

JSR
Holdings Inc.

P.O. Box 312
Baie Verte, NL, A0K 1B0

Department of Environment, Climate Change and Municipalities
West Block, Confederation Building
P.O. Box 8700
St. John's, NL A1B 4J6
Email: ECCMInfo@gov.nl.ca

April 17, 2021

Honourable Minister Davis:

RE: Request to Amend Conditions of Minister's Release Decision for Environmental Assessment (EA Registration #2013, Indian River Park

In 2018, JSR Holdings Inc. purchased the property formerly known as the Newfoundland and Labrador Provincial Park -Indian River Park, from a private developer. Since its acquisition, the owners have implemented a planned 2-Phase development process which has resulted in the construction of new services and infrastructure as well as upgrades to the pre-existing park infrastructure. Phase 1 development has been completed and included the construction of a new main office and convenience store, a new sewer treatment plant and installation system, picnic gazebo, water and electivity to 108 campsites, comfort stations, and a 30 x 50-foot bouncy play areas for children. To date, the park has been completely reliant on private investment with an approximate value of ~\$1.7 million dollars invested into the park's upgrades to date. The second phase will see an additional \$1 million dollars in investment to the park.

Phase 2 development commenced during April 2021 and is scheduled to be completed over the next year. Under this phase, the plan is to develop an additional 80-90 fully serviced campsites including the the associated road and sewer infrastructure. Attached to this document, is an aerial photo of the park outlining the proposed expansion zone.

Under the conditions listed as part of the Minister's Release for the original Environmental Assessment Registration (#2013), the following was included:

- *For all proposed new development, a minimum 50-metre naturally vegetated buffer, which includes trees, is to be maintained along Indian River, which is a scheduled salmon river.*

We are hereby requesting an amendment to this condition, such that the minimum buffer on the river be reduced from 50-metres to 10-metres. We are requesting the 10-metre buffer based on a number of factors such as:

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- Extensive consultation on the proposed development with staff from the Department of Fisheries and Land Resources. The development is considered a one-time minimal impact development with little to no additional impact on the other associated vegetation and minimal to no impact to the river/riverbed.
- The original buffer established by the Government of Newfoundland and Labrador, when this site operated as a provincial park, was set to 10-metres. We are requesting the new development be given the same consideration as the original Provincial Park buffer.
- Due to the physical constraints of the expanded zone (salmon river, Trans Canada Highway and private development) the reduced buffer is critical for a sustainable business model for the park. Without access to the additional area the proposed expansion will not reach the planned scale/number of sites.

As part of our commitment to having a minimal footprint we are committed to ensuring all sites will retain greenery around and between each site, and that no soil will be removed or disturbed. Development is a one-time, minimal impact activity. Sites will also have new greenery (shrubs, flowers) planted at each site.

We are proud to say that our park is focused on nature and we promote and encourage natural vegetation. We are committed to planting trees, grass, and flowers and will take all measures to ensure that there is no erosion or silt along the riverbanks or running into the rivers. As a significant number of our clients are salmon anglers, we are committed to protecting and promoting a healthy river in our Park.

We kindly ask you to consider our request to amend the buffer from 50-metres to 10-metres so we can continue the development of this nature-focused, family-oriented RV park.

Full details for our park are outlined in the project files: <https://www.gov.nl.ca/eccm/projects/project-2013/>.

Regards,

Brad Watkins

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cc. Joy Barker

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