

Environmental Protection Plan

ATV/ARGO Trails for Red Indian Lake Outfitting



**Red Indian Lake Outfitting and Tours
PO Box 5
Buchans, NL A0H 1G0**

**Prepared with the Assistance of
GEMTEC Consulting Engineers and Scientists
19 Dundee Avenue
Mount Pearl, NL A1N 4R6**

August 9, 2022

TABLE OF CONTENTS

1.0	INTRODUCTION.....	1
1.1	Purpose and Objectives.....	2
1.2	Organization of the EPP	3
1.3	Roles and Responsibilities	3
1.3.1	Owner/General Manager.....	3
1.3.2	On-Scene Commander.....	3
1.3.3	Environmental Services Consultant.....	4
1.3.4	Foreman.....	4
1.3.5	Contractors.....	4
1.4	Environmental Orientation	4
1.4.1	Visitor Orientation.....	4
1.4.2	Contractor Orientation.....	5
1.4.3	Toolbox Meetings.....	5
2.0	REVISED PROJECT DESCRIPTION.....	6
2.1	Project Activities	9
2.2	Land Use Conflicts.....	10
2.3	Existing Trails in the Area	10
2.4	Construction Schedule.....	10
3.0	PROPOSED TRAILS	11
3.1	Rerouted Hinds Lake Trail	11
3.2	Rerouted Saddler Lake Trail	15
3.3	Mary March River Trail.....	20
3.4	Halfway Mountain / Skidder Brook Trail - CL 145970	24
3.5	Alex Pond Trail - CL 145971	29
3.6	Kenneth Brook Trail - CL 145972.....	33
4.0	REGULATORY REQUIREMENTS	34
4.1	Potential Permits, Approvals and/or Authorizations.....	34
4.2	Environmental Compliance Monitoring.....	34
4.2.1	Inspections and Monitoring.....	34
4.3	Relevant Legislation, Regulations and Policy.....	35
5.0	ENVIRONMENTAL PROTECTION PROCEDURES	36
5.1	Erosion Control	36
5.2	Route Selection and Corridor Width.....	37
5.3	Buffer Zones	39
5.4	Vegetation Clearing	39

5.5	Laydown and Storage Areas.....	40
5.6	Wetland Crossings.....	40
5.7	Trail Markers.....	43
5.8	Watercourse Crossings.....	44
5.9	Equipment Use and Maintenance	46
5.10	Storage and Handling of Fuel and Other Hazardous Material	47
5.11	Waste Disposal.....	49
5.12	Sewage Disposal	49
5.13	Dust Control.....	49
5.14	Noise Control.....	50
6.0	CONTINGENCY PLANS	51
6.1	Fuel and Hazardous Material Spills.....	51
6.2	Wildlife Encounters	52
6.3	Forest Fires	53
6.4	Discovery of Historic Resources	54
7.0	EPP CONTROL REVISIONS	55
8.0	CONTACT LIST	56
9.0	REFERENCE LIST.....	57
10.0	SIGNATURE PAGE	59

LIST OF TABLES

Table 1:	RILOT Lodges and Satellite Camps	6
Table 2:	Summary of Revised Trails described in EPP	9
Table 3:	Coordinates of Water Features that Intersect Rerouted Hinds Lake Trail	11
Table 4:	Coordinates of Water Features that Intersect Rerouted Saddler Lake Trail	15
Table 5:	Coordinates of Water Features that Intersect Halfway Mountain/Skidder Brook Trail ..	24
Table 6:	Coordinates of Water Features that Intersect Alex Pond Trail	29
Table 7:	Potential Permits, Approvals and/or Authorizations	34
Table 8:	Recommended Minimum Buffers for Activities near Watercourses.....	39

LIST OF FIGURES

Figure 1:	RILOT’s Proposed Revised Trail System	7
Figure 2:	Original Trails Included in 2015 Registration Document (Crown Lands, 2015)	8

Figure 3: Original Hinds Lake Trail - Proposed 2015..... 12

Figure 4: Rerouted Hinds Lake Trail with Water Feature Intersects-Topo 13

Figure 5: Rerouted Hinds Lake Trail-Imagery..... 14

Figure 6: Original Saddler Lake Trail- Proposed 2015..... 17

Figure 7: Rerouted Saddler Lake Trail with Water Feature Intersects-Topo 18

Figure 8: Rerouted Saddler Lake Trail-Imagery 19

Figure 9: Original Mary March River Trail - Proposed 2015..... 21

Figure 10: Existing Mary March River Trail -Topo 22

Figure 11: Existing Mary March River Trail-Imagery..... 23

Figure 12: Original Halfway Mountain / Skidder Brook Trail - Proposed 2015 26

Figure 13: Halfway Mountain / Skidder Brook Trail-Water Feature Intersects-Topo 27

Figure 14: Halfway Mountain / Skidder Brook Trail-Imagery..... 28

Figure 15: Alex Pond Trail (2015) 30

Figure 16: Alex Pond Trail with Water Feature Intersects-Topo 31

Figure 17: Alex Pond Trail-Imagery..... 32

Figure 18: Standard Trail Terms and Path Maintenance with Ditches 37

Figure 19: Recommended ATV Trail Clearances in PPWSAs 38

Figure 20: Raised Plank Decking 41

Figure 21: Puncheon Construction..... 42

Figure 22: Corduroy Structure..... 42

Figure 23: Raised Bed or Turnpike Structure 43

Figure 24: PPWSA signage available from WRMD Regional Offices 44

LIST OF APPENDICES

Appendix A Correspondence with Ms. Joanne Sweeney, Director (A)

Appendix B EA Committee Technical Comments

Appendix C Wildlife Division Appendices

1.0 INTRODUCTION

Red Indian Lake Outfitting and Tours (RILOT) has been operating an outfitting business in the Buchans area for fifteen years, since 2005. Currently RILOT operates seven lodges/satellite camps in the Project area, all of which have been typically accessed by off-road vehicles, e.g., ATV or ARGO. In 2015 RILOT submitted a Registration document to the Newfoundland and Labrador (NL) Environmental Assessment Division (EAD) describing a project that would see RILOT modify and manage a series of existing ATV trails (assumed to be existing for approx. 20-30 years) for purposes of accessing their remote outfitting facilities. During the EA process, the project was reviewed by government regulators and made available for a legislated public review period. Minister Crummell released the project from the EA process on October 9, 2015 with several conditions of release, one dealing specifically with the requirement for an acceptable Environmental Protection Plan (EPP).

The proponent shall prepare and submit an environmental protection plan (EPP) for all applicable construction, operation and maintenance activities to the Minister of Environment and Conservation for approval before the start of any site-specific construction. The EPP shall describe the environmental protection and mitigation measures that will be applied throughout the life of the project to avoid or minimize potential negative effects on the environment associated with the project.

RILOT submitted an EPP to the EAD in September 2018 but was advised that there were deficiencies in that document. Further consultation with government officials outlined what the contents of a revised EPP should contain.

On September 11 2019, RILOT met with officials of the EAD, the Water Resources Management Division (WRMD) and the Wildlife Division (WD), via teleconference. As indicated in an email from Ms. Joanne Sweeney, Director (A) of the EAD, “the purpose of the call was for government officials to listen to your concerns regarding the decision that the EPP you submitted for the *ATV/ARGO Trails for Red Indian Lake Outfitting* project was deficient, and to provide clarification on the information that needs to be included in the EPP for the project” (Appendix A). In that email, Ms. Sweeney indicated that the basis for the revised EPP are the original comments provided by the Wildlife Division in 2015 (Appendix A). In addition, Ms. Sweeney indicated that Appendix 5 from the Wildlife Division, the conditions that must be met for the construction and operation of a licensed trail (Appendix C), will also formulate the EPP. Advice from regulators indicated that some trail rerouting would likely be required as well.

RILOT is sensitive to the fact that some sections of the existing trails for which they are seeking a license occur on wetlands as defined in the NL *Water Resources Act*, SNL 2002 cW-4.01, (“the Act”). According to the *Act*, a wetland “means land that has the water table at, near or above the land surface and includes bogs, fens, marshes, swamps and other shallow open water areas.” In the “Policy for Development in Wetlands”, the criteria whereby a permit can be issued under Section 48 of the *Act*, for all development activities in and affecting wetlands is explained. In that policy document, “wetland development” is defined as “the carrying out of an activity or operation which includes the construction of ditches, mechanical disturbance of the ground, alteration of normal water level fluctuations, infilling, drainage, dredging, channelization, and removal of vegetation cover and/or organic matter on a wetland for social or economic benefits, or the making of any change in the use or the intensity of use of any wetland which affects its hydrologic characteristics or functions”.

The objective of the policy is to permit developments in wetlands which do not adversely affect the water quantity, water quality, hydrologic characteristics or functions, and terrestrial and aquatic habitats of the wetlands.

There are several wetlands occurring in the original trail system, and on the advice of various regulators, Mr. Thorne undertook to review the original trail system with a view to identify key transit routes necessary to his commercial outfitting business. This exercise resulted in a modified and reduced trail system that will minimize adverse impacts to wetlands. The resulting trail system with rerouted sections indicated are described in s. 3.0.

By licensing ATV/ARGO trails, RILOT will be permitted to use the trails in order to conduct activities associated with its outfitting business. Also, as the license holder RILOT, will follow recommendations relative to the upkeep and maintenance of the trails. RILOT understands that although it will be their responsibility to maintain the trails, the general public will have access to them and will be permitted to use them.

According to s.5.2.4 of the Policy on Development in Wetlands, permitted development in wetlands can include,

Infilling, dredging, or any other disturbance of wetlands for the construction of permanent or temporary roads, bridges, culverts, trails, power and telecommunication transmission lines, pipelines, etc., through wetlands which would necessitate only minor disturbances to the vegetation and organic cover, the flow drainage pattern of the area and ground slope.

RILOT is presenting mitigations in this document that describe how construction and maintenance of ATV trails in wetland areas should be carried out. RILOT will undertake new construction for rerouted trail sections and will carry out maintenance work on requested trails that traverse wetland areas as indicated on Figure 1, and will adhere to recommendations relative to this work to the extent possible. By ensuring ongoing maintenance is carried out on Project trails in a manner that minimizes additional damage, RILOT believes there is less likelihood that additional trails and damage will be made in surrounding wetland areas by hunters or other members of the general public.

1.1 Purpose and Objectives

The purpose of this revised EPP is to outline potential environmental concerns and describe protection measures related to activities carried out to construct, operate and/or maintain portions of the trail system described in RILOT Registration document (1805) released in September 2015, as well as new rerouted sections over terrain as recommended by government regulators. RILOT has prepared this revised EPP in keeping with advice provided by the provincial EAD, the WD and the WRMD, and in keeping with technical review comments received during the EA review of the project in 2015. This document also provides details on rerouted sections of the reduced trail system.

RILOT is confident that proper construction and maintenance practices will allow ATV trail users a more enjoyable ride while minimizing damage to the environment. This plan also outlines practical procedures required for all personnel, i.e., RILOT employees, contractors and suppliers, to reduce or eliminate potential adverse environmental effects, as well as instructions for addressing planned and unplanned

activities or events associated with ongoing or new site work. RILOT will appropriately address the mitigation of concerns identified.

1.2 Organization of the EPP

This EPP has been developed to provide information on how specific activities in support of the project should be conducted such that adverse environmental effects are minimized. This EPP contains the following sections:

- **Section 1.0** introduces the EPP. It outlines the overall purpose, objectives, organization, roles and responsibilities of those involved and environmental orientation requirements.
- **Section 2.0** provides a description of potential project activities.
- **Section 3.0** Provides a description each trail section.
- **Section 4.0** lists the permits, approvals and authorizations that may be required for the work.
- **Section 5.0** describes environmental protection procedures associated with work activities.
- **Section 6.0** outlines the contingency plans for potential unplanned and accidental events.
- **Section 7.0** outlines the procedures for revising the EPP.
- **Section 8.0** provides a list of key personnel and regulatory contacts.
- **Section 9.0** lists references cited in the EPP.
- **Section 10.0** contains a signature page for employee and contractor sign-off.

Supporting information and documents are provided in the appendices:

- **Appendix A** - copy of an email from Ms. Joanne Sweeney, Director(A), EAD, September 2019.
- **Appendix B** - EA Committee comments provided to RILOT in 2015 on release of the project.
- **Appendix C** - comments provided by the WD in September 2019.

1.3 Roles and Responsibilities

This section outlines the roles and responsibilities of parties involved with on-going and new activities associated with the operation and maintenance of the ATV/ARGO trails.

1.3.1 Owner/General Manager

The Owner/General Manager will be responsible for ensuring this EPP is completed and updated as required and that it meets all regulatory approvals. The Owner/General Manager will be consulted on various aspects of EPP management as well as on environmental compliance monitoring processes such as field checklists and environmental audits. The Owner/General Manager will be supported in this function by the Environmental Services Consultant (ESC).

1.3.2 On-Scene Commander

The On-scene Commander is the person designated responsible for all aspects of an emergency response. In the event of a fuel spill, forest fire or other unforeseen event occurs the On-scene Commander will manage response operations and assign responsibility for all persons responding.

1.3.3 Environmental Services Consultant

The ESC will be responsible for the development, acceptance, implementation and management of this EPP. They will be accountable for review and acceptance of this EPP. The ESC will be informed of all regulatory requirements associated with project activities.

1.3.4 Foreman

The Foreman will be responsible for overseeing construction, operation and maintenance activities, including the management of project environmental issues through implementation of components of the EPP. The Foreman will also:

- Provide input to the ESC with respect to preparing revisions to the EPP.
- Report directly to the Owner/General Manager with respect to aspects of environmental compliance monitoring.
- Ensure visitors, contractors and employees travelling on project trails receive appropriate orientation and training.

1.3.5 Contractors

If any contractors are required to contribute to the construction, maintenance and operation of the various trails, they will be responsible for the following:

- Implementing environmental protection procedures as outlined in this EPP.
- Holding toolbox meetings at the start of each shift to discuss health, safety and environmental issues.
- Ensuring EPP conditions are reflected in their proposals and bids, and will comply with all relevant regulations, guidelines, permits, approvals and authorizations.

1.4 Environmental Orientation

An environmental orientation session will be developed and presented to all personnel and trail visitors who arrive at the trails under RILOT's care during operation and maintenance activities. The orientation will cover elements of this EPP such as: environmental protection measures, proper storage and handling of fuel and hazardous materials, encounters with wildlife, protection of rare/endangered species, protection of historic and heritage resources, waste management, environmental incident reporting requirements and emergency response. Orientations will be delivered by experienced individuals with an in depth knowledge of the EPP and a knowledge of project activities.

All personnel who attend the environmental orientation session will be required to sign an attendance sheet, and will be provided with access to copies of the EPP, as appropriate. All documentation will indicate the completed orientation and expiration dates.

1.4.1 Visitor Orientation

A brief orientation will be provided to visitors, (i.e., clients of RILOT) who arrive at the trails under RILOT's care, but will not be completing any maintenance work. The visitor orientation will cover relevant environmental protection measures, emergency procedures, environmental incident reporting

requirements, and other general project environmental requirements.

1.4.2 Contractor Orientation

Contractor orientations will include a review of the following:

- Environmental protection measures
- Compliance activities and corrective actions
- Environmental contingency measures
- Incident reporting requirements
- All permit-required work; and
- Provincial rules and regulations

1.4.3 Toolbox Meetings

Toolbox or short, informal meetings, will be held by the Foreman with any contractors at the beginning of each work shift. The tool box meeting will involve discussion of work task assignments for the day and any associated safety hazards. These meetings will also provide the opportunity to discuss environmental concerns and applicable mitigation measures that apply.

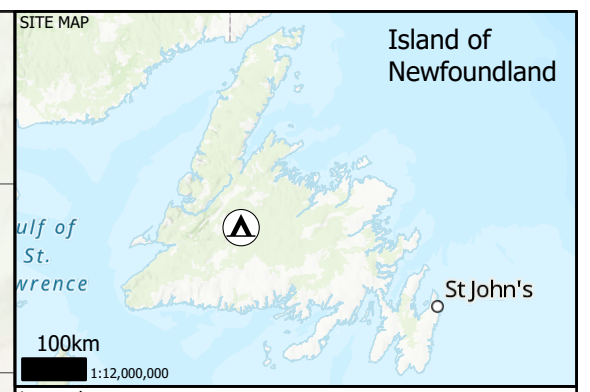
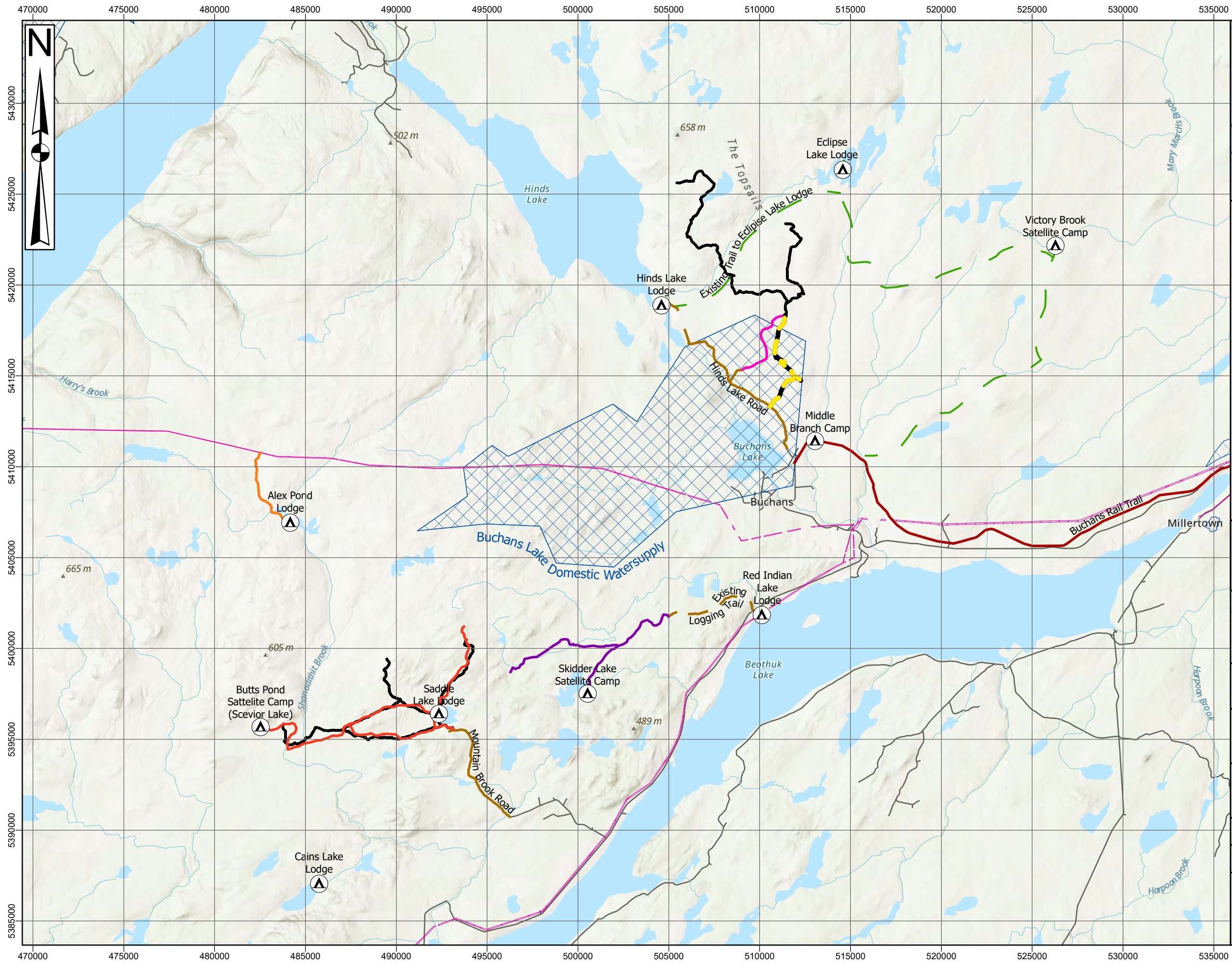
2.0 REVISED PROJECT DESCRIPTION

The project for which this EPP is written involves the licensing of five existing ATV trails (with rerouting planned), as well as the maintenance and operation of those same trails. These trails connect RILOT's various lodges in the Buchans Region and enables RILOT to carry out their outfitting business in the province (Table 1 and Figure 1). Some of these trails were developed over 20-30 years previous and others are former woods trails and roads constructed by mining exploration companies and other outfitting companies that operated in the area in years past. Several regulators advised that rerouting of some sections would be required before the EPP could be approved in order to reduce potential effects to wetlands.

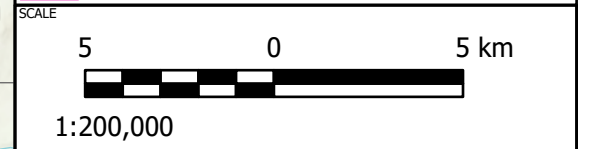
Table 1: RILOT Lodges and Satellite Camps

Lodge/Camp Name	Coordinates	
Red Indian Lake Lodge	N 48 46.169'	W 056 51.739'
Saddle Lake	N 48 43.238'	W 057 06.243'
Butts Pond (Sceviour Lake)	N 48 42.832'	W 057 14.248'
Alex Pond	N 48 48.904'	W 057 12.943'
Hinds Lake	N 48 55.378'	W 056 56.087'
Eclipse Lake	N 48 59.388'	W 056 48.042'
Cains Lake	N 48 38.182'	W 057 11.604'
Middle Camp Branch	N 48 51.20'	W 56 49 19'
Skidder Lake Satellite Camp	N 48 46.07'	W 56 55.56'

The trails described in this EPP differ in some locations than what was proposed and approved with conditions in 2015. On the advice of regulators, RILOT reviewed their original Registration document and significantly reduced the original trail system (Figure 1) from six trails to five and significantly rerouted two of the five abovementioned trails using available satellite imagery (Table 2 and Figure 1). In addition to the two rerouted trails, RILOT commits to providing details relative to the rerouting of the remaining trails once access is possible in that area. When access is possible, RILOT will provide more detailed GPS based location data on all five trails. This ground truthing exercise may result in more precise trail rerouting information for all trails. This information will be available during the WRMD permitting process, anticipated to be completed following approval of the EPP.



- Legend**
- Lodge
 - Crown Lands Proposed Trail
 - Buchans Lake Domestic Watersupply
 - Alex Pond Trail
 - Halfway Mountain / Skidder Brook
 - Proposed Section to be Re-routed
 - Hind Lake Trail (Re-routed)
 - Saddler Lake Trail (Re-routed)
- Existing Road/Trail**
- Buchans Rail Trail
 - Gravel Road
 - Existing ATV/Snowmobile Trail
 - Existing Trail (Crown Lands Lease 127210)
 - Town Roads
 - Transmission Line



CREDITS/NOTES

1. This drawing is a schematic representation. Sizes, locations and dimensions are approximate.
2. COORDINATE SYSTEM: NAD 1983 CSRS UTM Zone 21N
3. Esri, NASA, NGA, USGS, Esri Canada, Esri, HERE, Garmin, SafeGraph, METI/NASA, USGS, NRCAN, Parks Canada, Esri, HERE, Garmin, FAO, NOAA, USGS, NRCAN, Parks Canada, Esri, USGS
4. Contains information from CanVec

PROJECT TITLE

**ATV/ARGO TRAILS FOR
RED INDIAN LAKE OUTFITTING**

REPORT TITLE

ENVIRONMENTAL PROTECTION PLAN

DRAWING TITLE

EXISTING AND PROPOSED ATV TRAILS

DATE 8/1/2022	DRAWN BY AS	CHECKED BY DWR
PROJECT NO. 80061.01	DRAWING NO. FIGURE 1	REVISION NO.



LucidDrawings and FileProjects\80061\80061_01.dwg, Date: 08/01/2022

**Government of Newfoundland & Labrador
Department of Municipal & Intergovernmental Affairs**



NOTE TO USERS

The information on this map was compiled from land surveys registered in the Crown Lands Registry.

Since the Registry does not contain information on all land ownership within the Province, the information depicted cannot be considered complete.

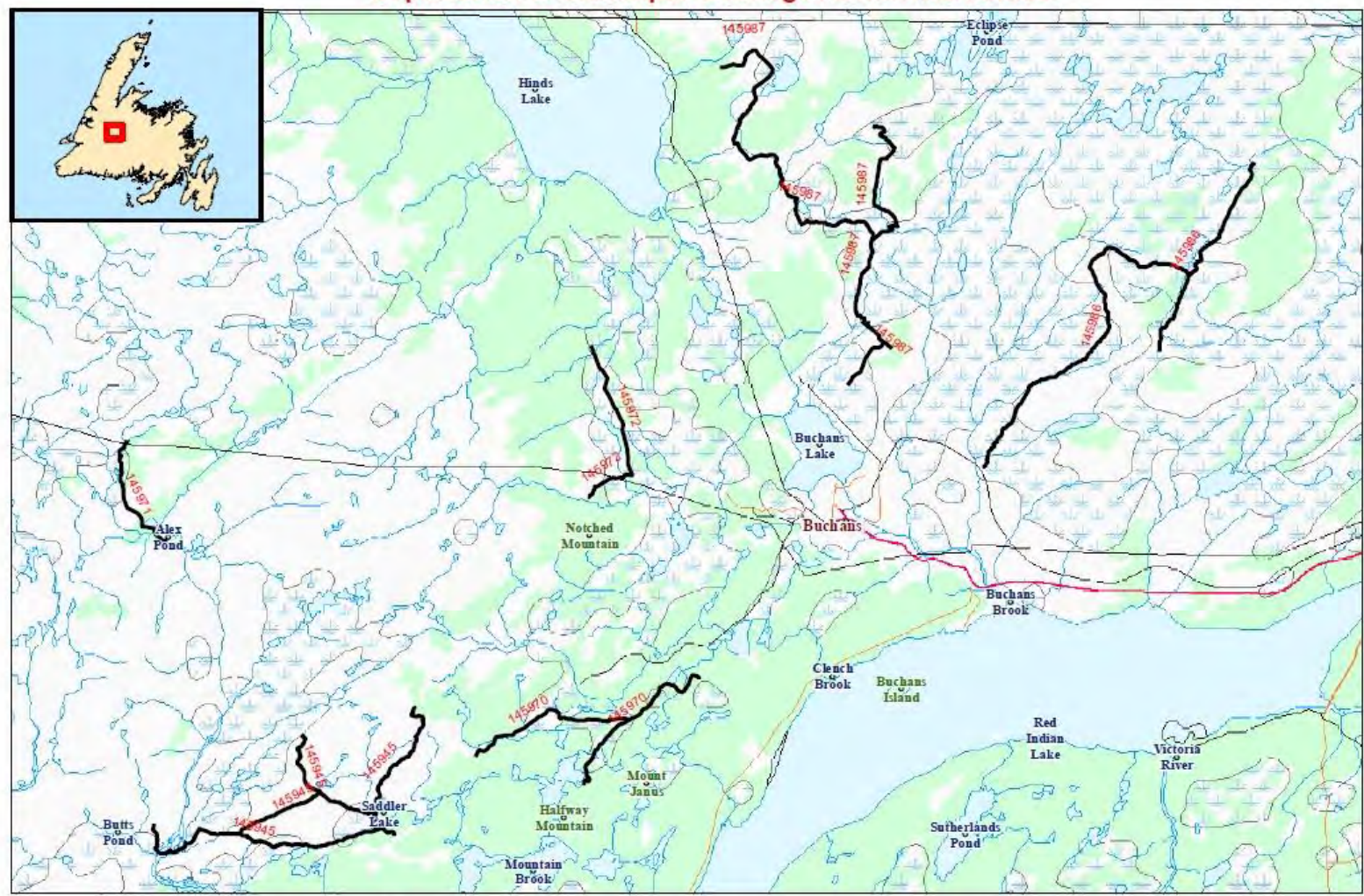
The boundary lines shown are intended to be used as an index to land titles issued by the Crown. The accuracy of the plot is not sufficient for measurement purposes and does not guarantee title.

Users finding any errors or omissions on this map sheet are asked to contact the Crown Titles Mapping Section, Howley Building, Higgins Lane, St. John's, Newfoundland.

Users finding errors or omissions can contact the Crown Titles Mapping Section by telephone at 729-3361. Some titles may not be plotted due to Crown Lands volumes missing from the Crown Lands registry or not plotted due to insufficient survey information.

The User hereby indemnifies and saves harmless the Minister, his officers, employees and agents from and against all claims, demands, liabilities, actions or causes of actions alleging any loss, injury, damages and matter (including claims or demands for any violation of copyright or intellectual property) arising out of any misreading or incomplete Crown Land titles, and the Minister, his or her officers, employees and agents shall not be liable for any loss of profits or contracts or any other loss of any kind as a result.

For inquiries please contact a Regional Lands Office.
 Corner Brook - 637-2387
 Gander - 256-1400
 Goose Bay - 856-2488
 St. John's - 729-2654
 Clarenville - 456-4074
 Grand Falls-Windsor 292-4267



Crown Lands Applications 145945, 145970, 145971, 145072, 145986, 145987 0 2.5 5 10 Kilometers

Figure 2: Original Trails Included in 2015 Registration Document (Crown Lands, 2015)

Table 2: Summary of Revised Trails described in EPP

Trail Name	CL App. No.	Status
Hinds Lake Trail	145987	Rerouted
Mary March River Trail	127210	Use existing Trail System
Alex Pond Trail	145971	To be Rerouted
Halfway Mountain/Skidder Brook	145970	To be Rerouted
Saddler Lake Trail	145945	Rerouted
Kenneth's Brook Trail	145972	Withdrawn

RILOT recognizes that in an ideal situation, early planning would precede trail development such that proper assessment of the trail route would be done in order to plan for the lowest maintenance option, thereby resulting in a more sustainable ATV trail. The higher the number of drainage features needed on a particular route will equate to a higher level of maintenance. In this instance and for the most part, the trails are existing and as such, they are being used and are not regularly monitored for degradation by any licensee.

2.1 Project Activities

The various activities associated with rerouting/constructing trail sections, operating and maintaining existing trails include:

- Site surveys to better define rerouted sections
- Vegetation clearing, as required
- Corduroy installation, as required
- Platform construction and installation
- Bridge construction, as required
- Culvert installation, as required; and
- Ditching, as required

Where possible, new rerouted trail sections will pass through wooded areas with mineral soil. In many sections, the terrain is barren and RILOT will endeavor to construct new sections in transition zones, (i.e., areas between wooded areas and open and/or boggy areas). Most transition zones will have a covering of heather type vegetation which can protect the trails from erosion. Any brush clearing for new trail sections will occur, where possible, outside bird breeding season and if this occurs during a high forest fire index period, RILOT will follow all recommended procedures from the Department of Fisheries, Forestry and Agriculture (DFFA). Cleared brush and wood will be used wherever possible to minimize negative impacts to wetland areas.

Activities associated with construction of rerouted sections of these trails will take place once all permits have been secured. RILOT will consult with government officials to determine the best window for completing trail construction activities. Operation and maintenance activities for these existing trails are anticipated to be of a minor nature and RILOT will consult with appropriate government officials to determine best windows for maintenance work. All construction, operation and maintenance activities associated with the trails will be funded by RILOT.

The hunting season is brief, approximately eight weeks from September-November, and the trails are often partially frozen during that period. Since travel over the trails will be limited during the hunting season, RILOT is confident that vegetation regrowth on the trails will occur in the off season and will help minimize long term damage and erosion. RILOT uses Argos and ATVs in their outfitting operations and would use Argos in particularly sensitive wetland areas as Argos have load-bearing tires that create minimal ground pressure, thus limiting negative impacts to wetland areas.

2.2 Land Use Conflicts

RILOT is unaware of any land use conflicts in this area such as mineral exploration or logging activity. If any land use conflicts are identified, RILOT commits to working with all parties and regulators to address any potential conflicting land uses, and to find a mutually acceptable solution. RILOT understands that they cannot prevent members of the public from using any trails that they register and maintain for their outfitting business.

RILOT will work to ensure their activities have minimal negative impacts on wildlife that may use the area. Restricting activities based on seasonal constraints may be a key part of successful coexistence of these ATV trails and wildlife and ecologically important landscape features in the area.

2.3 Existing Trails in the Area

RILOT is aware of two licensed trails in the area, specifically License Number 127210 that originates at Owls Nest (Hinds Lake) with a destination at Eclipse Lake and License Number 127208 that originates from the pole line with a destination to Bruce Lake and south (Figure 1).

2.4 Construction Schedule

Construction of rerouted trail sections will begin following receipt of all required permits and depending on weather conditions in the area. RILOT is hopeful that trails will be registered and available for use as soon as possible.