

JUN 23 2017

Registration 1752

Mr. Trevor Linehan
Colinet-Rocky River Zip Line and Adventure Park
P.O. Box 102
Colinet NL A0B 1M0

**Re: Colinet-Rocky River Zip Line and Adventure Park -
Environmental Preview Report (EPR) Review**

Dear Mr. Linehan:

The Environmental Preview Report (EPR) submitted on February 10, 2017 has been reviewed and an opportunity to comment has been provided to the Environmental Assessment Committee (EAC) and to the public as required by the *Environmental Protection Act*, SNL 2002, cE-14.2. Upon consideration of the comments received, please be advised that the EPR is deficient and you must submit another EPR with revisions that address the comments made by the EAC.

The revised EPR will consider and address the following deficiencies, including, but not limited to:

- A market analysis that demonstrates the feasibility of the project from a market demand and viability perspective. The provided market analysis is too general and must be revised to also include an analysis on competitive impacts on other businesses in the region.
- The EPR guidelines required that you provide details on each aspect of the project, and these details were not consistently provided in the EPR. For example:
 - Zip line tower heights were not provided for the zip line but instead stated as “various heights”.
 - Please clarify information regarding location and mapping for zipline towers. For example: Section 4.1 of the EPR, notes the proposed construction of 14 zip line towers and 11 zip lines. However, Appendices #0 and #48 show 12 towers rather than 14. Tower 12 is shown at the end of the zipline course and located at the western side of Colinet Arm. Appendix 29 states that Towers #8 -#12 will be constructed in Year 5. Appendix 6 shows a zipline diagram with 14 tower locations and lists coordinates for 13 towers but these are not labelled. The diagram shows the first tower placed north of Route 91 although all towers are to be constructed south of the highway.

- The EPR states that users will walk from the end of the zip line along the hiking trail to the exit the course. Is this from Tower #3? Also how will users return from Tower #14 to the start of the course? Additional detail is required on the logistics of the zip line operation in terms of the RDA property boundaries, the trail routes and construction, foot traffic to and from the RDA chalet area, parking at the chalet (ticket purchase area), festival grounds and cottage area. Indicate any potential conflicts or hazards due to increased foot traffic across this roadway and how it can be mitigated. A map of all existing trails and proposed trails and roads should be provided and their intended use in your project.
 - The installation of electrical service to the festival area and cottage area was not described in the EPR.
 - The EPR states that the 1.95 kilometre hiking trail will require culverts and that the installation and culvert locations will be designed by an engineering firm. More details are required regarding the design of the trail and proposed route showing the locations of stream crossings, culverts, avoidance of wetlands and trail design that minimizes impacts to wetlands.
 - The EPR did not include a lot-specific site evaluation to determine the suitability of the site for the installation of septic systems (for the chalet, cottages and festival area).
 - RDA property: Section 4.1 states that the St. Mary's Rural Development Association (RDA) has two leaseholds that may be used by the proponent as part of the zipline business. The EPR states that the RDA has given Right of Usage. A letter is attached from the RDA dated October 27, 2016 indicating their intended support of the project. The letter indicates that a formal agreement has yet to be finalized and that the RDA has taken steps to contact Crown Lands to inquire about changes to their leasehold agreement to accommodate the zipline project. The EA Division is aware that one of these properties is no longer leased by the RDA and that you have applied for a land Grant for this parcel. The EPR must be revised to describe the current status of these properties, a revised land use agreement, the RDA property boundary and intended use of these properties.
 - The Department of Transportation and Works indicated that the parking space described in the EPR is not adequate to accommodate the events described. Please describe how parking will be accommodated. Additional detail and site inspection is required to determine if all sight lines are met.
- The EPR should include details to show that you have consulted with property owners in the vicinity of the project area and the results of that consultation. For example, consultation may be required with the Fisheries and Oceans Canada property, cabin owners and residential properties that are located in the area of Towers 1, 2 and 3, as well as any other property owners that may be impacted by the project construction and

or operation. The EPR guidelines state that where project infrastructure will be constructed within 15 metres of a body of water and there is an upland land owner, there is a requirement under Section 7 of the *Lands Act* to consult with that land owner.

- The original project description (Registration #1752 submitted in 2014) included components that you removed upon submission of the EPR (the ATV trail and Marina) and includes future expansion plans that are shown in Appendix 0 of the EPR that you added. These future expansion plans includes applications for two parcels of crown land, three additional zip line towers, an access road and a camping area. The same level of detail is required for the future expansion areas you have identified. If you have future development plans for the park, or if you have included additional components in the EPR that were not part of your original project, you must describe these in more detail than you currently have in a revised EPR.
- The EPR Guidelines issued to you on August 14, 2014 stated the requirement for a 30-metre naturally vegetated buffer on all wetlands and waterways, which includes Black Duck Gully. There is also a requirement to maintain a 50 metre naturally vegetated buffer on Colinet Arm. The Wildlife Division of the Department of Fisheries and Land Resources has allowed two exceptions to the buffer requirement – 1) the rope bridge across Black Duck Gully within the 30 metre buffer and 2) the zip line tower sites within the 50 metre buffer on Colinet Arm. Access trails to the zip line tower sites for the purposes of construction and maintenance may be included in your plans but disturbance must be kept to a minimum. You are reminded that all other project design, including all other infrastructure and trail construction must adhere to the buffer requirement. Please submit a project design that maintains the integrity of the 30-metre naturally vegetated buffer on all wetlands and waterways and the 50 metre buffer on Colinet Arm. These plans must be reviewed and approved prior to any construction.
- Additional information is required regarding the planned installation of a tree screen measuring approximately 90 metres at the southern end of the hiking trail. The location of the tree screen is shown in Appendix 0 of the EPR. The Crown land application for the hiking trail, which is planned to be 6 feet in width, does not accommodate tree planting. As well, the landscape in this area is not described and may be wetlands where tree planting is not appropriate. The requirement of a tree screen in this area should be explained in the revised EPR.
- Additional information and revisions are required regarding the decommissioning of the project to ensure procedures are in compliance with regulations. For example, decommissioning of culverts, silt screens and other planned environmental installations, septic systems and the proposed grading of the hiking trail and infilling with surrounding soils and peat. Rehabilitation of the cottage and festival areas is not

discussed. The EPR does not discuss the change in land ownership or changes to land use agreements with the RDA property that would follow decommissioning.

Please note that you are required to submit a revised EPR and address the concerns highlighted above as well as ensure that the revised EPR meets the requirements of the EPR Guidelines issued to you in August 2014. Attached for your review is a list of comments from the EAC on the review of your EPR. A copy of the EPR Guidelines is also attached.

The EAC is available to meet with you regarding the information requirements. Until that time, no authorizations or permits can be issued pursuant to any other Act or Regulation.

If you have any questions concerning these matters, please contact Dr. Susan Squires, Director (A), Environmental Assessment Division, at (709) 729-0673 or susansquires@gov.nl.ca or Ms. Brenda Rowe Chair of EAC at (709) 729-2553 or browe@gov.nl.ca.

Sincerely,

A handwritten signature in black ink that reads "Eddie Joyce".

EDDIE JOYCE, MHA
District of Humber West
Minister