



Preapproved Routine Impact Assessment Backcountry Campsites

Parks Canada National Office
IAA 2019

Preapproved Routine Impact Assessments (PRIA) are pre-determined environmental management and mitigation measures for a defined class of routine, repetitive projects or activities with well understood and predictable effects. Approved PRIAs are an acceptable Impact Assessment pathway as they fulfill Parks Canada's obligations under the *Impact Assessment Act* (IAA) as a manager of federal lands.

This PRIA applies to the construction, maintenance, repair, replacement or decommissioning of a backcountry campsite (e.g., tent pad, food cache, fire pit) located within an existing backcountry campground.

Any additional campsites must be serviced within the capacity of the existing toilet system (i.e., pit privy). Maintenance of a privy at an existing backcountry site (i.e., decommission the existing pit, dig another pit within the site and relocate the privy to the new site) is permitted but adding a net new pit privy (i.e., increasing the existing number of privies at a site) is not permitted. Construction of new trails or site access points or widening of existing trails are not permitted.

Backcountry campsites are located in the wilderness away from roads, developed areas or facilities. They may also be referred to as introductory, rustic, remote, rudimentary or primitive campsites. Typically, sites can only be reached by foot or boat, often several hours of travel from any development.

Water body includes a lake, a canal, a reservoir, an ocean, a river and its tributaries and a wetland, up to the annual high water mark, but does not include sewage or waste treatment lagoon, a mine tailings pond, an artificial irrigation pond, a dugout or a ditch that does not contain fish habitat as defined in subsection 2(1) of the *Fisheries Act*.

High water mark is the usual or average level to which a body of water rises at its highest point and remains for a sufficient time so as to leave a mark on the land. (Fisheries and Oceans Canada, 2015). Upper Controlled Water Elevation (UCWE) is used as definition of high water mark in managed waterways.

Scope of Application:

This PRIA includes:

- Construction, maintenance, repair, replacement or decommissioning of a backcountry campsite located within an existing backcountry campground.
- Sites may have a tent pad, bear proof food box or food cache, picnic table, fire pit and pit privy.

Conditions and Exceptions:

This PRIA does not apply under the following exceptions/conditions:

- Construction of a new backcountry campground.
- Projects that result in increased capacity requirements such as installation of a new toilet system or an additional pit privy.

- Construction of a new trail or site access points or widening of an existing trail.
- Use of heavy equipment for tree removal (e.g., skidders, harvesters, excavators).

General:

- The project permanently alters the characteristics of a water body (e.g., temperature, pH, turbidity, flow, water level, water body bed).
 - This includes, permanent fill placed in a water body or permanently increasing a physical work's footprint below the high water mark; dredging; and construction of a permanent diversion channel.
- The project results in **residual** adverse effects on migratory birds or their nests.
 - Refer to the draft- *Parks Canada Guidance on Reducing Risk to Migratory Birds* and associated draft- *Conservation Measures for Minimizing Impacts to Migratory Birds During the Nesting Period*.
- The project results in **residual** adverse effects on an individual, a residence or the critical habitat of a listed species at risk under the *Species at Risk Act*.
 - Determine if mitigations are needed to ensure no residual adverse effects to species at risk. Such mitigations should be included in the Supplementary Mitigations section.
- The project is likely to require an [approval](#) under the *Canadian Navigable Waters Act* (s. 5(1)). Check if your project is a Major Works in any Navigable Water or Works in Navigable Waters Listed on the [Schedule](#).
- The project is likely to require an [authorization](#) under the *Fisheries Act* (s.35(1) or 36(3)). Check if your projects needs a [review](#).
- The project involves the removal of or causes damage to cultural resources of heritage value, for example, heritage buildings designated by the Federal Heritage Buildings Review Office, archaeological sites, historical and archaeological objects, or cultural landscapes.
- The project involves the removal of or causes damage to paleontological resources.
- The project results in loss or reduction in size of a wetland.
- The project adversely impacts sites of significance to Indigenous peoples or current access and use of areas where hunting, fishing or gathering rights are exercised by Indigenous peoples.

Other considerations:

Use of the PRIA may not be appropriate in circumstances such as:

- Sites in permafrost regions.
- If the campsite is in a zone susceptible to natural hazards such as a land slide zone, floodplain, or area vulnerable to storm surge and sea level rise or in natural, previously undeveloped areas.

Approved geographic area of application:

This PRIA may be used within all Parks Canada administered protected heritage places that have existing backcountry campsites.

Parks Canada Specialists:

Impact Assessment:

If there are any questions on how to apply this PRIA, consult a member of the Impact Assessment Team.

Species at Risk:

If there is any uncertainty regarding potential adverse effects to species at risk, consult a member of the Species Conservation Team.

Environmental Management:

If there are questions on environmental management issues (e.g., treated wood, contaminated sites, hazardous materials or greening operations), consult a member of the Environmental Management Team.

Cultural Resources:

If there is any uncertainty regarding potential adverse effects to known or potential cultural resources, consult a member of the Cultural Resource Management Protection Team or, if applicable, the local Field Unit specialist.

Valued Components and Effects Analysis

Soil/Land Resources

- Soil contamination from equipment leaks and accidental spills
- Soil compaction and rutting
- Soil erosion, loss of topsoil and exposure of subsoils

Water Quality

- Reduced water quality due to increased erosion, sedimentation, transport of debris and contamination (e.g., leaks and accidental spills)
- Contamination from leaching of paints or treated wood
- Groundwater contamination from grey water or other liquid wastes

Wildlife and Vegetation

- Wildlife sensory disturbance causing displacement/habitat avoidance
- Wildlife habituation/attraction to artificial food sources
- Loss or fragmentation of habitat where development occurs in or adjacent to previously undisturbed areas (including disturbance to nests, roosts and/or dens and disruption of nesting, roosting and/or denning animals)
- Introduction of or spread of non-native and invasive plant species
- Damage to and removal of vegetation, disturbance of adjacent natural areas, root exposure and physiological distress

Visitor Experience and Safety

- Reduced quality of visitor experience due to noise and presence of construction equipment
- Reduced accessibility to portions of the site where work is taking place
- Hazard to visitors and staff due to construction activities

Cultural Resources

- Adverse effects to the heritage value or character defining elements of a cultural resource or a heritage place, including:
 - Impacts to archaeological resources (known or potential) from displacement or destruction, resulting in loss of heritage value

Mitigation Measures

Pre-Project Planning:

- 1) Clearly identify and avoid sensitive environmental features and habitats in the work area and schedule work to avoid critical wildlife life stages. If useful, complete the *Environmental Timing Windows Table*.
- 2) Work within the vicinity of waterbodies or wetlands may require a site specific Erosion and Sediment Control Plan.
- 3) Schedule operations to avoid wet, windy and rainy periods or very dry periods that may increase erosion and sedimentation.
- 4) Work with a Cultural Resource Management (CRM) Advisor and CRM specialists (archaeologists, historians, and built heritage advisors) to assess the impact of intervention to cultural resources and identify necessary mitigation measures.
- 5) Select grey water (e.g., water from dish washing, cooking or toiletry) management options appropriate to the site, risk of wildlife conflict and visitor capacity.
- 6) The use of treated wood is subject to restrictions depending on the preservative selected, the type of use and the receiving environment. It must be handled, installed, and disposed of according to current guidance prepared by Parks Canada.
- 7) A Spill Response Plan should be developed prior to work starting.
- 8) Where possible, plan to use paints and stains with minimal chemicals/heavy metals and low VOCs.

Example: Environmental Timing Windows (*to be deleted or adapted*)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Fish	AVOID INSTREAM WORK					Least risk window for work in and around freshwater, June 15 – Sept 15				AVOID INSTREAM WORK		
Birds	Reduced risk for harm to birds			AVOID VEGETATION REMOVAL Bird Nesting Period: April - Mid August				Reduced risk for harm to birds				
Bats	Bat in Hibernacula			Bats Nursing Pups							Bat in Hibernacula	
Turtles	Hibernation		Road Mortality	Nesting -avoid disturbance		Road Mortality		Hatchlings – avoid disturbing	Road Mortality	Hibernation		
Snakes	Avoid disturbance of Hibernacula			Road Mortality		Peak : breeding, live young Mitigate road mortality			Migration Road mortality	Avoid disturbance of Hibernacula		

Work Site Preparation/Staging/Laydown:

- 9) People working on the project/activities must review the mitigation measures and any site specific considerations with designated Parks Canada staff before work begins.
- 10) Clearly mark the work site and restricted areas with stakes, biodegradable flagging tape or other means to minimize the disturbance footprint; remove when the project is completed.
- 11) Staging areas, material/equipment drop sites must be identified, including duration of use, within an existing disturbed footprint (e.g., trail, gravel surface, previously disturbed area with high resiliency) or approved by designated Parks Canada staff.
- 12) Use existing roadways, trails, disturbed areas or other areas as approved by designated Parks Canada staff for site access, travel within the site and construction activities.

Equipment Operations:

- 13) Select equipment appropriate to the nature of work being conducted (e.g., avoid using large scale machinery when hand tools or smaller scale machinery could be used).
- 14) Equipment must be properly tuned, clean and free of contaminants, in good operating order, free of leaks (e.g., fuel, oil or grease), and fitted with standard air emission control devices and spark arrestors prior to arrival on site.
- 15) Machinery must be stored, maintained and refuelled on a flat surface, outside the dripline of trees (The area defined by the outermost circumference of a tree canopy where water drips from and onto the ground) and above the high water mark and in such a way as to prevent any deleterious substances from entering the water. Increase the buffer zone depending on the level of risk and site-specific conditions.
- 16) Refuelling must take place on an impermeable fuel mat with a berm or within a container. Leaks and spills during refuelling must be cleaned up and contaminated materials must be disposed of appropriately. Fuel must never be dispelled or deposited into the environment or any water body.
- 17) Any required cleaning of tools and equipment should be done off-site. If it must be on-site, it must be in an appropriate area at least 30 meters from a waterbody.
- 18) Gas generators must be secured to prevent movement during operation and set up on an impermeable fuel mat with a berm or within a container that can contain 110% of the volume of fuel in the generator. Cover generator and containment system if rain is in the forecast.

Pit Privies:

- 19) When replacing a pit privy, follow the *Parks Canada Planning Guide on Human Waste Management Solutions*, including:
 - a) Monitor to ensure that sanitary conditions do not create environmental or health problems. The toilet system has to be appropriate for the soil conditions and several factors have to be considered when replacing the privy.
 - b) Locate pit privy down gradient from potable water sources, a minimum of 100 meters from any water source, and in a semi-open area with reasonable sight lines on approach as bears may be attracted to odours.

Helicopter Operations:

- 20) Helicopter fueling is permitted only at the fueling station or approved by designated Parks Canada staff.
- 21) All fuel drums require secondary containment during storage.
- 22) The Prime Contractor is responsible for ensuring that a Spill Response Plan for fueling and fuel drum storage is developed prior to start of work, as stated in the Spill Response Plans.
- 23) Helicopter operations must not occur within areas of exposed soils where rotor wash will disturb soils or vegetation.
- 24) Helicopter operations are not to occur within 100 meters of sighted wildlife, raptor nests or any identified sensitive features.

Wildlife:

- 25) When possible, conduct any clearing of vegetation outside critical wildlife timing windows such as the breeding bird window and bat maternity season.
- 26) On-site workers must receive any required wildlife awareness training, according to field unit policy.
- 27) On-site workers must be made aware of and subsequently report any incidental sightings of species at risk immediately to designated Parks Canada staff.
- 28) If active nests, dens or roosts are discovered, stop work and contact designated Parks Canada staff immediately for direction.
- 29) When possible, conduct activities during daylight hours, avoiding critical foraging times (dusk and dawn). Consult with Parks Canada staff for site-specific advice.
- 30) Never approach or harass wildlife (e.g., feeding, baiting, luring). If wildlife is observed at or near the work site, allow the animal(s) the opportunity to leave the work area.

- 31) Designated Parks Canada staff must be alerted immediately to any potential wildlife conflict (e.g., aggressive behaviour, persistent intrusion), distress or mortality.

Vegetation:

- 32) Clear minimum area necessary; trees should be removed only if necessary for project completion or visitor/staff safety and vegetation must not be trimmed more than necessary.
- 33) When felling trees, precautions must be taken to minimize damage to surrounding vegetation.
- 34) When log ends or stumps are freshly cut and exposed within the sight lines, rub exposed area with soil to reduce the brightness of fresh saw cuts.
- 35) Employ pruning techniques to minimize risk of tearing the bark and harming the tree; ensure that only branch tissue is removed and stem or trunk tissue is left undamaged (refer to Appendix A).
- 36) Retain a 15-30 meter vegetated buffer, from the high water mark of waterbodies. In sloped areas, buffers should increase in width as the slope increases.
- 37) Protect roots of trees to drip line to prevent disturbance or damage. Avoid dumping and storage of materials over root zone.
- 38) Where re-vegetation is required, use native plants/soils/seed mix approved by Parks Canada staff.

Invasive Alien Species:

- 39) All construction equipment from outside the site must be washed outside the protected heritage place prior to arrival to minimize risk of introducing invasive weed species. Proof that this mitigation was applied may be requested before equipment is permitted into the protected heritage place.
- 40) If invasive species are a serious issue, consider more effective cleaning methods such as pump and high pressure hose or high pressure water unit.
- 41) Work in uninfested sites before moving to infested sites.
- 42) All soil, gravel, untreated construction lumber, erosion and sediment control products (e.g., hay, straw, mulch), or other applicable materials from outside the site must be approved by the designated Parks Canada staff.
- 43) Minimize ground disturbance, vegetation removal and bare soil exposure and stabilize and re-vegetate disturbed areas as soon as possible.
- 44) Monitor disturbed and re-vegetated areas until the designated Parks Canada staff establishes that native vegetation is growing successfully and invasive alien species spread is prevented.

Visitor Experience and Safety:

- 45) If possible, schedule activities outside peak visitor season or adjust hours of work to minimise disturbance to visitors using the area.
- 46) Close and mark the work site and safety hazards with appropriate signage while active construction, repair or maintenance is underway.
- 47) If closing the area is not possible, maintain a safe working distance between work activities and visitors.
- 48) Visitor access trails outside the construction area must be free of construction materials, waste, machinery and equipment.

Cultural Resources:

- 49) Avoid known potential cultural resources and archaeological sites.
- 50) Apply additional mitigation measures (in supplementary mitigation section) that may have been previously identified by a Parks Canada archaeologist or cultural resource advisor for the immediate area of work.
- 51) If cultural resources (i.e., structural remains and/or artifact concentrations) are encountered, work must cease in the immediate area, the site secured and the designated Parks Canada staff contacted for further direction.
- 52) The designated Parks Canada staff should ensure that on-site workers receive appropriate cultural resource awareness training if required.

Erosion and Sediment Control:

- 53) Select erosion and sediment control measures that correspond with the nature and duration of the project and install before starting work, especially within 30 meters of a waterbody.
- 54) Regularly inspect and maintain erosion and sediment control structures during all phases of the project and alter measures when necessary.
- 55) Use erosion and sediment control products made of 100% biodegradable materials (e.g., jute, sisal or coir fiber) when possible. Ensure backing materials are also biodegradable.
- 56) Use of hay or straw in erosion and sediment control must be approved by Parks Canada staff.
- 57) Use sediment and erosion control products that reduce potential for wildlife entanglement, when possible. These options include:
 - Net-less erosion control blankets made of excelsior or loose mulch and unreinforced silt fences.
 - Netting with a loose-weave wildlife safe design.
- 58) Limit duration of soil exposure; phase activities whenever possible and restore disturbed areas as soon as possible.
- 59) Avoid equipment operation on steep or unstable slopes.
- 60) Contain and stabilize waste material above the high water mark to prevent them from entering any waterbody.
- 61) Topsoil separation is required; stockpile topsoil away from subsoil and spoil material and above the high water mark or top of bank of nearby waterbodies and ensuring sediment re-entry to the watercourse is prevented.
- 62) Store excavated soils on tarps to limit damage to underlying vegetation and cover with weighted tarps if left for an extended period of time.
- 63) Reuse excavated material on site, unless there are any indicators of potential contamination.
- 64) Under thawed conditions, backfill material will be compacted prior to topsoil replacement; distribute topsoil evenly over the excavated area.
- 65) Under frozen ground conditions, material will be sufficiently spread over the excavated site to allow for a settlement under thawed conditions. Where practical, topsoil replacement will be postponed until the backfill has thawed, settled and dried out.
- 66) Maintain effective sediment and erosion control measures until any required re-vegetation of disturbed areas is achieved.
- 67) Remove temporary erosion and sediment control products, especially non-biodegradable materials, when they are no longer required.

Site Clean-up and Waste Management:

- 68) All wildlife attractants must be secured (e.g., petroleum products, human food, recyclable drink containers and garbage) in wildlife-proof containers, a secure building or vehicle. When possible, keep food waste separate from construction waste and remove daily.
- 69) Secure all waste materials (e.g., construction waste and materials, excavation, vegetation) above the high water mark of nearby waterbodies to prevent entry.
- 70) Contain wastes and transport to an approved waste landfill site outside the Parks Canada site unless otherwise directed; cover waste loads during transportation.
- 71) Dispose of contaminated materials at provincially or territorially certified disposal sites outside of the Parks Canada site.
- 72) All construction materials must be removed from the site on project completion. Burning is not permitted unless approved by Parks Canada.

Spill Response Plans and Hazardous Material Management:

- 73) Ensure that all on-site workers receive a briefing about the Spill Response Plan and are aware of the location and use of spill kits and containment devices.
- 74) Follow all applicable regulations and codes for the management and handling of hazardous waste.

- 75) Spill containment equipment must be present on-site. A spill contingency response kit including sorbent material and berms to contain 110% of the largest possible spill related to the work must be available on site at each location of potential spills (sites where equipment is working and at refueling, lubrication, and repair locations).
- 76) All spills must be contained and cleaned-up as soon as it is possible to safely do so. In the event of a major spill, all other work must stop until the spill has been adequately contained and cleaned up.
- 77) Petrochemical products, paints and chemicals must be used and stored in such a way as to prevent any deleterious substances from entering the water.
- 78) Notify the designated Parks Canada staff and the emergency contact immediately of any spill. In the event of a major spill, call the first contact authority.
- 79) Contaminants must be recovered at the source and disposed of according to applicable laws, policies and regulations. The site will be inspected by Parks Canada staff to ensure completion to expected standards.
- 80) If hazardous waste or potentially contaminated material is uncovered during excavation / construction, work must stop and excavated materials must be secured onsite in a manner that prevents contamination of the surrounding environment, including leaching. The designated Parks Canada staff must be contacted for further direction.

Supplementary Mitigations

- 81) A few supplementary mitigation(s) may be required to ensure all potential impacts are mitigated.

Approvals

Original signed by Julie Tompa

Dec 13, 2019

Julia Tompa
Director, Natural Resource Management Branch

Date

Original signed by Calvin Mercer

Dec 9, 2019

Calvin Mercer
Director, Asset Management and Project Delivery
Branch

Date

References:

Appalachian Trail Conservancy. 2011. *Backcountry Sanitation Manual*. Second edition. 142 pages + Appendix

Canada Gazette. 2019. Designated Classes of Projects Order.

Environment and Climate Change Canada. [*Guidelines to Reduce Risk to Migratory Birds*](#). Accessed October 2019.

Parks Canada Agency, Mountain Parks. (2007). *Trail and Back Country Facility Design Guidelines*.

Parks Canada. 2014. *Best Management Practices Trail Surfaces Building/Upgrades and Primitives Campsites*. Fundy National Park, New Brunswick South Field Unit.

Parks Canada. 2016. *National Best Management Practices for the Installation of Diversified Accommodation*. 9 pages+ Appendix

Parks Canada. 2017. *National Best Management Practices for Common Activities*.

Parks Canada. 2018. *Human Waste Management Solutions Planning Guide*. 26 p.

Parks Canada. 2018. *DRAFT Guidance on Reducing Risk to Migratory Birds and associated Conservation Measures for Minimizing Impacts to Migratory Birds During the Nesting Period*.

Appendix 1 – Proper Pruning Method

To request a copy of this document with images, please contact ia-ei@pc.gc.ca.

To find the proper place to cut a branch, look for the branch collar, an often visible swelling that forms at the base of a branch where it is attached to its parent branch or to the tree's trunk. On the upper surface, there is usually a branch bark ridge that runs (more or less) parallel to the branch angle, along the stem of the tree. A proper pruning cut does not damage either the branch bark ridge or the branch collar.

A – The first cut is a shallow undercut to prevent bark tearing

B – The second cut completely removes the limb

C – The third cut removes the stub and is cut flush with the branch collar