



ENVIRONMENTAL PREVIEW REPORT

Great Coastal Trail

Parson's Pond to Daniel's Harbour

Prepared for TDCI



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Appendices

Appendix A: Public Engagement Plan
Appendix B: Mitigation Plan
Appendix C: Environmental Protection Plan
Appendix D: Trail Management Plan
Appendix E: Waste Management Plan
Appendix F: Field Report
Appendix G: Map Book
Appendix H: Stream Crossings

Acronyms and Abbreviations

ACCDC	Atlantic Canada Conservation Data Centre
ARU	Autonomous Recording Unit
ATV	All-terrain Vehicle
BBS	Breeding Bird Survey
COSEWIC	Committee on the Status of Endangered Wildlife in Canada
DECCC	Department of Environment, Conservation and Climate Change
DFO	Fisheries and Oceans Canada
DH	Daniel’s Harbour
EARD	Environmental Assessment Registration Document
EM	Department of Energy and Mines
ECCC-CWS	Environment and Climate Change Canada – Canadian Wildlife Service
EPA	<i>Environmental Protection Act</i>
EPP	Environmental Protection Plan
EPR	Environmental Preview Report
FA	Department of Fisheries and Aquaculture
FAL	Department of Forestry, Agriculture and Lands
GCT	Great Coastal Trail
GCTA	Great Coastal Trail Authority
HDPE	High Density Polyethylene
IMBA	International Mountain Bicycling Association
ind	Individual(s)
kg	Kilogram
km	Kilometre
km/h	Kilometres per Hour
LSD	Local Service District
LTO	Licence to Occupy
LUA	Land Use Atlas
m	Metre
mm	Millimetre
NDT	Newfoundland Daylight Time
NL	Newfoundland and Labrador
NBBA	Newfoundland Breeding Bird Atlas

NLESA	<i>Newfoundland and Labrador Endangered Species Act</i>
NTS	National Topographic System
PAO	Provincial Archaeology Office
PP	Parson’s Pond
PPWSA	Protected Public Water Supply Areas
ROW	Right-of-Way
SAR	Species at Risk
SARA	<i>Species at Risk Act</i>
SC	Stream Crossing
SxS	Side-by-Side [offroad vehicle]
t	Tonnes
TAP	Tourism Assurance Plan
TCAR	Department of Tourism, Culture, Arts and Recreation
TDCI	Trailhead Development Company Incorporated
TI	Department of Transportation and Infrastructure
UAS	Unmanned Aerial System
UNESCO	United Nations Educational, Scientific and Cultural Organization
WC	Water Crossing
WRMD	Water Resources Management Division

1 Name of the Undertaking

The undertaking has been assigned the name “Great Coastal Trail – Parson’s Pond to Daniel’s Harbour”.

2 The Proponent

2.1 Name of the Proponent

The Proponent is the Trailhead Development Company Incorporated (TDCI).

2.2 Chief Executive Officer

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3 The Undertaking

This Environmental Preview Report (EPR) has been prepared to update the information previously presented in the Environmental Assessment Registration Document (EARD) for *Great Coastal Trail – Parson’s Pond to Daniel’s Harbour* (the Project; Registration No. 2284 [CDA 2024]) as per the Project EPR Guidelines released on 26 April 2024. The organization and content of the EPR adheres to the recommended format suggested in the EPR Guidelines. Requested plans are provided as stand-alone appendices (refer to page iv, Appendices A through E), except for:

- 1) plans to engage provincial regulatory agencies on the design of future phases of the Great Coastal Trail, which are stated in the main body of the EPR in various sections; and
- 2) “*a Contingency Plan that considers potential accidents and malfunctions and site-specific conditions and sensitivities, and facilitates a quick and effective response*”, which is presented in EPR Section 4.5.

Note that the original registration was prepared on behalf of the Central Development Association (Parson’s Pond, NL) and referenced the following two main components: 1) Gateway (Trailhead; Crown Lands application #161559); and 2) Demonstration Trail (Crown Lands application #161561). The TDCI is the current registered Proponent (effective 3 March 2025). The Gateway initially proposed as a stand-alone tourist attraction and trailhead for the route located south of Parson’s Pond River is no longer considered as part of the Project.

3.1 Nature of the Project

The nature of the proposed Project is the development of a coastal trail between Parson’s Pond and Daniel’s Harbour, along the western coast of the Great Northern Peninsula.

3.2 Purpose, Rationale, and Need for the Project

The purpose of the Project is to develop a new shared-use trail route (e.g., walking and biking) between Parson’s Pond and Daniel’s Harbour, designed to be the southern leg and Demonstration Trail of the much larger proposed Great Coastal Trail (GCT) development. In its entirety, the grand vision of the GCT is to connect the two UNESCO World Heritage sites of the Great Northern Peninsula, Gros Morne National Park and L’Anse aux Meadows National Historic Site (Figure 3.1). It is important to emphasize that this EPR is confined to the proposed trail development between Parson’s Pond and Daniel’s Harbour only (i.e., the Project). Future EARD(s) and/or permit authorization(s) for GCT segments north of this Project will be the responsibility of the Great Coastal Trail Authority (GCTA), a separate corporate entity from TDCI (i.e., the Proponent). The Project Area does not overlap UNESCO World Heritage Sites or any part of the Provincial Crown Land Wind Land Reserve; therefore, these will not be discussed further. The proposed route of the Demonstration Trail also does not overlap with any Protected Public Water Supply Areas (PPWSAs). There are three PPWSAs in the vicinity of the Project, on the east side of Route 430 (see Figure 4.1 later). The closest point of approach of the trail route to any PPWSA boundary is approximately 385 m (Coldbrook PPWSA, Parson’s Pond; see Figures 4.1a and 4.2).

The Project will serve as a Demonstration Trail model for the larger GCT, in terms of trail construction standards and environmental considerations. The goal of the Project is to spur economic development and tourism in the region by providing recreational opportunities and promoting community engagement, collaboration, and linkage. The Project will be operational and maintained seasonally during snow-free periods (i.e., May-October).



Figure 3.1. Overview map showing the general locations of the Town of Parson's Pond, Portland Creek, Daniel's Harbour, and the Great Coastal Trail Demonstration Trail Project in relation to Gros Morne National Park and L'Anse aux Meadows National Historic Site, Great Northern Peninsula of Newfoundland. Medical facilities in proximity to the Project are identified.

3.3 Project Area

The Project spans ~26.6 km along the Great Northern Peninsula of Newfoundland, divided into ten distinct trail segments (Figure 3.2). Each segment connects to at least one access point along NL Route 430 (a paved two-laned highway; known as Great Northern Peninsula Highway and/or Viking Trail) for staging and phased construction. Segment lengths vary from 1.3-3.7 km, reflecting the terrain, land use patterns, and opportunities to highlight coastal views, cultural landscapes, and natural features. The overall design approach emphasizes a human-scale, multi-use trail that balances accessibility and sustainability. By combining ten shorter segments with frequent access points, the trail will offer flexible entry for residents and visitors alike, while providing a consistent standard for safety, environmental protection, and long-term maintenance.

The trail configuration traverses a variety of landscapes, including coastal bluffs, cliffs and shoreline, boreal forests, inland barrens, and traditional pathways historically used for berry picking, hunting, and local travel. These varied environments offer users both immersive natural experiences and meaningful cultural connections.

Coastal trail route selection in this area is complicated by the constraints of coastline, Route 430 and associated transmission line rights-of-way (ROWs), Crown Land titles, private land ownership, watercourses, and sensitive areas, such as wetlands, waterbodies, and local areas of importance (i.e., coastal sand dunes).

3.4 Route Alterations

The current Project trail configuration has been altered from the original route plan presented in the EARD based on comments and feedback from provincial and federal regulatory agencies, updated Crown Lands parcel information since initial filing, subsequent discussions with private landowners and the general public, and changes in overall Project scope. Further details are provided in Section 4.1.1.

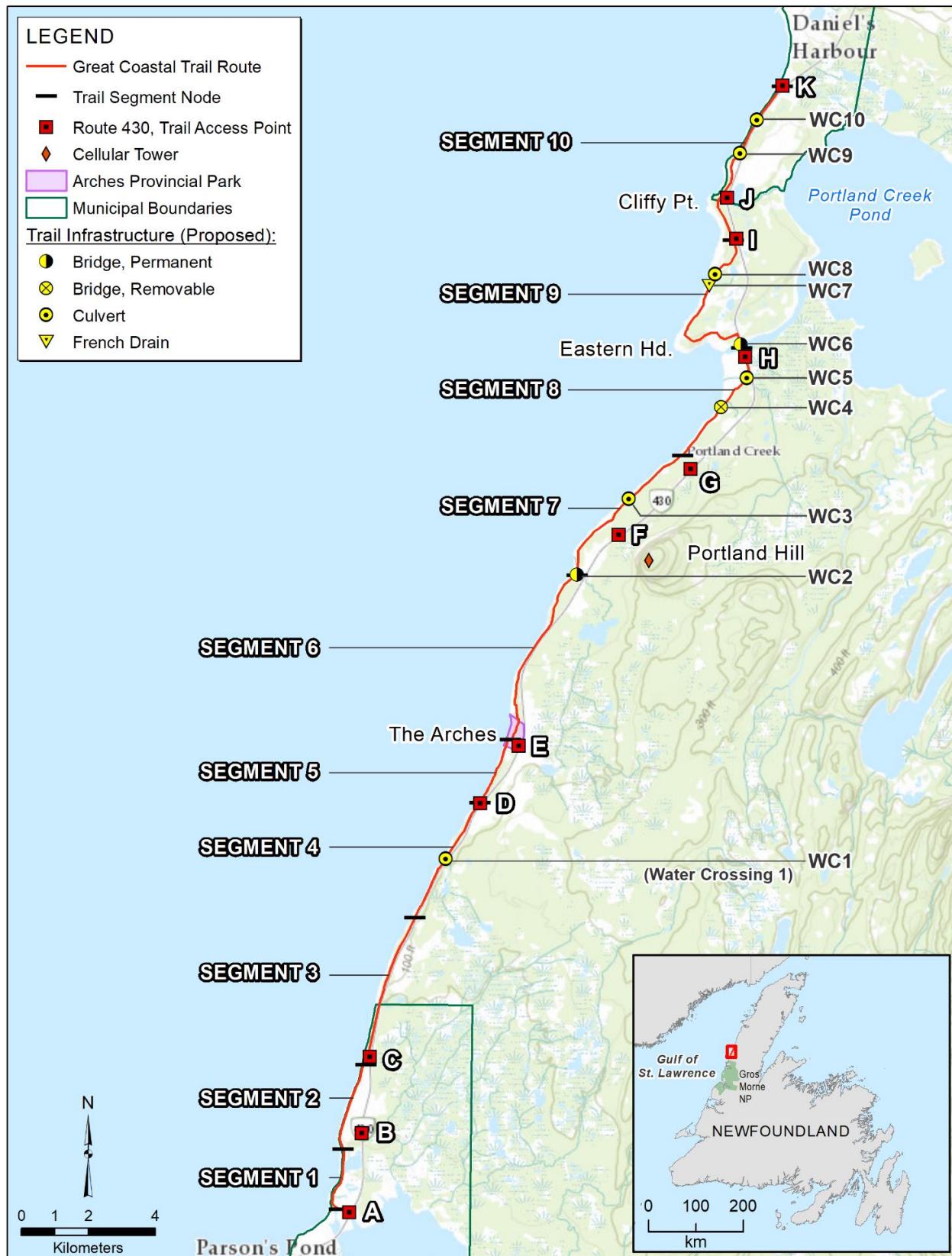


Figure 3.2. Overview map depicting Great Coastal Trail segments between the communities of Parson's Pond and Daniel's Harbour, trail access points off Route 430, and proposed trail infrastructure at ten identified water crossings.

4 Description of the Undertaking

4.1 Geographical Location, Existing Environment, Physical Components

4.1.1 Geographic Location and Physical Components

The proposed Project will extend between the coastline and Route 430 from Parson’s Pond to Daniel’s Harbour on the west coast of Newfoundland. The start location is located at 50.032992°N, 57.710033°W, and within 100 m of historical fishing stages on the north side of the Parson’s Pond River. The opposite terminus ends at the parking lot of Bennett Lodge (Restaurant and Lounge), located at 50.226555°N, 57.590872°W, just south of the main built-up area of Daniel’s Harbour. Portions of the trail are within the municipal boundaries of Parson’s Pond and Daniel’s Harbour, with an approximate linear overlap of 4.3 km and 2.6 km, respectively (see Figure 3.2 and Figure 4.2). The Demonstration Trail route otherwise has minimal overlap with existing human habitation: one small section ~1.0 km in length runs beside the dead-end Main Road, in the community of Portland Creek, along which are located several houses and an inn; another short section runs along an informal dirt track that services several cabins and camper trailers, starting at the beginning of trail Segment 5 (see Figure 4.2; Access Point D). Additional map frames of the full trail route at 1:25,000 scale are presented below to facilitate understanding of the geographical setting and assist identification of trail segments, proposed trail infrastructure at identified water crossings, and access points used as reference markers throughout the EPR (Figures 4.1a-f). Canadian digital topographic data (CanVec product, 1:50,000) and relevant layers from the provincial Land Use Atlas (LUA) are presented in both Figure 4.1 and a separate detailed Map Book at 1:2,500 scale (see Appendix G). The Map Book contrasts currently proposed Project elements with the initial EARD linear trail route configuration and Crown Land Application (#161561) area overlain on high-resolution satellite imagery base maps (Google Satellite).

4.1.1.1 Revised Project Components

Route alteration was primarily guided by consultations with the Department of Transportation and Infrastructure (TI) and the Wildlife and Crown Lands Divisions of the Department of Forestry, Agriculture and Lands (FAL). Primary alterations from the initially proposed route are in response to a commitment that the trail development will not utilize TI roadway infrastructure (e.g., shoulders, bridges, culverts) and will be located beyond the 20-m Highway ROW (from centre line) of Route 430.

A summary of the main revisions proposed for the current trail configuration include:

- Removal of the original concept of a Gateway, Pedestrian Area, and Parking Area on the south side of Parson’s Pond River and an adjacent pedestrian bridge river crossing;
- Proposed trail route will have no overlap with TI property, and remain outside the Route 430 ROW;
- Rerouting around the sensitive sand dunes west of Route 430 and south of Portland Creek River;
- Removal of additional areas in the vicinity of Portland Creek dunes, Eastern Head, and Clifffy Point for future expansion plans (e.g., lookout developments);
- Parson’s Pond trailhead moved to the north side of Parson’s Pond River with an associated Parking Area to be located within 250-m of the trailhead (tentatively proposed access would be off North Street);
- Clear span pedestrian bridge across Portland Creek River located west of existing Route 430 bridge;
- Revised Project buffer around trail centreline is now 2-m (4-m total corridor width) uniformly applied over the entire 26.6 km trail length. This 4-m is considered the maximum width, actual width will be decreased in constrained areas (i.e., within the minimum 30-m naturally vegetated buffer requirement along all waterbodies and wetlands, except for coastlines and water crossings); and
- Revised Trail distance and Crown Lands application area: EPR (26.6 km; 0.11 km²) vs. EARD (28.0 km; 0.62 km²). An areal decrease of ~82%.



Figure 4.1a. Proposed Great Coastal Trail Project elements (Demonstration Trail Segments 1 to 3, Parson’s Pond) depicting select layers of the National Topographic System (1:50,000 scale) and the NL Land Use Atlas at a scale of 1:25,000.



Figure 4.1b. Proposed Great Coastal Trail Project elements (Demonstration Trail Segments 3 to 4) depicting select layers of the National Topographic System (1:50,000 scale) and the NL Land Use Atlas at a scale of 1:25,000.

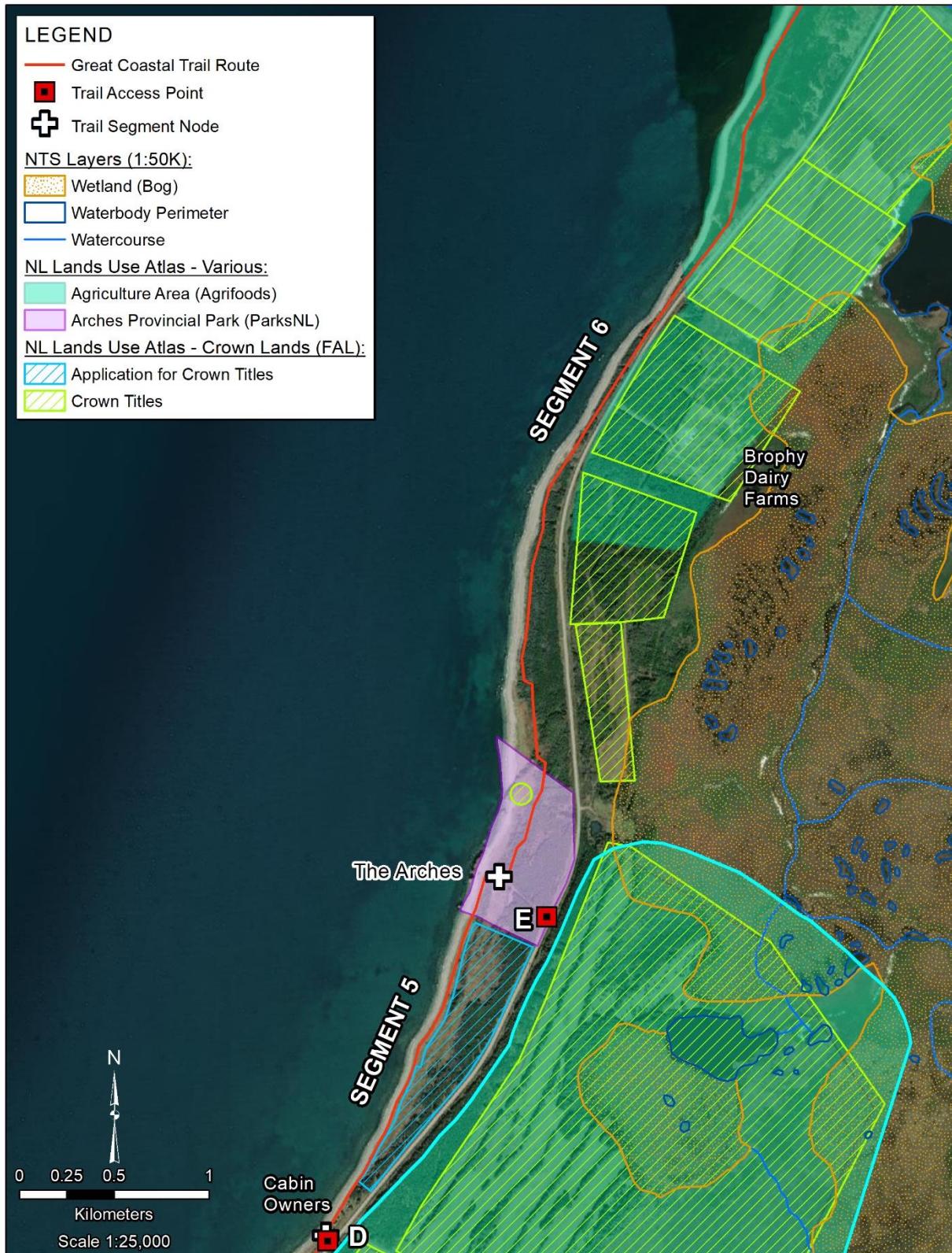


Figure 4.1c. Proposed Great Coastal Trail Project elements (Demonstration Trail Segments 5 to 6, Arches Provincial Park) depicting select layers of the National Topographic System (1:50,000 scale) and the NL Land Use Atlas at a scale of 1:25,000.

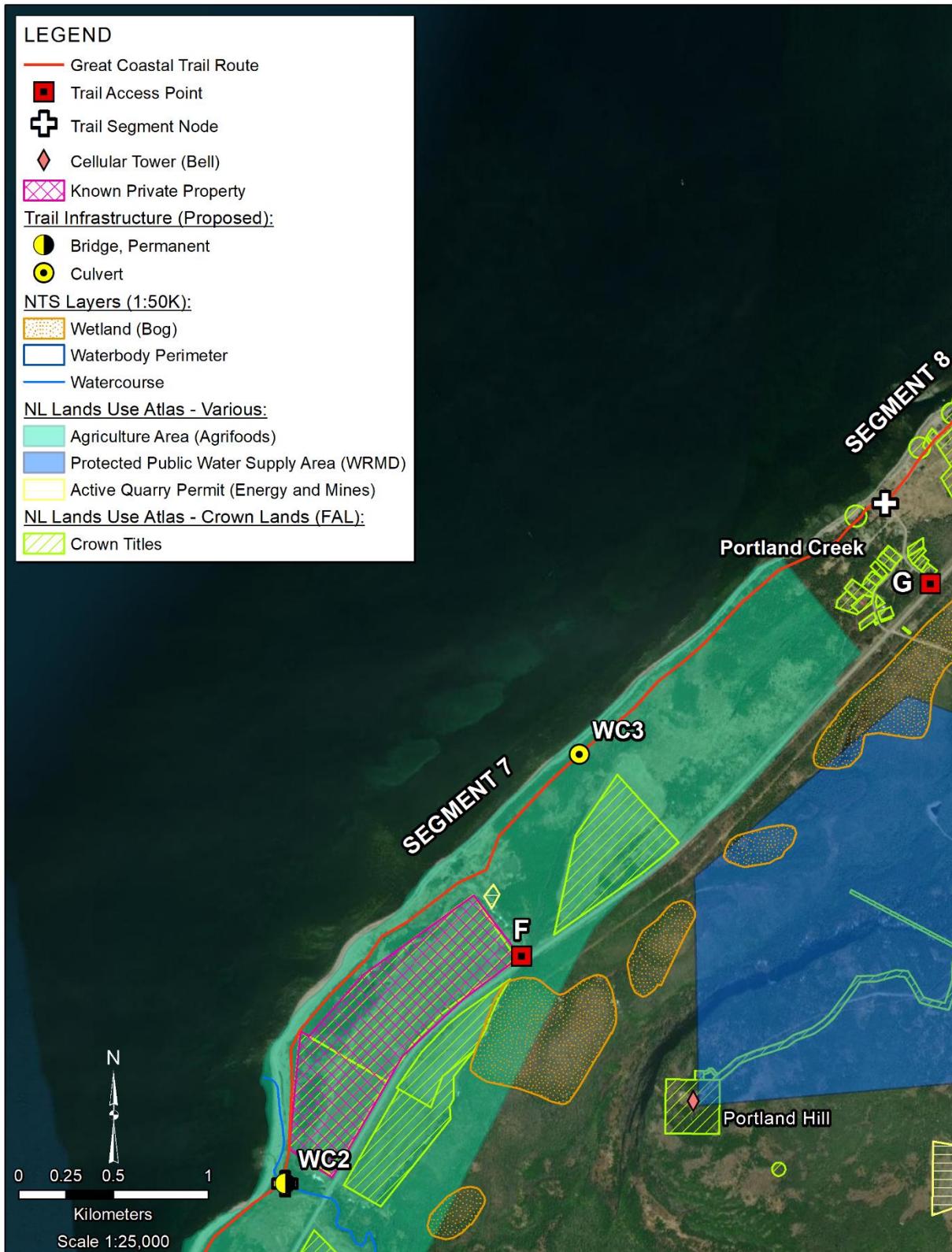


Figure 4.1d. Proposed Great Coastal Trail Project elements (Demonstration Trail Segments 7 to 8, Portland Creek) depicting select layers of the National Topographic System (1:50,000 scale) and the NL Land Use Atlas at a scale of 1:25,000.



Figure 4.1e. Proposed Great Coastal Trail Project elements (Demonstration Trail Segments 8 to 9, Portland Creek River) depicting select layers of the National Topographic System (1:50,000 scale) and the NL Land Use Atlas at a scale of 1:25,000.



Figure 4.1f. Proposed Great Coastal Trail Project elements (Demonstration Trail Segments 9 to 10, Daniel’s Harbour) depicting select layers of the National Topographic System (1:50,000 scale) and the NL Land Use Atlas at a scale of 1:25,000.

Alterations from the initially proposed trail route were made in response to a commitment that the trail development will not utilize TI roadway infrastructure or assets (e.g., shoulders, bridges, culverts) and will be located beyond the 20-m Highway ROW (from centre line) of Route 430. Thus, there will be no Project overlap with TI property beyond that of mobilizing crew, equipment, and supplies by vehicle(s) to/from access points located directly off of Route 430. As such, TDCI acknowledges that the proposed Project will comply with TI’s requirements, including the following:

1. TI’s legislation, specifications and policies, including the *Works, Services and Transportation Act*, the *Building Near Highways Regulations*, as well as TI’s access policy;
2. Commitment that the proposed Project must comply with the *Building Near Highways Regulations*, specifically, Section 3(c) of the Regulations which states that “A person shall not erect, repair, alter or structurally improve a fence, building or other structure, nor shall he or she plant trees, shrubs or hedges without the prior permission of the Minister within (c) 20-m from the centreline of the proposed or existing highway (Route 430) described in Schedule C of the *Building Near Highways Regulations*;
3. Acknowledgement that any requests for access (temporary or permanent) to TI’s roadways would have to be submitted individually for consideration. Approved access locations would be subject to the formal application process and any request fees required;
4. A commitment that the development shall not utilize TI roadway infrastructure as part of the trail routing including shoulders, bridges, etc. and should not be located in the road ROW as prescribed in the *Building Near Highways Regulations*, unless otherwise approved by TI;
5. A commitment that the development/construction shall not negatively affect TI roadway maintenance and operations including roadside drainage and culvert systems; and
6. A commitment that any design submission to TI would have to be sealed by a Professional Engineer licensed to practice in the province.

4.1.1.2 Topography

The Project is within the Coastal Plain subregion of the Northern Peninsula Forest Ecoregion, between the coastline and The Long-Range Mountains (see Figure 3.1). It is a subregion characterized by gradual elevation changes, rugged coastline, strong westerly winds, and stands of low growing spruce and fir tuckamore. Elevation along the trail length ranges between ~0-25 m, with no known steep elevation gradients.

4.1.1.3 Flood and Erosion-prone Areas

Flood risk mapping exists only for the southern portion of the Project, which has been incorporated into the Town of Parson’s Pond Municipal Plan (Figure 4.2; refer to Section 4.2.1.1). Information is dated (Martec Limited 1988) but did demark boundaries for 20-year and 100-year flood zones, which the proposed trail route overlaps by approximately 681 and 712 m, respectively. This linear overlap is not cumulative, as the 20-year flood risk area is nested within the larger 100-year flood risk polygon. The proposed parking lot tentatively planned for the Parson’s Pond trailhead (access off North Street) would be entirely within the 20-year flood risk area (Figure 4.2). TDCI will consult with DECCC, Water Resources Management Division (WRMD) with respect to permitting requirements for the proposed trail sections and parking lot development within the Parson’s Pond 20-year flood risk zone.

Erosion was observed throughout the Demonstration Trail route, which may be exacerbated by the construction and use of a permanent trail system (for details, see Figure 4.3).

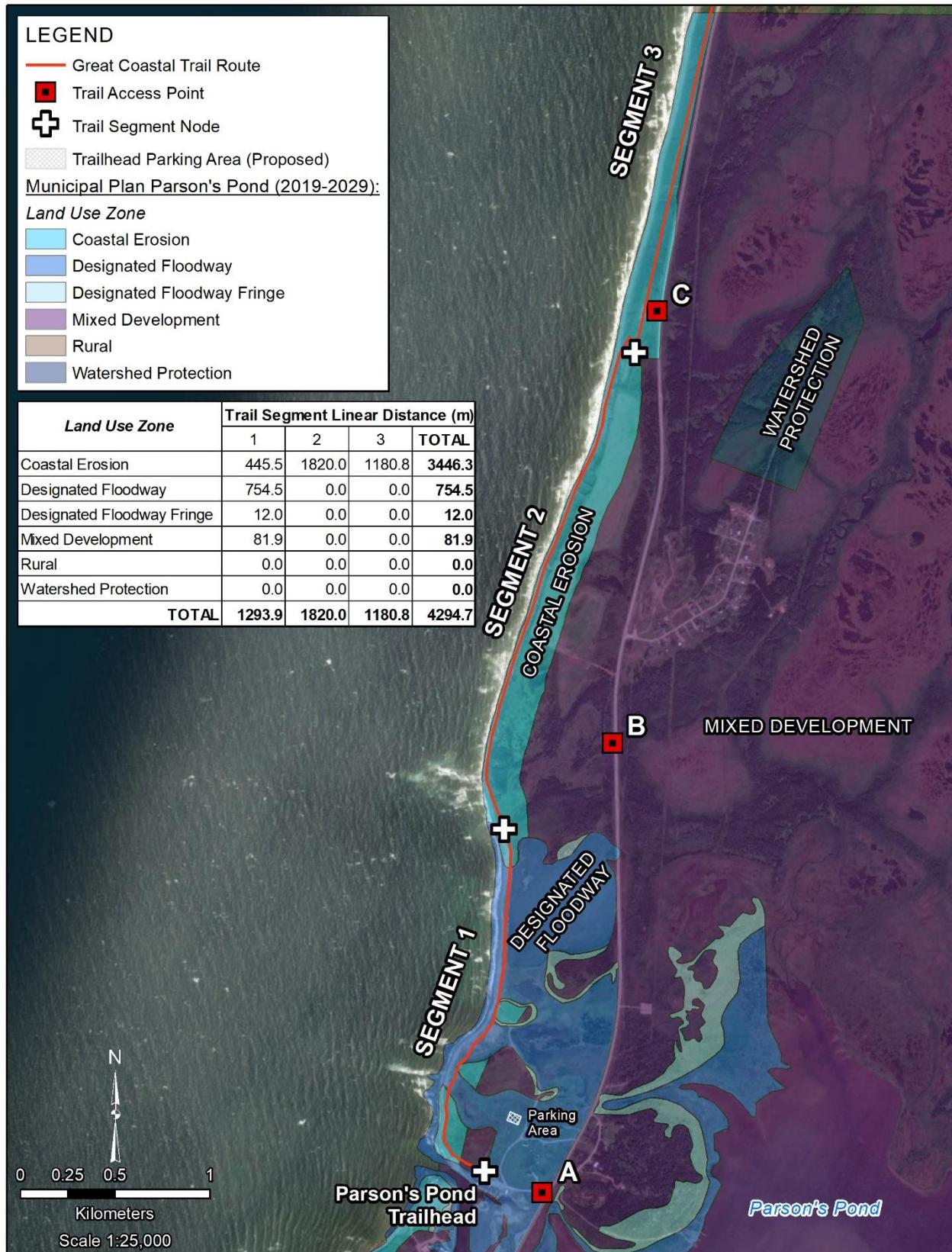


Figure 4.2. 20-year and 100-year flood zones as depicted in Parson’s Pond Municipal Land Zoning.

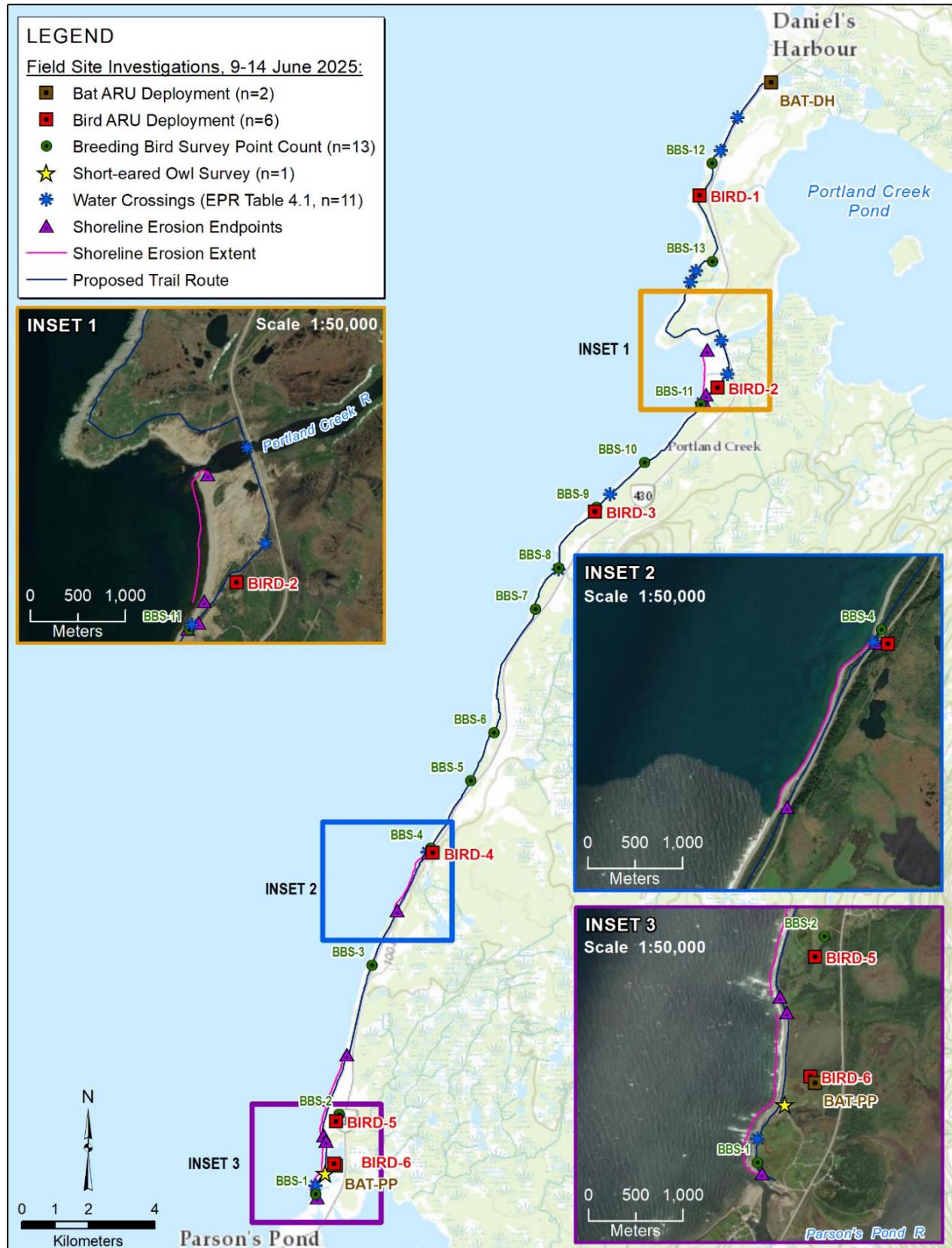


Figure 4.3. Shoreline erosion extent and endpoints as identified during the field visit on 9-14 June 2025.

The flood risk mapping product and areas zoned as designated floodway (i.e., approximate 20-year flood zone), designated floodway fringe (i.e., approximate 100-year flood zone) and coastal erosion have been incorporated into the registered future land use map in the Town of Parson’s Pond Municipal Plan (see Figure 4.2). Note that all of Segment 2 (1.82 km) and approximately 40% of Segment 3 (1.18 km) are zoned as coastal erosion designation.

4.1.1.4 Waterbody and Wetland Crossings and Proposed Bridges/Culverts

Seven water crossings were identified along the proposed trail route from 1:50,000 scale topographic data, and several more were found during field surveys in the Study Area between 9-14 June 2025 (see Field Report, Appendix F). Table 4.1 presents a summary of all known water crossings that intersect the proposed trail and require infrastructure installation to maintain baseline water flow rates and potential fish passage (refer to Section 4.1.3.2). During field surveys, no dedicated surveys for fish or fish habitat were conducted at water-crossing locations beyond the collection of photos and high-level assessments conducted bankside. Photos and notes were reviewed by a fisheries biologist to assess the likelihood of fish potential and possible species for each water crossing (Table 4.1). Water crossing ID used throughout this EPR differs from the site ID assigned in the field. Refer to columns in Table 4.1 that serve to cross reference sites identified in the Field Report (Appendix F) and associated ‘Stream Crossing (SC)’ photo summary (Appendix H) with EPR water crossing (WC) site locations. It should be noted that CanVec digital topographic data (NTS 1:50,000) used for GIS desktop tasks for this EPR are dated for the Study Area. Source date for vector classified hydrographic features (e.g., waterbody polygons and linear watercourses) and saturated soils (e.g., bog/wetland polygons) was 1991. The most recent high-resolution Google Satellite data available for entire length of the proposed trail route was collected 22 June 2024. We used a combination of satellite imagery assessment and notes and photographs from the site visit to ‘ground-truth’ sensitive areas of interest. Trail route configuration was modified to remain outside of the 30-m vegetated buffer for waterbodies and wetlands to the extent possible.

WC0 was determined to be completely dried up during the 2025 Field Study and is no longer considered a viable water crossing. Field investigation determined that this watercourse (and its original associated source pond, as demarcated on NTS 1:50,000 CanVec data) is now best classified as a successional catchment with no present outflow to the ocean (refer to Appendix H, Figure 1); elevation in this area is ~1-m above sea level. A review of historical satellite imagery suggests that this catchment basin has had no connection to the ocean since at least 2019. As such, it will not be discussed further. In total, there are ten water crossings of varying size (i.e., ranging from ephemeral rivulets, to brooks, streams, and rivers; the largest being Portland Creek River; WC1 to WC10; Table 4.1) that the Project will intersect.

There is one wetland crossing located south of Portland Creek River in the vicinity of the sand dunes. This area is designated as the western fringe of an extensive (3.0 km²) bog on 1:50,000 CanVec data. After construction of Route 430, this bog was severed leaving a separate area approximately 4.3 ha on the western side of the road. The northern end of Segment 8 crosses this area for a distance (including 30-m wetland buffer) of 534 m. Site assessment suggests that the hydrological function of this wetland is compromised. There were culverts installed under Route 430 in this area, but they are dry. The bog on the western edge has contracted, being desiccated at the margins and encroached by dunes. An existing transmission line ROW (NL Hydro; low voltage line between Portland Creek and Belburns; refer to Section 4.2.6.2) overlaps the western wetland here and the proposed trail route would occur within, or adjacent to the ROW to limit ecological disturbance. As a conservative measure, we report the full length of trail route through the CanVec polygon for this area (Table 4.2). There is no opportunity to reroute the trail here as either sensitive sand dunes or crossing Route 430 are the only alternatives.

There are two locations where the trail is within the 30-m vegetated buffer around waterbodies, one of which is within the 15-m environmental buffer. Additional details are presented in Table 4.2.

Table 4.1. Water crossing locations, types, fish habitat presence, and planned trail infrastructure (including proposed bridges/culverts).

Water Crossing ID	Field Report ID	Segments	NTS: 50K	Coordinates		Type	Notes	Fish Habitat Presence	Proposed Trail Infrastructure
				Latitude (°N)	Longitude (°W)				
WC0	SC1	1	Yes	50.035502	57.711734	N/A	Watercourse and associated small source pond no longer present	N/A	N/A
WC1	SC2a	4	Yes	50.093322	57.681432	Permanent flow, connection to ocean	Cobble/gravel substrate. Two existing Route 430 culverts (1 hanging, 1 with flow) ~15 m from proposed trail route.	Likely yes	Culvert: 2 x 600 mm
WC2	SC3b	6 and 7	Yes	50.14235	57.646087	Permanent flow, connection to ocean	Bedrock substrate	Likely yes	Bridge: ~12 m
WC3	SC13	7	No	50.15538	57.632144	Permanent flow	Sand/cobble/gravel substrate. Riparia vegetation is spruce, mountain maple, and bracken fern.	Likely yes: habitat appears suitable for brook trout, possibly Atlantic salmon.	Culvert: 1 x 600 mm
WC4	SC4b	8	Yes	50.17124	57.60731	Permanent flow, connection to ocean	Cobble/gravel substrate, lack of riparian cover	Likely yes	Temporary, Seasonal Bridge: ~4 m
WC5	SC14	8	Yes	50.176186	57.60033	Intermittent channel with organic substrate.	Bog buckbean, water horsetail, riparian vegetation is grasses and sedges.	Unlikely	Culvert: 1 x 600 mm
WC6	SC6	8 and 9	Yes	50.182049	57.602031	Permanent flow, connection to ocean	Large river, boulder/cobble/gravel substrate	Yes: Scheduled salmon river.	Portland Creek Bridge: 100 m
WC7	SC7	9	Yes	50.192114	57.610391	Appears Dry	No channel observed	No	Rock Crossing/ French Drain
WC8	SC10	9	No	50.194088	57.608896	Channel with intermittent flow	Cobble/gravel substrate, limited riparian vegetation of grasses	Unlikely	Culvert: 1 x 450 mm
WC9	SC9	10	No	50.214896	57.602215	Channel with organic substrate	Bog buckbean and water horsetail, riparian vegetation is grasses and sedges	Unlikely	Culvert: 1 x 900 mm
WC10	SC8	10	No	50.220616	57.597652	Perched watercourse, connection to ocean	Cobble/gravel substrate, herbaceous riparia cover	No	Culvert: ~1 x 450 mm

Table 4.2. Non-water crossing points where trail passes within the 30-m natural buffer for waterbodies and wetlands.

Type	Trail Segment	Map Book Reference ^a	Trail Length within 30-m Buffer (NTS)	Description
Waterbody	1	1.0 km (pages 1-2)	202 m	Very constrained. No opportunity to reroute; Recent satellite imagery suggests 340 m of trail route within 15-m buffer.
Waterbody	9	21.0 km (page 22)	91 m	Conjoined buffer of two small ponds (~15 m diameter, each) on Eastern Head. Satellite imagery suggests trail route is beyond the 30-m buffer.
Wetland	8	19.25 km (pages 20-21)	534 m	South of Portland Creek River. Severed fringe bog that has since been compromised in terms of ecological and hydrological function since construction of Route 430. Proposed trail route will travel within or adjacent to the existing NL Hydro ROW.

^a Map Book (Appendix G): Chainage marker distance with page/map number(s) in parentheses.

Overlap with TI Property and Infrastructure

There will be no overlap of trail project elements with TI property and infrastructure (e.g., ROW, road shoulders, bridges, roadside drainage and culvert systems). The revised configuration for the Project route is outside of the 20-m ROW and there will be a standalone clear span pedestrian bridge across Portland Creek, on the west side of the existing Route 430 bridge.

4.1.2 Existing Environment

In what constitutes approximately the southern “half” of the Project Area, roughly between Parson’s Pond (trailhead location 50.032992°N, 57.710033°W) and the endpoint of Segment 6 (50.142344°N, 57.646100°W), Route 430 runs quite close to the coastline and thus (given the aim to keep the trail between the coastline and Route 430) allows for only a very small margin of land through which the trail may be allowed to pass. This section of the trail is characterized by coastal marsh, meadow, tuckamore (wind-swept and stunted softwood), and immature softwood forest. The northern “half” of the proposed trail route, from the endpoint of Segment 6 to the Daniel’s Harbour trailhead (50.226555°N, 57.590872°W), is much more varied in habitat as the highway moves away from the coast and allows the trail to be routed slightly more inland. The habitats in this northern section include those same ones found in the southern half, plus bog, sand dunes, barrens, mature softwood forest, deciduous scrub, and mixed wood forest.

A desktop analysis of the existing environment was conducted using data obtained from the Newfoundland Breeding Bird Atlas (NBBA), eBird, and a data request from the Atlantic Canada Conservation Data Centre (ACCDC) with a buffer zone of 5 km from the proposed trail route, resulting in a total focal area (i.e., terrestrial and marine) of ~312 km². It is important to note that there are no known seabird colonies in the vicinity of the proposed trail route. The nearest colonies to the south are located at Belldowns Islands, off Cow Head, Shallow Bay and north of Daniel’s Harbour at Keppel Island, mouth of Hawkes Bay (ECCC-CWS 2025). NBBA observation data obtained via both general atlassing and standardized 5-minute point counts, combined with eBird observation data, revealed landbird communities typical of western Newfoundland’s predominant habitat types of coniferous forest, coniferous scrub, bog, open meadows and barrens (e.g., White-throated Sparrow *Zonotrichia albicollis*, Savannah Sparrow *Passerculus sandwichensis*, Yellow-bellied Flycatcher *Empidonax flaviventris*, Common Raven *Corvus corax*, and Pine Grosbeak *Pinicola enucleator* were relatively common; Birds Canada et al. 2025). Additionally, federally- and provincially-listed (*Threatened*) Bank Swallows *Riparia riparia* have been observed near Parson’s Pond and Portland Creek, both of which host coastal bluffs and stream banks composed primarily of sand, forming ideal breeding habitat for the species (NBBA 2022; ACCDC 2025). Isolated records also exist in the area for Ivory Gull *Pagophila eburnea* (*Endangered* under both SARA Schedule 1 and NLESA), Short-eared Owl *Asio flammeus* (*Special Concern* under SARA Schedule 1 and

Threatened under NLESA), Harlequin Duck *Histrionicus histrionicus* (*Special Concern* under SARA Schedule 1 and *Vulnerable* under NLESA), Common Nighthawk *Chordeiles minor* (*Special Concern* under SARA Schedule 1 and *Vulnerable* under NLESA), Olive-sided Flycatcher *Contopus cooperi* (*Special Concern* under SARA Schedule 1 and *Vulnerable* under NLESA), Rusty Blackbird *Euphagus carolinus* (*Special Concern* under SARA Schedule 1 and *Vulnerable* under NLESA), Barn Swallow *Hirundo rustica* (*Threatened* under SARA Schedule 1 and *Vulnerable* under NLESA), and Lesser Yellowlegs *Tringa flavipes* (under consideration for addition to SARA Schedule 1 and *Threatened* under NLESA). One record of an at-risk invertebrate, the Yellow-banded Bumble Bee *Bombus terricola* (*Special Concern* under SARA Schedule 1 and *Vulnerable* under NLESA), originates from Daniel’s Harbour at the northern end of the proposed trail route.

Portland Creek River (WC6) is a scheduled salmon river located in Salmon Fishing Area 14A. The Northwest Newfoundland population (designated unit), which includes Salmon Fishing Area 14A, is designated ‘Not at Risk’ (COSEWIC 2010, 2025). In 2024, catch per unit effort on Portland Creek River was 0.54, based on catch return data of 322 rods and 173 catch (DFO 2025). Other freshwater fish species targeted by anglers in the region of the proposed trail include brook trout, brown trout, and land-locked salmon (i.e., ouananiche).

4.1.2.1 Species At Risk

Using the aforementioned list of species observed in the area, combined with professional judgement, a summary of Species of Conservation Concern and Species at Risk (SAR) with the potential to interact with the Project is provided in Table 4.3. This list was used to help develop a field study, which was conducted during June-August 2025 to support the EPR (see Appendix F). Biologists conducted in-person habitat observations and bird surveys during 9-14 June 2025 and acoustic surveys for birds and bats (via deployment of Autonomous Recording Units [ARUs]) from June-August 2025. The study focused primarily on birds and mammals of conservation concern that could be potentially impacted by trail development.

Table 4.3. Species of Conservation Concern / Species at Risk potentially resident in the study area between Parson’s Pond and Daniel’s Harbour, NL.

Taxon	Species	Scientific Name	Preferred Habitat	COSEWIC Status	SARA Schedule 1 Status	NL ESA Status	NF S-Rank, 2020
Birds	Common Nighthawk	<i>Chordeiles minor</i>	Highly varied; open areas for foraging in flight; bare ground with shade for nesting	Special Concern	Special Concern	Vulnerable	SNA
	Short-eared Owl	<i>Asio flammeus</i>	Grasslands, tundra, wetlands	Threatened	Special Concern (under consideration for ↑)	Threatened	S2S3B
	Olive-sided Flycatcher	<i>Contopus cooperi</i>	Coniferous or mixed forest, near water or wetland	Special Concern	Special Concern	Vulnerable	S3B, SUM
	Bank Swallow	<i>Riparia riparia</i>	Riverbanks, lake and ocean bluffs, aggregate pits, road cuts	Threatened	Threatened	Threatened	S1S2B, SUM
	Barn Swallow	<i>Hirundo rustica</i>	Fields, meadows, and wetlands for foraging; near water bodies	Special Concern	Threatened (under consideration for ↓)	Vulnerable	S2B, SUM
	Gray-cheeked Thrush <i>minimus</i> subspecies	<i>Catharus minimus minimus</i>	Boreal forest; dense coniferous woods	Threatened	*under consideration for addition	Threatened	SNRB

Taxon	Species	Scientific Name	Preferred Habitat	COSEWIC Status	SARA Schedule 1 Status	NL ESA Status	NF S-Rank, 2020
	Evening Grosbeak	<i>Coccothraustes vespertinus</i>	Mature / old mixed wood forest	Special Concern	Special Concern	Vulnerable	S3S4
	Red Crossbill	<i>Loxia curvirostra ssp. <i>percna</i></i>	Pine stands; also mature Black and White Spruce, Balsam Fir	Threatened	Threatened	Endangered	S1S2
	Bobolink	<i>Dolichonyx oryzivorus</i>	Prairie, hayfields, pastures, meadows	Special Concern	Threatened (under consideration for ↓)	Vulnerable	S1B, SUM
	Rusty Blackbird	<i>Euphagus carolinus</i>	Sedge meadows, wetlands, lakes, rivers	Special Concern	Special Concern	Vulnerable	S2S3B, SUM
Mammals	Little Brown Myotis	<i>Myotis lucifugus</i>	Hibernation: caves / mines. Maternity colonies in buildings and large-diameter trees. (Resident)	Endangered	Endangered	Endangered	S1S3
	Northern Myotis	<i>Myotis septentrionalis</i>	Hibernation: caves / mines. Maternity colonies in buildings and large-diameter trees. (Resident)	Endangered	Endangered	Endangered	S1S3
	Eastern Red Bat	<i>Lasiurus borealis</i>	Roosting: Forest, especially deciduous. Foraging: Areas above water bodies, meadows, open forest canopy. (Migratory)	Endangered	*under consideration for addition	Endangered	SNA
	Hoary Bat	<i>Lasiurus cinereus</i>	Roosting: Forest, both coniferous and deciduous. Foraging: Areas above wetlands, grasslands, open fields with patchy trees. (Migratory)	Endangered	*under consideration for addition	Endangered	SUM
	Silver-haired Bat	<i>Lasionycteris noctivagans</i>	Roosting: In cavities and under bark of large-diameter trees (both deciduous and coniferous). Foraging: Forest, including openings and edges. (Migratory)	Endangered	*under consideration for addition	Endangered	SNR
	Caribou – NL population	<i>Rangifer tarandus caribou</i> (Boreal)	Coniferous forests, barren lands, shrub lands, and wetland complexes	Special Concern	Special Concern	Not Listed	S3S4
	American Marten – NL population	<i>Martes americana atrata</i>	Mature conifer and mixed wood forest; successional softwood forest	Special Concern	Threatened (under consideration for ↓)	Vulnerable	S3
Fish	American Eel	<i>Anguilla rostrata</i>	Freshwater life stages may occur in all waterbodies and watercourses with connection to the	Threatened	Decision made to not add to Schedule 1 (17)	Vulnerable	S3N

Taxon	Species	Scientific Name	Preferred Habitat	COSEWIC Status	SARA Schedule 1 Status	NL ESA Status	NF S-Rank, 2020
			ocean; bottom dwellers		December 2025).		
Insects	Gypsy Cuckoo Bumble Bee	<i>Bombus bohemicus</i>	Parasitic; habitat associated with host bumble bee species' preferred habitat (usually meadows, fields, farmland, open woodland)	Endangered	Endangered	Endangered	S1?
	Suckley’s Cuckoo Bumble Bee	<i>Bombus suckleyi</i>	Parasitic; habitat associated with host bumble bee species' preferred habitat (usually meadows, fields, farmland, open woodland)	Threatened	*under consideration for addition	Threatened	S2?
	Yellow-banded Bumble Bee	<i>Bombus terricola</i>	Forested wetland, mixed woodland, farmland, urban areas, montane meadows, grasslands, boreal habitat	Special Concern	Special Concern	Vulnerable	S3S4
	Transverse Lady Beetle	<i>Coccinella transversoguttata</i>	Habitat generalist; agricultural areas, gardens, parks, coniferous or deciduous forest, grassland, meadows, riparian areas	Special Concern	Special Concern	Vulnerable	SU

Note: S-Rank: ? = Inexact numeric rank [qualifier]; B = Breeding [qualifier]; M = Migrant [qualifier]; N = Non-breeding [qualifier]; S#N# = Range Rank; S1 = Critically Imperiled; S2 = Imperiled; S3 = Vulnerable; S4 = Apparently Secure; SNA = Not Applicable; SNR = Not Ranked; SU = Unrankable.

COSEWIC, SARA Schedule 1, and *Newfoundland and Labrador Endangered Species Act* species status designations current as of 19 December 2025.

Breeding Bird and Species at Risk Surveys

Between 9-14 June 2025, an LGL Limited ornithologist completed 13 breeding bird surveys, one Bank Swallow survey, and one Short-eared Owl survey in the immediate area of the proposed trail route (Figure 4.4). The same ornithologist also noted all birds detected incidentally in the Study Area during transit (on foot and by vehicle), ARU deployment, and dedicated Short-eared Owl and Bank Swallow surveys during this time. Detailed survey methodology is provided in Appendix F and survey findings are summarized below.

During breeding bird surveys (13 surveys, five minutes per survey), 134 individual birds of 31 species were detected. The five most common species by number were: Canada Goose, *Branta canadensis* ($n = 16$), White-throated Sparrow ($n = 14$), American Robin, *Turdus migratorius* ($n = 11$), Bank Swallow, *Riparia riparia* ($n = 8$), and Yellow-bellied Flycatcher, *Empidonax flaviventris* ($n = 8$; see Appendix F). The only “probable” or “confirmed” evidence of breeding observed during breeding bird surveys was that of four Canada Goose goslings accompanied by two adults. Aside from Bank Swallows, there were no other avian SAR detected during the 13 dedicated breeding bird surveys.

A dedicated Bank Swallow Survey was carried out on 13 June 2025, in which the observer walked along the bluff edge adjacent to trail Segment 2 and recorded all observed Bank Swallows and their burrows (for details of methods and results, see Appendix F). There were three loose groupings of Bank Swallows and burrows found during the survey (see inset in Figure 4.4). In total, across the three groupings, 77 individual Bank Swallows and a minimum of 20 burrows were counted.

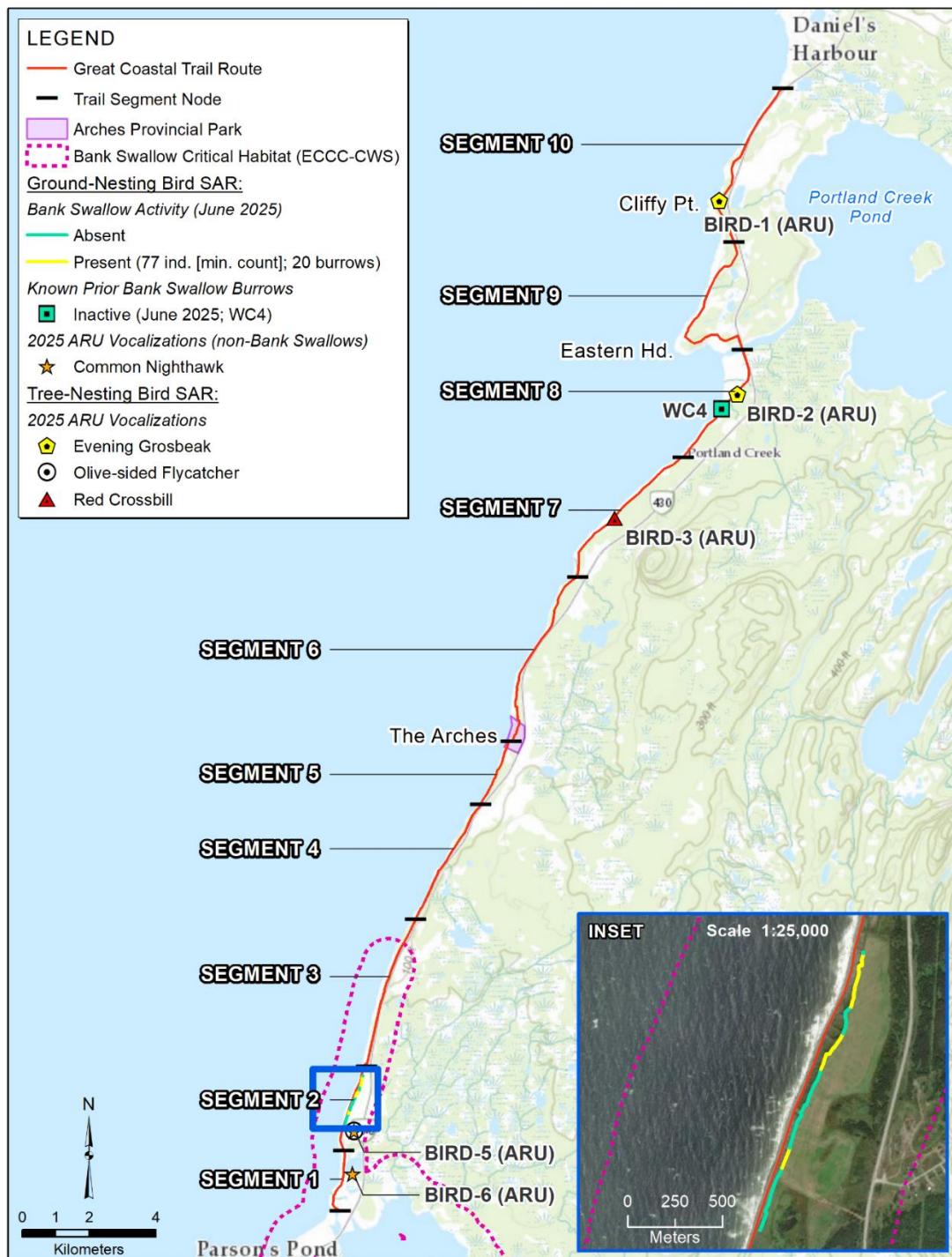


Figure 4.4. Bird species at risk (SAR) presence detected during the 2025 Field Study.

The Short-eared Owl survey took place on 10 June 2025, next to a horse pasture on the northwest edge of the town of Parson’s Pond (50.037608°N, 57.709125°W). No Short-eared Owls were detected during the survey.

Eight ARUs (six acoustic, two ultrasonic) were used to record bird and bat vocalizations in the Study Area between early June and early August. From these recordings, the presence of the following five avian SAR were verified: Bank Swallow, Common Nighthawk, Evening Grosbeak, Olive-sided Flycatcher, and Red Crossbill (see Figure 4.4). Three bat SAR were verified to occur in the Study Area: Little Brown Myotis, Northern Myotis, and Silver-haired Bat; all three species were detected at the Parson’s Pond ARU location, only Little Brown Myotis was detected at the Daniel’s Harbour ARU location (see Appendix F).

American marten’s Newfoundland population (*Martes americana atrata*) is also a SAR, listed as *Vulnerable* under NLESA (Hearn and Durocher 2023) and designated *Special Concern* by COSEWIC (2022). The species was included in Table 4.3 because habitat classification of the site indicated the presence of some suitable, but not preferred or critical, habitat (as per Environment Canada 2013). During field investigations there was little evidence of forest structure having the life history requirements preferential for marten (i.e., contiguous mature stands of conifer forest with abundant coarse woody debris). Recent habitat modelling on occupancy of Newfoundland marten suggests that core area (>60% probability of female occurrence) in the vicinity of the trail route is confined to the east side of Route 430 (Hearn and Durocher 2023).

Although the Newfoundland woodland caribou population is not currently afforded legal protection under the provincial *Endangered Species Act*, this species is considered *Special Concern* by both COSEWIC and SARA Schedule 1 (Table 4.3). The probability of interference of the trail with caribou habitat and or use is low. Sightings of caribou west of Route 430 (between the highway and the coastline) between the Parson’s Pond and Daniel’s Harbour trail route are presumed rare given the lack of suitable habitat, confined coastal margin, and visual and noise disturbance associated with highway traffic. Caribou Management Area 69, corresponding to much of the Great Northern Peninsula from Parson’s Pond northward, is closed to hunting (NLFA 2025a); therefore, no conflicts between trail construction/use and caribou hunting activity are expected.

Although invertebrate SAR were not targeted by specific surveys, a road-killed, Yellow-banded Bumble Bee was opportunistically collected on the shoulder of Route 430 south of Portland Creek (50.141808°N, 57.644343°W) on 10 June 2025. The preferred habitat of Yellow-banded Bumble Bees is forested wetland (NatureServe 2025), which is prevalent at this location and in many other areas along the proposed Demonstration Trail route.

4.1.2.2 Terrestrial Mammals

Non-SAR mammalian wildlife that overlaps the Project Area include moose (*Alces americanus*), black bear (*Ursus americanus*), coyote (*Canis latrans*), fox (*Vulpes vulpes*), snowshoe hare (*Lepus americanus*), and small mammals (i.e., mice, voles, shrews). Estimated moose density across the length of the Demonstration Trail is low except for a single moose survey grid cell associated with the intersection of Route 430 and the Five Mile Resource Road (approximately 75-m north of Access Point D, on the opposite side of Route 430; see Figure 4.1). This lone grid cell is estimated as medium-low moose density and overlaps with a section of trail between approximately 50.084349°N, 57.689240°W and 50.102801°N, 57.672452°W (Segment 4; ~2.4 km of trail; NLFA 2022). The Demonstration Trail lies adjacent to, but not within, the Portland Creek Newfoundland Moose Management Area 2 (MMA 2). MMA 2 is bounded to the west by Route 430 (i.e., the seaward side of Route 430 is not designated a hunting area); therefore, there is no expected land use conflict between the Demonstration Trail and moose hunting activity.

4.1.2.3 Vegetation and Rare Plant Surveys

Vegetation communities within the Study Area were observed to be a mixture of boreal forest, barrens, and wetlands. The Study Area is predominantly boreal forest that parallels Highway 430, and in many cases the proposed trail bisects this forest habitat. The boreal forests in the Study Area are dominated by balsam fir (*Abies balsamifera*), with smaller amounts of spruce (*Picea glauca* and *P. mariana*) and tamarack (*Larix*

laricina). In many instances, the understory is dense and well-defined with balsam fir, speckled alder (*Alnus incana* ssp. *rugosa*), mountain maple (*Acer spicatum*), and serviceberry (*Amelanchier* sp.). The ground layer consists of moss and a diversity of herbaceous vegetation and ferns, including bracken fern (*Pteridium aquilinum*), dewberry (*Rubus pubescens*), twinflower (*Linnaea borealis*), blue-bead lily (*Clintonia borealis*), and wild lily-of-the-valley (*Maianthemum canadense*). Low-lying regions of the Study Area support a variety of wetland habitats including bogs dominated by both ericaceous shrubs and herbaceous plant species, such as leatherleaf (*Chamaedaphne calyculata*), sheep laurel (*Kalmia angustifolia*), and labrador tea (*Rhododendron groenlandicum*). The ground layer consists of peat hummocks with sphagnum moss and a diversity of herbaceous plants including bogbean (*Menyanthes trifoliata*), sedge species (*Carex* spp.), and cranberry (*Vaccinium macrocarpon*). In general, the coastal barrens were denuded of vegetation except for ericaceous shrubs, several herbaceous plant species, and lichen.

No plant or lichen SAR were observed within the study area during the field site visit between 9-14 June 2025; plant communities were comprised of common species assemblages (for details, see Appendix F).

4.1.2.4 Local Economy

The Demonstration Trail will be built within Local Area 75 of Economic Zone 7 on the Great Northern Peninsula. Local Area 75 includes the communities of Belburns, Cow Head, Daniel’s Harbour, Parson’s Pond, Portland Creek, St. Paul’s, and Three Mile Rock (GNL n.d. a). The gross personal income per capita in 2022 for the Daniel’s Harbour Area was \$37,800 and \$42,900 for the province (GNL n.d. a). The area population has been in decline since the mid-1980s. The 2021 Census population count for this area was 1,370 (Statistics Canada 2023). The 2021 employment rate in Local Area 75 for individuals 15 years and older was 32.4% employed and 31.6% unemployed (Statistics Canada 2023). The trail will pass through/near three communities in this region, Parson’s Pond, Portland Creek, and Daniel’s Harbour. Specific population information for those towns and the province is presented in Table 4.4. Parson’s Pond is the largest community, with 368 inhabitants in 2021, followed by Daniel’s Harbour (220), and Portland Creek (86). Employment rates in the three communities varies seasonally and in 2021 was 12.5% (Portland Creek), 25.8% (Parson’s Pond), and 41.2% (Daniel’s Harbour) (Table 4.4; Statistics Canada 2023).

Table 4.4. Population characteristics for Parson’s Pond, Portland Creek, Daniel’s Harbour, and NL.

Population Characteristics	Parson’s Pond	Portland Creek	Daniel’s Harbour	Newfoundland and Labrador
Population	368	86	220	510,550
Population Density (ind./km ²)	29.8	7.2	28.6	1.4
Land Area (km ²)	12.34	11.88	7.68	358,170.37
Median Population Age (years)	54.8	57.6	60.8	48.4
Participation Rate (%)	45.2	25	49	56.1
Employment Rate (%)	25.8	12.5	41.2	47.5
Unemployment Rate (%)	42.9	75	16	15.2
Average Household Income (2022)	\$95,300 ^b	n.d.	\$105,200 ^c	\$125,000
Commute within Municipality (%)	57.1	n.d.	n.d.	55.6
Commute to Another Municipality (%)	42.9	n.d.	n.d.	42.6

Source: ^a Statistics Canada (2023); ^b GNL n.d. b; ^c GNL n.d. c.

Note: ind. = Individual(s).

The top industries in Parson’s Pond and Daniel’s Harbour includes agriculture, forestry, fishing, hunting, utilities, construction, healthcare/social assistance, retail, mining/quarrying, trades, and manufacturing (Statistics Canada 2023). The trail will also pass by agricultural land (including Brophy Dairy Farms) and parks, including the Arches Provincial Park. Notable businesses in Parson’s Pond include the Sunrise Bakery & Café, General Store, Post Office, Fire Department, and Parson’s Pond Club. The Mountain Waters Resort is located

on the banks of Portland Creek Pond and has a Crown Lands claim that intersects the trail at the river edge. In addition to an RV camp, it is a well-established outfitter business specializing in guided fishing excursions within the Portland Creek River watershed. The trail will also pass by the Entente Cordiale Inn (closed for renovations since 2023) north of Portland Creek.

4.1.3 Proposed Trail Components

This section describes the proposed trail components relevant to the revised trail route. Mapping is provided in the Map Book (see Appendix G).

4.1.3.1 Trail Route and User Areas

Elements of the trail route include the trail tread, trail corridor, trailheads, access points, and parking areas. The trail tread will allow for two-way passage with a width of ~2-3 m and a trail corridor ~3-4 m wide. In some areas, the tread may narrow to 2.0-m. In these areas, passing zones may be placed every 50-100 m. Sightlines and overhead clearance will be maintained to a minimum of 3-m throughout the trail. There will be one parking area near the trailhead at the end of Church Rd in Parson’s Pond; its location has not been finalized but will preferably be within 250 m of the trailhead and have access off North Street (see also Section 4.3.1). The other planned parking area is the existing lot adjacent to the Bennett Lodge in Daniel’s Harbour. Access points along the trail will be included for trail users to facilitate day use excursions (see Figure 3.2). It has not yet been determined if parking lots will be created for some of these access points.

4.1.3.2 Waterbodies and Wetlands Crossings

Additional trail infrastructure will be needed for water crossings. Crossings will be required at several points along the trail and will consist of culverts, bridges, and rock crossings (see Table 4.1). Culverts will be required in trail Segments 4, 7, 8, 9, and 10. Culvert diameters will vary based on the local hydrological conditions and range between 450-900 mm. The largest estimated diameter culvert will be installed at site WC9. Bridges will be installed at sites WC2 (Junction of Segments 6 and 7), WC4 (Segment 8), and WC6 (Junction of Segments 8 and 9). The largest bridge will cross Portland Creek (WC6), be rated for pedestrian use only, and be installed to the west and adjacent the existing TI bridge on Route 430. This bridge will have a span of ~100 m and will be located outside of the Route 430 ROW and not interfere with existing transmission line ROW(s) across Portland Creek. The proposed bridge at WC2 will have a 12-m span and consist of a modular panel design. The bridge at WC4 will be a non-permanent, seasonal bridge with a span of 4-m. This temporary span will be installed annually after the spring freshet and removed during the offseason. The proposed trail intersection at WC4 is ~35 m from the confluence with the ocean at a semi-confined beach channel; private property considerations have to be taken into account for this location (see Figure 4.1e). Only a single access point is proposed, at a point considered the most stable given the potential for variable flow rate (refer to Appendix H, Figure 7). Periodic inspections of the temporary bridge at WC4 are elaborated on in Section 4.4.2.

All bridges will be clear span bridges, constructed to professional engineering standards, and likely be of prefabricated modular design to facilitate installation. Currently, detailed drawings of prefabricated bridges are unavailable. Final selection will be based on discussions with architects, engineers, and consultation with the Department of Fisheries and Aquaculture (FA), FAL and DFO. Figures depicting the locations of these proposed water crossing areas are presented in the Environmental Protection Plan (EPP; Appendix C). It is understood that additional information may be required to confirm fish presence, assess fish species assemblage and abundance at select trail route water crossings. In consultation with DFO, FA and FAL, this data would be utilized to make final determinations on culvert type/size, bridge requirements and mitigation measures for installation of trail infrastructure.

The trail route traverse through designated wetland habitat and an associated 30-m buffer in the vicinity of the Portland Creek dunes (see Section 4.1.1.4; Table 4.2).

4.2 Project Interactions and Overlaps

4.2.1 Existing Developments

This section describes overlap between the proposed Project and municipal development plans, local service districts (LSDs), Crown Land titles, and private land. Relevant restrictions for the revised trail route and indicators of Project support are also provided.

4.2.1.1 Municipal Development Plans and Local Service Districts (LSDs)

The demonstration Trail passes through the communities of Parson’s Pond, Portland Creek, and Daniel’s Harbour. Of the three communities, only the Town of Parson’s Pond has a municipal development plan. The Parson’s Pond Municipal Plan and Development Regulations for 2019-2029 have been in effect since 22 January 2021 (Town of Parson’s Pond 2020). Within the plan, trails are classified as non-building uses and are considered recreational open space thus permitted in certain development exclusion zones (e.g., Designated Floodway and Coastal Erosion designation areas). Approximately 4.3 km of trail, including portions of Segments 1 to 3, overlap land use zoning for Coastal Erosion (3,446 m overlap), Designated Floodway (755 m), and Designated Floodway Fringe (12 m) as defined in the Development Regulations (see Figure 4.2 and its embedded table for details). Designated Floodway Fringe lists recreational space as discretionary use and will require approval from the municipal council prior to development. The proposed parking area (30 x 45 m; Figure 4.2) for the Parson’s Pond trailhead is currently located within the Designated Floodway land use zone. The Town of Parson’s Pond provided a written letter of support on 3 November 2023 for the initial project undertaking occurring within the Floodway Zoning areas, which was included with EARD submission. An updated letter of support for the current Project was issued to TDCI on 10 October 2025 (refer to Section 4.2.1.3).

Although the Town of Daniel’s Harbour has a defined municipal boundary, it does not have a registered municipal development plan. For portions of the trail within Daniel’s Harbour (2.6 km), TDCI will consult with the town regarding permitting requirements reflective of any council regulations. Portland Creek is an unincorporated community and is a designated local LSD under the *Municipalities Act* (GNL 2006). TDCI is in consultation with the LSD committee about trail development within the community.

4.2.1.2 Crown Land Titles

The revised Demonstration Trail route overlaps with Crown Titles in the Parson’s Pond Municipal Boundary or Portland Creek LSD. Table 4.5 lists the Crown Title areas and the original title owner in the vicinity of the trail route (see Figure 4.1 and Appendix G for maps of these areas).

A recent Application for Crown Title (#164303; total area of 0.14 km²; applicant unknown) has been filed for the area immediately adjacent to the trail in the vicinity of the cabin owners in Segment 5 (see Figure 4.1 and Map Book [Appendix G]). This area is located within the 1-km provincial park referral buffer and is no longer visible on the Land Use Atlas (i.e., as of 19 December 2025; it was displayed in September-October 2025). Given the proximity to the proposed trail and the unknown status of Application for Crown Title #164303, it has been retained in Table 4.5 and on map products for this EPR.

Approximately 5 km north of Portland Creek, along the shores of Portland Creek Pond, is the Mountain Waters Resort. This is a seasonal resort (operating between 15 May-15 October) focused on fishing and hunting, with seven permanent structures and 50 clearings for RVs and tents. According to the provincial LUA, this resort has an assigned Crown Lands parcel that includes spatial delineation but no attribute data; it is assigned as ‘Miscellaneous Crown Lands Info’ that overlaps the trail crossing at both sides of the Portland Creek River (WC6).

Table 4.5. Crown Lands Records information for parcels that the Demonstration Trail route intersects.

Area	Trail Section	Crown Lands Record Type	Crown Title Number	Original Title Owner	Notes
Parson’s Pond	1	Crown Title: Lease	122611	Newfoundland and Labrador Hydro	Transmission Line ROW
	1	Quit Claim	124320	Peter Bavis (Estate of)	Deed Number 461
	1	Crown Title: Grant	75493	Trevor Keough	Vol 186 Folio 80
	1	Crown Title: Grant	21701	Peter Bavis (Estate of)	Vol 208 Folio 88
	1	Crown Title: Grant	137829	William Nicholas Keough	Vol 309 Folio 5; Claim of private land
	1	Crown Title: Grant	140399	William Nicholas Keough	Vol 315 Folio 138
Cabin Area south of Arches Provincial Park	5	Application for Crown Title *	164303	Unnamed	Refer to note below
Portland Creek	6	Crown Title: Licence	89601	Roger Keough	Within Arches PP boundary
	7	Crown Title: Licence	120589	Harvey N Caines	Residential
	7	Crown Title: Lease	111312	Brophy Dairy Farms Limited	Agriculture Lease
	8	Crown Title: Licence	94170	Oscar Calvin Collett	Residential
	8	Crown Title: Licence	124526	Local Service District of Portland Creek	Unknown
	8	Crown Title: Grant	105679	Diocesan Synod of Western Newfoundland	Unknown
	8	Crown Title: Licence	111951	Austin G. Caines	Residential
	8	Crown Title: Licence	111617	Harrison Caines	Residential
	8	Quieting of Titles	Court No.: 717 PID: 10101188	Unnamed	Entente Cordiale Inn
	8	Crown Title: Licence	120715	Local Service District of Portland Creek	Issued LTO
	8-9	Crown Title: Lease	88279	Newfoundland and Labrador Hydro	Transmission Line ROW
	8-9	Crown Title: Lease	135290	Newfoundland and Labrador Hydro	Transmission Line ROW
	8-9	Misc. Crown Lands Info	Unknown	Mountain Waters (RV Park) Resort	Unknown

Source: NLFAL (2023).

Note: Presented Crown Lands information current as displayed on the Lands Use Atlas as of 22 October 2025 (* #164303 no longer shown on the Land Use Atlas as of 19 December 2025; retained in the EPR and associated figure due to its unknown status); LTO = Licence to Occupy.

4.2.1.3 Private Land

Locations where the trail route will come in close proximity to private land, or where TDCI may request temporary access during the trail construction phase have been identified. Specific land parcels are identified in Figure 4.1a-f and the Map Book (Appendix G) where TDCI is presently in discussion with landowners.

Discussions are currently on-going and include topics such as the potential for easement(s) through their property to the option of small land purchase where the trail route would encroach on existing property boundaries.

4.2.1.4 Support / Commitment for the Project

Currently, TDCI has received letters of support for the Project from several entities and business owners that operate within the area, or own land in proximity to the proposed trail route. TDCI is having ongoing discussions with the following (names in parentheses have provided letters of support):

- Municipalities:
 - (Town of Parson’s Pond);
 - Town of Daniel’s Harbour
- Portland Creek LSD;
- (Arches Provincial Park);
- Organizations:
 - (Central Development Association);
 - Cabin and trailer owners south of Arches Provincial Park; and
- Private land owners/other land users:
 - (Bennett’s Lodge; [Jim Bennett])
 - Brophy Dairy Farms Limited
 - (Entente Cordiale Inn; conditional [Paul Wylezol])
 - (Mountain Waters Resort; [Ryan Wentzell])
 - Sunrise Bakery and Cafe

4.2.2 Sensitive Wildlife Habitat

Sand dunes occur adjacent to the Demonstration Trail route in the coastal areas near Portland Creek (specifically Portland Cove) and Cliffy Point (within the Daniel’s Harbour municipality; Figure 4.5). The Portland Cove coastline consists of sand dunes and beach terraces composed of marine sediments, including gravel and sand (Proudfoot and St. Croix 2001). Cliffy Point is located on Segment 10 of the trail and the existing path to this area is Access No. 10 for the trail. As noted in Section 3.4, trail routing was altered to increase the distance from sand dunes west of Route 430 and south of Portland Creek River. Also, trail features originally considered in the vicinity of Portland Creek dunes, Eastern Head, and Cliffy Point for future expansion plans (e.g., lookout developments) have been removed. The current proposed trail route does not overlap with sand dunes.

As described in Section 4.1.2.1 (and Appendix F), Bank Swallows and their burrows were observed during surveys along the coastal bluffs ~2 km north of Parson’s Pond (Figure 4.5Figure 4.5). These areas are next to agricultural fields that are suspected foraging sites of the birds. Segments 1, 2, and 3 (southern portion) of the proposed trail route occur in an area federally designated as Critical Habitat (No. 1233_NL_2; see Table D-1 in ECCC 2022) for Bank Swallow (considered *Threatened* under the SARA). The Parson’s Pond Critical Habitat for Bank Swallow encompasses 30 km of shoreline and is one of two areas of Critical Habitat identified for this species on the island of Newfoundland. The proposed trail occurs adjacent to 5.6 km of shoreline considered Critical Habitat for Bank Swallow. Under SARA, it is prohibited to damage or destroy Bank Swallow Critical Habitat, which includes activities that damage their burrows or alter nesting sites. Prohibitions also extend to killing, harming, harassing, capturing, or taking an individual Bank Swallow.

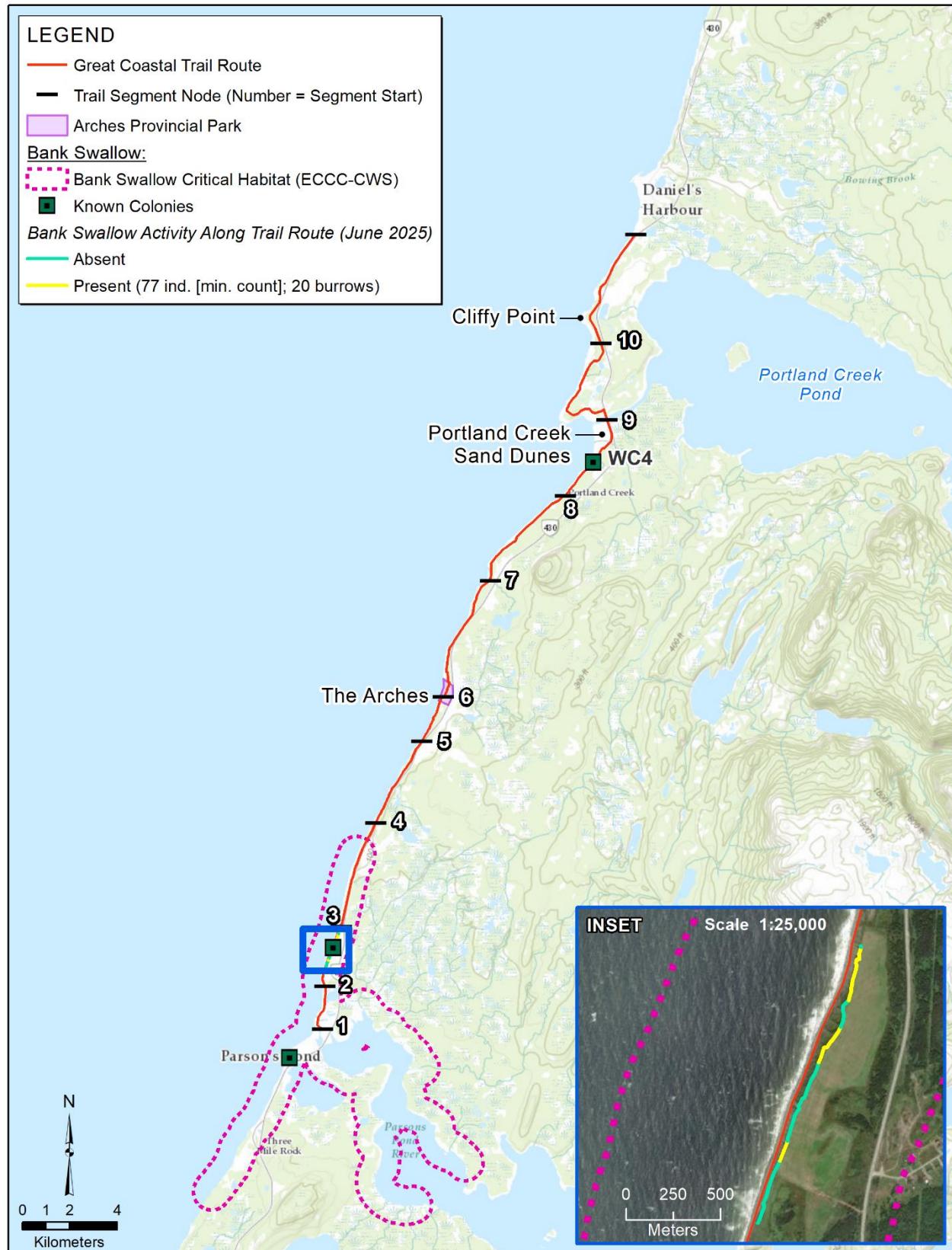


Figure 4.5. Sensitive wildlife habitat in the vicinity of the trail route.

4.2.2.1 Provincial Parks – The Arches Provincial Park

There is one provincial park located along the Parson’s Pond to Daniel’s Harbour Demonstration Trail. The Arches Provincial Park is accessible from Route 430 and is ~11 km north of Parson’s Pond and 7 km south of Portland Creek. Established in 1972, the park surrounds a unique geological feature on the beach where a massive rock formation has been eroded from thousands of years of wave action into three natural arches (ParksNL 2025). The provincial park is 13.1 hectares and surrounded by a 1-km referral buffer. Park boundaries (not including the referral buffer) are ~0.3 km wide from Route 430 to the coast and 0.5 km long from end to end.

The proposed trail route within the park boundary is ~600 m and will utilize or build upon existing trails in the southern portion of the park. Approximately 400 m of vegetation clearing will be required from the park access road to the northern boundary. Maximum clearing area would be 1,600 m² (4-m corridor width), but discussion on final width of trail tread and corridor within the park are ongoing. Note that the portion of trail Segment 5 located within the park boundary is under a separate LTO application with Parks NL.

4.2.3 Water bodies and Wetlands

The trail will traverse water crossings with a combination of culverts and bridges. Not including perpendicular water crossings, the Demonstration Trail will be within the minimum 30-m buffer requirement at two additional waterbodies and one marginal wetland (See Section 4.1.1.4; Tables 4.1-4.2). The trail tread passes within the 30-m buffer at these three points due to physical constraints (e.g., terrain, shoreline, or Route 430 ROW).

4.2.4 Species At Risk

As discussed in Appendix F, Bank Swallows (designated *Threatened* both federally and provincially) were encountered in large numbers (77 individual birds, 20 burrows of unknown occupancy status) during the dedicated survey for this species between ~2.2-3.2 km north of Parson’s Pond, at a known colony location within Critical Habitat for this species (see Section 4.2.2). Eight Bank Swallows were also observed during a Breeding Bird Survey conducted close (~250 m) to the dedicated survey location mentioned above (on 10 June 2025), and three individuals were observed incidentally (13 June 2025) as they flew over the sand dunes next to Portland Creek, although a relatively thorough search of the dunes revealed no nest burrows. ARUs detected five avian SAR: Bank Swallow (three locations across 26 unique days in total), Evening Grosbeak (two locations across four unique days), Common Nighthawk (two locations on one day), Olive-sided Flycatcher (one location/date) and Red Crossbill (one location/date; Appendix F). No other SAR were observed.

American eel is the only aquatic SAR with potential to occur within the Project footprint, given that it may be found in almost all lakes and streams that connect to the ocean. Specific to the proposed trail route, American eel may be located within watercourses (or higher order systems) associated with WC1, 2, 3, 4, and WC6 (refer to Fish Habitat Presence column in Table 4.1). Only those life cycles associated with feeding and maturity (e.g., elvers, yellow eels, and silver eels) occur in freshwater environments, where they may remain for 10+ years before migrating back to the Sargasso Sea for reproduction (COSEWIC 2012). American eel is provincially designated as threatened under the *Endangered Species Act* (Table 4.3). On 17 December 2025, the federal government legislatively decided to not add American eel to SARA Schedule 1 (Canada 2025).

4.2.5 Fish and Fish Habitat

Probable fish habitat presence was observed (based on surface photograph assessment) at five of the ten proposed water crossings (WCs 1-4, and 6; see Table 4.1). Primarily, habitat at these locations appeared to be suitable for Brook Trout, with WC6 (Portland Creek) being the only Scheduled Atlantic Salmon river. Also

possessing potentially suitable habitat for Atlantic Salmon are WC2 and WC3. It should be noted the population of salmon (Northwest Newfoundland) present in the Project Area is not listed as at-risk (COSEWIC 2010, 2025).

4.2.6 Existing Infrastructure

This section describes overlap between the proposed Project and existing infrastructure, including TI property and other infrastructure (e.g., dumps, roads), and land use designation and zoning/forestry activities.

4.2.6.1 TI Property

TI is responsible for the construction and maintenance of provincial highways and provincial government buildings, among other government properties and equipment. The department also provides information on highway closures and conditions for travellers. Route 430 is within the department’s responsibility. At times the Demonstration Trail will follow the path of the Route 430. Other TI property associated with Route 430 includes culverts (see Table 4.1) and highway shoulders. Proposed trail infrastructure (i.e., bridges and culverts) at water crossings located downstream of TI property will be designed and installed to prevent negative impact on upstream TI assets.

4.2.6.2 Other Infrastructure

NL Hydro has crown land lease corridors for transmission line ROWs that cross the Demonstration Trail near the Parson’s Pond trailhead at the end of Church Road (TL227, a 69 kV line) and at multiple locations near Portland Creek River. Approximately 450 m of trail route is presently located within a low voltage transmission line ROW through the wetland east of Portland Creek dunes. This was done to limit disturbance to wetland sensitive habitat. This low voltage, single wooden pole line has terminus points at Portland Creek and Belburns, north of Daniel’s Harbour. It is understood that the trail route may have to shift to or beyond the ROW edge, if shared use is not possible. Near the Portland Creek River the trail crosses both TL227 and TL259 (138 kV, double wooden pole structure) lines twice, on either side of the river. South of the river at the dunes southeastern extent (50.175255°N, 57.601746°W and 50.176495°N, 57.600216°W), and ~150 m from the northern riverbank (50.183148°N, 57.605777°W and 50.183819°N, 57.603263°W); presented coordinates are for TL227 and TL259, respectively. At these locations the trail will only cross perpendicular to the existing transmission line ROWs.

Route 430 (i.e., the Great Northern Peninsula Highway) is a paved highway connecting communities on the Northern Peninsula. The route traverses 423 km from Deer Lake to Goose Cove East. Route 430 has been designated as a Protected Road under the *Urban and Rural Planning Act* (see here). There are several road buffers associated with protected roads that restrict development and permitting. Route 430 is a Schedule C Protected Road, which includes a 20-m protected buffer from the centre line of the road within which specific activities¹ are prohibited in accordance with Building Near Highways Regulations, 1997, NLR 28/97 (GNL 1997).

The proposed trail route is within the Rural Conservation Zone for Route 430 (i.e., 500-m buffer of the Route 430 centreline). Under the *Urban and Rural Planning Act* (see CNLR 996/96-Protected Road Zoning Regulations here), there is no specific reference to trails within a Rural Conservation Zone, but public scenic routes are permitted (see Public recreation use: Section 5.c.).

Local roads are present in communities along Route 430 and consist of both paved and un-paved surfaces.

Given the revised trail route, ROW bridges are no longer applicable to the Project.

¹ Prohibited activities include erecting, repairing, altering, or structurally improve a fence, building, or other structure, nor plant trees, shrubs, or hedges without permission from the Minister within a specified distance as per the Schedule designation.

4.2.6.3 Land Use Designations and Zoning/Forestry Activities

According to the LUA (NLFAL 2023), there are no active FAL wood cut block permits (commercial or domestic) within or adjacent to the forested sections of the proposed trail route. All commercial harvesting occurs east of Route 430. There are several Silviculture polygons identified from the LUA west of Route 430, all of which are delineated as pre-commercial thinning. Portions of Segment 7 intersect and/or are near these areas, but they were already cleared prior to the establishment of the agricultural sector adjacent to this trail segment (see Section 4.2.7; see also Table 4.5 in Section 4.2.1.2).

The Project occurs within Forestry Management District 17 (Zone 8), for which the most recent 5-Year Crown Forest Management Operating Plan was 2018-2022 (NLFAL 2017). An EARD for a Forest Operating Plan Amendment (2023-2027) was submitted on 12 December 2025 to harvest additional areas in Zone 8 in response to recent spruce budworm outbreaks, however proposed silviculture harvesting areas are all north of Port Saunders and do not overlap the proposed trail area (NLFAL 2025b).

4.2.7 Agricultural Activities

Agricultural activities including fields and farms can be found on the east side of Route 430. The Demonstration Trail will be built on the west side of Route 430 along the coast. At Portland Creek, the trail will pass by the Brophy Dairy Farm. The farm has three Crown Land leases on the coastal side of Route 430 within an Agriculture-Crown Reserve.

Sections 6 and 7 of the proposed trail pass through an Agriculture-Crown Reserve north of Arches Provincial Park to just south of Portland Creek. An Agriculture-Crown Reserve is Crown Land designated for agriculture utilization. The reserve is under jurisdiction of FAL with specific referral to Agrifoods. Main trail access in this area for the construction phase is Access Point F, an existing route built to service agriculture land. In total, Brophy’s Dairy Farm Limited has been granted 18 Crown Land Titles whose boundaries are within 500 m of the proposed trail route (with the closest point ~1-m from the 2-m trail buffer corridor).

The proposed development will not interfere with agricultural activities. TDCI acknowledges that there may be future agricultural activities in the Project vicinity (e.g., manure/fertilizer spreading, heavy equipment use, presence of animals, odour) and acknowledges that agricultural activities may influence trail user experience.

4.2.8 Mining

The Demonstration Trail is within the Western Newfoundland Referral Area mining area which encompasses all western Newfoundland, extending from Port aux Basques to St. Anthony and to just west of Beothuk Lake in central Newfoundland. The nearest known active mineral exploration is the Portland Creek Uranium Project (Infiniti Resources) area, ~14 km east of the Demonstration Trail (NLEM 2013).

Approximately 1.7 km north of Portland Creek River, between Route 430 and the coastline, there is a small existing quarry (see Figure 4.1). Part of this quarry lease area is operated by TI, and the other is operated by Marine Contracting Inc. (MCI) of Corner Brook, NL. The trail route corridor (Segment 9) is ~5-m from the southeastern boundary of the MCI active quarry permit (No. 150192). TDCI has had ongoing communication with MCI and have been told that future intentions for their quarry are uncertain. MCI’s quarry permit for this area expires 27 January 2026 (permits are issued for a period of 1 year). TI was issued a quarry permit (No. 151104) on 19 August 2025 that abuts the MCI permit to the north. It is unknown if TI intends to take over the MCI claim (once it expires) and expand the quarry footprint.

The proposed trail route is greater than 100 m from the edge of the TI quarry and is ~50 m from the existing quarry pit edge within the MCI quarry lease boundary. Both distances are considered within the recommended quarry blast safety zone (i.e., 500 m radius buffer). For context, the closest distance from the MCI quarry permit boundary to the centreline of Route 430 is ~125-m. TDCI has been in talks with MCI concerning trail use in the

area and safety considerations (see Section 6.4). At present, the notices and procedures provided below are followed during blasting operations and would continue to be implemented during future blasting operations.

- Blasting operations occur irregularly and involve the services of a specialized blasting company that develops a specific plan for scheduled blasting operations;
- Where applicable, the blasting company performs a safety check of the trail and highway (i.e., Route 430), and if necessary, closes sections of the trail/highway to ensure no individuals occur proximal to the blasting area;
 - Trail/highway closures typically are of short duration (i.e., <60 minutes) and infrequent (i.e., generally no more than once per year); and
- Prior to blasting operations, public notice is provided via radio stations servicing a given area. Should the blasting company inform the GCTA and/or their partner organizations in advance of planned blasting operations, the GCTA will also provide notice via a planned trail digital app.

The trail route in this area was selected to keep it as high and dry as possible, while still respecting safety concerns. Shifting the route farther south or east of its current configuration around the quarry boundary will result in moving into an existing (unmapped on NTS 50k) watercourse riparian buffer that connects a pond on the eastern side of Route 430 with the pond located ~60-m from the MCI quarry permit boundary (an existing culvert spans Route 430 at approx.: 50.197710°N, 57.601886°W). This would result in additional construction needs, including at least two more bridge crossings and infill base material and/or boardwalk considerations for the trail tread in this wet area.

4.2.9 Heritage Sites

There are several designated heritage sites within the communities along the Demonstration Trail. The Parson’s Pond Fishing Village Project, part of the Fisheries Heritage Preservation Program, consists of 22 wooden fishing stages and two fish stores (Alexander Payne’s Store and Edward Payne’s Store) constructed in the 1960s (Heritage NL 2025). The village is located on the northern shoreline at the mouth of Parson’s Pond River (50.032569°N, 57.709877°W), spans ~150 m, and is accessible from the trailhead at the end of Church Road. The trailhead is ~40-m from various outbuildings (e.g., sheds/lockers) associated with the fishing stages, at closest point. The trail will also pass by the Old Church of England Cemetery (50.033649°N, 57.710594°W) heritage site accessible from North St (Heritage NL 2025). The cemetery is the oldest Anglican cemetery in Parson’s Pond and was in use circa 1880 to the 1930s. Daniel’s Harbour has two heritage sites which are located ~1.5 km from the northern most trailhead, the Henry House Store (part of the Fisheries Heritage Preservation Program) and the Nurse Myra Bennett House (Heritage NL 2025). Constructed circa 1904, the Henry House Store served as a food storage and retail business and is located on Storefront Road (50.239739°N, 57.590533°W). The Nurse Myra Bennett House was the home of Myra and Angus Bennett and is located on Circular Rd (50.239032°N, 57.587717°W). The Demonstration Trail route ends before entering the center of Daniel’s Harbour.

A standalone archaeological field investigation was completed, permitting was filed with the NL PAO (Provincial Archaeology Office), and a Historic Resources Impact Assessment has been submitted to the PAO as per Project EPR Guidelines. The report is considered confidential; however, a public summary is provided as an appendix to the EPP (Appendix C)

4.2.10 Health Facilities

NL Health Services (formerly Western Health) operates the health facilities in western Newfoundland. Of the three towns along the Demonstration Trail, Daniel’s Harbour and Parson’s Pond have a medical clinic in the community (see Figure 3.1). These medical clinics offer primary health care services. Portland Creek is ~10 km

from the Daniel’s Harbour clinic and ~27 km from the clinic in Parson’s Pond. Another medical clinic in the area is in the town of Cow Head, ~17.5 km south of Parson’s Pond. The Bonne Bay Health Centre in Norris Point and the Rufus Guinchard Health Centre in Port Saunders provide emergency and hospital services. The Bonne Bay Health Centre is ~68 km from Parson’s Pond while Rufus Guinchard Health Centre is ~72 km from Daniel’s Harbour. The closest hospital to the Demonstration Trail is Western Memorial Regional Hospital in Corner Brook, ~185 km and 211 km from Parson’s Pond and Daniel’s Harbour, respectively. In general, the hospital and health centres are open 24/7 for emergency services, whereas clinics are only open one day per week (Table 4.6/Table 4.6). The province also provides health care advice through the HealthLine service, where a virtual nurse practitioner is available daily from 8 am to 8 pm. The HealthLine service can be accessed by dialing 811 or through the 811 NL Healthline app. The NL volunteer search and rescue team has a base in Rocky Harbour, ~60 km from the trailhead in Parson’s Pond. The closest Royal Canadian Mounted Police detachments to the Demonstration Trail are in Port Saunders and Rocky Harbour. There is a fire brigade in Parson’s Pond and several fire volunteer departments in the Port Saunders area. For emergencies, trail users are advised to call 911.

Table 4.6. Health facilities near the Demonstration Trail.

Health Facility	Address	Accessible From	Proximity (km)		
			Parson’s Pond	Portland Creek	Daniel’s Harbour
Western Memorial Regional Hospital	100 Health Care Crescent, Corner Brook, NL A2H 0J4	Route 440	185	202	211
Bonne Bay Health Centre	131-135 Main Street, Norris Point, NL, A0K 3V0	Route 430	68	85	95
Rufus Guinchard Health Centre	1 Hospital Lane, Port Saunders, NL A0K 4H0		98	81.5	72
Cow Head Medical Clinic (Wed, 08:30-16:30)	126 Main Street, Cow Head, NL A0K 2A0		17.5	34	44
Parson’s Pond Medical Clinic (Tues, 08:30-16:30)	2 Sports Avenue, Parson’s Pond, NL A0K 3Z0		0	17	27
Daniel’s Harbour Medical Clinic (Thur, 08:30-16:30)	2 Church Lane, Daniel’s Harbour, NL, A0K 2C0		27	10	0

Note: Rt = Route; Thur = Thursdays.

4.2.11 Telecommunications

The combined cell network coverage is reported to be 100% along the trail for the three major providers (Telus, Rogers, and Bell) and their subsidiaries (e.g., Koodo, Virgin; Table 4.7; Kearney 2024; Bell 2025; Rogers 2025; Telus 2025). Telus and Bell offer 4G LTE and 4G HSPA+ coverage along the route (Bell 2025; Telus 2025) while Rogers offers extended coverage in the area but does not specify which generation of wireless technology is supported (Rogers 2025). There is one cell tower along the Demonstration Trail route, on Portland Hill (50.144855°N, 57.626737°W; elevation 171 m; antenna height 39 m; see Figures 3.2 and 4.1), located ~1.4 km east of the intersection of trail Segments 6 and 7, the approximate midpoint of the proposed trail (Villeneuve 2025). There are two other cell towers in the neighbouring communities of Cow Head and Port Saunders. These three towers are operated by Bell. The altitude of the Portland Hill cell tower should afford good coverage along the trail route; however, there may be occasional dead spots owing to obstructions or low-lying areas. Cell coverage in rural areas of NL can be sparse (MNL 2025), and it is not recommended to rely on cell phones exclusively (NLT n.d.).

Table 4.7. Telecommunications coverage along the demonstration route.

Telecommunication Provider	Type	Coverage along the Route		
		Parson’s Pond	Portland Creek ^a	Daniel’s Harbour
Telus (including Koodo)	4G LTE, 4G HSPA+	100%	100%	100%
Rogers (including Chatr/Fido)	Extended Coverage	100%	100%	100%
Bell (including Virgin Plus)	4G LTE, 4G HSPA+	100%	100%	100%

^a Cell phone tower in community.

4.3 Construction Phase

The trail will be constructed to a variable tread width of ~2-3 m, with a cleared corridor width of 3-4 m to allow safe two-way travel for hikers and cyclists. In constrained areas, tread width may narrow to ~2.0-m, with strategically located passing zones or widened pull-outs every 50-100 m to maintain user comfort and safety. Low-impact machinery and hand tools will be used to construct and maintain the trail. At this time there are no washroom facilities planned for the trail, as outlined in the EARD.

The estimated numbers and types of employees required for the Construction Phase are provided in Section 3(v) of the initial Project EARD (available [here](#)).

4.3.1 Revised Project Location

Changes to the trail have occurred since the Project was registered on 4 January 2024. Originally the Project was designed with a Gateway in Parson’s Pond which would mark the start of the trail. The trail start has since been moved to the end of Church Street and the plans for the Gateway have been reconsidered (see Figure 3.2). There will be a parking lot constructed for trail users within 250 m of the Parson’s Pond trailhead. Approximate dimensions will be 30 x 45 m with proposed access via North Street. A proposed area has been indicated on EPR Figures 4.1a and 4.2 and in the Map Book (Appendix G). Discussions for final parking lot location are currently ongoing with the landowner who holds a historical claim for this area that is not registered with Crown Lands.

The trailhead in Parson’s Pond was initially designed to start near the Parson’s Pond Club at the corner of Waterfront Road and Route 430, which would necessitate the building of a trail bridge and conduct of a harbour study. The revised trail design places the trailhead across the bridge at the end of Church Road. This revision eliminates the need for a bridge or harbour study at Parson’s Pond.

The 30-m buffer zones for the revised Project location are indicated in the Map Book (Appendix G).

4.3.2 Materials and Methods

The following sections describe the materials and methods that will be utilized to construct the Demonstration Trail. Construction materials will be locally sourced where possible. Trail construction methods for this project are based on established North American best practices in sustainable trail development and are largely based on the International Mountain Bicycling Association (IMBA) standards (see EPP and Trail Management Plan, Appendices C-D). These methods are designed to ensure environmentally responsible, low-maintenance, and long-lasting trails. The methods have been adapted to suit local conditions and align with recognized trail building standards used throughout North America.

4.3.2.1 Materials

Materials that will be used to construct the trail include *in situ* soil, timber, culverts, gravel, and geotextile fabrics. The trail tread will consist primarily of compacted *in situ* soil, created by removing surface vegetation and organic duff, then compacting the tread soil to a durable finish. Timber (e.g., boardwalks) and culverts will be used at small water crossings and areas where the terrain cannot support trail traffic. Where soils are too wet or organic to support trail traffic, suitable mineral soils or stone with geotextile fabrics will be added from

approved local sources whenever possible. Geotextile fabric is permeable material used to separate, protect, and reinforce soils while allowing drainage.

Materials will be delivered to accessible trailheads or staging areas by truck, then distributed along the trail route. From these staging areas, all construction materials and equipment will be transported to site using low-impact methods suitable for remote and sensitive environments.

4.3.2.2 Methods

The Demonstration Trail will be constructed to a multi-use standard suitable for both hiking and cycling, providing safe two-way passage while maintaining an alignment that fits naturally into the coastal landscape. The tread width will range from 2-3 m, with localized narrowing in constrained terrain (to ~2.0-m). Where the tread is narrower, passing zones or widened pull-outs may be incorporated every 50-100 m to allow users to safely overtake or rest. This design supports the intended flow of hikers and cyclists, while avoiding the appearance of a roadway that could encourage ATV use. The cleared corridor will nominally measure ~3-4 m wide, with a minimum 3.0-m overhead clearance.

The above methods will not be employed within the Bank Swallow critical habitat. Debris may be cleared from the trail but otherwise no modifications would occur. Additionally, the method of trail construction along the ~1 km section of Main Road in the community of Portland Creek will be finalized in consultation with the Portland Creek LSD and utility providers (e.g., NL Hydro). It is possible that trail users may use existing road shoulders along this road length instead of new tread construction.

The trail will be constructed by two crews simultaneously, with additional support as required. Each crew will consist of two excavators with operators, a two-person finishing crew, and one logistics support person. Timeline for construction is estimated at 1.5 years (e.g., April 2026-September 2027), which accounts for potential delays due to an overlapping migratory bird nesting period, regulatory permitting approvals for culvert and bridge installation, and unforeseen logistics challenges.

To maximize efficiency, crews will begin at opposite ends of the trail configuration and work toward one another (see Figures 3.2 and 4.1):

- Crew 1: Segment 1, Access Point A (southern end).
- Crew 2: Segment 10, Access Point K (northern end).
- Additional Crews: As required. Staged at central access points, working outward in one or both directions.

This arrangement ensures that multiple sections of the trail are advanced simultaneously and linked progressively, reducing gaps and facilitating logistics. Equipment access will follow flagged alignments or existing corridors to minimize disturbance, and operators will be trained in low-impact trail construction practices.

Primary construction equipment includes:

- Tracked power barrows with carry payloads up to 2500 kg;
- Micro to mini excavators up to 3.6 tonnes (e.g., Kubota U17, Kubota KC70-4 Track Carrier, Kubota SVL75 skid steer loader); and
- ATVs, and small side-by-sides (SxS) equipped with trailers or cargo beds.

Where terrain allows, narrow gauge tracked carriers may be used to minimize tread impact. Excavators will be used for grading, shaping, culvert installation, and structure foundations. Tracked dumpers and SxS will haul materials to work zones in staged loads. In wetlands or steep areas, manual methods and hand tools may be used to supplement mechanized work. No large machinery or wheeled equipment exceeding weight or width thresholds for backcountry access will be employed.

Construction methods will include full-bench cuts on side slopes and raised tread in wet areas, and rock armouring in erosion-prone locations, following best practices (IMBA 2004; Carsten 2023).

The trail tread will consist primarily of compacted *in situ* soil, created by removing surface vegetation and organic duff, then compacting the tread soil to a durable finish. Where soils are too wet or organic to support trail traffic, suitable mineral soils or stone will be added from approved local sources where possible. The trail corridor will be constructed by clearing vegetation, pruning, and felling trees to maintain the desired width. Vegetation clearing and tree felling will be scheduled outside of the migratory bird nesting season wherever possible (15 April-15 August in Newfoundland). Where clearing must occur within that window, mitigations will be employed to reduce potential risks to wildlife as outlined in the Project Mitigation Plan and EPP (see Appendix B and C).

Vegetation Clearing

Vegetation clearing, pruning, and tree felling will be required along much of the Demonstration Trail route to establish a safe tread and corridor for both hiking and cycling trail users. The degree of shrub and tree clearing is variable per trail segment but overall amounts to 15.0 linear km; approximately 56% of the trail route (Table 4.8). It will be carried out using a combination of mechanized and manual methods (Figure 4.6-Figure 4.7). Clearing will focus on removing only what is necessary for user safety and sightlines, with particular attention to curves and downhill grades where cyclists may require extended visibility. On hillside alignments, corridor clearing may be offset to the uphill side for stability and improved sightlines. A minimum 30-m buffer of natural vegetation will be maintained around water bodies and wetlands whenever possible. As described in Section 4.1.1.4, there are three areas where the trail corridor is within the 30-m buffer due to terrain constraints; two separate waterbody locations and the bog expanse adjacent to the Portland Creek dunes.

The systematic removal of the surface organic layer, ground vegetation, and small shrubs, will mainly be completed with a mini excavator equipped with a grading or toothed bucket (Figure 4.8). Excavators will serve as the primary tool for removing vegetation to establish the tread. Mini excavators (up to 3.6 t) will also be used to remove the surface organic layer, clear small shrubs and saplings, to shape the trail corridor to its design width. Chainsaws and brush saws will complement this work for felling or pruning larger stems, with hand tools used selectively in tighter areas.

Tree removal will be minimized by routing the trail through natural gaps wherever possible. Larger trees will be retained where safe to do so, with only hazard trees (e.g., dead, leaning, or structurally compromised) removed. Root systems of removed trees may be left intact to help stabilize soils if they do not interfere with the tread. Larger trees and hazard stems to be removed will be identified through field assessments. All stumps within the tread will be cut flush to ground level to eliminate tripping hazards. Selective pruning will be used to avoid unnecessary clear cutting and focus only on stems and branches that obstruct the trail corridor and trail overhead clearance. Overhead clearance will be maintained at ~3-m. Table 4.8 summarizes the trail segments that will require tree clearing.

Table 4.8. Summary of trail segment length and estimated vegetation clearing required per segment, reported as estimated linear distance and percentage.

Trail Segment	Trail Segment Length (km)	Estimate of Required Clearing/Cutting (Linear km)	Percent of Vegetation Clearing Required per Trail Segment	Segment Description
1	1.3	< 0.1	1 %	Parson’s Pond trailhead; meadow and large pond
2	1.8	0.1	5 %	Majority of segment <15 m from shoreline
3	3.0	2.5	83 %	Narrow strip of land west of Route 430
4	2.5	1.5	60 %	Narrow strip of land west of Route 430 ending at Cabin access road

Trail Segment	Trail Segment Length (km)	Estimate of Required Clearing/Cutting (Linear km)	Percent of Vegetation Clearing Required per Trail Segment	Segment Description
5	1.4	<0.1	1 %	Starts at Cabin access road toward Arches Provincial Park
6	3.6	3.0	83 %	Arches Prov. Park and ends at WC2 Bridge
7	3.3	2.5	76 %	From WC2 Bridge to the Town of Portland Creek
8	2.6	0.9	35 %	Town of Portland Creek to WC6 Bridge
9	3.7	2.0	54 %	Portland Creek River (WC6) Bridge to Quarry access road
10	3.4	2.5	74 %	Quarry access road to Bennett's Lodge parking lot; Daniel's Harbour trailhead
TOTAL	26.6	15.0	56 %	

Edges of the cleared corridor will be feathered and irregular to maintain a naturalistic appearance, avoiding the tunnel effect of straight-edged cuts. Low vegetation (<0.5 m) may be retained adjacent to the tread where it does not impede travel, to help stabilize soils and preserve ecological character.

Clearing debris will be managed in line with best practices and cut materials will be scattered downslope outside the corridor or removed as required. No piles will be left within the corridor. By combining mechanized efficiency with selective manual work and wildlife-sensitive scheduling, the Project will create a safe and durable trail corridor while minimizing ecological disturbance.

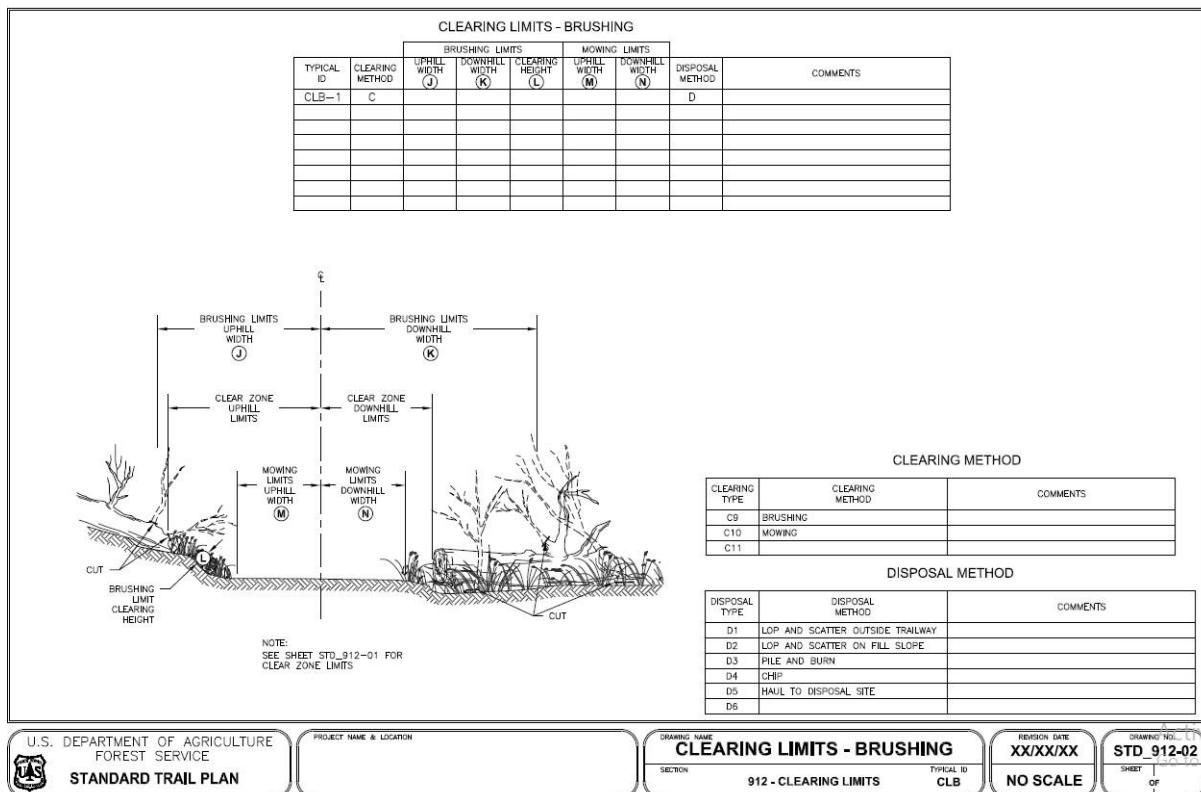


Figure 4.6. Example of a trail corridor clearing diagram and log, part of a Standard Trail Plan developed by the US Department of Agriculture Forest Service, which will be used to guide construction of the Demonstration Trail (USDAFS 2023).

Figure 4.7. Example of a trail tree and log clearing log, part of a Standard Trail Plan developed by the US Department of Agriculture Forest Service, which will be used to guide construction of the Demonstration Trail (USDAFS 2023).

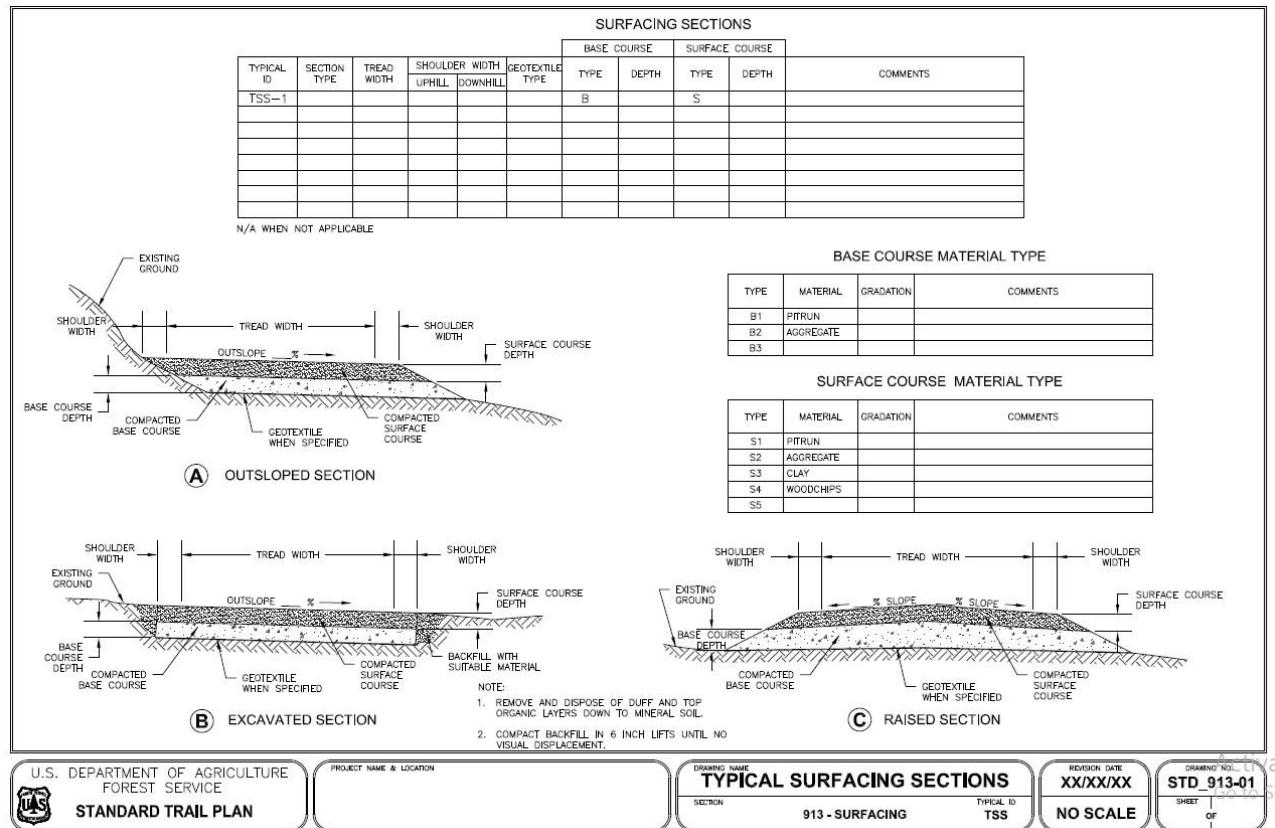


Figure 4.8. Example of a trail cross section/trail surfacing log, part of a Standard Trail Plan developed by the US Department of Agriculture Forest Service, which will be used to guide construction of the Demonstration Trail (USDAFS 2023).

Waterbody and Wetland Crossings

Field reconnaissance and high-resolution satellite imagery have identified ten water crossings along the trail route (see Table 4.1). These are primarily small brooks or seasonal drainages. Where greater channel flow, depth, or width is present, appropriately sized infrastructure will be installed in accordance with the NL Department of Environment, Conservation and Climate Change (DECCC) guidelines (NLECCC 2018). Crossing infrastructure will include bridges, culverts, and rock. All waterbody/wetland crossing infrastructure will be constructed using durable, low-impact methods that align with engineered specifications and recognized best practices for trail infrastructure.

Bridges

Bridges will be required at three locations where spans exceed culvert feasibility or to minimize disturbance in sensitive aquatic environments (see Figure 3.2). Appropriate mitigation measures for aquatic invasive species and fish and fish habitat will be followed (see Appendix C). These clear span bridges will be engineered pedestrian bridges (see Table 4.1 for bridge length estimates), with two permanent and one seasonal. Bridges will be constructed to professional engineering standards, with structural components (e.g., sills, girders, decking) fabricated from pressure-treated timber or galvanized steel, depending on span and load requirements (Figure 4.9). Abutments will be set back from the water's edge to minimize disturbance and may be supported on rock cribbing, driven piles, or precast concrete footings, as dictated by engineer design and site conditions. Handrails and safety features will be included where required.



Figure 4.9. Example of bridge that could be deployed on the Demonstration Trail (e.g., at Portland Creek). Note: All bridges will be clear span bridges (i.e., no pilings/abutments in the water).

Culverts

Culverts will be installed where concentrated surface water flow or ephemeral channels are encountered. These culverts will be HDPE with diameters selected based on hydrological assessment and anticipated peak flows. Installation will include bedding on compacted granular base, correct alignment to natural flow, backfill with appropriate compaction, and armouring of inlet and outlet zones with riprap to prevent erosion. Culverts will be installed with at least 150 mm of compacted fill cover and riprap armouring at inlets and outlets (Figure 4.10). Where necessary, additional geotextile fabric will be used beneath the culvert structure to separate fill material from native soils and ensure long-term stability.

Culverts for trail water crossings will generally be installed at lengths of 3.4-4.6 m. This length ensures the structure fully spans the cleared trail tread (~2-3 m wide) with adequate cover and shoulder on each side to prevent erosion at the inlet and outlet. The ‘rule of thumb’ is that the culvert should extend beyond the trail width with at least 30.5-60 cm of extra length per side to account for side slopes and fill stability. Diameter will vary depending on the contributing watershed and expected peak flows, but a minimum 450-600 mm diameter is typically applied for small streams and drainage channels, with larger diameters required for higher flows. All culverts will be embedded slightly below natural grade to allow for natural streambed material to accumulate inside, maintaining aquatic passage and meeting best practice environmental guidelines.

All installations will comply with applicable provincial water crossing guidelines and will be implemented using low ground pressure equipment to minimize disturbance. Site-specific erosion and sediment control measures will be applied throughout construction, and crossings will be scheduled during dry or frozen conditions when feasible to further reduce potential environmental impact.

Figure 4.10. Example of a culvert installation log, part of a Standard Trail Plan developed by the US Department of Agriculture Forest Service, which will be used to guide construction of the Demonstration Trail (USDAFS 2023).

Rock and Geotextile Fabric (Fill for the Trail Bed)

On a site-by-site basis and in consultation with the DECCC and/or FA and FAL, the need for additional culverts will be evaluated to maintain water flow and ecological/wetland function.

Crossings over sensitive bog or marsh areas will employ geotextile fabric and clean granular fill or riprap to distribute weight and protect underlying organic soils. In areas with deeper saturation or prolonged inundation, a geotextile layer will be laid directly over the prepared alignment, followed by graded rock fill to create a stable, free-draining causeway. This method helps prevent rutting, minimizes settlement, and maintains natural water flow across the bog or wetland area.

Riprap/fill will be sourced from available local resources whenever possible. TDCI will work with the contractor(s) constructing the trail to determine exact fill amounts required for the trail bed. This information will be provided to DECCC and other government agencies as appropriate prior construction.

Trail Construction

The proposed trail development for the proposed Project spans ~26.6 km along the Great Northern Peninsula of Newfoundland, divided into ten distinct trail segments. Each segment connects to an access point along Route 430 for staging and phased construction (Table 4.9). Segment lengths vary from 1.3-3.7 km, reflecting the terrain, land use patterns, and opportunities to highlight coastal views, cultural landscapes, and natural features.

Table 4.9. Trail access points for the construction phase.

Access Point	Latitude (°N)	Longitude (°W)	Segment(s) Serviced	Notes
A	50.032348	57.707296	1	North Street access point; Parson’s Pond Trailhead
B	50.046047	57.703944	2	ATV trail to access north side of large pond
C	50.059203	57.701832	2 and 3	Road pull-off for ATV trail access
D	50.102971	57.672101	4 and 5	Start of gravel road servicing cabins south of Arches Prov. Park
E	50.112837	57.661716	5 and 6	Arches Provincial Park road
F	50.149244	57.634878	7	Agricultural field road
G	50.160557	57.615505	7 and 8	Main Road, Portland Creek community
H	50.179871	57.600817	8 and 9	Portland Creek Dunes interpretive pull-off
I	50.200229	57.603241	9 and 10	Quarry access road
J	50.207304	57.605698	10	Cliffy Point access road
K	50.226537	57.590726	10	Bennett’s Lodge parking lot; Daniel’s Harbour Trailhead

Note some segments can be accessed from multiple locations, including Access Point C which can service Segments 2 and 3, D can service Segments 4 and 5, E can reach Segments 5 and 6, G can access Segments 7 and 8, H can access 8 and 9, and I can reach Segments 9 and 10.

Once the corridor is cleared, tread construction will begin using mini excavators as the primary tool where possible. Excavators will strip away the organic layer to expose stable mineral soil and shape the tread to the design width. Removed organics will be scattered downslope or reused for edge rehabilitation.

The finished grade for the trail crest near Parson’s Pond will consider flood prevention and be below the 20-year flood elevation to avoid interference with the flow of water or displacement of water that could create a worse flooding situation for other locations (see Figure 4.2).

Grades will be kept modest and sustainable, generally averaging 5-8% with short stretches up to 10-12%. Steeper slopes will be negotiated with switchbacks or climbing turns, each designed with broad landings and stable approaches. To manage drainage, the alignment will follow a rolling contour design with frequent grade reversals and a slight out slope (3-5%) to shed water off the tread. In places where out sloping isn’t feasible, alternate features such as grade dips, or rock armouring will be employed. Final shaping and compaction will be completed by the excavator and hand crews using tampers and finishing tools. Any excess spoil will be spread thinly downslope to avoid erosion or used for on-site features such as armouring or retaining walls. This approach delivers a stable, durable tread that balances efficiency in construction with long-term sustainability and low maintenance needs.

On side slopes, the trail will be built using bench cut techniques, with a preference for full bench construction to ensure the tread rests entirely on compacted native soil. Where partial benching is necessary, fill will be compacted in layers or reinforced with rock to maintain durability. Backslopes will be cut to stable angles and left roughened to encourage revegetation.

4.3.3 Schedule

Trail construction will occur following Project approval, with an anticipated start in spring 2026. The trail is estimated to take ~1.5 years to complete, which includes a 2026 primary construction period (e.g., April-December) and subsequent completion period in spring 2027 (e.g., April-June). Wildlife-sensitive scheduling will be implemented as a mitigation to minimize Project-related risks to wildlife, species at risk, and sensitive habitats. Vegetation clearing and tree felling will be scheduled outside of the migratory bird nesting season (15 April-15 August in Newfoundland) where feasible. Where clearing must occur within that window, mitigations will be followed to minimize risk (see Mitigation Plan and EPP, Appendices B and C).

Productivity is estimated at ~1.25 km per month per crew, or ~25 km for the 2026 primary construction season with two (5 person) crews working on different sections simultaneously. Additional crew(s) may be deployed for select segments, as required. A ~1.5-year phasing is realistic and allows flexibility for necessary regulatory permitting and authorizations for proposed water crossings, supply procurement of associated infrastructure (i.e., particularly to stage bridge installation), and allows more time to adapt construction plans in response to potential wildlife timing conflicts, sensitive areas and weather. With this approach, the ~26.6 km Demonstration Trail will be ready for operation in summer 2027.

Clearing will be timed and supervised to avoid disturbance to wildlife. In particular, tree felling will be scheduled outside the core bird nesting season, 15 April-15 August, to avoid disturbance to active nests and comply with wildlife protection requirements. Surveys for Short-eared Owls will be completed within seven days prior to any construction in open or grassland habitats. Should active nests be identified, a protective buffer will be established and clearing postponed until the site is vacated. If other sensitive habitats (e.g., bat roosting colony, fox dens, rare plants) are identified during planning or fieldwork, protective measures will be implemented in consultation with the NL Wildlife Division (see Mitigation Plan and EPP, Appendices B and C).

4.3.4 Transportation

Construction crews and equipment will access the trail sites from existing roads and routes. No new roads will be created to access the trail. Staging areas will be established at accessible points along the trail route. All construction materials and equipment will be transported to site using low-impact methods suitable for remote and sensitive environments. Materials such as timber, culverts, gravel, and geotextile will be delivered to accessible trailheads or staging areas by truck, then distributed along the trail route using compact, low ground pressure equipment (e.g., plate compactor). Primary transport and construction equipment that will be utilized includes tracked power barrows (e.g., Kubota KC70-4 Track Carrier) with carry payloads up to 2500 kg, micro to mini excavators up to 3.6 tonnes, ATVs, and small side-by-sides (SxS) equipped with trailers or cargo beds. Equipment access will follow flagged alignments or existing corridors to minimize disturbance, and operators will be trained in low-impact trail construction practices.

TDCI is aware that access permits and permits for work within, or through, the Route 430 ROW will be required from Government Services prior to construction (e.g., for mobilization and/or temporary staging of equipment).

4.3.5 Future Lookout Developments/Other Trail Components

Future lookout developments are not being considered at this time. The areas that were initially reserved for future lookout developments (Portland Creek dunes, Eastern Head, and Clifffy Point) are no longer being considered. The trail footprint will adhere to a strict uniform buffer of 2-m on either side of the centre line (4-m total width).

During development of the EARD and this EPR, TDCI has had consulted regularly with various provincial government departments/divisions (e.g., TI, FAL, FA, DECCC, TCAR, PAO, Crown Lands Division, Wildlife Division, WRMD). In future, consultation with government agencies will be ongoing during the Construction, Operation and Maintenance, and Rehabilitation and Decommissioning phases as required, including for any trail revisions (e.g., route modification) prior to construction. This will include communications to acquire necessary permits (see Section 9).

4.3.6 Measures to Ensure Appropriate Trail Construction

The following standards have been used in developing construction procedures and mitigation measures listed below. Procedures and mitigation measures will integrate proven principles from established guidance documents, including the International Mountain Bicycling Association’s (IMBA) Trail Solutions, which emphasize sustainable trail layout, erosion control, and natural surface construction methods.

- IMBA Trail Solutions ([2004](#)-IMBA 2004);
- Ontario – Best Practices for Trail Design ([2006](#)-TAOC 2006);
- Shuswap Trail Standards and Resources (available [here](#)-STA n.d.);
- GNL Environmental Guidelines for Watercourse Crossings ([2017](#)-NLECCC 2018);
- GNL Environmental Guidelines for Bridges ([2018](#)-NLECCC 2018);
- GNL Environmental Guidelines for Culverts ([2018](#)-NLECCC 2018);
- DFO Best Management Practices for the Protection of Freshwater Fish Habitat in Newfoundland and Labrador ([2023](#)-DFO 2023); and
- Best Practices for Parks Canada Trails ([1996](#)-PWGSC 1996).

4.4 Operation and Maintenance Phase

During the Operation and Maintenance Phase, activities will include maintenance by Project-associated personnel and recreational use by hikers and cyclists. The trail will be open and maintained annually from May-October as a shared-use path for walking/hiking and cycling. The trail will be inspected monthly (during spring, summer, and fall) and after severe weather events to ensure the safety of users. It is anticipated that maintenance will mainly include filling of potholes and bridge or culvert repairs. The trail will also be monitored for garbage and dumping. Maintenance will not occur from November-April, so use of the trail during this period will be considered at the risk of the trail user. Trail operation and maintenance protocols are outlined in the Trail Management Plan (Appendix D) and EPP (Appendix C). The following section presents aspects of the operation and maintenance of the proposed Demonstration Trail as per the Guidelines.

4.4.1 Signage and Wayfinding

Types of trail signage that will be used for the Project include:

- Trailheads and access points with GPS coordinates and unique ID codes;
- Restricted use for pedestrians and cyclists with no use by unauthorized motorized vehicles with explanation why motorized vehicle access is restricted (environmental protection, user safety, and trail longevity);
- Wayfinding markers;
- Emergency Information Panels (includes emergency contacts for the area and nearest access point);
- Hazard Signs (temporary and permanent signs for trail closures or known risks);
- Interpretation Panels (educational panels about trail safety, responsible recreation, or environmental sensitive areas); and
- Seasonal Alerts (including temporary signage communicating site-specific risks such as icy conditions or maintenance activities).

Well-maintained signs are important for orienting trail users and identifying prohibited activities (e.g., unauthorized vehicles or activities). Damaged, missing, or out-of-date signs can result in a poor/negative experience and disorient trail users. Every effort will be made to install signs with long lifespans and tested in Canadian climates. It has been estimated 10% of trail signage will need to be replaced annually (TCT 2025).

During the end of construction activities, trail signage and wayfinding markers will be installed for trail users. Signage will include trailhead identification, trail directions, areas of interest, and warning signs. Signs will be inspected yearly at the start and end of each trail use season. Sign inspection will include check for signage visibility (e.g., overgrown vegetation removal), repair of loose fittings, repair or replace missing signs, and removal or updating of obsolete signs. A signage maintenance log will be kept by TDCI.

In addition to wayfinding and information signs, contact information for TDCI to allow users to communicate trail conditions will be included on signs at key points along the trail (e.g., trailheads and large infrastructure).

4.4.1.1 Market Readiness Standards/Expectations Compliance

TDCI commits that the GCT Demonstration Trail will meet the key expectations of the Department of Tourism, Culture, Arts and Recreation (TCAR), as follows:

- Trailhead Branding and Orientation Panels: Professionaly designed signage will align with the Tourism Assurance Plan (TAP; see [here](#)) and Destination Trails standards – featuring trail maps, user guidance, safety information, and interpretive content (e.g., natural, cultural, wayfinding and storytelling);
- Wayfinding and Marker Systems: Consistent, GPS-referenced markers help users navigate confidently – a hallmark of visitor-ready trail infrastructure; and
- Interpretive Panels and Storytelling: Educational panels will highlight local geology, ecology, and Indigenous and cultural narratives – Enhancing visitor engagement in line with TCAR’s experiential tourism direction.

4.4.2 Inspections and Maintenance

Infrastructure that will require maintenance during the operation of the trail includes the trail tread, trailway clearance, trail clearing width, water crossings, and signage. Equipment used during maintenance will be fit for purpose and in working order. Prior to any maintenance, crews will post alerts at trailheads near the work site and clearly mark the trail adjacent to the worksite.

The Demonstration Trail will be open between May-October each year, weather dependent. Maintenance crews will inspect the trail and associated infrastructure at the start and end of the operational season. Trail tread and associated infrastructure inspections along the route will be conducted by authorized staff with the assistance of approved motorized transport. Irregular trail inspections may also be carried out periodically via unmanned aerial system (UAS) drone flights. For example, although installation of the temporary, seasonal bridge at WC4 will occur in late-April to early-May (e.g., after the spring freshet), its positioning relative to water channel flow will be inspected monthly and after high rainfall and storm surge events to ensure optimal functionality and trail user safety.

The Trail Monitoring and Maintenance Program is provided in Section 3 of Appendix D. As per the Guidelines, this section includes TDCI’s commitments to undertaking measures to ensure the trail will be maintained and used appropriately.

4.4.2.1 Personnel

Seasonal trail crew staff (employees and contracted crews) will perform routine inspections, minor repairs, and waste collection. Specialized contractors (e.g., bridge carpenters or heavy equipment operators) will be engaged for larger repairs or replacements.

4.4.2.2 Damage Response

During seasonal inspections, trail sections or infrastructure requiring repair or maintenance will be flagged, logged, and reported to the TDCI for action. This includes potential damage to trails, private property, the Arches Provincial Park, and TDCI property, as applicable. Unsafe trail sections will be closed immediately, with signage installed until repairs are complete. Any accidental damage to adjacent private land will be documented and addressed in consultation with the landowner.

Communication of trail segment (and/or water crossing infrastructure) closures will be relayed to trail users via the Public Engagement Plan and the Trail Maintenance Plan (Appendices A and D). Maintenance crews will follow the appropriate plans to minimize environmental impacts and to properly carry out required maintenance (see Appendices B, C, D, and E). Bridges will be inspected as per engineering design, and any repairs will be completed by certified engineers and construction contractors.

4.4.2.3 Funding

A dedicated Trail Maintenance Fund will be established from a combination of operational revenues (e.g., tourism programming and social enterprise income), public donations, and secured funding agreements. Annual operating budgets will include a line item for maintenance and repair, ensuring predictable resources for routine maintenance and contingency repairs.

4.4.2.4 Waste Collection

Waste receptacles will be placed at primary trailheads and high-use access points. Waste will be collected daily during peak season and weekly during the shoulder season. While crews are conducting trail maintenance, they will collect and carry-out garbage produced during maintenance, as well as any additional garbage observed on the trail. Trail users are expected to follow a carry-in/carry-out policy and dispose of garbage in proper receptacles. All collected garbage will be transported to approved municipal disposal facilities.

4.4.2.5 Trail Safety

Trail safety will be maintained via the following methods:

- Regular inspection and prompt repair of infrastructure hazards (e.g., loose decking, eroded sections);
- Clear safety signage at trailheads outlining emergency contacts, rules of use, and hazard awareness;
- Maintenance crews will have first aid kits and communication devices available for use; and
- Coordination with local emergency services to ensure responders have trail maps and geographic coordinates for all access points.

4.4.2.6 Preventing Unauthorized Motor Vehicle Access/Use of Trail

The Project is designed to be a multiuse trail for pedestrians and cyclists. Motorized vehicles operated by the public, such as ATVs, will be prohibited from use on the trail. Infrastructure and communication procedures to prevent unauthorized motor vehicle access to the trail will be developed in consultation with sustainable trail building standards (IMBA) and contractors as appropriate.

Prevention methods may include but not be limited to:

- Gates, bollards, or barriers installed at trailheads and road crossings to prevent off-road or other vehicle access while maintaining accessibility for emergency and maintenance vehicles; and
- Interpretive signage explaining why motorized use is restricted (i.e., environmental protection, user safety, and trail longevity).

4.5 Contingency Plan

The Demonstration Trail contingency planning describes the steps to be taken in the event of an emergency during the Construction, Operation and Maintenance, and Decommissioning Project phases. Anticipated situations that could occur during different phases include:

- Construction/Decommissioning Phases:
 - Equipment malfunction;
 - Fuel/lubricant spills;
 - Worker injury;
 - Severe weather;
- Operation and Maintenance Phase:
 - User injuries or medical emergencies;
 - Lost persons;
 - Wildlife encounters;

- Infrastructure failure (bridge/boardwalk/culvert); and
- Erosion or washouts.

Several steps will be employed to address these situations. First, the trail is designed with multiple access points that will also serve as emergency response access and egress points. During Construction and Decommissioning phases, crews will be equipped with first aid and spill kits. Crews will be trained in first aid, spill response, and emergency communications. Crew emergency protocols will include authority to temporarily close or reroute sections of the trail if hazards occur. Temporary hazard signage alerting users to the trail closure will be posted by work crews and removed after the trail is reopened. When the trail is operational, maintenance crews will identify trail risks during routine inspections of trail infrastructure. Maintenance crews will have the authority to install or update signage to identify new hazards as they emerge. A maintenance reporting system with incident logs will be kept by the TDCI.

Trail signage will include the following safety features:

- GPS-references with unique codes will be placed at regular intervals to help users communicate to first responders their exact location (a map of these GPS markers with codes will be made available on the trail website and via a planned trail app to be developed by the GCTA);
- All trailheads will have signage that lists local emergency contacts, distance to nearest access point, and safety guidance for trail users (e.g., “In case of emergency, call 911 and report marker code”);
- Hazard signage will be posted for known risks (e.g., steep slopes, wildlife crossings, flood-prone areas) and when maintenance crews have a section closed;
- Educational panels on trail safety, responsible recreation, and environmental sensitivities (e.g., avoiding fragile areas, staying on the designated trail, areas of private property) at trailheads; and
- Seasonal Alerts will be posted when site-specific conditions occur (e.g., icy conditions, trail maintenance, high winds).

4.5.1.1 Roles and Responsibilities

During construction, contractors are responsible for site safety. The TDCI Safety Officer will ensure signage, maps, and emergency protocols are in place and up to date. Local emergency responders will be provided with updated access maps and a signage code key annually. Maintenance crews will be responsible for site safety and posting temporary signage alerting trail users to any closures.

4.5.1.2 Monitoring and Review

Annual review of contingency measures with emergency services and local stakeholders will occur. User feedback collected via QR codes or posted contact information on trailhead signage will be reviewed annually. Signage, response procedures, and maintenance schedules will be updated as site conditions evolve.

5 Alternatives

This section describes technically/economically feasible alternative means and locations for the Project.

5.1 Means/Locations

The following are alternative means (of access) and/or locations for the trail:

- Originally-planned route configuration;
- Originally-planned buffers;
- Trail placement relative to Route 430 nearer to other uses; and
- Trail access that requires crossing Route 430.

The Project was specifically designed to be a coastal trail. Proposed revisions for both route configuration and uniform 2-m buffer for an amended request for Crown Lands application (#161561) reduces the number of potential interactions with TI property and existing Crown Lands claims. Placing the trail on the landward (east) side of Route 430 increases potential interactions with Crown Lands claims, silviculture areas, agriculture-crown reserve areas, PPWSAs, and potentially important areas for sensitive species or SAR (e.g., Newfoundland marten and caribou). The proposed Project route allows trail users to easily access points of interest and the coast without needing to require crossing Route 430. The potential option of crossing Route 430 is a matter of safety that would increase vehicle/pedestrian interactions and potential risks to trail users and road users.

Previous Project-related information describing alternate locations that were considered is featured in the Historic Resources Impact Assessment report for the Project. This document is considered confidential and has been submitted to the Provincial Archaeology Office.

The stand-alone Map Book (Appendix G; 1:2,500 scale) contrasts Project elements presented in this EPR for the amended Crown Lands application (#161561; December 2025) with the originally proposed Project elements (i.e., alternative locations for the Project, depicting initial trail configuration and buffer concept presented in the EARD, including areas set aside for future lookout developments; December 2023). The Map Book also depicts digital topographic data (CanVec product, 1:50,000; including environmental buffers for waterbodies and wetlands) and relevant spatial layers from the provincial LUA in relation to original vs current Project elements, all overlain on high-resolution satellite imagery base maps (Google Satellite).

Through an iterative process over the duration of the Project to date, owing to the constraints of the geography, infrastructure, and land users, the alternate locations are not considered feasible. Potential environmental effects and supporting rationale are provided above (see Section 4.2.8, last paragraph) and below, but otherwise the non-feasible alternatives noted above are not considered further.

5.2 Environmental Effects

5.2.1 Route Configuration

The alternate location of the landward side of Route 430 could introduce additional environmental effects in the area. The landward side has numerous wetlands and waterbodies that would require trail crossing infrastructure or additional trail route alterations.

5.2.2 Buffers and Placement Relative to Route 430

To maintain the required 30-m buffer from waterbodies and wetlands and 20-m buffer from Route 430, and to avoid Crown Lands incursions would require route alterations further inland. These alterations would greatly expand the total length of the trail. An increase in total trail length increases both the amount of vegetation and trees that would need to be removed and construction materials that would be required to build the trail. There are also fewer access points for trail construction and operation, requiring new roads to be built to service the Project. A route on the landward side of Route 430 may also place the trail further into core areas for both boreal caribou and Newfoundland marten.

5.3 Rationale for Preferred Means/Location

Locating the trail on the seaward (west) side of Route 430 is the preferred option as the environmental effects and Crown Lands conflicts are reduced compared to the alternate trail location. The seaward placement of the trail eliminates any need for trail users to cross Route 430. The area seaward of Route 430 has limited development but does have existing seasonal trails and access routes that serve to reduce the Project footprint.

Buffer zones for wetlands and waterbodies and Route 430 ROW can be maintained with minimal changes to the trail route and minimizing the length of the trail required.

Mitigation measures associated with the preferred means/location are provided in the EPP (Appendix C).

5.4 Alternatives Considered but Eliminated from Further Analysis

Other alternatives considered and rejected with justification included “No Action”. In this alternative, the trail would not be built and the potential increase in tourism would not be achieved. If a “No Action” alternative was used, The GCT would not extend along the length of the Northern Peninsula and, thus, this alternative was rejected.

Rationale for the rejection of alternate sites is provided in Section 5.3.

6 Environmental Effects and Mitigations

TDCI is required through the Provincial environmental assessment process, pursuant to the NL *Environmental Protection Act* (EPA), to prepare an EPR for the Great Coastal Trail—Parson’s Pond to Daniel’s Harbour Project. A requirement of the EPR, as specified in the EIS Guidelines issued by the NL DECCC, is to “...provide detailed information regarding the potential effects on the environment and the proposed measures to mitigate potential adverse environmental effects.”

This section describes the approach, scoping considerations, and methods used to assess the effects of Project activities on the environment and the effects of the environment on the Project that could occur. The methods used to prepare the EPR were developed in consideration of the NL EPA, recent provincial assessments, and the EPR Guidelines for the Project.

6.1 Assessment Scoping and Methods

6.1.1 Scoping

Scoping of an assessment mainly includes scoping of issues and determining the spatial and temporal extent of the assessment, selecting which Valued Environmental Components or VECs (i.e., sensitive and/or representative species, species-groups and associated habitats, or important socio-economic factors) to assess, and identifying the Project activities in each Project phase (Construction, Operations, and Decommissioning) to analyze. Scoping was conducted according to the following steps, not necessarily in chronological order:

- Detailed review of EPR Guidelines prepared by the NL DECCC;
- Review of relevant information on Project activities and literature on the effects of trail construction, operation/maintenance, and decommissioning/rehabilitation;
- Consultations with key groups and the public (see Appendix A); and
- Consultations with provincial and federal agencies (see Appendix A).

6.1.2 Valued Environmental Components

In conducting environmental assessments, agencies and the public have found it useful to focus the assessment of a project through the identification of VECs. VECs are biological, physical, cultural, and economic components determined to be of most concern with respect to being affected by a project.

Identification and selection of the VECs for the Project was accomplished through issues scoping through regulatory and public consultation; review of the EPR Guidelines; professional judgement; and consideration of recent environmental assessments for other projects in the province similar in scope. The VECs selected for

assessment include: Terrestrial Mammals, Fish and Fish Habitat, Migratory Birds, Species at Risk, Sensitive Wildlife Habitat, and Land Users.

6.1.3 Temporal and Spatial Boundaries

The scope of the assessment includes both temporal and geographic or spatial considerations. The considerations include the Project schedule from construction through operations and decommissioning/rehabilitation. The geographic area considered in the assessment includes the Demonstration Trail and parking lots but also the area within which environmental components could be affected. The Affected Area is the geographic extent of a specific potential effect on a VEC. It varies according to the timing and type of project activity in question and the sensitivities of the VEC in question. Thus, there are several affected areas or geographic extents in this EPR.

The temporal boundaries of the Project extend from the start of construction through decommissioning/rehabilitation. The temporal boundaries of the different Project phases, assuming that the EPR is released in early 2026, include:

- Construction from spring 2026 to summer 2027 (~1.5-year total with possible two-year construction window encompassing Portland Creek bridge installation).
- Operation and Maintenance from 2027–2046 (assumed for EPR purposes).
- Decommissioning and Rehabilitation (estimated one to two years).

The geographic extent of a specific potential effect on a VEC varies according to the timing and type of Project activity in question and the sensitivities of the VEC. Thus, there are several potentially affected areas or geographic extents discussed in this EA. The spatial boundaries used in the assessment include:

- Project Area: is the physical footprint of the project in which Project activities/components occur, which includes the Demonstration Trail and parking lot footprints (see Figure 4.1).
- Study Area: is the area where Project-related effects are reasonably predicted to occur. In general, given the nature of this Project, this is limited to the area around the proposed trail route on the west side of Route 430.

6.1.4 Assessment Methods

The systematic assessment of the potential effects of the Project involved the following key steps: consideration of interactions between Project activities and the VECs; identification and evaluation of potential effects of Project activities on VECs, including description of mitigation measures and residual effects; and preparation of residual effects summary tables. Consideration was also given for potential cumulative effects.

6.1.4.1 General Evaluation Criteria for Assessing Environmental Effects

Several criteria were considered when evaluating environmental effects on a given VEC as per standard assessment procedure (Table 6.1; IAAC 2024). Depending on the type of VEC being assessed, specific definitions and categories for assessment criteria were developed, which are summarized in the subsections below.

6.1.4.2 Evaluation Criteria for Assessing Effects on Biological VECs

Table 6.2 presents descriptions for the characterization of residual environmental effects on biological resources. The criteria are used to describe the potential residual effects that remain after mitigation measures have been implemented.

Table 6.1. Summary of assessment criteria.

Assessment Criteria	General Description
Nature	The long-term trend of the residual effect.
Magnitude	The overall amount or degree of change in a measurable parameter, or variable, related to existing conditions that are expected.
Geographic Extent	The range or scale of approximate geographic areas over which any potential interaction and effect is anticipated to occur.
Timing	Refers to the effects of seasonal variability on the VEC.
Frequency	How often the residual effect being assessed is expected to occur.
Duration	The length of time a potential residual effect may occur.
Reversibility	Refers to the ability of the VEC to return to its original state once the stressor is removed.
Ecological/Socio-economic Context	Existing condition and trends in the area where residual environmental effects occur.
Certainty of Knowledge	The general level of confidence in the knowledge used to describe the potential environmental effect.

Table 6.2. Characterization of residual effects on biological VECs.

Assessment Criteria	Categories/Parameters for Biological VECs
Nature	<p>Positive – A residual effect that provides benefit to biological VEC relative to baseline.</p> <p>Negative – A residual effect that is detrimental to biological VEC relative to baseline.</p> <p>Neutral – No net change in measurable parameters for biological VEC relative to baseline.</p>
Magnitude	<p>Negligible – No measurable change to biological VEC relative to baseline.</p> <p>Low – Judged to result in <1% change in the size or health of the population or the carrying capacity of its habitat. A change in a population can result from an absolute reduction in population size or from displacement of animals to areas outside the area of consideration.</p> <p>Moderate – Judged to result in a 1% to <10% change in the size or health of a population or the carrying capacity of its habitat.</p> <p>High – Judged to result in a 10%, or greater, change in the size or health of a population or the carrying capacity of its habitat.</p>
Geographic Extent	<ul style="list-style-type: none"> • <1 km² • 1–10 km² • 11–100 km² • 101–1,000 km² • 1,001–10,000 km² • >10,000 km²
Timing	Negligible Sensitivity – Residual effect is not sensitive to seasonality.

Assessment Criteria	Categories/Parameters for Biological VECs
	<p>Moderate Sensitivity – Residual effect may be influenced by seasonality, but the assessment of attribute parameters is unchanged (i.e., magnitude, geographic extent, duration, frequency, reversibility).</p> <p>High Sensitivity – The assessment of the residual effect (i.e., magnitude, geographic extent, duration, frequency, reversibility) is changed based on seasonality.</p>
Frequency	<p>Single Event – Residual effect occurs once during the Project.</p> <p>Irregular Events – Residual effect occurs sporadically at an irregular interval and is not predictable.</p> <p>Regular Events – Residual effect occurs regularly and may be at predictable intervals or specific times.</p> <p>Continuous – Residual effect occurs continuously.</p>
Duration	<p>Short-term – Residual effect restricted to construction or decommissioning/rehabilitation phases.</p> <p>Medium-term – Residual effect extends through project operations but is expected to subside when operations cease.</p> <p>Long-term – Residual effect extends beyond the life of the Project.</p>
Reversibility	<p>Reversible – Residual effect is likely to be reversed after activity completion and rehabilitation.</p> <p>Irreversible – Residual effect is unlikely to be reversed.</p> <p>It should be noted that a biological effect may be irreversible at the individual level (e.g., mortality of an individual animal) but reversible at the population level.</p>
Ecological / Socio-economic Context	<p>Undisturbed – Area is relatively undisturbed or not adversely affected by human activity.</p> <p>Disturbed – Area has previously been substantially disturbed by human development or human development is still present. The proposed Demonstration Trail route is considered disturbed given the presence of human development.</p>
Level of Confidence (Certainty of Knowledge)	<p>High – Based on good understanding of cause-effect relationships and data specific to the Project Area.</p> <p>Moderate – Based on good understanding of cause-effect relationships using data from elsewhere or incompletely understood cause-effect relationships using data specific to the Project Area.</p> <p>Low – Based on incomplete understanding of cause-effect relationships and/or incomplete data specific to the Project Area.</p>

Significant biological effects are those that are considered to be of sufficient magnitude, duration, and geographic extent to cause a change in the VEC that will alter its status or integrity beyond an acceptable level. Establishment of the criteria is based on professional judgement but should be transparent and repeatable. An effect can be considered significant (negative by definition), not significant, or positive. A significant residual negative effect on biological VECs is defined as a residual Project-related change in the VEC population and/or habitat in the Study Area where recovery to baseline condition is unlikely.

6.1.4.3 Evaluation Criteria for Assessing Effects on Land User VEC

Table 6.3 presents descriptions for the characterization of residual environmental effects on the Land User VEC. The criteria are used to describe the potential residual effects that remain after mitigation measures have been implemented.

Table 6.3. Effects ratings used for assessing land user effects.

Assessment Criteria	Categories/Parameters for Land Use VEC
Nature	Neutral – No residual change in measurable factor(s). Positive – A positive or desirable residual change in measurable factor(s). Negative – A negative or undesirable residual change in measurable factor(s).
Magnitude	Negligible – No measurable use capacity change. Low – A measurable use capacity change but within typical/historical variability, in accordance with relevant regulatory standards/guidelines, and allows use activities to occur as per the norm within the Project Area. Moderate – A measurable use capacity change potentially in exceedance of typical/historical variability but still in accordance with relevant regulatory standards/guidelines and allows use activities to occur as per the norm within the Project Area. High – A measurable use capacity change in exceedance of typical/historical variability and/or of relevant regulatory standards/guidelines; use activities cannot occur as per the norm within the Project Area.
Geographic Extent	Project Area – Residual effect is restricted to the Project Area. Study Area – Residual effect extends into the Study Area. Beyond Study Area – Residual effect extends beyond the Study Area.
Timing	Negligible Sensitivity – Timing has no effect on use activities. Moderate Sensitivity – Timing may affect use activities. High Sensitivity – Timing affects use activities.
Frequency	Single Event – Single occurrence of residual effect. Irregular Events – Sporadic and irregular occurrence of residual effect. Regular Events – Regular occurrence of residual effect, possibly according to set intervals/schedule. Continuous – Continuous occurrence of residual effect.
Duration	Short-term – Residual effect restricted to construction or decommissioning/rehabilitation phases. Medium-term – Residual effect extends through Project operations but is expected to subside when operations cease. Long-term – Residual effect extends beyond the life of the Project.
Reversibility	Reversible – Residual effect expected to be reversed after Project construction, operation, and/or decommissioning/rehabilitation phase(s) is/are complete. Irreversible – Residual effect is unlikely to be reversed.
Ecological / Socio-economic Context	Undisturbed – Area is relatively pristine or not adversely affected by anthropogenic activity and/or human development is still present. Disturbed – Area has previously been considerably disturbed by anthropogenic activity. The proposed Demonstration Trail route is considered disturbed given the presence of human development.
Level of Confidence (Certainty of Knowledge)	High – Based on good understanding of cause-effect relationships and data specific to the Project Area. Moderate – Based on good understanding of cause-effect relationships using data from elsewhere or incompletely understood cause-effect relationships using data specific to the Project Area. Low – Based on incomplete understanding of cause-effect relationships and/or incomplete data specific to the Project Area.

A significant residual negative effect on the Land User VEC is considered to be of sufficient magnitude, duration, geographic extent, and/or irreversibility to cause a change in the VEC that will result in a change/disruption to the extent that activities cannot occur as per the norm and there is concern or altered well-being of stakeholders (e.g., loss of access to a historically or culturally-important area or resource, loss of income/revenue).

6.2 Potential Effects of the Project on the Environment

During the Construction, Operations, and Decommissioning phases various routine Project activities may affect the following VECs: Terrestrial Mammals, Fish and Fish Habitat, Migratory Birds, Species at Risk, Sensitive Wildlife Habitat, and Land Users in and near the Demonstration Trail. As described below, residual effects of Project activities are anticipated to be limited in magnitude and duration. Furthermore, potential effects of Project activities on VECs are not expected to contribute measurably to cumulative effects of other anthropogenic activities in the area on these VECs.

6.2.1 Terrestrial Mammals

As reviewed in Section 4.1.2.2, non-SAR mammalian wildlife that may interact with the Project include moose, black bear, coyote, fox, snowshoe hare, and small mammals. During the Construction Phase, trail clearing and construction activities may result in short-term and temporary disturbance to some terrestrial mammals (e.g., Shannon et al. 2016; Miller et al. 2020). The trail footprint will result in the alteration of 0.11 km² of habitat. Similarly, trail maintenance, trail use (by pedestrians and cyclists), and decommissioning activities have the potential to result in short-term and temporary disturbance effects on terrestrial mammals including displacement from the immediate area. Several key mitigation measures are in place to minimize the effects of Project activities on terrestrial mammals as summarized in Table 6.4. Additional details on mitigation procedures applicable to terrestrial mammals are provided in the EPP (Appendix C) and Trail Management Plan (Appendix D). With mitigation measures in place, residual effects of Project activities on the Terrestrial Mammal VEC are predicted to be negligible to low in magnitude, localized (<1 km² to 1-10 km²), short to medium-term in duration, occur at irregular intervals, have moderate sensitivity to seasonality, and are considered reversible. As such, residual effects of Project activities on terrestrial mammals are predicted to be not significant.

Table 6.4. Summary of potential effects of Project activities on Terrestrial Mammals VEC and key mitigation measures.

Potential Effect	Phase / Effect Pathway	Key Mitigation Measures
Loss and/or alteration of habitat, which could result in loss of foraging and breeding areas.	All Phases: 0.11 km ² of habitat will be cleared and altered.	Disturbance of existing vegetation outside the trail route will be avoided. Offshoot trails will not be created. Trail distance and Crown Lands application area decreased by ~82% from EARD submission.
Behavioural disturbance including avoidance.	All Phases: Physical presence and noise/vibration from construction/maintenance equipment and activities. Operation Phase: Physical presence and noise/vibration from trail users.	Project personnel and trail users will be advised to not feed wildlife. Project personnel and trail users will be advised to not chase, catch, divert, follow, or otherwise harass wildlife. Right-of-way (including personnel and equipment) will yield to wildlife.
Effects on health from noise, air pollution, and wastes.	All Phases: GHG emissions and noise from equipment may affect terrestrial fauna health via inhalation of GHG emissions and potential auditory impairment. Exposure to wastes resulting in	No blasting required. Minimize use of motorized vehicles to extent possible. Unauthorized ATVs prohibited from trail use.

Potential Effect	Phase / Effect Pathway	Key Mitigation Measures
	attraction and negative effects on health.	Equipment will be maintained in good working order to minimize noise and air/ground pollution. Implementation of procedures in Waste Management Plan (see Appendix E)

6.2.2 Fish and Fish Habitat

Field reconnaissance and high-resolution satellite imagery have identified ten water crossings along the trail route. These are primarily small brooks or seasonal drainages with five water crossings known or expected to provide fish habitat (see Table 4.1).

Potential effects of trail construction and its associated water crossings on fish and fish habitat include increased shoreline erosion and sediment deposition, impediments to fish movement (e.g., culverts), altered streambed topography, behavioural effects, and potential effects on fish health (Table 6.5). To avoid disturbance to fish and fish habitat, the Demonstration Trail has been routed to pass at least 30-m from all waterways and water bodies wherever possible. In the instances where this is not possible and the proposed trail must circumvent <30-m away from or cross over a water body, low-impact construction methods will be used to minimize impacts to fish habitat (see EPP in Appendix C). TDCI will coordinate with DFO (and provincial regulators), to ensure appropriate permitting and best available practices are being used in all work occurring in and near water. With mitigation measures in place, residual effects of Project activities on the Fish and Fish Habitat VEC are predicted to be negligible to low in magnitude, localized (<1 km²), short to medium-term in duration, occur at irregular intervals, have high sensitivity to seasonality, and are considered reversible. As such, residual effects of Project activities on fish and fish habitat are predicted to be not significant.

Table 6.5. Summary of potential effects of Project activities on Fish and Fish Habitat VEC and key mitigation measures.

Potential Effect	Phase / Effect Pathway	Key Mitigation Measures
Loss and/or alteration of habitat, which could result in loss of foraging and spawning areas including change in fish passage.	All Phases: placement of culverts at two crossings, one temporary bridge, and two permanent bridges at water crossings deemed suitable fish habitat.	Routing of trail whenever possible at least 30 m from a water body. Use of low impact construction methods including bridges with abutments set back from the water's edge; rip-rap for bank stabilization and erosion prevention; appropriately-sized extended culverts for erosion protection. In-water work will be planned to respect DFO timing windows to protect fish in NL, as required through Letter(s) of Advice, <i>Fisheries Act</i> authorizations, or in consultation with DFO.
Change in fish habitat quality	All Phases: erosion and sedimentation from construction / maintenance activities in and near water crossings.	Use low-impact construction methods (see above). Installation of silt barriers to prevent erosion of material into water bodies.

Potential Effect	Phase / Effect Pathway	Key Mitigation Measures
Behavioural disturbance including avoidance.	All Phases: Physical presence and noise/vibration from equipment and activities.	In-water work will be planned to respect DFO timing windows to protect fish in NL, as required through Letter(s) of Advice, <i>Fisheries Act</i> authorizations, or in consultation with DFO.
Effects on health from noise and wastes.	All Phases: Noise from in-water activities may result in potential auditory impairment. Exposure to wastes during accidental release of deleterious substances.	No blasting required. In-water work will be planned to respect DFO timing windows to protect fish in NL, as required through Letter(s) of Advice, <i>Fisheries Act</i> authorizations, or in consultation with DFO. Implementation of procedures in Waste Management Plan (Appendix E) and EPP (see Appendix C) including no fueling of equipment within 100 m of waterbody and access to spill kits.

6.2.3 Migratory Birds

Non-SAR migratory birds were reviewed in Section 4.1.2 and include species typical of landbird communities of western Newfoundland’s predominant habitat types of coniferous forest, coniferous scrub, bog, open meadows and barrens. During breeding bird surveys conducted in June 2025, 31 species were detected. The most common non-SAR birds included Canada Goose, White-throated Sparrow, American Robin, and Yellow-bellied Flycatcher (see Appendix F). The only “probable” or “confirmed” evidence of breeding observed was that of Canada Goose.

Effects of Project activities on migratory birds may include decreased habitat use and breeding productivity due to habitat fragmentation, removal, and disturbance; decreased prey abundance due to vegetation removal; and direct disturbance to birds and their nests by construction and eventual use of the trail by pedestrians and cyclists (e.g., Hanson et al. 2009). Numerous mitigation measures are in place to avoid and minimize these potential effects (Table 6.6). With these measures in place, residual effects of Project activities on the Migratory Bird VEC are predicted to be negligible to low in magnitude, localized (<1 km²), short to medium-term in duration, occur at irregular intervals, have high sensitivity to seasonality, and are considered reversible. As such, residual effects of Project activities on migratory birds are predicted to be not significant.

Table 6.6. Summary of potential effects of Project activities on Migratory Bird VEC and key mitigation measures.

Potential Effect	Phase / Effect Pathway	Key Mitigation Measures
Loss and/or alteration of habitat including preferred foraging and breeding areas including nests.	All Phases: 0.11 km ² of habitat will be cleared and altered.	Disturbance of existing vegetation outside the trail route will be avoided. Offshoot trails will not be created. Trail distance and Crown Lands application area decreased by ~82% from EARD submission. Wherever possible, a minimum 30-m undisturbed vegetation buffer around all water bodies and wetlands/bogs on either side of the proposed route will be maintained.

Potential Effect	Phase / Effect Pathway	Key Mitigation Measures
		Avoid construction whenever possible during 15 April-15 August breeding season; if avoidance not possible bird nest sweeps required within seven days of the start of clearing. Buffers (in compliance with the MBCA) will be established if active nests are identified during the breeding season (see Appendices B and C).
Behavioural disturbance including effects on breeding activities.	All Phases: Physical presence and noise/vibration from construction/maintenance equipment and activities. Operation Phase: Physical presence and noise/vibration from trail users.	Project personnel and trail users will be advised to not feed birds. Project personnel and trail users will be advised to not chase, catch, divert, follow, or otherwise harass birds. Avoid construction whenever possible during 15 April-15 August breeding season; if avoidance not possible, bird nest sweeps required within seven days of the start of clearing. Buffers (in compliance with the MBCA) will be established if active nests are identified during the breeding season (see Appendices B and C).
Effects on health from noise, air pollution, and wastes.	All Phases: GHG emissions and noise from equipment may affect terrestrial fauna health via inhalation of GHG emissions and potential auditory impairment. Exposure to wastes resulting in attraction and negative effects on health.	No blasting required. Minimize use of motorized vehicles to extent possible. Unauthorized ATVs prohibited from trail use. Equipment will be maintained in good working order to minimize noise and air/ground pollution. Implementation of procedures in Waste Management Plan (Appendix E) and EPP (see Appendix C).

6.2.4 Species at Risk

There are avian, bat, caribou, fish, and insect SAR that are known or suspected of occurring along and near the proposed Demonstration Trail (see Section 4.1.2.1 and Table 4.2). Some of these SAR were identified as occurring along the proposed Demonstration Trail route during field surveys including several bird species (Bank Swallow, Common Nighthawk, Olive-sided Flycatcher, Evening Grosbeak, Red Crossbill), three bat species (Little Brown Myotis, Northern Myotis, Silver-haired Bat), and one insect species (Yellow-banded Bumble Bee) (see Appendix F).

6.2.4.1 Bird SAR

As reviewed in Section 4.1.2.1, there are ten species of bird SAR that are known or expected to occur along and adjacent to the Demonstration Trail. As with the Migratory Bird VEC, effects on avian SAR may include decreased habitat use and breeding productivity due to habitat fragmentation, removal, and disturbance; decreased prey abundance (arthropods, seeds, small mammals) due to vegetation removal; and direct disturbance to birds and their nests by construction and eventual use of the trail by pedestrians and cyclists. The reader is referred to Table 6.6 in Section 6.2.3 for a discussion and key mitigation measures. Given that the EPR Guidelines require specific mitigation measures and monitoring commitments for Bank Swallows and Short-eared Owls below; this section including Table 6.7 focuses on these two species.

The Demonstration Trail route is proposed to pass along a beach directly under a Bank Swallow colony at the top of the coastal bluffs approximately 2.0 km north of Parson’s Pond. Potential impacts to the colony from trail construction will be low relative to those from a route that traverses the top of the coastal bluffs, by reducing the potential for artificially increased rates of erosion (e.g., via vegetation removal and increased foot/bicycle traffic). Signs to educate trail users about Bank Swallows, and to request their respect of the birds’ breeding

habitat (e.g., active and inactive burrows), will be posted where the trail passes by the colony (see Mitigation Plan in Appendix B; Table 6.7). Effects on Bank Swallow prey (arthropods) are expected to be minimal (ECCC 2022). Short-eared Owls were not observed during preliminary surveys in June 2025 but additional surveys for this species will take place immediately prior to construction in the event that vegetation clearing or other construction activities must occur within the main bird breeding window of 15 April-15 August (Table 6.7 and Appendices B and C). Development of nature trails is not considered a threat to Short-eared Owls (ECCC 2018; COSEWIC 2021). With mitigation measures in place, residual effects of Project activities on the Bird SAR VEC are predicted to be negligible to low in magnitude, localized (<1 km²), short to medium-term in duration, occur at irregular intervals, have high sensitivity to seasonality, and are considered reversible. As such, residual effects of Project activities on bird SAR are predicted to be not significant.

Table 6.7. Summary of potential effects of Project activities on Bird SAR VEC and key mitigation measures.

Potential Effect	Phase / Effect Pathway	Key Mitigation Measures
Loss and/or alteration of habitat including preferred foraging and breeding areas including nests.	All Phases: 0.11 km ² of habitat will be cleared and altered.	See measures listed in Table 6.6. In addition, the following measures will be implemented: Avoidance of Bank Swallow nesting colonies and localized critical habitat along/near the trail, particularly near areas with known breeding colonies at Parson’s Pond and Portland Creek; Relocation of the trail route from the top of the coastal bluff near Bank Swallows burrows located 2 km north of Parsons Pond reduces the potential for artificially increased rates of erosion (e.g., via vegetation removal and increased foot/bicycle traffic); Construction and maintenance crew members will be informed of known Bank Swallow burrow locations; and Protection buffers will be included in operational plans to avoid potential risks to the burrows.
Behavioural disturbance including effects on breeding activities.	All Phases: Physical presence and noise/vibration from construction/maintenance/decommissioning equipment and activities. Operation Phase: Physical presence and noise/vibration from trail users.	See measures listed in Table 6.6. In addition, the following measures will be implemented: Prior to any mechanical ground disturbance (e.g., mini-excavator) related to trail construction and maintenance activities in extensive areas devoid of tree cover (e.g., coastal barrens, meadows) during the breeding period (15 April-15 August), a Short-eared Owl survey will be conducted by a qualified ornithologist within seven days of the planned construction/maintenance activity start date. The survey is necessary to ensure that no ground-nesting Short-eared Owl are disturbed by the planned activities. Any identified Short-eared Owl nest(s) or young will result in the implementation of a no-disturbance buffer of 800 m, and construction and/or maintenance activities will be postponed until after 15 August, and/or a subsequent survey confirms the young have successfully fledged; Survey results, including GPS locations of approximate Short-eared Owl nest site(s) will be emailed to the FAL

Potential Effect	Phase / Effect Pathway	Key Mitigation Measures
		<p>Wildlife Division as soon as possible after survey completion.</p> <p>Disturbance to the Bank Swallow colony that has been identified in the coastal bluffs north of Parson’s Pond will be reduced by routing the trail on the beach, ~5-10 m below the bluffs.</p> <p>Signage will be in place to educate trail users about Bank Swallows, and to request users respect the birds’ breeding and foraging habitat. These signs will be posted where the trail passes by the colony.</p>
Effects on health from noise, air pollution, and wastes.	All Phases: GHG emissions and noise from equipment may affect terrestrial fauna health via inhalation of GHG emissions and potential auditory impairment. Exposure to wastes resulting in attraction and negative effects on health.	See measures listed in Table 6.6.

6.2.4.2 Bat SAR

Five potential bat SAR (two resident and three migratory species; all considered Endangered under COSEWIC and NL ESA) are known or may occur along the Demonstration Trial (see Table 4.3 in Section 4.1.2.1). During the site investigation for the Project, three bat SAR were verified to occur along the trail route: Little Brown Myotis (resident species), Northern Myotis (resident species), and Silver-haired Bat (migratory species); all three species were detected at the Parson’s Pond ARU location, only Little Brown Myotis was detected at the Daniel’s Harbour ARU location. However, total number of verified ultrasonic recordings ($n = 25$) were low over the approximately two-month recording period, suggesting transient movements as opposed to active foraging locations or flight corridor use. Similarly, there is low potential for bat roosting habitat adjacent to the trail route. The predominant tree cover along the coast is stunted, wind-swept tuckamore (i.e., black spruce and balsam fir) with only occasional trees at protected river mouths having a diameter at breast height (dbh) >25 cm. Like birds, potential effects of Project activities on bats include loss and change in habitat, behavioural disturbance, and health effects (Table 6.8). With mitigation measures in place, residual effects of Project activities on the Bat SAR VEC are predicted to be negligible to low in magnitude, localized ($<1 \text{ km}^2$), short to medium-term in duration, occur at irregular intervals, have high sensitivity to seasonality, and are considered reversible. As such, residual effects of Project activities on bat SAR are predicted to be not significant.

Table 6.8. Summary of potential effects of Project activities on Bat SAR VEC and key mitigation measures.

Potential Effect	Phase / Effect Pathway	Key Mitigation Measures
Loss and/or alteration of habitat including preferred foraging and roosting areas.	All Phases: 0.11 km^2 of habitat will be cleared and altered.	<p>Disturbance of existing vegetation outside the trail route will be avoided.</p> <p>Offshoot trails will not be created.</p> <p>Trail distance and Crown Lands application area decreased by ~82% from EARD submission.</p>

Potential Effect	Phase / Effect Pathway	Key Mitigation Measures
		<p>Wherever possible, maintain a minimum 30-m undisturbed vegetation buffer around all water bodies and wetlands/bogs on either side of the proposed route.</p> <p>Trees larger than 25 cm DBH (i.e., those most likely to be used by bats for roosting) will be left intact whenever possible.</p>
Behavioural disturbance including effects on breeding activities.	<p>All Phases: Physical presence and noise/vibration from construction/maintenance equipment and activities.</p> <p>Operation Phase: Physical presence and noise from trail users.</p>	<p>Project personnel and trail users will be advised to not chase, catch, divert, follow, or otherwise harass bats.</p>
Effects on health from noise, air pollution, and wastes.	<p>All Phases: GHG emissions and noise from equipment may affect terrestrial fauna health via inhalation of GHG emissions and potential auditory impairment.</p> <p>Exposure to wastes resulting in attraction and negative effects on health.</p>	<p>No blasting required.</p> <p>Minimize use of motorized vehicles to extent possible.</p> <p>Unauthorized ATVs prohibited from trail use.</p> <p>Equipment will be maintained in good working order to minimize noise and air/ground pollution.</p> <p>Implementation of procedures in Waste Management Plan (Appendix E) and EPP (see Appendix C).</p>

6.2.4.3 Fish SAR

American Eel, considered Threatened by COSEWIC (2012) and Vulnerable under the NL ESA, may be present in streams (associated with WC1, 2, 3, 4, and WC6; see Table 4.1) along the Demonstration Trail. Only those life cycle events associated with feeding and maturity (e.g., elvers, yellow eels, and silver eels) occur in freshwater environments, where they may remain for 10+ years before migrating back to the Sargasso Sea for reproduction (COSEWIC 2012). American Eel may experience effects similar to those outlined for the Fish and Fish Habitat VEC (Section 6.2.2; COSEWIC 2012). With mitigation measures in place, residual effects of Project activities on the Fish SAR VEC are predicted to be negligible to low in magnitude, localized (<1 km²), short to medium-term in duration, occur at irregular intervals, have high sensitivity to seasonality, and are considered reversible. As such, residual effects of Project activities on American Eel are predicted to be not significant.

6.2.4.4 Other Mammal SAR

As reviewed in Section 4.1.2.1, there is limited likelihood of caribou (Northern Peninsula herd) and American marten (Newfoundland population) occurring along the Demonstration Trail and adjacent areas to the trail. If caribou and marten did occur near the proposed trail route during construction, maintenance, and decommissioning activities, the most likely effect would be temporary disturbance. Similarly, it is possible that trail users (hikers, cyclists) may cause temporary disturbance.

To minimize potential effects, the following mitigation measures (caribou/marten specific) are in place:

Caribou and marten sightings (including mortalities) will be reported to the TDCI, who will maintain a record and provide the data to the FAL Wildlife Division on an annual basis.

Additional details on mitigation procedures applicable to mammal (non-bat) SAR are provided in the EPP (Appendix C) and Trail Management Plan (Appendix D). With mitigation measures in place, residual effects of

Project activities on caribou and marten are predicted to be negligible to low in magnitude, localized (<1 km² to 1-10 km²), short to medium-term in duration, occur at irregular intervals, have moderate sensitivity to seasonality, and are considered reversible. As such, residual effects of Project activities on caribou and marten are predicted to be not significant.

6.2.4.5 Insect SAR

As reviewed in Section 4.1.2.1, there are three species of bumble bees (Gypsy Cuckoo, Suckley’s Cuckoo, Yellow-banded) and one beetle species (Transverse Lady Beetle) that may occur along or adjacent to habitat of the Demonstration Trail. It is possible that some habitat may be lost/ altered but the small-scale nature of habitat change (0.11 km²) is not expected to result in measurable change to any of the at-risk species. Signage will be erected to inform trail users of the at-risk nature of these species. Additional details on mitigation procedures applicable to insect SAR are provided in the EPP (Appendix C) and Trail Management Plan (Appendix D). With mitigation measures in place, residual effects of Project activities on insect SAR are predicted to be negligible in magnitude, localized (<1 km²), short to medium-term in duration, occur at irregular intervals, have moderate sensitivity to seasonality, and are considered reversible. As such, residual effects of Project activities on insect SAR are predicted to be not significant.

6.2.5 Sensitive Wildlife Habitat

There are several areas of sensitive habitat along the proposed Demonstration Trail route including sand dunes, Bank Swallow critical habitat, and wetlands/water bodies.

6.2.5.1 Sand Dunes

Sand dunes occur adjacent to the Demonstration Trail route in the coastal areas near Portland Creek (specifically Portland Cove) and Cliffy Point (within the Daniel’s Harbour municipality; see Figure 4.5). As noted in Section 3.4, trail routing was altered to increase the distance from sand dunes west of Route 430 and south of Portland Creek River. Also, trail features originally considered in the vicinity of Portland Creek dunes, Eastern Head, and Cliffy Point for future expansion plans (e.g., lookout developments) have been removed. The proposed trail route does not overlap with sand dunes and no effects on this habitat are expected.

6.2.5.2 Bank Swallow Critical Habitat

As described in Section 4.1.2.1, Bank Swallows and their burrows were observed during surveys along the coastal bluffs ~2 km north of Parson’s Pond (see Figure 4.5). These areas are next to agricultural fields that are suspected foraging sites of the birds. Segments 1, 2, and 3 (southern portion) of the proposed trail route occur in an area federally designated as Critical Habitat (No. 1233_NL_2; see Table D-1 in ECCC 2022) for Bank Swallow (considered *Threatened* under SARA). The proposed trail occurs adjacent to 5.6 km of shoreline considered Critical Habitat for Bank Swallow. Under SARA, it is prohibited to damage or destroy Bank Swallow Critical Habitat, which includes activities that damage their burrows or alter nesting sites. Prohibitions also extend to killing, harming, harassing, capturing, or taking an individual Bank Swallow. Project activities in the Bank Swallow Critical Habitat will be conducted to adhere to SARA prohibitions. As noted previously, to educate trail users about Bank Swallows and their critical habitat, signage will be posted where the trail passes by the colony, or any new colonies that may be established adjacent to the coastal bluffs in this area. Additional mitigation measures for Bank Swallows and their habitat are provided in Table 6.7.

6.2.5.3 Wetlands

As outlined in Section 4.1.2, a portion of the southern half of the Demonstration Trail is characterized by coastal marsh (along with meadow, tuckamore, and immature softwood forest). The northern half of the proposed trail route has more varied habitat and includes coastal marsh plus bog (as well as sand dunes, barrens, mature softwood forest, deciduous scrub, and mixed wood forest). It is possible that Project activities may affect

wetlands via loss of or change to wetland function through direct effects, primarily during clearing and grubbing of the trail and via indirect disturbance.

A minimum 30-m buffer of natural vegetation will be maintained around wetlands (and water bodies) whenever possible. Not including perpendicular water crossings, the Demonstration Trail will be within the minimum 30-m buffer requirement at two additional waterbodies and one marginal wetland, the bog expanse adjacent to the Portland Creek dunes (see Section 4.1.1.4; Tables 4.1-4.2). The trail tread passes within the 30-m buffer at these three points due to physical constraints (e.g., terrain, shoreline, or Route 430 ROW).

The wetland south of Portland Creek River is a fringe bog that has been compromised in terms of ecological and hydrological function related to the construction of Route 430. Approximately 500 m of trail ($\sim 0.002 \text{ km}^2$) will overlap the compromised wetland. To minimize effects on this compromised wetland, the trail route will occur within or adjacent to the existing NL Hydro ROW. Additional mitigation measures include:

- Where terrain allows, narrow gauge tracked carriers may be used to minimize tread impact.
- Tracked dumpers and SxS will haul materials to work zones in staged loads.
- In wetlands, manual methods and hand tools may be used to supplement mechanized work.
- No large machinery or wheeled equipment exceeding weight or width thresholds for backcountry access will be employed.
- Where greater channel flow, depth, or width is present, appropriately sized infrastructure will be installed in accordance with the NL Department ECCC guidelines (NLECCC 2018).
- On a site-by-site basis and in consultation with the DECCC and/or FA and FAL, the need for additional culverts will be evaluated to maintain water flow and ecological/wetland function.
- All wetland crossing infrastructure will be constructed using durable, low-impact methods that align with engineered specifications and recognized best practices for trail infrastructure.
- As necessary, crossings over sensitive bog or marsh areas will employ geotextile fabric and clean granular fill or riprap to distribute weight and protect underlying organic soils. In areas with deeper saturation or prolonged inundation, a geotextile layer will be laid directly over the prepared alignment, followed by graded rock fill to create a stable, free-draining causeway. This method helps prevent rutting, minimizes settlement, and maintains natural water flow across the bog or wetland area.
- To reduce the risk of introducing or spreading exotic and/or invasive vascular plant species (e.g., Purple Loosestrife, *Lythrum salicaria*), equipment will arrive at the construction site clean and free of soil and vegetative debris. Equipment will be inspected by Project personnel and either approved for use or cleaned, re-inspected and approved for use.

In summary, with mitigation measures in place, residual effects of Project activities on the Sensitive Habitat VEC are predicted to be negligible to low in magnitude, localized ($< 1 \text{ km}^2$), short to medium-term in duration, occur at irregular intervals or continuously, have low sensitivity to seasonality, and are considered reversible. As such, residual effects of Project activities on the Sensitive Habitat VEC are predicted to be not significant.

6.2.6 Land Users

There are numerous land users that overlap and occur adjacent to the proposed Demonstration Trail as described in Section 4.2 and depicted in Figure 4.1. The following sections describe the potential for the Project to interact with and potentially affect various Land Users and the mitigation measures in place to eliminate or minimize potential effects.

6.2.6.1 Agriculture

As reviewed in Section 4.2.7, agricultural activities including fields and farms are located adjacent to the trail route. At Portland Creek, the proposed trail will pass by the Brophy Dairy Farm, whose boundaries are within 500 m of the proposed trail route with the closest point of approach of ~1-m from the 2-m trail buffer corridor. The farm has three Crown Land leases on the coastal side of Route 430 within an Agriculture-Crown Reserve. Additionally, Sections 6 and 7 (Figure 4.1d) of the proposed trail pass through an Agriculture-Crown Reserve north of Arches Provincial Park to just south of Portland Creek.

It is possible that farm animals may experience minor disturbance during construction and/or operation phases where the trail route occurs near active pasture (grazing) fields. Additionally, route access or land use conflicts could occur during construction with trail building equipment, vehicles, or personnel. There could also be route access conflicts to gates, paddocks, or forage storage areas, etc. at the farm(s) from trail tread. The key mitigation measure to minimize interactions and potential effects is regular communication with agricultural sector stakeholders (see Public Engagement Plan in Appendix A) to prevent conflicts. Also, signage will be in place and the trail will be constructed in a manner that dictates hikers/cyclists to stay on the trail. With mitigation measures in place, residual effects of Project activities on agricultural users are predicted to be negligible to low in magnitude, localized (within Project Area), short to medium-term in duration, occur at irregular intervals or continuously, have low sensitivity to seasonality, and are considered reversible. As such, residual effects of Project activities on agriculture users are predicted to be not significant.

6.2.6.2 Quarries

As reviewed in Section 4.2.8, the proposed trail route (Segment 9; Figure 4.1e) is ~5-m from an active quarry permit (No. 150192) for MCI. TDCI has been advised by MCI that they have no future intentions with the quarry. MCI’s quarry permit for this area expires 27 January 2026. TI was issued a quarry permit (No. 151104) on 19 August 2025 that abuts the MCI permit to the north. The proposed trail route is beyond 100 m of the present TI quarry permit boundary. Blasting operations are conducted by a specialized blasting company and are an irregular occurrence (typically not occurring more than once per year) of short duration (i.e., less than an hour).

Given the proximity of existing quarries to the proposed trail route there is potential for disruption of blasting schedule and / or operations conducted by contractors in the quarry which could affect quarry project deliverables and finances. In addition, there are liability concerns for the quarry given the potential for harm related to blasting operations (e.g., noise, dust, thrown rock material). Several key mitigation measures are in place to minimize these potential effects as outlined below and in Appendices C and D.

- Ongoing communication with active quarry permit holders particularly to ensure TDCI remains informed of blasting schedule and other activities that may affect the trail and trail users (see Public Engagement Plan in Appendix A).
- Signage and trail user education regarding quarry activities will be erected.
- Trail route has been designed to avoid direct overlap with quarry operations.
- Contracted blasting company will develop a specific plan (including setback distances and notification requirements) for any scheduled blasting operation that considers Project activities and trail use.
- Blasting company will perform a safety check of the trail and highway (Route 430), recommend closing sections of both the trail and highway, if necessary, to ensure no individuals are in proximity of the blasting area.
- Public notice is also provided on radio stations servicing the area in advance of the blasting operation.

With mitigation measures in place, residual effects of Project activities on quarry users are predicted to be negligible to low in magnitude, localized (within Project Area), short duration, occur at irregular intervals, have low sensitivity to seasonality, and are considered reversible. As such, residual effects of Project activities on quarry users are predicted to be not significant.

6.2.6.3 Cabin and RV Trailer Users

A short section (~650 m) of the proposed trail occurs near a dirt track that services ~15-20 seasonal cabins and camper trailers, starting at the beginning of trail Segment 5 (see Figure 4.1c; Access Point D). Potential effects on cabin and RV trailer users include noise disturbance during construction activities, decreased access and privacy, and increased risk of vandalism and unauthorized camping by trail users. Key mitigation measures to minimize potential effects include:

- Public Engagement Plan and regular communication with cabin and RV trailer group stakeholders;
- Signage for trail users to stay on the trail; and
- Potential shared use of cabin access road with proposed road upgrades to benefit multi-use.

With mitigation measures in place, residual effects of Project activities on cabin and RV trailer users are predicted to be low in magnitude, localized (primarily within Project Area), short duration, occur at irregular intervals, have medium sensitivity to seasonality, and are considered reversible. As such, residual effects of Project activities on cabin and RV trailer users are predicted to be not significant.

6.2.6.4 Fishing Stages

Historical fishing stages (22) and fish stores (two) span ~150 m along the northern shoreline at the mouth of the Parson’s Pond River (Figure 4.1a; Heritage NL 2025). At the closest point, the trailhead is ~40-m away from various outbuildings associated with the fishing stages. There could be reduced access of fishers to the fishing stages and associated outbuildings during trail construction activities or from trail users parking directly at the trailhead. Additionally, temporary disruption of activities (e.g., boat operation, fish landings, maintenance) at fishing stages is possible from trail users seeking unauthorized access for photos, etc. To mitigate these potential effects, signage for trail users to stay on the trail will be in place at the trailhead and there will be ongoing communication with owners and/or operators of fishing stages (see Public Engagement Plan in Appendix A).

With mitigation measures in place, residual effects of Project activities on fishing stage users are predicted to be low in magnitude, localized (primarily within and near Project Area), short duration, occur at irregular intervals, have medium sensitivity to seasonality, and are considered reversible. As such, residual effects of Project activities on fishing stage users are predicted to be not significant.

6.2.6.5 Local Residents

As reviewed in Sections 4.2.1.2, 4.2.1.3, and highlighted in Figure 4.1, the proposed trail overlaps and is adjacent to the private properties of local residents. Potential effects on local residents include negative effects on quality of life associated with increased tourism, potential unauthorized parking by trail users in non-designated space, potential damage to private property by trail users, and road use conflicts between locals and trail users along shared use of Main Road in the community of Portland Creek. Some local residents may perceive trail use as positive as it enhances tourism in the area. To mitigate potential negative effects, the following mitigation measures will be implemented:

- Ongoing and regular communication with private landowners related to potential interest for easement(s) or small-scale land purchase(s) where the trail route corridor encroaches or is immediately adjacent their property boundary;

- Ongoing and regular communication with local residents including public outreach via media, posters, and online presence (see Public Engagement Plan in Appendix A);
- Ongoing and regular engagement with Town of Parson’s Pond, Town of Daniel’s Harbour, and Portland Creek LSD Committee; and
- During seasonal inspections any accidental damage to adjacent private land will be documented and addressed in consultation with the landowner.

With mitigation measures in place, residual effects of Project activities on local residents are predicted to be negligible to low in magnitude, localized (primarily within and near the Project Area), short duration, occurring at irregular intervals, have medium sensitivity to seasonality, and are considered reversible. As such, residual effects of Project activities on local residents are predicted to be not significant.

6.2.6.6 Recreational Users / Fishing Outfitters

Recreational users including fishers, hunters, and berry pickers may utilize areas along and adjacent to the proposed trail. As noted previously, the Great Northern Peninsula from Parson’s Pond northward to Routes 432, 433, and 434, is closed to caribou hunting (CMA 76, St. Anthony is seasonally open; NLFAL 2025a); therefore, no conflicts between trail construction/use and caribou hunting activity are expected. Likewise, the Demonstration Trail lies adjacent to, but not within, the Portland Creek Newfoundland MMA 2. Therefore, there is no expected land use conflict between the Demonstration Trail and moose hunting activity. Portland Creek River (WC6) is a scheduled salmon river. Other freshwater fish species targeted by anglers in the region of the proposed trail include brook trout, brown trout, and land-locked salmon (i.e., ouananiche). The Mountain Waters Resort (Figure 4.1e) is located <2 km from the proposed trail route across Portland Creek River, along the shores of Portland Creek Pond. This is a seasonal resort (operating between 15 May-15 October) focused on fishing and hunting in the area. Potential effects of Project activities on recreational users include disturbance of local forage areas (e.g., berry patches, etc.) from trail construction activities and reduced fishing potential, access, or experience during pedestrian bridge construction spanning Portland Creek. It is possible that increases in tourism activity associated with trail use may also result in increased opportunities for local businesses, including the Mountain Waters Resort. To mitigate potential negative effects on recreational users, the following mitigation measures will be implemented:

- Disturbance of existing vegetation outside the trail route will be avoided and offshoot trails will not be created;
- Trail distance and Crown Lands application area decreased by ~82% from EARD submission;
- Ongoing and regular communication with recreational users and local businesses (see Public Engagement Plan in Appendix A); and
- Various measures outlined in Table 6.5 and the EPP (Appendix C) to protect fish and fish habitat.

With mitigation measures in place, residual effects of Project activities on recreational users and outfitters are predicted to be negligible to low in magnitude, localized (primarily within and near Project Area), short duration, occurring at irregular intervals, have medium sensitivity to seasonality, and are considered reversible. As such, residual effects of Project activities on recreational users and outfitters are predicted to be not significant.

6.2.6.7 NL Hydro

The proposed trail route occurs within or adjacent to an existing NL Hydro low-voltage transmission line ROW between Portland Creek and Belburns (see Section 4.2.6.2). This route was selected to limit disturbance to an existing wetland (which is considered compromised in function; see Section 6.2.5.3). At the trailhead in Parson’s Pond and in the community of Portland Creek, the proposed trail occurs adjacent to power line supports

(~50-m in Parson’s Pond (TL227; 69 kV line) and ~1 km along Main Road in Portland Creek). Near the Portland Creek River, the trail crosses two NL Hydro ROWs for TL227 and TL259 (138 kV line) at four separate crossing points, twice on either side of the river. There is potential that Project activities may reduce access to the utility corridor ROW by NL Hydro and/or Newfoundland Power personnel. To mitigate this risk, TDCI will consult with NL Hydro and Newfoundland Power prior to and during trail construction. Minor adjustments to the trail route may be required.

With mitigation measures in place, residual effects of Project activities on NL Hydro and Newfoundland Power are predicted to be negligible to low in magnitude, localized (Project Area), short duration, occurring at irregular intervals, have medium sensitivity to seasonality, and are considered reversible. As such, residual effects of Project activities are predicted to be not significant.

6.2.6.8 Arches Provincial Park

The proposed trail route occurs within the Arches Provincial Park boundary for ~600 m and will utilize or build upon existing trails in the southern portion of the park (Figure 4.1c). It is anticipated that vegetation clearing will be required from the park access road to the northern boundary (~400 m or 0.002 km²) but discussion on final width of trail tread and corridor within the park are ongoing. Visitor experience may change as a result of Project activities. Construction activities (e.g., disruption, noise) may temporarily result in negative experience for park users and access/use of the new trail may be perceived as a positive or negative experience. There may be increased demand on the Provincial Park facilities, namely the single pit toilet. To mitigate potential negative effects for park users, the following measures will be implemented:

- Consultation with Parks NL on final trail route configuration through the park and Licence to Occupy (LTO) permit prior to trail construction;
- Signage and trail user education (see Trail Management Plan in Appendix D); and
- Vegetation clearing and trail maintenance to occur outside of tourism season to minimize negative visitor perception or interaction.

With mitigation measures in place, residual effects of Project activities on Arches Provincial Park users are predicted to be negligible to low in magnitude, localized (Project Area), short duration, occurring at irregular intervals, have medium sensitivity to seasonality, and are considered reversible. As such, residual effects of Project activities on Park users are predicted to be not significant.

6.3 Potential Effects of the Environment on the Project

The Demonstration Trail is located in coastal areas and as such it may be exposed to flooding, erosion, and storm surges. The Parson’s Pond trailhead is within the 20-year and 100-year flood zones (Martec Limited 1988). As such, possible erosion and flooding effects on the trail include loss and/or deposition of substrate including rocks (e.g., rock throw from wave action); loss and/or deposition of plant material; loss or damage of signage and other infrastructure and resultant pollution; and forced alterations of the trail route to avoid dangerous areas (e.g., eroded or unstable banks). Appropriate mitigation measures will be implemented to the extent possible during construction to minimize the trail from being subject to, artificially increased rates of erosion and/or flooding (e.g., riprap on shorelines, slightly raised trail bed; see EPP in Appendix C). This will be implemented in consultation with DECCC and the PAO, as per findings and recommendations of the project-specific Historic Resources Impact Assessment report. The trail will be inspected on a regular basis and maintenance activities will be conducted in the event of trail damage due to severe weather. As such, residual effects of the environment on the Demonstration Trail are predicted to be not significant.

6.4 Summary of Potential Residual Effects

This EPR provides detailed information regarding the potential effects of the Demonstration Trail on the environment and the proposed measures to mitigate potential negative environmental effects on Terrestrial Mammals, Fish and Fish Habitat, Migratory Birds, Species at Risk, Sensitive Wildlife Habitat, and Local Users. With the implementation of mitigation measures, the residual effects of Project activities on VECs were predicted to be not significant. The confidence in prediction was considered high or medium to high. TDCL commits to implementing the mitigation measures included in this EPR and associated plans including ongoing engagement with local users along and adjacent to the Demonstration Trail as well as appropriate regulatory agencies.

7 Rehabilitation and Decommissioning

Progressive rehabilitation will be integrated into all stages of trail construction. As each trail segment is completed, disturbed areas outside the final tread and cleared corridor will be restored to their natural condition. Excavated soils will be leveled, organic debris and duff spread to promote revegetation, and, where necessary, erosion control materials such as coir matting, jute mesh, or native seed mixes will be applied. Felled brush and limbs will be scattered to blend with the forest floor, stabilizing soils and discouraging informal trail creation.

The rehabilitation schedule will follow trail construction, ensuring that no segment is left open and unrehabilitated throughout the full construction period. Exact sequence details of construction and subsequent rehabilitation for each of the ten segments are at this point unknown but will follow a phased approach based on individual segments (see Figure 3.2). Areas adjacent to water crossing infrastructure (i.e., bridge or culvert) will be rehabilitated immediately after installation to limit the potential for erosion of streambanks and/or silt deposition into the watercourse. Mitigation measures will be employed for erosion control and to reduce the introduction of aquatic invasive species as outlined in the EPP (see Appendix C).

Temporary features, such as staging areas, access tracks, and material stockpiles, will be decommissioned once their function is complete. These sites will be graded to blend with surrounding terrain and rehabilitated using local organic materials and native seed blends to re-establish natural vegetation. Any local borrow sources utilized during construction will be backfilled or stabilized.

In the unlikely event that there is a need to decommission and rehabilitate either the entire Project footprint, complete segments, or portions of select segments because of abandonment and/or realignment decisions, sections of the trail tread and corridor will be closed, scarified, and re-vegetated to prevent erosion and restore ecological continuity. This will be performed in consultation with regulatory agencies (e.g., DECCC, WRMD, FA, FAL, DFO) as need(s) arise and exact sequence details will be provided at that time. A phased approach utilizing trail segments as the unit of focus will assist communication with regulators and be the basis of decommissioning plans.

8 Project-Related Documents

No engineering design work has been performed to date with respect to the bridge requirements (i.e., load, deck height, etc.). The Portland Creek River span has been limited to conceptual design only. Final engineering will be done in consultation with DFO, FA, FAL and other regulatory agencies for all clear span bridges.

A harbour study focused on the Parson’s Pond River and estuary originally referenced in the EARD was not conducted based on feedback from TI during the EARD review process. The inability to use the existing abutments of the old Route 430 bridge as the base for a new pedestrian crossing Parson’s Pond River resulted in reconsidering the initial Gateway concept.

As noted previously, a Historic Resources Impact Assessment report (considered confidential) has been submitted to the PAO.

A report was prepared for the full GCT initiative (i.e., 850-km concept; including the Demonstration Trail), that included trail branding, website design, and elements in accordance with TCAR TAP (Tract 2023).

9 Approval of the Undertaking

Pursuant to Part 10 of the *Environmental Protection Act* (EPA), the Project was Registered with DECCC (Registration No. 2284; CDA 2024). Additionally, the proposed undertaking requires the acquisition of a series of permits, licences, reviews/approvals, and other authorizations. Necessary approvals and permits are listed in this section.

9.1 Approvals and Permits

Upon receipt of Project approval, applications will proceed for the necessary permits, licences, approvals, or other authorizations (Table 9.1). These will be added to updated versions of appropriate plans (see Appendices B-E) as they are received. Requirements outlined in each will be adhered to by all applicable Project personnel.

Table 9.1. Permits required for the Project.

Name	Act/Regulation	Governing Body	Status
			Provincial
Release of the Undertaking	Environmental Assessment Regulations/EPA	DECCC	Awarded upon approval of the EPR.
Licence to Occupy Crown Land, Crown Land Leases/Grants/Easements	<i>Lands Act</i>	FAL	Application No. 161561 is being amended to reflect the new trail configuration, 4-m corridor width, and elimination of buffer areas for future lookout developments. Once application is approved, other permits will be submitted for consideration.
Permit to Alter a Body of Water, and Schedule A: Culverts and Schedule B: Bridges Permits	Section 48, <i>Water Resources Act</i> , SNL 2002 cW-4.01	DECCC	Permit application will be submitted to the department for approval once necessary Project approvals have been received.
Certificates of Approval for Instream Activity (e.g., culvert installation, bridges)	<i>Water Resources Act</i>	DECCC	Approval application will be submitted to the department once necessary Project approvals have been received.
Water Use License	<i>Water Resources Act</i> and Environmental Control Water and Sewage Regulations	DECCC	Licence application will be submitted to the division once necessary Project approvals have been received.
Waste Hauling Permit and Special Waste Permits	<i>Waste Material Disposal Act</i>	DECCC	Permit applications will be submitted to the department for approval once necessary Project approvals have been received.

Name	Act/Regulation	Governing Body	Status
Fuel Cache Permit	EPP and Environmental Guidelines for Fuel Cache Operations	Engineering and Inspections Division, Government Services	Permit application will be submitted to the division for approval once necessary Project approvals have been received.
Certificate of Approval for Storing and Handling Gasoline and Associated Products	EPA and Storage and Handling of Gasoline and Associated Products Regulations	Engineering and Inspections Division, Government Services	Approval application will be submitted to the Division once necessary Project approvals have been received.
Permit for Storage, Handling, Use or Sale of Flammable and Combustible Liquids	<i>Fire Prevention Act</i> and <i>Fire Prevention Flammable and Combustible Liquids Regulations</i>	Engineering and Inspections Division, Government Services	Permit application will be submitted to the division for approval once necessary Project approvals have been received.
Installation and Repair Permit and Maintenance Permit	Section 33: Electrical Regulations, <i>Public Safety Act</i>	Justice and Public Safety	If applicable, permit applications will be submitted to the department for approval for work with electrical equipment once necessary Project approvals have been received and the electrical plan(s) has/have been reviewed and approved by the Government Service Centre.
Shoreline Development Application	<i>Lands Act</i>	FAL	Notice of Intent will be submitted to the department for approval once the Licence to Occupy Crown Land has been approved.
Operating Permit	Forest Fire Regulations	FAL	Permit application will be submitted to the department for approval once necessary Project approvals have been received.
Domestic Wood Cutting Permit	<i>Forestry Act</i>	FAL	Permit application will be submitted to the department for approval once necessary Project approvals have been received.
Development Permit	Protected Road Zoning Regulations	Government Services	Permit application will be submitted to the department for approval once necessary Project approvals have been received.
Highway Access Permit	Protected Road Zoning Regulations	TI and/or Government Services	Permit application will be submitted to the department for approval once necessary Project approvals have been received. Required for proposed Access Points off of Route 430.
Highway Access Permit	Building Near Highways Regulations	TI	If applicable, a permit application will be submitted for approved access locations and if construction needs to occur in TI's ROW once necessary Project approvals have been received.
Title Approvals	Crown Lands Division Requirements	FAL	Already underway.
Approval for Waste Disposal and Permission to Build Parking/Pedestrian Area(s)	<i>Urban and Rural Planning Act</i> and any relevant Municipal Plan(s)	Municipal Councils; Department of Municipal and Community	Approval(s) will be submitted to the applicable municipality(ies). Application will be submitted to the Town of Parson’s Pond for all elements pursuant to the

Name	Act/Regulation	Governing Body	Status
		Affairs; Department of Government Services	Act within the Municipal Planning Area of Parson’s Pond. Application will be submitted to Government Services for all elements pursuant to the Act within the building control line of Route 430 (i.e., Municipal Planning Area of Parson’s Pond; Municipal Boundary of Daniel’s Harbour; and within building control lines of the protected road spanning between Parson’s Pond Municipal Planning Area and the Municipal Boundary of Daniel’s Harbour).
Approval for Trail Development through a Provincial Park (i.e., the Arches) and LTO	Provincial Parks Act	Parks NL	An application will be submitted for approval once necessary Project approvals have been received.
Compliance with Standards, possible need for a permit	NL ESA and <i>Wildlife Act</i> and Regulations	DECCC	Commitment already in place that no Project personnel will disturb, harass, injure, or kill an individual of a <i>Threatened</i> or <i>Endangered</i> SAR. Permit application will proceed if the Minister deems it necessary.
Compliance Standard	Halocarbon Regulations	Engineering and Inspections Division, Government Services	If applicable (e.g., emergency fire suppression), Project personnel will abide by Regulations.
Compliance Standard	Used Oil and Used Glycol Control Regulations, EPA	DECCC	Relevant commitments already in place (see Appendices B and C).
Compliance Standard	<i>Water Resources Act</i>	DECCC	If applicable, waters discharged from the proposed site during the Construction or Operations and Maintenance phases would occur in compliance with Regulations.
Compliance Standard	<i>Occupational Health and Safety Act</i> and Regulations	Government Services, Occupational Health and Safety Division	Commitment already in place that Project personnel will abide by all relevant Regulations.
Compliance Standard	<i>Occupational Health and Safety Act</i> , Workplace Hazardous Information System Regulations	Government Services, Occupational Health and Safety Division	Commitment already in place that Project personnel will abide by all relevant Regulations.
Compliance Standard	Archaeological Research Permit Regulations, <i>Historic Resources Act</i>	PAO	A confidential, Historic Resources Impact Assessment report has been submitted.

Name	Act/Regulation	Governing Body	Status
Federal			
Construction within Navigable Waters Permit	<i>Canadian Navigable Waters Act and Regulations</i>	Transport Canada: Navigation Protection Program (NPP)	An application will be submitted for approval once necessary Project approvals have been received.
Letter of Advice for Projects Near Water and/or Authorization if it is not possible to avoid and mitigate Project impacts on fish and fish habitat	<i>Fisheries Act and/or Species at Risk Act</i>	DFO: Fish and Fish Habitat Protection Program	Request for a review of the Project will be submitted once necessary project approvals have been received. Authorization will be submitted if applicable.
Permit to Destroy Nests and Eggs	<i>Migratory Birds Convention Act</i>	ECCC-CWS	If applicable, permit application will be submitted to the department for approval once necessary Project approvals have been received ONLY if there is a proven danger or damage to human health, public safety, or other interest. It is not anticipated this will be necessary.
Relocation Permit for Migratory Birds, Eggs, and Nests	<i>Migratory Birds Convention Act</i>	ECCC-CWS	If applicable under the permit's limited circumstances, permit application will be submitted to the department for approval once necessary Project approvals have been received. It is not anticipated this will be necessary.
Permit Authorizing an Activity Affecting Listed Wildlife Species	<i>Species at Risk Act</i>	ECCC/Parks Canada/DFO (as appropriate)	Permit application will be submitted to the department for approval once necessary Project approvals have been received.
Compliance Standard	<i>Fisheries Act</i>	DFO	Commitment already in place for pollution prevention and erosion-prone areas (see Appendices B and C).
Compliance Standard	<i>Motorized Snow Vehicle and All-Terrain Act Regulations (NL); Code of Practice: Temporary Stream Crossings (DFO); Best Management Practices for the Protection of Freshwater Habitat in NL (DFO)</i>	Digital Government and Service NL; DFO	Commitments already in place (see Appendices B and C).
Compliance Standard	Best Practices for the Use and Storage of Chloride-Based Dust Suppressants	ECCC	If applicable, relevant Best Practices will be adhered to.

Name	Act/Regulation	Governing Body	Status
Compliance Standard (possible)	Canadian EPA	ECCC	Environmental protection commitments already in place (see Appendices B and C).
Policy Adherence	Federal Policy on Wetland Conservation	ECCC	Applicable commitment already in place for wetlands (see Appendices B and C).

Notes:

Permits issued relating to waste management under the *Canadian EPA* fall under the following types of permits or authorizations: authorizations for ozone-depleting substances and halocarbon alternatives, disposal at sea, permits of equivalent levels of environmental safety, and transboundary permits (ECCC 2019); these permits/authorizations are not applicable to the Project.

A permit is not required under the *Dangerous Goods Transportation Act* and Regulations (NL Department of Transportation and Infrastructure; Department of Environment, Conservation and Climate Change) provided the storing, handling, and transporting of fuel, oil, and lubricants are fully in compliance with the Regulations (GNL 2014).

Heating oil is not anticipated to be utilized for the Project; therefore, the Heating Oil Storage Tank System Regulations under the EPA are not applicable.

The Office of Indigenous Relations and Reconciliation does not issue permits or regulatory authorizations applicable to the Project.

In accordance with provincial Air Pollution Control Regulations, no burning of materials will be conducted in association with Project activities.

No pesticides will be involved in the Project; therefore, provincial Pesticide Control Regulations are not applicable.

Should future development require the installation of a subsurface sewage disposal system, approval must be sought from Government Services, with plans in conformance with the Sanitation Regulations and Private Sewage Disposal and Water Supply Standards and prepared by an approved designer.

No regulatory requirements for the NL Department of Jobs, Growth, and Rural Development apply to the Project.

The GNL Energy Branch Electricity and Regulatory Affairs divisions did not identify any apparent conflicts with electricity policy. Labrador Affairs similarly had no comments on the Project.

National Parks of Canada Land Use Planning Regulations (SOR/2024-230) and National Parks General Regulations under Parks Canada are no longer applicable to the Project, as the EPR clarifies that the trail route does not occur within vicinity of any National Park.

As the proposed route does not reside within federal lands, no regulations/requirements for Transport Canada Environmental Programs and Indigenous Relations are applicable.

Approval for Fire/Life Safety and Building Accessibility under the *Buildings Accessibility Act* by Government Services is no longer applicable to the Project, given the revised proposed route and no construction of structures or outbuildings.

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