From: Pilgrim, Bret <Bret.Pilgrim@dfo-mpo.gc.ca>
Sent: Thursday, August 11, 2022 3:31 PM
To: Moss, Melissa
Subject: EMGS Controlled-source Electromagnetic Survey EA Addendum Comments

Good afternoon Melissa,

DFO has completed a review of the EA addendum “EMGS 2022 Controlled-source Electromagnetic Survey Environmental Assessment Response to Regulator Comments” submitted by Electromagnetic Geoservices Canada (EMGS) Inc. and concludes that the responses are acceptable.

Please note an additional comment submitted by our Marine Planning and Conservation Program for the operator’s information.

Page 6.25, Section 6.5.4.3 Marine Fish and Shellfish
Section 6.5.4.3 states that benthic habitat will be "temporarily disturbed" and that effects "on the sea pen population are [...] predicted to be temporary (with disturbed areas recolonized from adjacent areas)".

In updated Figure 2, the survey lines overlap sea pen SiBAs inside the NE Slope OECM. In these overlap areas any anchor making contact has the potential to crush/kill, or otherwise damage any sea pens present. Sand seeping from the dissolvable anchors may have impacts on sea pens in the dispersion area, which is larger than the impact footprint from the anchor contacting the bottom. The impact of increased sedimentation on sea pens specifically has not been studied. However, sedimentation has been shown to reduce the ability of other coral species to feed and in some cases may lead to polyp mortality (Gass and Roberts 2006; Brooke et al. 2009; Liefmann et al. 2018). Sea pens have slow growth rates, meaning that once a colony is destroyed or threatened it takes a considerable amount of time (decades) for sea pens to re-establish. It therefore seems unsuitable to describe the effects as temporary, particularly when considering the key ecosystem functioning role sea pens play in seafloor systems (recycling of organic matter, substrate stabilization, and providing essential habitat for juvenile fish, including those with commercial value).
If you have any questions, please let me know.

Thanks,

Bret
Bret Pilgrim
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Fish and Fish Habitat Protection Program | Programme de protection des pêches
Ecosystems Management | Gestion des écosystèmes
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