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Your file Votre référence

July 25, 2017

Our file Notre référence
PATH #17-HNFL-00142

Darren Hicks
Canada-Newfoundland and Labrador Offshore Petroleum Board
140 Water St., 4th Floor
St. John's, NL A1C 6H6

Dear Mr. Hicks:

Re: Review of Environmental Assessment of Fugro Offshore Seafloor and Seep Sampling Program (2017-2027)

I am writing further to your July 5, 2017 letter requesting review of the June 2017 Environmental Assessment (EA) Report prepared in relation to the above noted offshore seafloor and seep sampling program proposed by Fugro GeoSurveys.

Based on review of the above noted EA Report, the following comments are offered for your review and consideration.

- Section 2.7 Key Mitigation Measures and Table 2.2 (page 7-10) - Given the potential for impact of sound on marine mammals (including Species at Risk) from multi-beam echo sounder (MBES) and sub-bottom profiling (SBP) survey activities it is felt that the Statement of Canadian Practice with Respect to the Mitigation of Seismic Sound in the Marine Environment should be, adhered to, and included in the list of key mitigation measures for the project. This section and table should be amended accordingly.
- Section 3.2 Species at Risk (Table 3.1, pages 14-15)
 - Regarding the Northern bottlenose whale (Scotian Shelf population) with footnotes B,E – E refers to “Management Plan anticipated in 2017” which should be changed to “Action Plan” which was recently posted on the public registry (see http://www.sararegistry.gc.ca/document/default_e.cfm?documentID=2940).
 - Regarding the Sowerby's beaked whale with footnotes B,C – C refers to “Action Plan anticipated in 2017” which should be changed to “Management Plan” which was recently posted on the public registry (see http://www.sararegistry.gc.ca/document/default_e.cfm?documentID=2938).
 - A summary describing the presence/distribution/behavior/habitat of Species at Risk with potential to occur within the study area should be included.
- Section 3.4.2 Other Users (Offshore Oil and Gas, page 25) - Production activities are mentioned in this section; however, other offshore oil and gas activities that overlap the study area should be included (e.g. exploratory programs, other geophysical/seismic programs).



- Section 3.7 Sensitive Areas (page 33) - A brief description and/or summary of the characteristics of sensitive marine areas within the study area should be included and Section 3.7 amended accordingly.
- Section 5.3 Project Interactions (Table 5.2, page 38) - The potential interaction of the use of MBES and SBP and Marine Fish and Shellfish (fish habitat) should be included. The Operation of vessels (e.g. lighting) has potential interaction with Species at Risk as well as Marine Fish and Shellfish (fish habitat) (e.g. attraction of marine biota to vessel lighting). This potential interaction should be included.
- Section 5.3 Project Interactions (page 38) - Standard environmental effects descriptors (e.g. magnitude, duration, extent, frequency, reversibility) should be included and described in this section of the EA Report.
- Section 6.0 Environmental Effects Assessment (pages 40-44) - This section should include a table with a summary of the assessment of residual effects of the project activities with significance ratings and associated levels of confidence.
- Section 6.1.1 Use of MBES and SBP (paragraph 2, last sentence, page 40) - Regarding the sentence "...since this Project will be operating in depths nominally less than 3,000 m, power levels will be lower than the maximum output." The maximum power level planned for use during this planned project and how it relates to levels that overlap and/or interact with marine fish, marine mammals and sea turtles should be provided and this section amended accordingly.
- Section 6.1.2 Collection of Heat Flow Measurements and Core Samples (paragraph 3, first sentence, page 41) – there appears to be text missing from this sentence "The deployment of the corer and probe have the potential to interact with and Marine Fish and Shellfish."

Thank you for providing the opportunity to review and provide comments on this project EA Report. If you have any questions or comments with respect to the above or if you require anything further please contact me.

Sincerely,

A/Senior Fisheries Protection Biologist – Marine, Coastal, Oil and Gas Development
Fisheries Protection and Regulatory Reviews
Ecosystems Management Branch