Assessment Report was provided to MCM for review on May 17, 2024. The finalized Stage 1 Archaeological Assessment Report will be submitted into the MCM register once it is ready and comments received during the Draft EPR review have been addressed.</p>	<p>Refer to comment 3 and 7 above.</p>	<p>Please see response to comment #3 above.</p>	<p>Please, refer to MCM email response regarding the Archaeology Assessment Review process.</p>	

Item No.	Issue	Comment/Issues Raised by MCM June 11, 2024	How the Comment was Considered by Ontario Northland August 8, 2024	Comment/Issues Raised by MCM September 4, 2024	How the Comment was Considered by Ontario Northland September 10, 2024	Comment/Issues Raised by MCM September 18, 2024	How the Comment was Considered by Ontario Northland September 19, 2024
		<p>per Section 48(3) of the <i>Ontario Heritage Act</i>) or that mitigation of impacts has been accomplished through excavation or an avoidance and protection strategy.</p> <p>Approval authorities and proponents should wait to receive the MCM's written confirmation that the archaeological assessment report(s) has been entered into the Register before issuing a decision or proceeding with any ground disturbing activities. The letter will also indicate that there are no further concerns for impacts to archaeological resources or articulate next steps to mitigate those concerns.</p> <p>The MCM's letter shall be included in the EPR.</p>					
21	Draft EPR: 3.2 Methodology 3.2.4 Archaeology 3.2.4.2 Field Investigations	The information about terms and conditions for archaeological licenses and PIFs is not necessary and should be removed.	This was removed from the EPR.	Addressed.	No response required.	N/A	N/A
22	EPR: 3.3 Existing Conditions 3.3.3 Built Heritage Resources and Cultural Heritage Landscapes of the Revised EPR	N/A	N/A	<p>Comment 18 from Ministry of the Environment, Conservation and Parks suggests providing MCM comments to support the following conclusion: "The Project Study Area does not feature any structure or areas believed to have CHVI.". The former sentence was deleted, as also suggested in MTO comment 50, leaving under this section a single sentence that no known or potential built heritage resources (BHRs) or cultural heritage landscapes (CHLs) were identified in the Study Area.</p> <p><i>We recommend adding a reference to the Cultural Heritage</i></p>	The EPR will be updated accordingly with the suggested reference to direct the reader to Appendix C .	Acknowledged. MCM will confirm once it has reviewed the final Revised EPR.	

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				<i>Report in Appendix C to support this section.</i>			
23	Draft EPR: 3.3 Existing Conditions 3.3.4 Archaeology	<p>The information on Borden numbers is not necessary and should be removed. Removing this information will allow this section focus on the Project Study Area's archaeological potential.</p> <p>We recommend deleting all the text in this section and replacing it with the following:</p> <p>A Stage 1 archaeological assessment was undertaken on [date] by [consultant archaeologist] for [property or Project Study Area]. A Stage 1 AA consists of a review of geographic, land use and historical information for the property and the relevant surrounding area, a property visit to inspect its current condition and contacting MCM to find out whether, or not, there are any known archaeological sites on or near the property. Its purpose is to identify areas of archaeological potential and further archaeological assessment (e.g., Stage 2-4) as necessary. The Stage 1 AA is included in Appendix X.</p> <p>[Then include the outcomes and recommendations of the report, which can usually be extracted from the AA's Executive Summary]</p> <p>As stated in comment 4 above, the Stage 1 AA has not been submitted to MCM for review. The findings of the Stage 1AA are subject to review and the report may require revision. The information in this EPR should be considered preliminary.</p> <p>The mapping in the draft Stage 1 AA shared with MCM shows that a portion of the Project Study Area (station footprint plus a buffer area) has archaeological potential.</p> <p>However, the text in this EPR section states the following:</p> <p>The property inspection confirmed that the proposed Timmins-Porcupine Station Project</p>	<p>The Borden numbers have been removed as suggested.</p> <p>The Stage 1 Archaeological Assessment Report has been updated to reflect the revised text suggested by MCM.</p> <p>The parts of the Study Area proposed for construction and operations/maintenance activities, including the land that may be required for future construction of a Bus Storage and Maintenance Facility, do not retain archaeological potential on account of deep and extensive land disturbance or permanently saturated conditions. These lands therefore do not require further archaeological assessment.</p> <p>If the project design changes during detail design (post TRPAP) and encroachment on the lands identified to retain archaeological potential is expected, Ontario Northland will complete a Stage 2 Archaeological Assessment survey prior to any disturbance or construction activities.</p> <p>Section 4.6 of the EPR (as well as the Stage 1 Archaeological Assessment Report) has been updated accordingly to reflect this language.</p> <p>The Stage 1 Archaeological Assessment Report will be submitted into the register as soon as it is finalized.</p>	<p>Partially addressed.</p> <p>The paragraph that mentioned Borden number was deleted, but the rest of the text remains the same.</p> <p>No direct reference to Stage 1 Archaeological Assessment was included as suggested. Stage 1 AA was submitted on August 2, 2024. After MCM review, the EPR should require revision. The current information in the EPR should be considered preliminary. See comment 7.</p> <p>A clear statement that a portion of the Study Area has archaeological potential and supporting maps were not included in Section 3.3.4, as recommended. A statement and a map were included later, under Section 4.6.1. Also, MTO comments 27, 29 and 30 point out the necessity of clarity in the Study Area regarding the archaeology potential.</p> <p>We recommend moving up the statement and map from Section 4.6.1 to Section 3.3.4 to clarify any questions and misinterpretation about archaeological potential earlier in the EPR or add reference to inform the reader that more information and a map can be found in Section 4.6.1.</p> <p>Please revise the EPR accordingly.</p>	<p>EPR will be updated accordingly to reflect the following suggestion: "We recommend moving up the statement and map from Section 4.6.1 to Section 3.3.4 to clarify any questions and misinterpretation about archaeological potential earlier in the EPR or add reference to inform the reader that more information and a map can be found in Section 4.6.1."</p>	<p>Acknowledged. MCM will confirm once it has reviewed the final Revised EPR.</p> <p>Please refer to MCM email response regarding the Archaeology Assessment Review process.</p>	<p>The questions and misinterpretations about archaeological potential have been clarified through the inclusion of Figure 4-1 within Section 4.6.1 that clearly shows the project area and archaeological potential. This revised map was also included in the Stage 1 AA Report which was entered by MCM into the public register on December 11, 2024. No further updates to this section of the EPR are deemed required.</p>

Item No.	Issue	Comment/Issues Raised by MCM June 11, 2024	How the Comment was Considered by Ontario Northland August 8, 2024	Comment/Issues Raised by MCM September 4, 2024	How the Comment was Considered by Ontario Northland September 10, 2024	Comment/Issues Raised by MCM September 18, 2024	How the Comment was Considered by Ontario Northland September 19, 2024
		<p>Study Area exhibits evidence of disturbance in the existing facilities on site, the surrounding twentieth-century development, and evidence of artificial drainage. Undeveloped lands within the project components exhibit low archaeological potential due to poor drainage.</p> <p>Forested land east of the railway north of Highway 101/King Street retain archaeological potential and will require Stage 2 test pit survey if impacted by the project designs.</p> <p>The discussion in this section of the EPR is not clear, and it creates a misapprehension that the Project Study Area does not have any archaeological potential. The report should clearly state that a portion of the Project Study Area has archaeological potential and should include maps showing this. More information is required to support the EPR's recommendations that Stage 2 AA is not required unless this area will be disturbed.</p>					
24	Draft EPR: 4.7 Archaeology	Please see the comment above and revise this section accordingly.	The report has been updated accordingly – please refer to responses above.	Addressed. Section 4.7 (now 4.6) was updated. See comment 23 above.	No response required.	N/A	N/A
25	Draft EPR: 4.13 Summary of Mitigation and Monitoring Commitments Table 4-6: Archaeology Impacts, Mitigation, and Monitoring Commitments	<p>It is not clear how the proponent has arrived at a conclusion that there is no potential for the disturbance of archaeological resources.</p> <p>In the Mitigation Measures/Commitments column:</p> <p>Under the first bullet, please see comment 6 above and ensure that it aligns with revised text.</p> <p>Under the third bullet, we recommend deleting this text and replacing it with the following standard text developed by MCM:</p> <p>Should previously undocumented archaeological resources be discovered, they may be a new archaeological site and therefore subject to Section 48(1) of the <i>Ontario Heritage Act</i>. The proponent or person discovering the archaeological resources must cease alteration</p>	<p>First bullet: report updated as per comments.</p> <p>Third bullet: agree with suggested text for replacement, report updated.</p> <p>Fifth bullet: agree with suggested text for replacement, report updated.</p> <p>Bullets 6 and 7 have been removed.</p>	Addressed.	No response required.	N/A	N/A

Item No.	Issue	Comment/Issues Raised by MCM June 11, 2024	How the Comment was Considered by Ontario Northland August 8, 2024	Comment/Issues Raised by MCM September 4, 2024	How the Comment was Considered by Ontario Northland September 10, 2024	Comment/Issues Raised by MCM September 18, 2024	How the Comment was Considered by Ontario Northland September 19, 2024
		<p>of the site immediately and engage a licensed consultant archaeologist to carry out an archaeological assessment, in compliance with Section 48(1) of the <i>Ontario Heritage Act</i>.</p> <p>Under the fifth bullet, please remove the reference to the Bereavement Authority of Ontario (BAO). The BAO does not become involved in an investigation unless it is establishing the boundary of a cemetery, or investigating remains discovered within or adjacent to a cemetery. Additionally, the Ministry of Government and Consumer Services is now the Ministry of Public and Business Service Delivery. Please update the text to reflect this.</p> <p>We recommend the following standard text for the fifth bullet:</p> <p>The <i>Funeral, Burial and Cremation Services Act</i>, 2002, S.O. 2002, c.33 requires that any person discovering human remains must cease all activities immediately and notify the police or coroner. If the coroner does not suspect foul play in the disposition of the remains, in accordance with Ontario Regulation 30/11 the coroner shall notify the Registrar, Ontario Ministry of Public and Business Service Delivery, which administers provisions of that Act related to burial sites. In situations where human remains are associated with archaeological resources, the Ministry of Citizenship and Multiculturalism should also be notified (at archaeology@ontario.ca) to ensure that the archaeological site is not subject to unlicensed alterations which would be a contravention of the <i>Ontario Heritage Act</i>.</p> <p>The purpose of the 6th bullet is not clear. It states that future archaeological assessments would be shared with ONTC, but it is not clear who would be commissioning the archaeological assessment, if not Ontario Northland.</p> <p>In bullet 7, it is not clear how an Archaeological Risk Management Plan will be of assistance to</p>					

Item No.	Issue	Comment/Issues Raised by MCM June 11, 2024	How the Comment was Considered by Ontario Northland August 8, 2024	Comment/Issues Raised by MCM September 4, 2024	How the Comment was Considered by Ontario Northland September 10, 2024	Comment/Issues Raised by MCM September 18, 2024	How the Comment was Considered by Ontario Northland September 19, 2024
		this project, as it has a relatively small Project Study Area, and the archaeological assessment already outlines the protocols for the discovery of human remains and undocumented archaeological resources.					
26	Section 6.2.1.7 Ministry of Citizenship and Multiculturalism	N/A	N/A	<p>MTO comment 32 and 51 suggested changes in Section 6.2.1.9 Ministry of Citizenship and Multiculturalism (now 6.2.1.7, page 84) regarding MCM responsibilities.</p> <p>We recommend that the text be revised as follows (see also MCM's initial letter dated June 11):</p> <p><i>MCM has an interest in undertakings such as this under its, mandate to develop policies and programs for the conservation of Ontario's cultural heritage. MCM is responsible for the administration of the Ontario Heritage Act (OHA) including its regulations. The OHA provides the primary statutory framework for the conservation of cultural heritage resources in Ontario. Including their identification, protection and wise management. The conservation of cultural heritage resources is also a matter of provincial importance as reflected in Ontario Regulation 231/08.</i></p> <p>As a member of the Government Review Team, MCM reviews various applications and associated technical studies to ensure compliance with the <i>Ontario Heritage Act</i> and fulfilment of due diligence</p>	<p>The applicable section of the EPR will be updated to reflect the following text as suggested by MCM: "We recommend moving up the statement and map from Section 4.6.1 to Section 3.3.4 to clarify any questions and misinterpretation about archaeological potential earlier in the EPR or add reference to inform the reader that more information and a map can be found in Section 4.6.1."</p>	<p>ONTC's response doesn't address MCM comment dated September 4, 2024.</p>	<p>The following text has been added to Section 6.2.1.7 of the EPR:</p> <p><i>MCM has an interest in undertakings such as this under its, mandate to develop policies and programs for the conservation of Ontario's cultural heritage. MCM is responsible for the administration of the Ontario Heritage Act (OHA) including its regulations. The OHA provides the primary statutory framework for the conservation of cultural heritage resources in Ontario. Including their identification, protection and wise management. The conservation of cultural heritage resources is also a matter of provincial importance as reflected in Ontario Regulation 231/08.</i></p>

Item No.	Issue	Comment/Issues Raised by MCM June 11, 2024	How the Comment was Considered by Ontario Northland August 8, 2024	Comment/Issues Raised by MCM September 4, 2024	How the Comment was Considered by Ontario Northland September 10, 2024	Comment/Issues Raised by MCM September 18, 2024	How the Comment was Considered by Ontario Northland September 19, 2024
				<p>related to cultural heritage more generally.</p> <p>Also, there is a typo in last sentence, the accurate section number is 6.6.3 Further Archaeological Assessment Studies, not Section 6.6.4 (that do not exist in the EPR) and should be revised.</p>			
27	Table of contents and Figures	N/A	N/A	Page numbers are missing in the Table of Contents (Sections 8.1 to 8.3) and in the Figures list.	Table of Contents formatting has been corrected.	Addressed.	No response required.
28	Draft Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment 2.3 Report Purpose	The report should explain the rationale for the Project Study Area (project footprint plus a 50m buffer) from a cultural heritage perspective, i.e., explain why a 50m buffer was selected.	Report revised to include information on why 50m buffer was applied.	<p>Not addressed.</p> <p>The following sentence was added: "The selected buffer area is inclusive of lands that may contain BHRs and CHLs that may be subject to direct or indirect impacts as a result of the Project.". While it justifies the purpose of the buffer area, it is not clear why 50m was chosen rather than 25m or 100m. A similar concern was also highlighted in MTO comment 48 and 71.</p> <p>While 50m may be considered sufficient for potential noise and vibration impacts, it does not account for all potential impacts to built heritage resources/cultural heritage landscapes. Additional impacts to BHR/CHLs may include but are not limited to the following: shadows that alter the appearance or change the visibility of a heritage attribute, isolation of a heritage attribute from its surrounding environment, context or a significant relationship and/or</p>	<p>Additional information has been added to Section 2.3 to provide appropriate analysis and rationale regarding determination of study area boundaries used to define scope of data collection and impact assessment activities (50 m buffer).</p> <p>Added text demonstrates that the study area is appropriately sized in relation to the site's characteristics, supporting appropriate assessment of all types of impacts to known or potential built heritage resources and cultural heritage landscapes.</p>	Addressed.	No response required.

Item No.	Issue	Comment/Issues Raised by MCM June 11, 2024	How the Comment was Considered by Ontario Northland August 8, 2024	Comment/Issues Raised by MCM September 4, 2024	How the Comment was Considered by Ontario Northland September 10, 2024	Comment/Issues Raised by MCM September 18, 2024	How the Comment was Considered by Ontario Northland September 19, 2024
				changing the character of a potential BHR/CHL through the obstruction of significant views or vistas to or from a property. An appropriate Study Area shall be defined by the analysis of site characteristics including potential staging area and should not focus on a single element, the proposed project footprint.			
29	Section 2.4 Report Purpose of the Revised Cultural Heritage Report	N/A	N/A	There is a typo in the second paragraph of Section 2.4, page 6. The first word of the second phrase is missing a letter: "The selected buffer area is...".	Typo revised in Cultural Heritage Report.	Addressed.	No response required.
30	Draft Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment 3.0 Methodology 3.3 Identification of Built Heritage Resources and Cultural Heritage Landscapes	We recommend editing the introductory paragraph as follows, to acknowledge that the MHSTCI 2019 TPAP guidance is one of the main documents guiding this report. This Cultural Heritage Report follows the above-mentioned TPAP guidance prepared by the then MHSTCI (now MCM) in 2019, as well as guidance presented in the Ontario Heritage Tool Kit (Ministry of Culture 2006) and Criteria for Evaluating Potential for Built Heritage Resources and Cultural Heritage Landscapes (Ministry of Tourism, Culture and Sport 2016). The objective of this report is to present an inventory of known and potential BHRs and CHLs, and to provide a preliminary understanding of known and potential BHRs and CHLs located within areas anticipated to be directly or indirectly impacted by the proposed project.	Text revised as suggested.	Addressed.	No response required.	N/A	N/A
31	Draft Cultural Heritage Report: Existing Conditions and Preliminary	See comment 2 on the Draft EPR, which applies to this section as well. We suggest changing the title of this section to be consistent with the change to the EPR. The first bullet in this section states that the City of Timmins was contacted for information in	Comment 2 in EPR addressed in Cultural Heritage Report, as suggested. Title of Section 3.5 in Cultural Heritage Report revised.	Partially addressed. See comment 19 above. Please confirm the date in which information sessions with Indigenous communities who demonstrated interest in the	As per response to comment #6 above, dates of engagement have been revised for consistency and accuracy in the Cultural Heritage Report.	Addressed.	No response required.

Item No.	Issue	Comment/Issues Raised by MCM June 11, 2024	How the Comment was Considered by Ontario Northland August 8, 2024	Comment/Issues Raised by MCM September 4, 2024	How the Comment was Considered by Ontario Northland September 10, 2024	Comment/Issues Raised by MCM September 18, 2024	How the Comment was Considered by Ontario Northland September 19, 2024
	Impact Assessment 3.0 Methodology 3.5 Consultation with Regulatory Authorities	<p>2023 but the team received no response. We recommend follow-up with the City.</p> <p>The last bullet in this section says: At project start-up, ASI made a request to the proponent that any engagement with Indigenous communities undertaken as part of this project include a discussion about known or potential BHRs and CHLs that are of interest to the respective communities. No feedback was received by the time of report submission.</p> <p>It is unclear if the requested discussions regarding cultural heritage took place. Please clarify.</p>	<p>Response from City of Timmins on 18 July 2023 added, no follow up required.</p> <p>Final bullet regarding ASI's request for information on Indigenous Engagement was removed as it repeats information contained in the bullet point immediately before. Information on which groups were contacted added into preceding paragraph noting information from Summary Report on Indigenous Engagement completed by Ontario Northland.</p>	<p>project were held. ONTC's comment 19 states a different year (2021) from the Cultural Heritage Report and Revised EPR (2023).</p>			
Item No.	Issue	MCM Comments from January 10, 2025	Ontario Northland Response on January 15, 2025				
32	Archaeology	Please edit the last paragraph in 4.6.1 as follows: "The Stage 1 AA report was entered by MCM into the Ontario Public Register of..."	Text revised as suggested.				
33	Archaeology	The text in section 4.6.1 is silent on whether the Stage 1 AA will be included in Appendix D as it only mentions the MCM letter. Based on our reading of the previous draft EPR, which included the archaeological assessment in the appendices, we assume the archaeological assessments will be provided. But if not, please include the PIF Number for this report within the EPR text.	We confirm that the Stage 1 AA Report as well as the Stage 2 AA Report will be included in Appendix D to the EPR. Text in this section has been updated accordingly.				
34	Archaeology	The comments above apply to section 4.6.2.	Text revised as suggested.				
35	Archaeology	Please make a minor edit to a ministry name in section 6.6.2: Ontario Ministry of Public and Business Service Delivery and Procurement .	Text revised as suggested.				

Table 5-13: Summary of MECP Comments and Ontario Northland Responses

Item No.	Issue	Comment/Issue Raised by Review Agency	How Comment was Considered by Ontario Northland
Ministry of Environment, Conservation and Parks			
1	Appendix H: Hydrogeology Technical Memo, General	The above-captioned documents satisfactorily describe existing soil and groundwater conditions at the subject site.	Comment acknowledged, no report updates required.
2	Appendix H: Hydrogeology Technical Memo, General	The historical ground surface in the study area might have originally been naturally saturated or flooded, necessitating the importation of the present fill materials.	Comment acknowledged, no report updates required.
3	Appendix H: Hydrogeology Technical Memo, General	Groundwater flow might be from north to south through the fill and upper silt and clay layer. The estimated flow velocity is about one metre per year with a downward component toward a more conductive underlying sand layer approximately 10 meters or more below ground surface.	Comment acknowledged, no report updates required.
4	Appendix H: Hydrogeology Technical Memo, General	The provided data show shallow soil and groundwater impacts by sodium and chloride consistent with the long-term application of road de-icing salt within an urban area. This might have implications for the re-use of excess soils in an agricultural application.	Comment acknowledged, no report updates required.
5	Appendix H: Hydrogeology Technical Memo, General	The sample results do not indicate any significant or widespread contamination by metals, Polycyclic Aromatic Hydrocarbons (PAH), Petroleum Hydrocarbons (PHC's) or Volatile Organic Compounds (VOC's) at the site.	Comment acknowledged, no report updates required.
6	Appendix H: Hydrogeology Technical Memo, General	There do not appear to be any overt geological or hydrogeological factors reported that would prohibit consideration of future Permit to Take Water (PTTW), Environmental Activity and Sector Registry (EASR) or Environmental Compliance Approval (ECA) applications for this location.	Comment acknowledged, no report updates required.
Ministry of Environment, Conservation and Parks - Sign-off Acknowledgements			
1	July 22, 2024	This email confirms that the ministry's Conservation and Source Protection Branch is satisfied with the responses and issues have been addressed.	Acknowledged, thank you for confirming.
2	August 30, 2024	The ministry's Adaptation and Resiliency Branch has no further comments.	Acknowledged, thank you for confirming.
3	August 30, 2024	The ministry's Senior Noise Engineer has not further comments.	Acknowledged, thank you for confirming.
4	September 19, 2024	I don't believe I responded to your email below regarding responses to ministry comments from the Environmental Assessment Branch, as well as comments from our surface water reviewer. We have reviewed the responses and have no further comments.	Acknowledged, thank you for confirming.

Table 5-14: Summary of MTO Comments and Ontario Northland Responses

Item No.	Issue	Comment/Issue Raised by Review Agency	How Comment was Considered by Ontario Northland
Ministry of Transportation			
1	Appendix F: Traffic Assessment Report, Section 4.1	Unfinished sentence "Figure 2 (above) graphically illustrates the Stud	Updated.
2	Appendix F: Traffic Assessment Report, Section 4.4.3	Incorrect reference of "Table 6 and Figure 7.	Updated.

Item No.	Issue	Comment/Issue Raised by Review Agency	How Comment was Considered by Ontario Northland
3	Appendix F: Traffic Assessment Report, Section 4.5.2	Distribution of development traffic. The 20% and 10% entering/exiting trip allocations for Gervais Street & Falcon Street, respectively, appears to be quite high given the surrounding road network characteristics. It is unlikely that 30% of the entering/exiting development trips would be from Gervais Street & Falcon Street. Rather, a smaller 5% allocation to each street for a total of 10% may be a more appropriate figure, with the remaining 90% to/from King Street (Hwy. 101).	Assumed distribution of development traffic was kept higher to create worst case scenario by higher conflicting traffic from side street. Hence, it was assumed to be 10-20% from side street. No updates required in the report.
4	Appendix F: Traffic Assessment Report, Section 4.5.3	King Street (Hwy. 101) AADT of 5,900 vpd used to derive hourly traffic volumes in analysis. However, roadway classification section 3.3 (Page 8) states that 2023 King Street (Hwy.101) AADT is 7020 vpd.	Updated calculation to match with 7020 vpd AADT. Original 5,900 vpd was based on 2019 ATR traffic counts on Highway 101 near Hallnor Road location.
5	Appendix F: Traffic Assessment Report, Section 4.5.3	The results of the UIBC Schedule scenario traffic analysis should still be presented in the report, even if the "traffic performance at all study area roads is expected to operate with excellent level of service.	In line with industry best practices for completing Traffic Impact Assessments, the worst-case scenario, aligning with the peak hours of the adjoining street, was assessed. The results indicate a Level of Service (LOS) A for all three intersections. Since the UIBC schedule includes train operations during midnight and early morning hours, when traffic volumes on adjoining streets are minimal, these periods were not modeled, as the results are expected to remain at LOS A. Section 4.5.3 of the report has been updated to add clarification on this point.
6	Appendix F: Traffic Assessment Report, Section 4.5.3	The v/c ratios are not shown in any of the analysis results tables.	Since VISSIM model was used in this project, VC ratio cannot be obtained from VISSIM model. However, Synchro model was developed covering both the study intersection in all 3 scenarios to address this comment. VC Ratio details are added in report sections for existing and horizon year conditions. See sections 4.4.3 and 4.5.4.
7	Appendix F: Traffic Assessment Report, General	The report does not review the warrants for LT lanes and/or RT lane/tapers on King Street (Hwy.101). An EB Left Turn lane on King Street (Hwy. 101) may be warranted according to Exhibit-9A-31 of the "MTO DESIGN SUPPLEMENT FOR TAC GEOMETRIC DESIGN GUIDE (GDG) FOR CANADIAN ROADS – 2017" October 2023 Edition.	<p>The warrant analysis was conducted in response to MTO comments, which identifies the need for a 15m eastbound left turn lane under existing conditions. A warrant check was also performed for future conditions, and it can be concluded that AM peak only involves 8 vph (out of total 42 vph) related to station taking eastbound left turn at King St. / Gervais St. Whereas PM peak is not expected to attract any station related traffic taking eastbound left turn at King St. / Gervais St. Therefore, the station traffic is not considered to be the trigger for the currently needed eastbound left turn lane.</p> <p>With this in mind, the report has been updated to include the left turn storage lane warrant analysis. Refer to Sections 4.4.3, 4.5.4, and 7 for details.</p> <p>It is important to note that warrants were not reviewed in the initial TIA, as the 95th percentile queue lengths for the eastbound left turn were recorded as zero meters in all scenarios.</p>