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List of Acronyms

CCME	Canadian Council of Ministers of the Environment
DFO	Fisheries and Oceans Canada
ECCC-CWS	Environment and Climate Change Canada - Canadian Wildlife Society
EHS	Environmental, Health, and Safety
EPP	Environmental Protection Plan
ESCP	Erosion and Sediment Control Plan
ESC	Erosion and Sediment Control
HADD	Harmful Alteration, Disruption, or Destruction
MBCA	Migratory Birds Convention Act
NL ECC	Newfoundland and Labrador Environment and Climate Change
NL ESA	Newfoundland and Labrador Endangered Species Act
NL WRMD	Water Resources Management Division
NTU	Nephelometric Turbidity Unit
OPR	Operating Procedure
POLs	Petroleum, Oils, and Lubricants
PPE	Personal Protective Equipment
RCMP	Royal Canadian Mounted Police
SARA	Species at Risk Act
SCC	System Control Centre
SDS	Safety Data Sheets
TDG	Transportation of Dangerous Goods
TDGA	Transportation of Dangerous Goods Act
TSS	Total Suspended Solids

WHMIS

Workplace Hazardous Materials Information System

Document Control

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1.0 INTRODUCTION

Bell Canada (the 'Proponent') is proposing the installation of new fibre cables throughout the Codroy Valley and South Branch region of insular Newfoundland. Before this installation, Newfoundland Power will complete an associated make-ready project on the DOY-01 feeder to facilitate the safe attachment of fibre cables for Bell Canada. Together, these two activities will comprise the 'Undertaking' (also referred to as the Project). The Undertaking will utilize existing infrastructure and will not require Bell Canada or Newfoundland Power to develop or occupy any new land within the Area of the Undertaking. The activities that will comprise the Scope of Work include 139 pole replacements and associated line work, lowering communication cables on 100 existing poles, brush clearing (approximately 18 km), tree trimming, installation of 168 km of new fibre cable, the creation of communication splices (76), and the installation of six pole-mounted central splitting point cabinets.. These activities may interact with various elements in the environment, including wetlands, Species at Risk and their habitats, salmon rivers, and others.

This Environmental Protection Plan (EPP) was developed to outline specific environmental procedures and controls to be used by Project personnel, from Bell Canada, Newfoundland Power and sub-contractors, that will ensure that potential environmental effects from Project activities are effectively mitigated.

2.0 ENVIRONMENTAL PROTECTION PLAN OVERVIEW

The Proponent is committed to the implementation of environmental protection measures that comply with applicable environmental legislation and industry standards throughout the Project.

As such, this EPP has been developed to:

- Provide a standard, systematic and, where required, specific description of the procedures and controls that the Sub-contractor will follow during the Project to ensure environmental protection;
- Outline Newfoundland Power's operating procedures (OPR) in place for various environmental components;
- Provide the Proponent with a comprehensive review of environmental concerns and clear, concise guidance on the methods to be used to address these concerns during the Project;
- Provide a record of environmental concerns, and the respective protection measures, which pertain to the Project; and
- Document changes to the plan arising from any revision process.

In the event of a differing procedure or mitigation measure between a specific OPR and this document, the measures outlined in this document will take precedent. A copy of, or parts of, this document will be provided to Bell Canada, the proponent, and the Newfoundland Power staff, and any sub-contractors who will be carrying out the Project activities.

2.1 Scope of the Environmental Protection Plan

This EPP covers all activities involved with the Project and proposes project specific protection procedures.

The Project involves the following activities and associated activities:

- Replace 139 poles and complete associated line work to transfer;
- Lower communication cables on 100 existing poles to ensure safe clearances;
- Modify Newfoundland Power conductor attachment heights on 3 existing poles;
- Conduct 14,117 linear m of brush clearing on the existing line/right of way with a maximum width of 5 m (brush to be cut and piled);
- Complete 4,148 linear m of brush clearing on the existing line/right of way with a maximum width of 5 m (brush to be cut and removed);
- Conduct 495 spans (approximately 25 linear km) of tree trimming on the existing line/right of way;
- Install 167.8 km of new fibre cable on 135 km of existing utility pole lines (cables may run concurrently for sections, accounting for the 32.8 km difference). Cables will be primarily lashed to the existing communication strand, with the new strand to be installed only as required.
- Create or enter 76 strand-mounted fibre communication splices; and
- Place 6 pole-mounted central splitting point cabinets on existing utility poles.

Project activities will be completed by Newfoundland Power crews and sub-contractors. When sub-contractors are working, Newfoundland Power crews may be present to assist with any work. A Newfoundland Power representative (the Project Manager) will be designated for the Project. The Project Manager will not be present on the site during all activities but will be accessible to the sub-contractor and other staff on site throughout the Project's lifespan.

2.1.1 Timing and Constraints

Potential interactions with terrestrial Species at Risk (SAR) and avifauna are expected to be minimal. The Project footprint is confined to an existing disturbed corridor, and work will occur outside sensitive breeding periods where feasible. Any residual effects on terrestrial components are expected to be short-term, reversible, and not significant. Nest search activities, if necessary, will be conducted as per Newfoundland Power's OPR 200.38, and when necessary, in consultation with the Government of Newfoundland Department of Fisheries, Forestry and Agriculture (NLFFA) and Environment and Climate Change Canada - Canadian Wildlife Service (ECCC-CWS). Any identified nests will be flagged.

Project activities will have minimal effects because of the relatively low project footprint in the already established Newfoundland Power right of way (ROW). The use of existing roads, trails, and disturbed areas, where feasible, will take place. If any species at risk are identified in the project area, work will stop immediately within 10 m of any SAR observation and resume only after confirmation by a qualified Biologist that the species has left (up to 24 hours). A Section 18 permit will be acquired from DOEC. All SAR sightings will be reported to NL WD and ECCC-CWS; and consult with NL WD if a previously unknown SAR is

discovered. Staff will receive training on identifying SAR, and the implementation of a Wildlife Response Protocol for all wildlife encounters. Additionally, onsite workers will record and report all wildlife interactions and conflicts to the Environmental Coordinator; notify NL FFA when required.

The Codroy Valley contains an extensive network of waterbodies and watercourses that drain from the surrounding highlands into several major rivers and coastal estuaries. Two scheduled Atlantic salmon rivers and their tributaries are present in the valley:

- Little Codroy River (136), including Cooper's Brook, Southern Brook, and Western Brook; and
- Great Codroy River (137), including Broom Brook, Ryan's Brook, Mullchingnic Brook, the North Branch (Upper Brook, Lower Brook, Crooked Brook), and the South Branch (Bullhouse Brook).

There are 72 potential water crossings identified in the assessment and there are two crossings over the Little Codroy River and one crossing over the Grand Codroy River. All identified crossings occur within the existing transmission line ROW and coincide with existing infrastructure such as public roads, bridges, and culverts. Any potential negative effects on waterbodies and watercourses will be mitigated accordingly by Newfoundland Power OPRs.

No in-water works are planned for the Project. Transmission line and fibre cable water crossings will be accessed via existing roads and established ROWs on either side of the crossing, therefore, no fording of rivers will be required during this Project. Potential interactions with surface water during the construction phase are limited to land disturbance near watercourses, which may cause erosion or siltation/sedimentation. There are four protected public water supply wells in the project area. A Section 61 permit to allow for development activity in a wellhead protected water supply area will be acquired.

Table 1: Groundwater protected public water supply wells in the project area

Community	Serviced Area	SA_NUM	Source Name	WS_NUM	Description	Supply Type	Source Type
St. Andrews	St. Andrews East	SA-0706	#3 Well	WS-G-0681	Protected Groundwater Zone 1 - Varied zones of protection in which specific activities are prohibited.	GW	Drilled
St. Andrews	St. Andrews	SA-0705	#2 Well	WS-G-0680	Protected Groundwater	GW	Drilled

					Zone 1 - Varied zones of protection in which specific activities are prohibited.		
St. Andrews	Air Strip Road	SA-0852	#4 Well Strip Road Well	WS-G-0821	Protected Groundwater Zone 1 - Varied zones of protection in which specific activities are prohibited.	GW	Drilled
St. Andrews	St. Andrews	SA-0704	#1 Well	WS-G-0679	Protected Groundwater Zone 1 - Varied zones of protection in which specific activities are prohibited.	GW	Drilled

There are several unprotected groundwater public water supply wells in the proposed project area as well.

Table 2. Unprotected groundwater public water supply wells in the proposed project area

Community	Serviced Area	SA_NUM	Source Name	WS_NUM	Description	Supply Type	Source Type
Benoit's Siding	Benoit's Siding (aka Bennett's Siding)	SA-0048	Drilled	WS-G-0048	Unprotected Groundwater Zone 1 - Varied zones of protection in which specific activities are prohibited.	GW	Drilled

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Tompkins	Tompkins	SA-0764	Greg Wall Well	WS-G-0738	Unprotected Groundwater Zone 1 - Varied zones of protection in which specific activities are prohibited.	GW	Drilled
Upper Ferry	Upper Ferry-Middle	SA-0784	#2 Well – Hughie MacIsaac Well	WS-G-0758	Unprotected Groundwater Zone 1 - Varied zones of protection in which specific activities are prohibited.	GW	Drilled
Upper Ferry	Upper Ferry-Upper	SA-0785	#3 Well – Marshall Devoe Well	WS-G-0759	Unprotected Groundwater Zone 1 - Varied zones of protection in which specific activities are prohibited.	GW	Drilled
Great Codroy	Great Codroy East	SA-0306	#1 Well	WS-G-0299	Unprotected Groundwater Zone 1 - Varied zones of protection in which specific activities are prohibited.	GW	Drilled
Great Codroy	Great Codroy West	SA-0307	#2 Well	WS-G-0300	Unprotected Groundwater Zone 1 - Varied zones of protection in	GW	Drilled

					which specific activities are prohibited.		
O'Regans East	O'Regans East	SA-0541	Drilled	WS-G-0523	Unprotected Groundwater Zone 1 - Varied zones of protection in which specific activities are prohibited.	GW	Drilled
Upper Ferry	Upper Ferry	SA-0872	#4 Well – Angus MacNeil Well	WS-G-0841	Unprotected Groundwater Zone 1 - Varied zones of protection in which specific activities are prohibited.	GW	Drilled
Benoit's Siding	Doyles	SA-0916	#2 Well Doyles	WS-G-0873	Unprotected Groundwater Zone 1 - Varied zones of protection in which specific activities are prohibited.	GW	Drilled

2.1.2 Unforeseen Circumstances

If unforeseen conditions are encountered in an active work area, the Site Manager may implement additional protection measures to effectively mitigate and/or avoid environmental risk.

2.2 Organization and Use of the Environmental Protection Plan

This EPP is structured to ensure that potential effects and protective measures, pertaining to the construction of the Project, are understood by all personnel involved. For ease of use, separate sections have been created for each activity involved in the project. Each section includes all applicable protective measures for the type of work concerned by that section. It

is intended that each section of this EPP can be used as a standalone guide for use in the field.

2.3 Maintenance of the Environmental Protection Plan

The EPP has been designed to evolve and change with the environmental protection needs of the Project. The Site Manager, defined in Section 3.1.2, is responsible for maintaining and administering the EPP, including any revision requests.

Revision requests will be handled in the following manner:

- EPP Holders will forward recommended revisions to the Site Manager using the *EPP Revision Form* (Appendix A);
- Upon regulatory approval, the revision is enacted and changes will be incorporated into the EPP by the Site Manager;
- The Site Manager will communicate changes to staff, sub-contractors, and other site personnel during the daily tailboard meeting;
- The Site Manager will update the EPP accordingly and in a timely fashion; and
- The Site Manager will forward the revision to all EPP Holders.

3.0 RESPONSIBILITIES AND TRAINING

The primary responsibility for implementing this EPP rests with the Site Manager who will have knowledge of erosion and sediment control mechanisms.

3.1 Roles and Responsibilities

The descriptions that follow outline the roles and responsibilities of specific personnel related to the EPP.

It should be noted that all personnel have the authority to stop Project activities if an unacceptable risk to the environment, health, or safety is identified.

3.1.1 Project Manager

The Project Manager will act as a liaison between the Proponent and the Site Manager, overseeing the planning and execution of Project activities.

The Project Manager will be responsible to:

- Designate a Site Manager;
- Develop and provide Project information (*i.e.*, scope, tasks, schedules) to the Site Manager;
- Prepare applications for environmental, or other required permits for Project activities;
- Manage Project costs;
- Provide Project status updates to the Proponent;
- Ensure Project activities comply with applicable federal, provincial, and municipal standards or regulations;

- Retain all environmental incident forms, including all spills and health and safety related incidents; and
- Develop and advise the Site Manager on appropriate measures to manage unexpected environmental conditions or events.

3.1.2 Site Manager

The Site Manager will be responsible to:

- Implement/enforce the requirements of the EPP with all staff, including Sub-contractors and sub-contractors;
- Promote and demonstrate commitment to Environmental, Health, and Safety (EHS) policies;
- Ensure that all site personnel are competent, adequately oriented, and fully aware of their obligations;
- Remain informed of the principles and procedures outlined in this EPP;
- Inform all personnel of changes to the EPP (*i.e.*, through tailboard meetings);
- Implement any necessary corrective actions;
- Advise on site-specific erosion and sedimentation control issues;
- Complete routine environmental inspection and monitoring;
- Provide appropriate plans and resources so that all environmental commitments can be met;
- Ensure compliance with all applicable regulations, authorizations, permits, and protocols;
- Review incident reports and implement appropriate measures to manage further unexpected environmental conditions or events;
- Maintain active lines of communication with sub-contractors, appropriate regulators, and other involved parties on behalf of the Proponent;
- Provide timely updates, where necessary, on the implementation of the EPP to the Proponent; and
- Track implementation of the EPP.

3.1.3 Sub-contractors & Other Personnel

All persons working on the Project are required to:

- Protect themselves, others, and the environment by exercising appropriate caution, identifying hazards, and implementing measures to reduce the hazards;
- Comply with all regulations, the Proponent's EHS policy, and any requirements set forth in this EPP;
- Familiarize themselves with the EPP and any revisions made throughout the duration of the Project;
- Adhere to the procedures provided in the EPP as well as any applicable EHS policies, regulations, permits, and authorizations;
- Initiate revision requests, when required, to improve the EPP;
- Notify the Site Manager immediately of any incident that results in (or could result in) injury to personnel, property, or the environment (including near misses); and
- Shut down an operation if it poses a threat to the environment, health, or safety.

3.2 Training and Orientation Requirements

The Site Manager will enforce the requirements of the EPP. EPP training and orientation will be provided to all personnel working on the site, where applicable, and may include:

- The Proponent's EHS commitments and obligations to this EPP;
- Discussion of specific site activities and the particular environmental issues which pertain to them;
- Specific focus on any areas of special environmental consideration (*i.e.*, scheduled salmon rivers);
- A detailing of all environmental protection procedures that are outlined in this EPP, with direction to any supporting documentation;
- Communication procedures for reporting any unplanned events or emergencies requiring immediate response;
- Procedures for maintaining the EPP; and
- Enforcement of the EPP.

Additional training requirements may include:

- Environmental Job Specific Training
- Workplace Hazardous Materials Information System (WHMIS);
- First Aid;
- Fire Prevention and Response (including the use of any available firefighting equipment); and
- Spill Response.

At least one person trained in the use of spill response equipment should be present on the site at all times.

The following are various types of additional training/orientation that could arise during the different stages of the Project.

Detailed Review with the Site Manager

Prior to the commencement of the Project activities, the Site Manager will review the directives outlined in this EPP. The objective of this review will be to ensure that adequate measures have been taken to ensure the success of this EPP during Project activities.

Project Kick-off Meeting

Before any disturbance occurs to the existing environment, the Site Manager will convene a meeting with the main supervisory personnel for all sub-contractors to review this plan, the key elements, and the roles and responsibilities therein.

Daily Tailboard Meetings

Prior to the start of each work shift or when new personnel arrive to site, a tailboard meeting with all site personnel shall be conducted. These meetings will be held to convey any safety,

health, or environmental concerns that have arisen, or are expected to arise, during the shift as well as any revisions to the EPP.

3.2.1 Records

The sub-contractor, on behalf of the Proponent, shall maintain on-site records of all environmental training, as well as the following records:

- Transportation of Dangerous Goods (TDG) Shipping Records (if applicable);
- Environmental incident forms, including all spills and health and safety related incident details;
- All waste-disposal waybills and other applicable shipping documents;
- Any incident reports of worker exposure to potential hazardous materials; and
- Safety Data Sheets (SDS) for all products on-site.

Note: A copy of all incident reports will be submitted to the Site Manager for entry into Devonway and retained for a period of two years following the completion of the Project.

3.3 Complaint Resolution Plan

For environmental concerns identified by local citizens, including any concerns associated with drinking water and recreational water in the vicinity of the Project site, Newfoundland Power will have on-site signage that will direct citizens to call the company's internal call centre, where their inquiry or concern will be directed to the appropriate person.

Call centre personnel will keep a log of any calls received associated with the Project and make this information available to the Project Manager and Site Manager. Depending on the call/complaint frequency, issues will be reviewed during site supervision planning meetings on a daily, weekly, or monthly basis, as applicable, to ensure that issues are being responded to and mitigated in a timely fashion. Resolutions may involve the development of additional standard operating procedures or site-specific mitigations. Complaints will be handled on a case-by-case basis and response procedures will be modified as necessary, depending on the frequency of complaints received.

The Site Manager will be responsible for responding to complaints which occur in the immediate vicinity of Project activities. Training for Sub-contractor leads will also be provided and a copy of this EPP document will be available to them and remain updated with respect to emergency contacts and procedures. All complaints received and resolutions undertaken at a Project site must be recorded by the Site Manager.

4.0 PROTECTIVE MEASURES

The Project will involve a variety of activities. Environmental interactions related to the Project are discussed in this section, followed by environmental protection procedures that have been designed to reduce any potential effects. Additionally, this section outlines operating procedures developed by the Proponent, Bell Canada, that may relate to specific environmental interactions.

The general environmental protection procedures applicable to the Project include:

- Compliance with conditions outlined in all required permits/approvals;
- Compliance with the environmental and occupational health and safety conditions outlined in any tender documents for the Project;
- Adherence to the erosion and sediment control measures detailed in the Erosion and Sediment Control Plan (ESCP), once developed;
- Completion of work as soon as possible (suspension of work may occur during and immediately after intense precipitation and periods of high run-off); and
- Compliance with environmental protection procedures for on-site storage and disposal of Project related materials as described below.

All applicable guidelines and regulations referred to in the following sections are listed in Appendix B.

4.1 Vegetation Clearing

During site preparation for work areas, laydown areas, roads, and ROWs, clearing of vegetation, such as trees and shrubs, is necessary. Environmental concerns of this activity include loss of habitat, sedimentation of watercourses, and potential disturbance or destruction of historic resources, which is highly unlikely.

Environmental Protection Procedures

The following measures shall be implemented to reduce the potential effects of vegetation clearing:

General

- clearing within waterbody buffer zones along the ROW shall be reduced to a 5m wide travel route, or as required for equipment;
- applicable permits including a Commercial Cutting Permit and an Operating Permit when required will be obtained before the start of vegetation clearing;
- all clearing shall comply with the requirements of all applicable permits;
- a cutting permit shall be obtained prior to the start of any site clearing. Clearing and tree removal shall be restricted to the minimum areas needed for the site and stockpiles;
- clearing shall consist of cutting to within 15 cm or less of the ground and stockpiling of all merchantable timber; as well as the removal, piling and mulching of shrubs, debris and other non-merchantable timber in the area, as appropriate;
- disposal of cleared non-merchantable timber, slash and cuttings from cleared areas shall take place through mulching and/or piling to minimize the amount of slash;
- if slash piles are to be used, they shall be piled so as not to cause unnecessary damage to vegetation outside the ROW. A 6.5 m break in slash piles shall be made every 200 m to allow for drainage and animal access. The maximum height of the piles shall not exceed 3 m;
- limits of clearing shall be shown on all drawings issued for construction. Only those areas designated on drawings shall be cleared. Trees shall be blazed/flagged at intervals in advance of clearing to demarcate the limits of the work. Blazed trees shall

- not be felled. Clearing activities shall not remove any trees outside the authorized clearing limits;
- slash, mulched debris and any timber shall not be permitted to enter any watercourse. All timber and slash/debris shall be piled/disposed of above spring flood levels;
- mechanical clearing by mechanical harvesters shall likely take place within the main construction areas and ROWs. For other clearing required, chain saws or other hand-held equipment may be used except where alternative methods or equipment are accepted by Newfoundland Power;
- mechanical clearing by means other than mechanical harvesting equipment (i.e., bulldozer or excavators) shall not occur;
- firefighting tools and water delivery systems must be available, as required, by the Operating Permit for the activity;
- a buffer zone of undisturbed vegetation shall be maintained between construction areas and all waterbodies, watercourses, and ecologically sensitive areas (refer to Section, "Buffer Zones" within this document), unless otherwise authorized. Buffer zone features shall be key elements of the environmental review of drawings prior to construction;
- where possible, timber shall be felled inward toward the work area to avoid damaging any standing trees within the immediate work area;
- workers shall not destroy or disturb any features that are indicative of a historic or archaeological site. Any such findings shall be reported immediately to NL Power (refer to Section "Discovery of Heritage or Archaeological Resources");
- clearing activities shall be in compliance with the Migratory Bird Management Plan (refer to Section "Wildlife Management");
- no clearing shall take place within 800 m of an active raptor nest. If a nest is encountered during clearing activities, all work shall stop until approval to continue has been given, in consultation with the appropriate regulatory agencies;
- if a tree containing an inactive raptor nest is encountered during transmission line clearing, a platform shall not be required as the tower shall provide an alternative nesting site;
- all merchantable timber shall be salvaged. It shall be cut into standard harvesting lengths (i.e., 2.5 - 3.5 m lengths), trimmed, and stored in identified stockpile areas;
- all merchantable timber within the specific clearing limits shall be stockpiled so as not to obstruct the access of work of others;
- all salvaged timber shall be piled at right angles to ROW so as not to obstruct the access or work of others, damage vegetation or be placed within buffer zones of critical habitat; and
- measures will be taken to ensure public safety, namely during clearing in residential, cottage, and recreational areas where public presence is elevated.

For the purposes of this EPP, merchantable timber is defined as being 2.5 m or more in length with a top diameter not less than 9.1 cm and being of generally sound condition. Non-merchantable timber consists of all other vegetation with no merchantable value, such as small trees, shrubs, limbs and/or branches.

Erosion and sedimentation can occur at any time during Project activities; however, the highest potential for erosion occurs during site preparation activities such as clearing, grubbing, and grading. Furthermore, any precipitation in combination with the site gradient and highly erodible soils will increase the potential for erosion. Control of erosion and potential sedimentation is essential for the protection of watercourses and wetland habitat present on the site. Mitigation measures for the Project will emphasize the prevention and control of erosion and sedimentation rather than treatment of sediment.

4.2 Erosion and Sediment Control

Erosion and sedimentation can occur at any time during Project activities; however, the highest potential for erosion occurs when accessing the site with heavy equipment (some vegetation removal may be required) and during the removal of poles, anchors, and other infrastructure present on the site. Furthermore, any precipitation in combination with the site gradient and highly erodible soils will increase the potential for erosion. Control of erosion and potential sedimentation is essential for the protection of watercourses, wetlands, and drinking water sources present on the site. Mitigation measures for the Project will emphasize the prevention and control of erosion and sedimentation rather than treatment of sediment. For this project, there is the possibility of erosion and sedimentation which will be mitigated by the ESCP. New poles will be used to replace older poles, but no new pole locations are planned.

Environmental Concerns

Disturbance, removal, and stockpiling of materials could create the potential for erosion, leading to sedimentation of water bodies and a degradation of water quality. This Project is also within proximity to several scheduled salmon rivers, and therefore, the harmful alteration, disruption, and destruction (HADD) of fish and fish habitat as a result of erosion and sedimentation is of concern.

Environmental Protection Procedures

For this project, Newfoundland Power's ESCP and relevant OPRs will mitigate the effects of erosion and sedimentation. The ESCP must be implemented and adhered to in order to minimize the potential for soil erosion at the site. The ESCP will address the following:

- Applicable federal, provincial, and municipal regulations and procedures outlined in the NL Department of Environment and Climate Change (NL ECC) [Chapter 10: Environmental Guidelines for General Construction Practices](#) and [Measures to protect fish and fish habitat \(dfo-mpo.gc.ca\)](#).
- Discharge criteria for sediment laden water;
- Erosion and sediment control inspection requirements;
- Permitted areas for soil disturbance and/or infilling;
- Sediment fencing locations and installation instructions;
- Mandatory ditch installations, lining components, and check dams;
- Guidelines for the siting and storing of construction and fill stockpiles;
- Dust generation mitigation measures (e.g., bed linings, spraying unpaved access roads with water etc.);
- Restricted areas for fuel storage, refueling, lubrication or cleaning of equipment based on watercourse/wetland buffers;

- Outline additional protection measures in preparation for precipitation events; and
- Seed and/or hydroseeding applications (where applicable).

Successful implementation of the ESCP will require that the Newfoundland Power crews or the sub-contractor:

- Install all control measures as indicated in the ESCP;
- Prevent the operation of machinery or equipment in wetland habitat or watercourses;
- Install and maintain sediment control measures prior to the commencement of activities and until the site is permanently stabilized; and
- Educate all personnel about the procedures outlined in the ESCP, relevant guidelines, and the importance of erosion and sediment control measures and plans.

Specific erosion and sediment control (ESC) measures that will be performed during all site activities will include the following:

- All ESC measures utilized shall be in compliance with the document *Chapter 10: Environmental Guidelines for General Construction Practices*, issued by Newfoundland and Labrador Environment and Climate Change (NL ECC), as well as federal, provincial, and municipal laws, regulations and guidelines that apply, including (but not limited to) the NL *Environmental Assessment Regulations, 2003*, *Canadian Environmental Protection Act, Fisheries Act* and the Canadian Council of Ministers of the Environment (CCME) guidelines.
- The sub-contractor performing the work is ultimately responsible for the protection of natural water bodies from sediment-laden runoff originating from the site and shall ensure that sediment-laden water above discharge criteria does not leave the site.
- All development work shall be planned and completed in stages to expose only limited areas of soil at one time. Minimizing the extent of exposed soils and duration of exposure will be the most significant and pertinent control measure of this plan.
- All ESC structures utilized for the work shall be installed prior to the start of work. ESC structures shall be functional and remain in place at all times until Project activities are completed and all work areas are permanently stabilized. All ESC structures shall be removed following final site stabilization.
- Sediment discharge into wetland areas shall not be permitted during the Project. For watercourses and water bodies, discharge criteria shall include a total suspended solids (TSS) concentration not exceeding 25 milligrams per litre (mg/L) above background levels, and a turbidity concentration not exceeding 8 nephelometric turbidity units (NTU) above background levels.
- Provincial Climate Change projections for the Port aux Basques area suggest that extreme precipitation events will become more intense in this region. Environment Canada's weather forecasts shall be monitored daily by the sub-contractor

- throughout the duration of the Project. When rainfall or heavy precipitation events are forecast, the Sub-contractor will verify that all work areas are stabilized with temporary surface cover and that all ESC structures are in place and functional.
- All ESC measures shall be inspected on a weekly basis, as well as before and after each rainfall event exceeding 10 mm. Any necessary repairs or alterations to the ESC measures shall be made immediately.
 - Wherever possible, existing vegetative cover shall be left undisturbed. Where applicable, any grubbing's generated during clearing activities shall be kept on-site for reuse as cover material.
 - Soil disturbance and/or infilling shall only be completed in permitted areas and all boundaries shall be identified using stakes. Wherever possible, disturbed soils shall be left loose (*i.e.*, only compacted in required areas) to promote surface water infiltration and minimize the generation of surface flow.
 - Sediment fencing shall be installed on contours down-gradient of all work areas and up-gradient of adjacent wetlands, watercourses, and/or water bodies. Sediment fence shall consist of a manufactured product specifically designed for use as sediment fence, and it shall be installed as per the manufacturer's instructions. Soils and vegetative cover shall not be disturbed within 2 m of the sediment fence, and care shall be taken to prevent damage to sediment fence during project activities. Damaged sediment fence shall be replaced within 24 hours of detection, or immediately if rainfall is imminent.
 - Where applicable, clean surface water shall be diverted around work areas using drainage channels such as swales and/or ditches. Separate drainage channels shall be utilized to direct surface water away from disturbed areas. All drainage channels utilized for the work shall have a positive grade with no dips to collect water, and shall be lined either with grass or granular material.
 - Check dams shall be installed in any drainage channels utilized for the work, provided construction of check dams will not cause overflow of the channel. Sediment build-up shall be removed from check dams as required.
 - All trucks hauling fill to and from the site will be covered (*e.g.*, cloth, tarps, etc.) to prevent dust generation. Vehicle traffic on exposed soils shall be minimized. If wet material is being transferred off-site, truck beds should be lined to prevent unwanted residue from escaping.
 - Areas for fuel storage, refuelling, maintenance, lubrication, or cleaning of equipment shall be located at least 30 m from all wetland areas, watercourses, and/or water bodies.

- During dry, windy weather, any unpaved access roads on-site or in the immediate vicinity of residential homes, shall be sprayed lightly with clean water to prevent dust generation (at the direction of the Site Manager). Any paved access roads shall be swept to remove excess sediment tracked from work zones, if possible.
- Any fill stockpiles stored on-site shall be compacted in a berm shape using appropriate equipment, protected from precipitation using anchored tarps, and placed up-gradient of ESC structures to capture runoff. Sediment fence shall be installed and maintained around the perimeter of any stockpiles, approximately 2 m from the toe of the pile.
- Water from excavations and dewatering shall be pumped through filter bags to vegetated areas up-gradient of ESC structures.
- Sediment fence shall be installed at the inlets of any culverts or drains, and rock dams shall be constructed at the outlets of any culverts, drains, ditches, or swales where the velocity of flow may cause erosion. Geotextile fabric shall be anchored under the cover of catch basins located within or down-gradient of work areas to prevent infiltration of sediment-laden runoff. Sediment build-up should be removed as required to prevent clogging of sediment fence and geotextile.
- All exposed soils shall be covered prior to precipitation events to temporarily prevent erosion. This temporary cover shall consist of a suitable material, such as straw mulch, wood chips, grubbing, grass, and/or polyethylene tarps. Temporary cover shall be continuously applied and maintained as required throughout the Project until all work areas are permanently stabilized.
- All soil piles will be covered and/or appropriately sloped during breeding season to prevent nesting of migratory birds.
- The application of seed or sod for temporary or permanent site stabilization shall be in conformance with applicable landscaping plans. The seed species used shall not be invasive, and the application of fertilizers to seed or sod shall be limited.
- Final stabilization will be achieved when surface soils are no longer exposed and permanent surface cover is in place in all work areas.

4.3 Non-Hazardous Solid Waste Disposal

A moderate to large amount of non-hazardous waste is created during any construction project. Waste build-up causes unsightly deposits and although the waste will be non-hazardous, some potential environmental concerns remain.

Environmental Concerns

The presence of non-hazardous waste on-site could potentially create issues to surrounding environments if waste is transported off-site due to wind conditions, improper storage, and/or improper handling and transportation. Improper storage or an untidy site can lead to waste that may contaminate soils and surface water and may also increase the potential for wildlife presence on the site which could endanger both the wildlife itself and site workers.

Environmental Protection Procedures

Newfoundland Power has operating procedures that outline protocols with regard to recycling (OPR600.02 Recycling) and waste disposal (OPR200.04 Waste Disposal). In addition to these documents, the following procedures will minimize the potential environmental effects associated with non-hazardous waste:

- Comply with all federal, provincial, municipal, and facility-based waste disposal regulations and requirements;
- when considering waste disposal options (including organic waste), it must be ensured that waste is disposed of at a waste disposal facility or facilities approved to accept the type and projected quantity of waste material. Brush should be chopped/shredded and may be removed to an approved compost facility or an approved waste disposal site for disposal with the prior permission of the owner/operator;
- Provide on-site facilities for the collection, handling, and storage of anticipated quantities of waste materials, including recyclables and re-usable items;
- Maintain progressive cleaning by keeping the work area in tidy condition, free from the accumulation of waste products and debris;
- All waste material generated is to be placed in suitable refuse containers and transported to an approved waste disposal site on a weekly basis, with the approval of the site owner/operator;
- Separate all waste into recycling and non-recycling streams as outlined by local waste management programs and transport recyclable materials to an authorized recycling facility for disposal;
- Remove all debris from the site and deposit into the appropriate waste container(s) at the end of each working day;
- Store all waste in appropriate containers at an approved location on-site until removal from the site for disposal;
- Minimize generated waste by implementing the principles of reducing, re-using, and recycling;
- Re-use materials on-site wherever possible and evaluate salvageable items for re-sale to other parties;
- Derelict vehicles, scrapped equipment and other debris is not to be stored on the site. This material must be disposed of at an approved waste disposal site or scrap yard on a regular basis, with the prior approval of the facility's owner/operator;
- Brush will be chopped/shredded and removed to an approved waste disposal site for proper disposal with the permission of the owner/operator of the waste disposal site. Tires and used or waste oil are not to be used to aid in the burning of brush;
- Cover dry materials and waste materials to prevent blowing dust and debris;

- Temporary, on-site stockpiling of non-hazardous, clean materials (*i.e.*, excavated materials) will be permitted prior to utilizing the materials as fill (stockpiles will be covered, if necessary, with tarps);
- Temporary storage of waste materials on-site will be located at least 30 m from known watercourses, wetlands, and water bodies;
- Burning and burying of waste materials on-site is prohibited;
- Open burning of tires; plastics; treated lumber; asphalt and asphalt products; drywall; demolition waste; hazardous waste; biomedical waste; domestic waste; trash, garbage, or other waste from commercial, industrial or municipal operations; manure; rubber; tar paper; railway ties; paint and paint products; fuel and lubricant containers; used oil; animal cadavers; hazardous substances; materials disposed of as part of the removal or decontamination of equipment, buildings or other structures is prohibited;
- Store food waste in such a manner that it will not be accessible to wildlife; and
- Use non-discharging chemical washrooms if necessary.

4.4 Sewage Disposal

All sewage disposal activities shall comply with Newfoundland and Labrador's Health and Community Services Act, 1997 and the Environmental Control Water and Sewage Regulations, 2003 under the Water Resources Act, 2003.

Environmental Concerns

The accidental release of untreated sewage is a concern to human health, drinking water quality, and freshwater and marine ecosystems. This applies to effluent from a sewage treatment system that does not meet the limit set in Schedule A of the Environmental Control Water and Sewage Regulations, 2003.

Environmental Protection Procedures

- Development of sewage treatment facilities shall be undertaken in consultation with the relevant regulatory agencies for a temporary or permanent sewage collection system, and a Certificate of Approval shall be obtained from the Service NL and/or the ECC;
- The health inspector with Service NL is the approval authority for sewage flows under 1000 gallons. The general sanitization of the site is under the jurisdiction of the health inspector who shall perform periodic inspections;
- all sewage disposal activities shall comply with Section 36(3) of the Fisheries Act;
- wastewater, septage, sludge, bio-solids, or other types of hazardous or deleterious liquids from the Project Site shall not be allowed to be discharged to public wastewater collection systems or treatment facilities;
- should development require the installation of a subsurface sewage disposal system, plans and specifications for an approved sewage disposal system must be submitted and approved. These plans must be in conformance with the Sanitation Regulations and the Private Sewage Disposal and Water Supply Standards, 2006 and prepared by an approved designer. A mobile "pit privy/port-a-pottie" may be used if emptied regularly by a certified septic hauler;

- If a Certificate of Approval is required for a sewage system, Digital Government and Service NL should be contacted;
- for septic systems, the location of a tile field shall be clearly marked, and vehicular traffic shall not be permitted to operate within this defined boundary; and
- portable washrooms and toilets used at any Project site shall be routinely inspected and properly maintained. Sewage sludge removed from the facilities shall be transported off Site for approved treatment and disposal. Companies engaged to perform this work must have approval from Service NL and/or ECC. Copies of government approvals must be provided to NL Power before work can proceed. All human sanitary waste must be contained and disposed of in a manner that meets all environmental and health requirements. Any concerns must be brought to the immediate attention of NL Power and H&S Coordinator.

4.5 Contaminant Prevention Plan

4.5.1 Hazardous Materials/Waste Materials Management

During the life of the Project there are multiple products that may be used or encountered that may be classified as hazardous materials. These products include, but are not limited to, petroleum fuel, oils, and lubricants (POLs). Construction of the transmission line will involve the use of poles and timbers chemically treated with preservatives.

Environmental Concerns

The major environmental concerns related to the use and storage of hazardous materials/hazardous waste materials are inappropriate usage and uncontrolled release into the environment through spillage or run-off causing subsequent adverse effects to terrestrial habitat, soil, surface water and groundwater quality, and human health and safety. In addition, rain and water can leach hazardous chemicals from treated poles and timbers, releasing them into the soil, ground water, and surface water.

Environmental Protection Procedures

To manage and minimize the impacts from the use of chemically treated poles and timbers, the procedures outlined in OPR200.03 (Chemically Treated Poles and Timbers) will be followed for usage, storage, and disposal.

All construction activity may involve the use of petroleum products and other lubricating and industrial liquids, including in vehicle and tool maintenance. The use and storage of these substances will follow all procedures outlined in OPR200.02 Management of Lubricating and Industrial Liquids.

The procedures and requirements of a WHMIS program shall also be in place in regards to all hazardous materials. The WHMIS procedures and requirement reinforce the proper handling, storage and control of hazardous or toxic materials thereby reducing the potential for accidental release and associated potential environmental effects.

Transportation of hazardous materials will be done in compliance with the Transportation of Dangerous Goods Regulations. Directors and Managers will have responsibility for ensuring compliance to the TDG regulations, as outlined in OPR105.03 Transportation of Dangerous Goods (TDG).

In addition to the management measures outlined in the above operating procedures, the following mitigation measures will also aid to minimize the potential environmental effects associated with the handling and storage of hazardous materials:

- Ensure that hazardous materials/waste materials are handled only by personnel who are trained and qualified to do so, and in a manner consistent with government and manufacturer recommendations for handling;
- Ensure that all hazardous materials are properly labeled and stored in compliance with WHMIS requirements;
- Storage containers shall be in good condition, free of rust and cracks;
- No fuel cache or storage containment of any type is to be installed on site;
- In the event that fuel storage is required, any drum-based fuel storage shall be reviewed by the Government Service Centre prior to installation;
- If stored outside, hazardous materials shall be protected from the elements and meet the requirements of Fire code regulations. Tarps are not permitted;
- The storage, handling and disposal of used and or waste oil must be in compliance with the *Used Oil and Used Glycol Control Regulations*;
- Designate a specific, contained area at least 30 m from a wetland or watercourse for handling and storage;
- Used oil and used glycol shall be retained in a tank or closed container. If applicable, the tank shall be registered and/or the container shall be approved by the Department of Digital Government and Service NL. Collection shall occur by those holding a valid certificate of approval and disposal which shall be in accordance with section 6 of the *Used Oil and Glycol Control Regulations*;
- While on site, mobile fueling tanks are to remain at the designated fueling area;
- Store POLs on flat, level terrain which has been approved by the Site Manager;
- Biodegradable alternative to petroleum-based hydraulic fluid for heavy machinery should be considered for use in place of petroleum products whenever possible;
- Comply with all applicable provincial and federal regulations for fuel storage;
- Keep firefighting equipment on-site, in close proximity to POLs, or other hazardous materials, and maintained to manufacturer's specifications;
- Spill response equipment shall be readily available on-site. Response equipment, such as absorbents and bags or bins for collection of cleanup debris, should be stored in an accessible location on-site;
- Persons working on the Project shall be knowledgeable about spill response procedures;
- Any spill or leak of gasoline or associated product is to be reported immediately to the System Control Centre;
- Permit smoking in designated areas only;
- Ensure all site personnel wear appropriate PPE;

- The Site Manager will maintain, and update accordingly, an inventory of all hazardous materials on site;
- Ensure that SDS are available for all hazardous materials in use or stored at the site;
- Implement a Spill Contingency Plan (Section 5.1) and designate personnel to be trained in the procedures and responsibilities outlined in the contingency plan;
- Separate waste oils and lubricants in containers or tanks, with sealable lids, and remove and dispose of these in an acceptable manner in accordance with provincial and federal regulations (Appendix B);
- Remove all potentially flammable waste and contain in special containers for disposal at an approved facility;
- It is prohibited to deposit a substance or combination of substances that could be harmful to wildlife in waters or an area frequented by wildlife or in a place from which the substance may enter such waters or such an area.
- Devices or tanks used to separate and remove oily wastes from oil and water mixtures may require registration under the Used Oil and Used Glycol Control Regulations;
- Burning, diluting, or mixing of hazardous materials for disposal is prohibited;
- If applicable, follow all federal, provincial, and municipal regulations that apply to the disposal of pesticides and fertilizers;
- When applying pesticides ensure all label directions are followed;
- All pesticide use, meaning the purchase, transport, storing, possessing and handling is subject to compliance with the Pesticides Control Regulations, 2012;
- If the use of a pesticide is required a Pesticide Applicator License will be required; and,
- Transportation of all hazardous waste will be conducted in compliance with the *Transportation of Dangerous Goods Act (1992) (TDGA)* and by a qualified company.

Pesticides will not be used on behalf of Newfoundland Power without first consulting the Manager, Environment. Herbicides are not permitted for use on Species at Risk including Blue felt lichen, Tradescant's aster, Wrinkled shingle lichen, Feathery false Solomon's seal. Sharpleaf aster and Boreal felt lichen.

4.5.2 Wastewater Management

Wastewaters containing various contaminants or high levels of suspended solids may be produced as a by-product of Project activities such as clean-up, disinfection, dewatering, and equipment maintenance.

Environmental Concerns

If not properly managed and disposed of, deleterious wastewaters may enter the surrounding environment through spillage or run-off, causing adverse effects to the terrestrial environment, groundwater quality, and human health and safety. Phosphorous and nitrogen containing detergents are commonly used in wash water for cleaning equipment. Excesses of these nutrients can be a major source of water pollution. Provincial and federal legislation regulates the release of wastewaters into aquatic receptors, including the Provincial *Environmental Control Water and Sewage Regulations*. Federal regulations include *the Fisheries Act*, which prohibits the release of any deleterious substance (including

wastewater) into water frequented by fish or in any place where the deleterious substance may enter such water.

Environmental Protection Procedures

The following procedures will be followed for the management and/or discharge of wastewaters which are directly derived from activities related to the Project:

- Ensure no discharge of wastewater or water containing suspended materials occurs into water bodies, watercourses, wetlands, drainage systems, or accumulates on the ground;
- Control the disposal or run-off of wastewater containing harmful substances in accordance with the ESCP and all provincial, federal, and municipal regulations;
- Adhere to provincial and federal guidelines for the protection of fish habitat;
- Adhere to provincial Environmental Control Water and Sewage Regulations under the Water Resources Act;
- Use approved, non-discharging mobile sanitary wastewater treatment units;
- Contain and remove all wastewater and mud generated during project activities for proper disposal and install silt fencing down-gradient of wastewater-generating activities to capture run-off;
- If required, water originating from excavations and dewatering of excavated materials can be pumped through a filter bag prior to discharge;
- Use detergents sparingly, and limit uses on the site;
- Do not allow the accumulation of wash water containing detergents on the ground;
- Designate an area, a minimum of 30 m away from watercourse and wetland habitats, for vehicle maintenance and washing; and
- Contain wash water for disposal at a wastewater treatment plant.

4.6 Noise Management

The operation of heavy equipment and large vehicles will create an increase in noise levels during Project activities.

Environmental Concerns

Noise caused by Project activities may cause short term disturbance to nearby receptors and wildlife, including birds.

Environmental Protection Procedures

The following procedures will minimize the potential environmental effects associated with increased noise:

- Provision of advanced notification to affected parties (e.g., nearby residents) concerning project durations, defining activities that are expected to be noisy and their expected duration, what noise mitigation measures are being applied, and when noise respite periods will occur;
- Working hours will be regulated by conditions of nearby municipalities;
- Keep Project vehicles to designated Project transportation routes and parking areas;
- Maintain Project vehicles and equipment to avoid elevated noise levels and, where possible, install noise muffling equipment;

- Limit vehicle idling;
- Where feasible, implement methods and select equipment which produces reduced noise levels;
- Sources of loud and random noise should be minimized during the migratory bird season. If avoidance is not possible, a migratory bird inspection must confirm the absence of migratory birds in the project area and noise must be minimized to the extent possible;
- Restrict noise-intensive activities to the hours of 0700-1900 hours, where practical;
- Ensure that Site Manager's periodically check the site, nearby residences, and other sensitive receptors for noise problems;
- If noise levels become an issue to local residents, scheduling of specific activities should be directed by the Site Manager;
- Provide local residents with contact numbers for appropriate personnel in case of noise issues;
- Respond to any noise related complaints promptly by conducting inspection, monitoring, and reasonable corrective action(s), as necessary; and maintain records related to all noise complaints received;
- Where possible, provide an information board at the entrance to the site with contact details, hours of operation and regular information updates;
- Regularly train workers and sub-contractors to use equipment in ways that minimize noise;
- Consider nearby receptors when employing the use of radios and stereos outdoors and be aware of the overuse of public address systems;
- Avoid shouting, and minimize talking loudly and slamming vehicle doors; and
- Avoid the use of reversing alarms by designing the site layout and planning work to minimize reversing, such as by including drive-through for parking and deliveries, where feasible.

If Project activities proceed into the evening hours, additional night-time mitigation measures will be applied:

- Avoid the use of equipment that generates impulsive noise;
- Minimize the need for reversing alarms;
- Avoid dropping materials from a height;
- Avoid metal-to-metal contact on equipment;
- If possible, schedule truck movements to avoid residential streets; and
- Ensure that periods of respite are provided in the case of unavoidable maximum noise level events.

4.7 Air Quality

The operation of equipment used during project activities will result in temporary, short-term emissions of air pollutants, including dust, debris, and materials.

Environmental Concerns

Particulate matter can enter aquatic systems and cause siltation. Airborne particulate emissions can affect air quality, industrial hygiene, and worker safety.

Environmental Protection Procedures

Project activities will adhere to the measures outlined in the following Operating Procedures, as they pertain to air quality

- OPR600.01 Greenhouse Gas Emissions
- OPR200.10 Vehicle Emissions

The following procedures will minimize the potential environmental effects associated with decreased air quality:

- Apply water as necessary (and as determined by the Site Manager) to reduce vehicle traffic dust:
 - The Site Manager will determine the location, timing, and amount of water application;
 - Water will not be applied in situations where surface water could freeze and create a hazard; and
 - Care will be taken to ensure that the potential for surface run-off of sediment is minimized.
- Cover open hauling trucks with tarps, as necessary;
- Limit vehicle speeds to reduce dust generation;
- Ensure stabilization of disturbed/exposed areas upon completion of activities;
- Implement sediment control measures as outlined in ESCP;
- Respond to significant air quality concerns by:
 - Investigating the source of the emissions;
 - Monitoring as necessary; and
 - Evaluating the use and effectiveness of the mitigation measures.
- Clean up mud and dust from paved roads, where required;
- Establish soil and material stockpiles in areas least prone to be impacted by prevailing winds;
- Cease dust generating activities during periods of excessive winds;
- If dust levels become an issue to local residents, scheduling of specific activities should be directed by the Site Manager;
- Heavy equipment should be operated in a manner to maximize fuel efficiency, thereby reducing emissions; and
- Vehicles and other fuel powered equipment should not be left idling unless necessary.

4.8 Traffic Management

Project activity may cause an increase in vehicular and heavy equipment traffic in the immediate vicinity of the site.

Environmental Concerns

During the Project, vehicular and heavy equipment traffic will be frequently visiting the site and may result in temporary traffic delays. Although the Project will be completed off public roads, disruptions may occur when larger vehicles slow down to turn off of main roads.

Additionally, the increase in traffic can result in unsightly mud being tracked onto public roads and equipment movement has the potential to impact surface water quality through the release of sediment.

Project activities will adhere to the procedures outlined in the Traffic Control operating procedures (OPR112.14 Traffic Control) as well as the following procedures to minimize the potential environmental effects associated with equipment movement at the site:

- Adhere to the site specific ESCP;
- Operate equipment and vehicles only in designated areas;
- It is advised that heavy-duty vehicles do not use engine brakes within residential streets while moving to and from the site;
- Project staff should use the main navigation channels or access roads to get to and from the site
- Travel will avoid high-traffic times of day, when possible, to reduce local traffic;
- If dust/mud tracking from the site is an issue, all vehicles leaving the site will submit to an appropriate cleaning station;
- Excessive mud or soil on public roads from the Project site will be removed;
- Cover and secure all loads on vehicles before bringing material to or from the site;
- Equipment transport will utilize a minimum number of vehicles to minimize effects to roadway flow;
- All travel will be conducted using safe work practices for transporting oversized loads. Consideration will be given to oversized loads at night to avoid high traffic periods and allow lane closures, as necessary, to navigate turns along the route; and
- Upgrades will be made to roads and overhead wires, branches, and signs if conflicts arise. Modifications and subsequent reinstatement will be completed according to applicable specifications and guidelines.

There are several informal trails (in addition to the T'railway) used recreationally by members of the community for walking, snowshoeing, skiing, etc., that are near the Project area. During Project activities, increased vehicle and heavy machinery traffic may temporarily impact recreational use of these trails, however, these impacts will be short in duration and signage will be posted at trailheads and/or in vicinity of the work areas to advise local users of the Project activities, including anticipated timelines and durations of the disturbance.

4.9 Surface Water and Wetlands

The Project primarily passes through the established ROW from existing pole placements with some watercourse crossings along the existing transmission line corridor. The Codroy Valley contains an extensive network of waterbodies and watercourses that drain from the surrounding highlands into several major rivers and coastal estuaries. Two scheduled Atlantic salmon rivers and their tributaries are present in the alley:

- Little Codroy River (136), including Cooper's Brook, Southern Brook, and Western Brook; and
- Great Codroy River (137), including Broom Brook, Ryan's Brook, Mullchingnic Brook, the North Branch (Upper Brook, Lower Brook, Crooked Brook), and the South Branch (Bullhouse Brook).

Seventy-two potential water crossings exist in the project area. All identified crossings occur within the existing transmission line ROW and coincide with existing infrastructure such as public roads, bridges, and culverts.

Any potential negative effects on water bodies and watercourses will be mitigated in accordance with relevant federal and provincial legislation, along with standard environmental mitigation measures.

Project activities are required to comply with Section 36(3) of the *Fisheries Act* which states: “no person shall deposit or permit the deposit of a deleterious substance of any type in the water frequented by fish or in any place under any conditions where the deleterious substances or any other deleterious substance that results from the deposit of the deleterious substance may enter any such water.”

Environmental Concerns

Disturbance of surface soils during project activities may cause the release and mobilization of soils by wind or water into nearby surface water bodies and wetlands. Clearing of vegetation can create hydrologic alterations leading to wetland loss and degradation; however, anticipated vegetation clearing is expected to be minimal, and the Project site has already undergone disturbance during previous construction and maintenance activities along the transmission lines. Indirect effects such as the on-going use of machinery and vehicles adjacent to a watercourse could potentially result in sediment and erosion and/or contamination via accidental spills and leaks during all phases of the Project.

Environmental Protection Procedures

During project activities, a minimum 30 m undisturbed buffer must be maintained along all waterbodies and wetlands that appear on a 1:50,000 topographical map to protect sensitive riparian and aquatic species, and their habitat. A minimum 30 meter buffer from the high water mark of any water body (1:100 Flood Zone) must be maintained to maintain movement corridors for migratory birds. Depending on the final plan for Project activities, a Section 48 Permit under the Water Resources Act, SNL 2002 is required. This permit is issued by the NL Water Resources Management Division (NL WRMD) for any alterations to or within 15 m of a body of water.

The following measures will minimize impacts to water quality of nearby surface water and wetlands during all Project activities:

- A minimum 30 m undisturbed buffer must be maintained along all waterbodies and wetlands;
- Ensure that refueling is done outside of the above-mentioned buffers for all watercourses, drainage channels, and wetlands;
- Where avoiding disturbances is not possible, the use of approved Brush Mats, Wetland Mats or Timber Corduroy shall be utilized. It is preferable that non-merchantable timber be used when feasible. Within the wetland area, original contours and drainage patterns will be restored. Timbers may remain if it does not

- restrict the movement of water flow in the wetlands. Otherwise remove enough so that the remaining is below existing grade levels.
- Ensure temporary protection below fuel tanks and nozzles (*i.e.*, placement of absorbent spill pads or other temporary non-permeable liner and collection systems);
 - Ensure that equipment is in good working condition;
 - Minimize or eliminate discharge of oily waste into the environment;
 - Ensure that no water containing suspended materials is pumped into any watercourses, drainage channels, and wetlands;
 - Ensure that any released water does not exceed 25 mg/L above background levels for TSS;
 - Control disposal or run-off of water containing suspended materials or other harmful substances;
 - Ensure that material is not stockpiled within 30 m of on-site watercourses, drainage channels, and wetlands;
 - Develop and implement a drainage plan for the site;
 - Developments within wetlands should be avoided;
 - A Section 48 Permit under the Water Resources Act is required for development within wetlands visible on a 1:50,000 scale map. All conditions noted within the permit shall be maintained;
 - Runoff from the Project site should be directed away from watercourses and wetlands;
 - Work vehicles and/or heavy equipment will be cleaned and inspected prior to use to prevent the introduction of weed/invasive/non-native species to sensitive habitats such as wetlands;
 - Infilling within 15 m of a waterbody requires a permit under the *Water Resources Act, 2002* obtained prior to the start of infilling, and must comply with NL ECC *Policy for Infilling Bodies of Water*;
 - Implement all erosion and sediment control measures outlined in the ESCP; and
 - Follow procedures are outlined in Section 5.1 in the event of an accidental release.

4.10 Wildlife Management Plan

The Project site is situated in landscape surrounded predominantly by mixed wood forests and areas of wetland habitat, small waterbodies and watercourses. The surrounding habitat supports several wildlife and avian species that may be present within the general Project site and there is potential for wildlife encounters with on-site personnel. OPR 600.04 is to be used when wildlife are encountered.

Environmental Concerns

Wildlife encounters can be distressing to both personnel and wildlife and can result in personal injury, property damage, or injury to the wildlife. In the case of some wildlife, including birds, distress has the potential to alter feeding and breeding behavior, potentially causing injury or death. The removal or disruption of habitat for Project activities can distress and/or lead to mortality of wildlife.

Under the *Species at Risk Act* (SARA), it is unlawful to “kill, harm, harass, capture, or take an individual of a wildlife species that is listed as an extirpated species, an endangered species or a threatened species” under SARA. Under SARA, it is also forbidden to “damage or destroy the residence of one or more individuals of a wildlife species that is listed as an endangered species or a threatened species, or that is listed as an extirpated species if a recovery strategy has recommended the reintroduction of the species into the wild in Canada”.

Species at risk (as listed on Schedule 1 of *SARA* or *under NL ESA*) may occur within the Project area. An identification guide of the Species at Risk that may occur within the Project area is provided in Appendix D.

Migratory Bird Management Plan

Project activities may disturb migratory birds present on the Project site. Many species of birds use trees, as well as brush, deadfall, and other low-lying vegetation for nesting, feeding, shelter and cover. Additionally, several species nest at ground level, in fields, burrows or in stockpiles of soft soil. The *Migratory Birds Convention Act* (MBCA) protects migratory birds, eggs, nests, and young. Migratory birds protected by the MBCA generally include all seabirds (except for cormorants and pelicans), all waterfowl, all shorebirds, and most landbirds. Under Section 6 of the Migratory Birds Regulations, it is forbidden to disturb, destroy or take a nest or egg of a migratory bird, or to be in possession of a live migratory bird, or its carcass, skin, nest or egg, except under the authority of a permit. Any species at risk sightings should be reported to ECCC-CWS at ec.scfatldonneesei-cwsatliadata.ec@ec.gc.cac.

For species such as caribou which are not listed under SARA, but are listed under provincial legislation only or that have been assessed and designated by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC), it is best practice to consider these species in EA as though they were listed under SARA.

Environmental Protection Procedures

Newfoundland Power has the following operating procedures in place outlining management of any operation that could potentially impact birds, eggs or nests, and wildlife interactions to operations:

- OPR200.38 Migratory Birds
- OPR600.04 Wildlife
- OPR200.39 Species at Risk/Endangered Species

Differences between OPR200.38 Migratory Birds and the vegetation clearing window listed below should be noted, with the clearing window of April 15 to August 15 stated in this document will take precedence for this Project.

The following measures will minimize potential effect to wildlife, avifauna, rare species, and associated habitat:

- Should any Species at Risk be encountered during project activity, cease all activity and report immediately to the Environmental Manager. All activity may be stopped until further consultation from NL FFA – Wildlife Division;
- All species at Risk observations will be reported to NL FFA – Wildlife Division;
- If vegetation clearing is required, it will be completed outside of the breeding bird season of April 15 – August 15;
- Should vegetation clearing be required during this time-frame, searches for migratory bird nests must be undertaken within the area to be disturbed (in consultation with ECCC-CWS), and all identified nests must be flagged;
- No vegetation clearing is to occur within 800 m of a bald eagle or osprey nest during the nesting season (April 15 to August 15) and 200 m the remainder of the year. The 200 m buffer applies to all other raptor nests (e.g., Northern Goshawk, Sharp-shinned Hawk, Merlin, American Kestrel, Great-horned Owl, Boreal Owl, Northern Saw-whet Owl);
- The location of any raptor nest must be reported to the NL Fisheries, Forestry and Agriculture Wildlife Division;
- Migratory birds and their nests can be found at any time of year. Any active nests identified at all times of the year will be flagged;
- No vegetation clearing will be undertaken within 5 m of a flagged migratory bird nest;
- All stockpiles of materials will be covered and sloped to less than 70 degrees during breeding season (April 15 – August 15) to deter nesting. Migratory birds take up occupancy of these piles, any industrial activities will cause disturbance to these migratory birds and inadvertently cause the destruction of nests and eggs. Alternate measures will then need to be taken to reduce potential erosion, and to ensure that nests are protected until chicks have fledged and left the area. For a species such as Bank Swallow, the period when the nests would be considered active would include not only the time when birds are incubating eggs or taking care of flightless chicks, but also a period of time after chicks have learned to fly;
- Project staff should not approach concentrations of seabirds, sea ducks or shorebirds;
- Any observations of Species at Risk should be reported to ECCC-CWS;
- If there is any noticeable change in migratory bird numbers or distribution at the location during operations, ECCC-CWS should be notified;
- Ensure that food scraps and garbage are not left at the work site;
- Report all wildlife encounters to the Site Manager and fill out a Wildlife Observation Form (Appendix E);
- Minimize disturbance to natural habitat beyond what's necessary for the Project;
- Ensure that wildlife is not harvested, harmed, harassed, or fed by Project personnel;
- Project staff should not approach concentrations of migratory birds (e.g. seabirds, shorebirds, waterfowl, etc.)
- Limit site activities to designated workspaces;
- Implement erosion and sediment control, noise, and spill contingency procedures (refer to Sections 4.2, 4.5, 4.6, and 5.2);
- Incorporate vegetation into landscaping plans and ensure that all vegetation used in landscaping plans are native species only;

- Work vehicles and/or heavy equipment will be cleaned and inspected prior to use to prevent the introduction of weed/invasive/non-native species; and
- Equipment will be regularly inspected and cleaned prior to, during, and following the project to mitigate the spread of invasive species.

In the event of a wildlife encounter, the following response procedures shall be implemented:

- All encounters with wildlife will be reported to the Site Manager;
- A Wildlife Report form shall be completed;
- Should the presence of wildlife result in damage to property, problem wildlife or nuisance animals (including black bears, coyotes, moose and beavers) the incident can be reported to the nearest Forest Management District Office at St. George's, NL [(709) 646-3720 during daytime hours] and **(709) 649-1743 for after hour emergencies**;
- Incidents of dangerous wildlife encounters (including aggressive animals, animal/vehicle interactions, animal mortalities as a result of Project activities, etc.) should be reported to the nearest Forest Management District Office at St. George's, NL.

4.11 Recreational Area of Interest

Western NL supports a wide range of both recreational (e.g., hiking, camping, kayaking) and subsistence (e.g., hunting, fishing) activities. The Codroy Valley area is rich in natural resources, including highly valued game species such as Atlantic salmon, brook trout, black bear, and moose. Subsistence hunting is culturally significant for local residents, and the region also attracts hunters from abroad during seasonal harvests. The Project Area intersects four outfitter buffer zones, which are established by the Newfoundland and Labrador Department of Tourism, Culture, Arts, and Recreation (NLDTCAR) to restrict new development, particularly cottage development, within designated areas surrounding licensed outfitting operations. Other subsistence land use activities that may occur in the area include domestic wood harvesting, hunting, fishing, berry picking, snowmobiling, and all-terrain vehicle (ATV) use. The Project does not overlap with any Domestic Harvest Areas.

4.12 Excavation, Backfilling and Grading

Excavation, backfilling and grading of common rock and other materials may be required at various locations within the Project Site.

Environmental Concerns

The principal environmental concerns associated with excavation, backfilling and grading are potential effects on water quality and fish and fish habitat due to runoff of sediment laden water. Potential disturbance to rare species and habitat and archaeological resources must also be considered.

Environmental Protection Procedures

All work shall be conducted in a manner that ensures the minimum amount of disturbance necessary and controls potential sedimentation of watercourses and waterbodies in or adjacent to the work areas as outlined in the following procedures:

- Excavation, backfilling and grading shall be done only after grubbing and stripping is

- completed. Where engineering requirements do not require grubbing and stripping (e.g., within the buffer zone of a stream crossing), filling shall occur without any disturbance of the vegetation mat or the upper soil horizons;
- excavation, backfilling and grading in the vicinity of stream crossings shall be done in a manner that minimizes erosion and sedimentation of watercourses and waterbodies;
 - a buffer zone of undisturbed vegetation shall be maintained between construction areas and all watercourses, waterbodies and ecologically sensitive areas (refer to Section, "Surface Water and Wetlands"); and
 - any quarry materials (e.g., aggregate, fill, rock, stone, boulders, gravel, sand, clay, borrow material, etc.) that may be required for the project must be sourced from either a site covered by a quarry permit or quarry lease, an external source as a by-product of an approved development, or within the legal boundary of the project site (within the legal boundary of the corresponding lease / easement) provided that their excavation would be in compliance with other permits and understandings.

5.0 CONTINGENCY PLANS

It is important to consider any potential malfunctions, accidents, and/or unplanned events that could occur during the Project and to develop contingency plans in the event of an emergency. The following unplanned events may result in negative impacts to the surrounding environment and/or may require implementation of a contingency plan:

- Spills of POLs;
- Failure of erosion and sedimentation controls;
- Discovery of heritage/archaeological resources; and
- Fire.

Incident Reporting Procedures

The following procedures shall be followed in the event of an incident:

1. All incidents that result in personal injury, third party liability, fires, spills, explosions, or the possibility of the outcomes must be reported as soon as possible to the **System Control Centre (SCC) at (709) 737-5993** and Site Manager.
2. The Site Manager will be responsible for notifying the Project Manager immediately of any serious environmental incident.
3. Incidents of a less severe nature must be reported to the Site Manager within 24 hours.
4. The Site Manager will be responsible for ensuring that the incident is reported and entered into Devonway.
5. An electronic copy of the report will be reviewed by the appropriate personnel.
6. All communications shall be recorded and logged.

Additionally, as a Bell contractor, it is the responsibility of NL Power staff or sub-contractors to immediately report all environmental incidents—whether or not you are directly responsible—by contacting the Enviro-Line at 1 877 BELL ENV (1-877-235-5368).

Environmental Emergencies Include:

- Environmental Emergencies: Spills, leaks, releases impacting or not the environment resulting from operations or third parties;
- Government Inspections and Infractions: Inspection/Investigation by a government official or environmental legal infraction, or notice of alleged violation; and
- Public Complaints: Public complaint, group complaint, or poor press coverage.

5.1 Spill Control Plan

The following section addresses the prevention and response for accidental spills of POLs and other hazardous materials/hazardous waste materials during Project activities. This can include spills from containers (drums and tanks), breaks in hydraulic or transfer hoses, equipment leaks, and traffic or vehicle related incidents. Spills can contaminate soils, surface water, and groundwater, and can be toxic for wildlife. Spill response procedures are detailed in the Newfoundland Power's Emergency Preparedness and Response Procedures: Hazardous Substances, Spills, Fires and Floods (EPR100.02). A copy of EPR100.02 shall be kept on-site at all times.

All spills, regardless of size and origin, shall be cleaned up. Reporting and subsequent clean-up of spills will be the responsibility of Newfoundland Power staff or the Sub-contractor on site, for larger spills a Newfoundland Power consultant may be contacted as required. The Site Manager should ensure that basic spill clean-up equipment (spill kit) is available on all equipment to clean up or contain a spill according to EPR100.02. Large scale spill response kits and materials are maintained regionally. The following materials will be available at the site for spill response at all times for use in the event of an accidental release:

- Absorbent materials (hydrocarbon absorbent);
- Small equipment such as shovels, rakes, toolkits, buckets, stakes, tarpaulins;
- Open-ended barrels for collection of clean-up debris; and
- All relevant PPE.

In addition, all staff will receive general site training regarding environmental awareness and compliance, proper handling and storage procedures as well as WHMIS awareness and emergency reporting procedures. Additional training will be provided to individuals involved in the transportation of dangerous goods or regulated substances.

5.1.1 Prevention

Spill control plans begin with prevention. In order to prevent environmental emergencies, all activities that eliminate or minimize the probability of an event occurring shall be practiced. The following procedures should be implemented prior to and during all applicable activities to minimize the likelihood of a spill:

- Ensure the proper handling, storage, and control of POLs and hazardous materials by following WHMIS;
- Ensure that POLs are stored off-site during non-working hours;
- Ensure that measures are taken to minimize or eliminate discharge of oily waste into the marine or riparian environment;
- Maintain an updated and complete inventory of all POLs and hazardous materials stored on site (during working hours);
- Conduct the transport of all POLs and hazardous materials in compliance with the *TDGA* and by a qualified company;
- Ensure all equipment (including all hydraulic hoses, oil, and fuel lines) is in good condition with no leaks, and inspect equipment periodically for fuel or hydraulic fluid leaks;
- Remove any faulty equipment from the site or repair it immediately;
- Ensure all personnel take every precaution to prevent spills during regular equipment maintenance operations such as oil changes, hydraulic top-ups, etc.;
- Ensure use of drip pans and containers, wherever possible;
- Ensure proper storage and security of all fuel and lubricants in a designated containment area that is approved by the Site Manager;
- Secure all fuel cans and lubricants and store them within a containment area on level terrain;
- Ensure that all empty oil, antifreeze, and hydraulic containers are collected from any maintenance site, placed in approved containers and disposed of properly;
- Ensure the storage, handling and disposal of used and or waste oil/glycol follows the Used Oil and Used Glycol Control Regulations;
- Adhere to standard environmental practices for fueling and equipment maintenance;
- Ensure that refueling and servicing is only completed at designated sites, on a level, hard surface, at least 30 m away from any waterbodies and wetlands; and
- Ensure temporary protection below any fuel tanks and nozzles when filling equipment (*i.e.*, absorbent spill pads or other temporary non-permeable liner and collection systems).

5.1.2 Response Procedures

EPR100.02 outlines the proper response procedures in the event of a spill. All spills involving hazardous substances will be reported to the **SCC at (709) 737-5993** regardless of quantity.

The First Newfoundland Power employee on site shall:

1. Assess the situation.
2. Ensure their personal safety.
3. Notify the SCC. In notifying the SCC, the caller will provide the following information:
 - The employee's name and call back number
 - Time and location of incident
 - Source of spill
 - Other pertinent information as requested by SCC Operator.
4. Undertake any containment actions which can be done safely while awaiting help.

If Notification of Spill is from External Parties

1. The SCC shall be notified.
2. The SCC shall notify the Site Manager.
3. Any spill or leak of gasoline or associated product is to be reported immediately to Service NL by calling the Environmental Emergency Line at 772-2083 or 1-800-563-9089.

Spill reporting and response shall occur as outlined in Newfoundland Power's EPR 100.02.

In the event of a spill the following procedures shall be followed:

- All spills, regardless of the type or response, must be reported to the System Control Center by the person noticing the spill;
- Notify the Site Manager immediately;
- Contain the spill immediately and Spill Response Contractor to take control of clean-up once they arrive to site;
- Set up a perimeter for traffic and pedestrian control;
- Ensure all personnel involved in the cleanup are issued appropriate PPE;
- Assign personnel to traffic and pedestrian control, containment, decontamination, waste retrieval and handling, sampling and equipment procurement;
- Use appropriate containment and decontamination practices to restrict contamination to the spill site;
- Spread absorbent material on oil that cannot be collected by pump.
- Pick up small amounts of oil on water using water repellent oil absorbent pads;
- Use specialized equipment (e.g., vacuum truck or oil skimmer) for large amounts of oil on water;
- Decontaminate large rocks and similar objects by cleaning with a degreaser;
- Place waste in liquid tight containers such as over pack drums;
- Separate wastes by type into separate over pack drums;
- Number drums used for waste collection and record contents;
- Clean the surfaces of solid objects with rags dipped in a suitable degreaser;
- Continue excavating for a cleanup until no indication of the contaminant can be detected;
- Take soil/water samples, if required;
- The Spill Response Contractor will communicate with the Department of Environment and Climate Change / Government Services Centre on whether to send an agent to inspect the site before rehabilitation starts. Follow their suggestions for further cleanup or sampling;
- Rehabilitate the site to the satisfaction of all parties involved;
- Consult NL FFA if there is risk of wildlife coming into contact with the spilled material. Mitigation may include measures to deter wildlife from coming into contact with the oil, measures to be undertaken if wildlife sensitive habitat becomes contaminated with the oil, and monitoring in relation to various spill events; and
- Follow appropriate procedures and regulations for storage and disposal of waste materials.

NOTE: Waste should be segregated as it is collected, i.e., separate drums for liquids, absorbents, earth, ice and snow, clothing, equipment, etc. Identify source, date and contents of these drums using weather-proof labels.

Additionally, as a Bell contractor, it is the responsibility of NL Power staff or sub-contractors to immediately report all environmental incidents—whether or not you are directly responsible—by contacting the Enviro-Line at 1 877 BELL ENV (1-877-235-5368).

Environmental Emergencies Include:

- Environmental Emergencies: Spills, leaks, releases impacting or not the environment resulting from operations or third parties;
- Government Inspections and Infractions: Inspection/Investigation by a government official or environmental legal infraction, or notice of alleged violation; and
- Public Complaints: Public complaint, group complaint, or poor press coverage.

5.1.3 Communication Procedures

In the event of an environmental emergency, specific communication requirements are needed with respect to local receptors of the Project area.

Impacts to Drinking Water Sources

In the event of a spill that may impact local drinking water sources (e.g., protected watersheds or residential drinking wells), the SCC will be notified immediately and the emergency reported to the Newfoundland and Labrador Environmental Emergency Regional Office. Per the advice of authorities, local residents will be contacted as needed.

In the event of a severe environmental emergency, a public forum may need to be held to notify all community members and establish response protocols and human health protection requirements. Local municipality representatives and emergency service departments will be engaged at this time and guidance may be required from Health Canada's Contaminated Sites Division. Every effort will be made to remediate the environmental impacts and progress and status of the efforts will be made publicly available through a dedicated Newfoundland Power contact and/or publicly held forums.

Impacts to Recreational Users

In the event of an environmental emergency resulting in impacts to local waterbodies and watercourses used for recreational enjoyment, the SCC will be immediately notified and the emergency will be reported to the Newfoundland and Labrador Environmental Emergency Regional Office.

If the emergency is severe, the appropriate municipality will be contacted to determine the best method to notify local residents and guidance may be required from the Newfoundland and Labrador Water Resources Management Division. Depending on the extent of impacts, posters or bulletins may need to be placed at all recreational entry points (in consultation with the local municipality). Residents in the impacted area will also be notified using local newspapers, community center notice-boards and/or individual resident notifications. Every

effort will be made to remediate the environmental impacts and progress and status of the efforts will be made publicly available through a dedicated Newfoundland Power contact and/or publicly held forums.

Impacts to Country Foods

For any environmental release where impacts cannot be remediated and long-term monitoring will be required, impacts to country foods may also occur. In this circumstance, Newfoundland Power shall reach out to the Office of Indigenous Affairs and Reconciliation to notify them of the situation and determine the appropriate steps to take to notify effected communities/ community members.

5.2 Failure of Erosion and Sedimentation Controls

As noted in previous sections, sediment laden run-off can be detrimental to the environment. Erosion and sediment control procedures will be detailed in the ESCP as part of the Project design to minimize and mitigate the effects of erosion and sediment run-off.

5.2.1 Prevention

All on-site personnel will take all precautions necessary to prevent erosion control failure including:

- Inspection of all erosion control measures weekly, as well as before, during, and after any storm events;
- All necessary maintenance and repair equipment will be stored on site for immediate access;
- Prompt removal of all accumulated sediment once a thickness of 1/3 of the effective height of the erosion control device is reached, or once a thickness of 300 mm immediately upstream of the device is reached;
- Removal of accumulated sediment prior to performing any necessary maintenance or repairs;
- Removal of accumulated sediments prior to the removal of an erosion control structure; and
- Placement of all removed sediment in a storage area, designated by the Site Manager, that will not pose any future risk of run-off.

5.2.2 Response Procedures

The following procedures are provided in the event of an erosion control failure:

- Notify the Site Manager immediately in the event of an erosion control failure;
- Ensure that escaped sediments are not discharging to watercourse or wetland habitats;
- Any effluent exceeding the TSS limit of 25 mg/L above background levels and/or a turbidity concentration exceeding 8 NTU above background levels will be reported to the Site Manager who will be responsible for contacting regulators;
- Take immediate, appropriate corrective action (*i.e.*, repair silt fence); and
- Ensure the incident is logged in Devonway.

5.3 Discovery of Heritage and Archaeological Resources

Project activities, including soil disturbance, have the potential to result in accidental archaeological discoveries. The *Historic Resources Act* protects archaeological sites and artifacts, and it is prohibited to move, destroy, damage deface, obliterate, alter, add to, mark, or in any other way interfere with discovered archaeological objects.

5.3.1 Archaeological Discovery

In the unlikely event of the discovery of a historic or prehistoric artifact, or archaeological site, the following procedures shall be followed:

- Suspend work in the area and inform the Site Manager immediately;
- The Site Manager will inform the Project Manager immediately;
- The Site Manager will contact the **Provincial Archaeologist at 709-729-2462**.
- Flag the site area for protection and maintain an appropriate buffer zone;
- Take all reasonable precautions to prevent any removal of, or damage to, the articles until assessed; and
- Do not resume work until authorization has been given by the appropriate authorities and written instructions are provided by the Site Manager.

5.3.2 Discovery of Human Remains

In the unlikely event of the discovery of human remains or a burial site, the following procedures will be followed:

- Suspend work in the area and inform the Site Manager and the Project Manager immediately;
- Secure the site, including equipment involved in the discovery, by flagging (or another appropriate method) and cover the excavation with a tarp;
- The Site Manager will contact the nearest Royal Canadian Mounted Police detachment [**Bay St. George RCMP Telephone: 709-643-2118, or Channel-Port aux Basques RCMP Telephone: 709-695-2149**].

Note: If remains are found while using heavy equipment then the equipment shall not be moved by the sub-contractor, as physical evidence may be destroyed.

5.4 Fires

Though unlikely, the possibility exists of a fire emergency during Project activities. In the event of a fire, appropriate response action plans are outlined in this section. Fire prevention measures are also provided.

It is imperative that all fires be contained immediately because of the high risk to human life, as well as to the loss or damage of property. It is important to note that firefighting chemicals, as well as spilled materials, can also cause serious harm to humans and the surrounding environment.

5.4.1 Prevention

All personnel will take all precautions necessary to prevent fire hazards. These precautions include, but are not limited to, the following measures:

- Dispose of all flammable waste on a regular basis at an approved facility;
- Smoke in designated areas only;
- Ensure that sufficient firefighting equipment to handle an on-site fire is kept in close proximity to all work areas and is maintained in proper working order;
- Ensure that on-site personnel are trained in the use of the firefighting equipment; and
- Do not permit burning of any type on site during Project activities.

5.4.2 Response Procedures

In most cases, fire response shall be handled by appropriately trained and equipped external fire agencies (Table 2 below). Unfortunately, some locations are outside fire response areas for fire departments or located such that they are not accessible year-round. In these cases, the local Forestry Office will be contacted if the spread of fire to trees/brush is possible.

All fires will be reported.

The first Newfoundland Power employee on site shall:

1. Assess the situation.
2. Ensure their personal safety
3. Notify the SCC.
4. Undertake any action which can be done safely while awaiting help.

In the event of a fire on-site, the following procedures will be followed:

- Ensure safety of personnel. Stay up-wind, avoid breathing vapours and minimize skin contact;
- Control access to the site;
- Contact SCC;
- Ground equipment at whatever isolating point(s) that can be reached safely;
- Assist in evacuation of general area if deemed necessary by fire personnel; and
- If fire is adjacent to oil filled equipment, inform fire personnel so that appropriate preventative action may be taken. Contain liquid wastes generated from the firefighting activities by initiating appropriate spill containment on the site.

6.0 SUMMARY OF NEWFOUNDLAND POWER OPERATING PROCEDURES

Table 3 summarizes Newfoundland Power Operating Procedures which it, Bell Canada and any sub-contractors will follow. Operating procedures are available from <https://workingwith.newfoundlandpower.com/SitePages/Main.aspx>

Table 3: Summary of Newfoundland Power Operating Procedures

Environmental Component	Applicable NL Power Operating Procedures
4.1 Erosion and Sediment Control	N/A

4.2 Non-Hazardous Solid Waste Disposal	• OPR200.04 Waste Disposal • OPR600.02 Recycling
4.3 Contaminant Prevention Plan	N/A
4.3.1 Hazardous Materials/Waste Materials Management	• OPR200.03 Chemically Treated Poles and Timber • OPR200.02 Management of Lubricating and Industrial Liquids • OPR105.03 Transportation of Dangerous Goods (TDG)
4.3.2 Wastewater Management	N/A
4.4 Noise Management	N/A
4.5 Air Quality	• OPR600.01 Greenhouse Gas Emissions • OPR200.10 Vehicle Emissions
4.6 Traffic Management	• OPR112.14 Traffic Control
4.8 Wildlife and Associated Habitat	• OPR200.38 Migratory Birds • OPR600.04 Wildlife • OPR200.39 Species at Risk/Endangered Species
5.1 Spill Control Plan	• EPR100.02 Emergency Preparedness and Response Procedures: Hazardous Substances, Spills, Fires and Floods
5.4 Fires	• EPR100.02 Emergency Preparedness and Response Procedures: Hazardous Substances, Spills, Fires and Floods

7.0 CONTACT LIST

It is the responsibility of the Site Manager to ensure that there is an updated list of emergency contacts posted in a central, visible location and to ensure that all contacts on the list are aware of their expected roles and responsibilities.

Table 4 provides contact information pertaining the Project.

Table 4: Contact Information

External Contact Information	
Contact	Contact Number
Emergency Response	Phone: 911
Codroy Volunteer Fire Department	Phone: 709.955.2339
Channel-Port aux Basques Fire Department	Phone: 709.695.2323
Royal Canadian Mounted Police (RCMP): Bay St. George	Phone: 709-643-2118
Royal Canadian Mounted Police (RCMP): Channel-Port aux Basques	Phone: 709-695-2149
Forest Management District: St. George's, NL	Phone: 709.646.3720 After Hour Emergency: 709.649.1743
Environmental Emergencies	24 Hour Line: 709.772.2083 or 1.800.563.9089
Provincial Archaeologist	Phone: 709.729.2462
Internal Contact Information	

Contact	Contact Number
System Control Center	Phone: 709.737.5993

8.0 NOTIFICATION

The Site Manager will notify the Sub-contractor in writing of observed non-compliance with federal, provincial, or municipal environmental laws or regulations, permits, and other elements of this EPP. A list of these applicable laws, regulations, and other references is provided in Appendix B.

After receiving such notice, the Sub-contractor shall inform the Site Manager of proposed corrective action and take such action for approval by the Site Manager and Project 2Manager, as necessary. The Site Manager may issue a stop work order until satisfactory corrective action has been taken. No time extensions will be granted or equitable adjustments allowed to the Contractor or sub-contractors for such suspensions.

9.0 SITE VISITORS

Any non-emergency visitors wishing to receive access to the Project site must provide 24 hours' notice to the Site Manager. In addition, the Site Manager will ensure that baseline PPE is maintained on-site for visitors and ensure that a site orientation is provided prior to supplying access.

REVISION REQUEST FORM

SECTION TO BE REVISED:

NATURE OF REVISION:

RATIONALE FOR REVISION:
(i.e. environment/worker safety, etc.)

SUBMISSION:

Please submit this request directly to the Environmental Monitor.

Date Submitted:

Signature:

Applicable Laws and Regulations

Legislation and Guidelines	Relevant Information	Responsible Agency	EPP Section Reference
Federal Legislation			
<i>Canadian Environmental Protection Act</i> (1999)	Aimed at preventing pollution and protecting the environment and human health, through efforts to reduce toxic substances in the environment. Divisions 5 and 6 address emissions and air pollution.	Environment Canada	
<i>Fisheries Act</i> (1985)	No person shall carry on any work, undertaking or activity that results in the harmful alteration or disruption, or the destruction, of fish habitat.	Fisheries and Oceans Canada	4.1, 4.3, 4.7
<i>Migratory Birds Convention Act</i> (1994) (Migratory Bird Regulations)	Prohibits the deposit of oil, oil wastes, or other substances harmful to migratory birds in any waters or areas frequented by birds.	Environment Canada	4.5
<i>Transportation of Dangerous Goods Act</i> (1992) (Transportation of Dangerous Goods Regulations)	Required: Clear identification of dangerous goods (classified under one of nine categories); proper containers and packaging; proper training of employees involved in shipping, receiving, and transportation. <u>Schedule 2:</u> A list of hazardous materials and products. <u>Schedule 3:</u> Classification procedures for hazardous materials not listed in Schedule 2.	Transport Canada	4.5
<i>Hazardous Products Act</i> (1985)	Proper labeling of products, education for training and safe storage, use and handling of controlled products.	Health Canada	4.5
Controlled Products Regulations (<i>Hazardous Products Act</i>)	Provide a classification system (A to F) which groups substances into the following groups: Flammable, oxidizing, poisonous, or infectious, corrosive, dangerously reactive, or compressed.	Health Canada	4.5

Applicable Laws and Regulations

Best Practices for the Reduction of Air Emissions from Construction and Demolition Activities	Provides technologies and work practices applicable for the reduction of emissions from construction and demolition activities, including design, site preparation, fabrication, landscaping, demolition and deconstruction, and renovation, with a focus on actions that can achieve reductions in particulate matter and volatile organic compound emissions.	Environment Canada	4.7
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Legislation and Guidelines	Relevant Information	Responsible Agency	EPP Section Reference
Provincial Legislation			
Newfoundland & Labrador Regulation 54/03 Environmental Assessment Regulations, 2003		Newfoundland and Labrador Environment and Climate Change	
Lands Act	The Proponent is required to obtain a lease under Section 3 of the Lands Act	Newfoundland and Labrador Fisheries, Forest and Agriculture	
<i>Water Resources Act</i>		Newfoundland and Labrador Environment and Climate Change	4.1, 4.2, 4.4, 4.5
Newfoundland & Labrador Regulation 39/04 Air Pollution Control Regulations, 2004		Newfoundland and Labrador Environment and Climate Change	4.7
<i>Emergency Services Act</i>	Act for the organization and administration of emergency services in the province	Newfoundland and Labrador Justice and Public Safety	5.0, 5.1, 5.4
<i>Environmental Protection Act</i>	Includes details on release of substances, emergency measures and reporting of releases (Chapter E-14.2)	Newfoundland and Labrador Environment and Climate Change	4.5, 5.1, 5.2
<i>Dangerous Goods Transportation Act</i>	Promotes public safety in the transportation of dangerous goods (Chapter D-1) Offences, penalties, fines described/defined.	Newfoundland and Labrador Transportation and Infrastructure	4.5, 5.1

Applicable Laws and Regulations

Consolidated Newfoundland and Labrador Regulation 1149/96 Workplace Hazardous Materials Information System (WHMIS) Regulations under the Occupational Health and Safety Act	WHMIS regulations and clarification of responsibilities	Digital Government and Service NL	3.1, 4.5, 5.1.1
Waste Management Regulations (under the EPA, Section 111)	Specific Regulation information for beverage containers, electronics, paint, used tires, used glycol, used oil	Newfoundland and Labrador Environment and Climate Change	4.3, 4.5
<i>Used Oil and Used Glycol Control Regulations</i> , under the <i>Environmental Protection Act</i>	Information pertaining to management, storage and disposal of used oil and glycol.	Newfoundland and Labrador Environment and Climate Change	4.3
Best Management Practices for the storage of waste dangerous goods/hazardous waste at business sites	Guidance document	Newfoundland and Labrador Environment and Climate Change	4.5
Landfill Bans, Special Wastes and Diversion Programs	Guidance document providing summary table of landfill bans, diversion programs and special considerations in effect.	Newfoundland and Labrador Environment and Climate Change	4.3
<i>Historic Resource Act</i>	Preservation of the Historic Resources of the Province (Chapter H-4); fossil and paleontological resource	Provincial Archaeology Office; Newfoundland and Labrador Tourism, Culture, Arts & Recreation	5.3
Archaeology Sites in Newfoundland & Labrador	Provides information on the 5,200 known sites throughout the province and their locations	Provincial Archaeology Office; Newfoundland and Labrador Tourism, Culture, Arts & Recreation	5.3
<i>Occupational Health and Safety Act</i>	OH&S in the province; Chapter (O-3)	Digital Government and Service NL, Occupational Health and Safety Division	3.2
Newfoundland and Labrador Regulations 5/12 Occupational Health & Safety Regulations, 2012	Duties of workers, employers, safety inspections, OH&S Policy and safety programs, noise regulations, etc.	Digital Government and Service NL, Occupational Health and Safety Division	3.1
Urban and Rural Planning Act, 2000	Section 12		
<i>Protected Roads Zoning Regulations</i> under the <i>Urban and Rural Planning Act</i>			

Applicable Laws and Regulations

<i>Environmental Control Water and Sewage Regulations, 2003 under the Water Resources Act</i>	All waters discharged from the proposed site, during construction and operation, are subject to compliance with the Environmental Control Water and Sewage Regulations.	Newfoundland and Labrador Environment and Climate Change	4.2, 4.4, 4.5.2, 4.9
<i>Highway Traffic Act</i>	Law relating to the use and operation of vehicles	Newfoundland and Labrador Transportation and Infrastructure	4.8
Newfoundland & Labrador Regulation 15204 Cargo Securement Regulations under the Highway Traffic Act, 2004	Requirements for Cargo Securement and cargo securement systems	Newfoundland and Labrador Transportation and Infrastructure	4.8
<i>Motorized Snow Vehicles and All-Terrain Vehicles Act</i>	Act regarding all-terrain vehicles including identification requirements and driving rules. (Chapter M-20)	Newfoundland and Labrador Fisheries, Forest and Agriculture	4.6
<i>Pesticides Control Regulations, 2012 under the Environmental Protection Act</i>	All pesticide use, meaning the purchase, transport, storing, possessing and handling is subject to compliance with the Pesticides Control Regulations, 2012	Newfoundland and Labrador Environment and Climate Change	4.5.1
<i>Wildlife Act (and Wildlife Regulations under the Act)</i>	Act relating to wildlife, Labrador Inuit Rights, penalties and offences (Chapter W-8)	Newfoundland and Labrador Fisheries, Forest and Agriculture	4.10
<i>Wilderness and Ecological Reserves Act</i>	Providing for natural areas in the province to be set aside for the benefit, education and enjoyment of the people of the province. (Chapter W-9) Additional regulations apply to each Reserve Area: https://www.gov.nl.ca/ffa/departments/legislation/#a1	Newfoundland and Labrador Fisheries, Forest and Agriculture	4.10
Consolidated Newfoundland and Labrador Regulation 1156/96 Wild Life Regulations under the Wild Life Act	Covers fishery, fur bearing animals, beaver, big game, small game, coyote, wild life, dogs, licenses and shooting licenses	Newfoundland and Labrador Fisheries, Forest and Agriculture	4.10
<i>Endangered Species Act</i>	When act applies, how species at risk is determined, how habitat is protected, how act is enforced (Chapter E-10.1)	Newfoundland and Labrador Newfoundland and Labrador Fisheries, Forest and Agriculture	4.10
Newfoundland & Labrador Regulation 57/02 Endangered Species List Regulations under the <i>Endangered Species Act</i>	Schedule A- Endangered Species; Schedule B - Threatened Species; Schedule C - Vulnerable Species	Newfoundland and Labrador Fisheries, Forest and Agriculture	4.10
<i>Fire Protection Services Act</i>	Fire protection codes and standards adoption, orders of the fire commissioner, reporting	Newfoundland and Labrador Justice and Public Safety	5.4

Applicable Laws and Regulations

Newfoundland & Labrador Regulation 45/12 Fire Protection Services Regulations under the <i>Fire Protection Services Act</i>	Sprinkler, fire detection, fire extinguisher, fireworks and general fire information	Newfoundland and Labrador Justice and Public Safety	5.4
<i>Animal Health & Protection Act</i>	Respecting the health and protection of animals; nuisance animals, transport of or injury to animal, heritage animals	Newfoundland and Labrador Fisheries, Forest and Agriculture	4.10

Bell Fibre Project in Codroy Valley: Salmon Bearing Watercourse Crossings

Crossing Location	WGS84 UTM Zone 21N		Latitude	Longitude
	Easting	Northing		
Muisies Brook	349140	5309341	47.919630	-59.019282
Johns Brook	348373	5308906	47.915538	-59.029388
Stephens Brook	347150	5307151	47.899467	-59.045124
Muddy Hole Brook	334882	5302981	47.858397	-59.207554
Ryans Brook	333311	5302972	47.858450	-59.228538
Grand Daddys Brook	324678	5302496	47.851873	-59.343666
Muddy Hole Brook	333654	5302150	47.851149	-59.223640
Grand Codroy River	330225	5301210	47.841801	-59.269071
Little Codroy River	333439	5295883	47.794748	-59.224102
Little Codroy River	329903	5292913	47.767122	-59.270117

Avian Species at Risk

Barrow's Goldeneye (*Bucephala islandica*)

Special Concern (SARA)

Male



Female



Bobolink (*Dolichonyx oryzivorus*)

Threatened (SARA)

Male



Female



Chimney Swift (*Chaetura pelagica*)

Threatened (SARA)



Eskimo Curlew (*Numenius borealis*)

Endangered (SARA)



Harlequin Duck (*Histrionicus histrionicus*)

Special Concern (SARA)



Newfoundland Gray-cheeked Thrush (*Catharus minimus minimus*)

Threatened (NL ESA)



Olive-sided Flycatcher (*Contopus cooperi*)

Threatened (SARA)



Red Crossbill (<i>Loxia curvirostra percna</i>)	Threatened (SARA)
Male 	Female 
Barrow's Goldeneye	Special Concern (SARA)

Short-eared Owl (*Asio flammeus*)

Special Concern (SARA)



Bank Swallow (

Rusty Blackbird (*Euphagus carolinus*)

Short Billed Dowitcher (*Limnodromus griseus*)

Three-toed Woodpecker (*Picoides dorsalis*)

Pileated Woodpecker (

Mammal
Species at
Risk

Woodland Caribou (*Rangifer tarandus*)
Newfoundland Population; Special Concern (COSEWIC)

Adult



Juvenile



Aquatic Species at Risk

Banded Killifish
____ (SARA)



Flora Species at Risk

American Bur-Reed (*Sparganium americanum*)
____ (SARA)

WILDLIFE OBSERVATION FORM

Name:	Location:
Date and time:	Contact Phone:
Species:	
Observation:	
Other Notes:	

Follow-up (to be completed by Environmental Monitor):