

From: EC
Sent: Thursday, April 24, 2014 5:00 PM
To: Hicks, Darren
Cc: EC
Subject: RE: GX Technology Canada Ltd. GrandSPAN Marine 2D Seismic, Gravity and Magnetic Survey, 2014 to 2018

Darren,

As requested in your letter of 18 March 2014, Environment Canada (EC) has reviewed the environmental assessment (EA) report “Environmental Assessment of GX Technology Canada Ltd’s GrandSPAN 2D Seismic, Gravity and Magnetic Survey, 2014-2018” (AMEC March 2014).

The report describes proposed 2D seismic, gravity and magnetic surveys for the Southern Grand Banks area of the Newfoundland and Labrador Offshore Area from 2014 until 2018.

Please note that EC’s previous comments on the scoping document and project description (submitted to you on 17 January 2014) are still applicable to the project as described in the EA report. In addition, the Canadian Wildlife Service of Environment Canada (EC-CWS) offers the following additional comments:

EC-01: Section 1.1 Project Overview and Scope

The environmental assessment mentions the potential use of helicopters, but does not go into detail concerning their use. Aircraft, particularly helicopters, have been known to cause significant negative impacts to migratory birds during various life stages (i.e. chick rearing, moulting). Mitigation measures such as timing and adjusting the altitude and pattern of helicopter flight lines can minimize disturbance. Helicopter use near seabird breeding colonies should be avoided from May 1st – August 31st (with an end-date of September 30th for Northern Gannet Colonies).

EC-02: Figure 4.47 – 4.59 Seasonal Distributions of Seabird Observations

The source of the data in this figure should be noted here.

EC-03: Section 5.2.5 Marine Wildlife

Quote: “GXT holds a CWS Migratory Bird Handling Permit, applicable to both ships.”

The permit should be referred to as a Migratory Birds Convention Act (MBCA) permit, not a Canadian Wildlife Service (CWS) permit.

EC-04: Section 5.5.1 Environmental Assessment Study Areas and Effects Evaluation Criteria
Quote: "Effects to more than 10 percent of individual birds"

We recommend providing a reference and explaining why the 10 percent threshold was chosen for this environmental assessment.

EC-05: Table 5.7 Marine / Migratory Birds: Potential Project-VEC Interactions

We recommend adding lighting, particularly in low visibility conditions, to the column "Health (Individuals or Populations)".

EC-06: Section 5.5.4.2 Seismic Sound

We recommend to always perform a ramp-up/soft start of the airgun prior to use. This beneficial management practice will help deter migratory birds from diving in the area.

I trust that this information will be of assistance in your review of this proposal. If you wish to discuss these comments or have further questions, please do not hesitate to contact me at your convenience.

Yours truly,

Environmental Assessment Analyst
Environmental Protection Operations Directorate