EA Review Comments	Husky Response
GENERAL COMMENTS	
1. All previous recommendations made during the review of the original EA should be applied to the activities described for this amendment to minimize effects on the environment.	Agreed. The revised EA makes reference to this in the introduction this statement in the last paragraph of the Introduction (Section 1.0).
2. The compensation strategy/option being presented (i.e. creation of a multi species reef through the layering of rocks over existing flow lines) appears to have merit and falls within the hierarchy of Compensation options. DFO will consider this option as providing a 1:1 compensation ratio.	Husky has discussed the following with DFO and are developing a Habitat Strategy, outlining Husky's intention to create a multi species reef through the layering of rocks over existing flow lines. The Compensation Plan that will be developed in line with the Strategy presented will have specific details on calculations and also supporting evidence towards a suitable compensation ratio. Husky intends to use underwater footage from similar rock berms on the Grand Banks to potentially support a greater than 1:1 ratio.
3. The document provides no information on any public consultations. The Fish Habitat Compensation Plan should include an explanation on how public concerns on the proposed compensation options have been addressed and if not, provide a reasonable explanation as to why they were not.	Consultations consistent with Husky's normal practice for developing Environmental Assessment Documents and commensurate with the scope and scale of this project were undertaken in the context of the EA as a whole. Consultations with respect to the Habitat Compensation aspect will be undertaken with relevant stakeholders as the Compensation Strategy and Plan are developed.
SPECIFIC COMMENTS	
§5.4, page 21: The Provincial Species at Risk should be described.	The revised EA addresses this issue in Section 5.4
§5.4, page 24: The Ivory Gull is now listed as Endangered on SARA's Schedule 1, not Special Concern.	The revised EA addresses this issue in Section 5.4; see also Table 5.2
§3.7, page 7: The document states that the rock berm length will be approximately 885 m at the NADC and 570 m at SDC and the height of the berm will be about 1.5 to 2.5 m with a base width ranging from 18 - 32 m. The report then states that approximately 56,000 m2 of natural sea bottom will be covered by the berm and the total exposed surface area of the rock berm will be approximately 57,500 m2. Please clarify how these numbers were generated. Prior to issuance of a Subsection 35(2) Fisheries Act Authorization, DFO will require detailed calculations/illustrations that clearly demonstrate how the final surface area values were obtained. Also, while specific details regarding these calculations will not be necessary for a Compensation Strategy, the Compensation Plan will need to provide detailed diagrams/calculations demonstrating how these numbers were developed and how the habitat gains balance any habitat losses.	These figures were generated based on project design information. The revised EA provides some more detail related to the range of area of the seafloor that could be affected by the project c.f. Sections 3.7, 7.1.1, 7.2.1.1, 7.2.1.6, 7.2.2.1, & 8.2 The impact assessment in the EA was developed based on the "worst" case area, i.e. the 56,000 m^2. Detailed calculations will be presented in the Habitat Compensation Strategy and Plan process to be consistent with other programs.

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§3.7, page 7: The proponent indicates in the project description (pg.4) that more rock berms may be constructed in future expansions, but that this amendment pertains only to the two berms being constructed in 2009. However, in this section the report states: *"berms that may also be placed on flowlines of existing and other new drill centres will be of similar length and dimension"*, which is somewhat confusing and should be removed.	The revised EA clarifies Husky's statement on this issue, c.f., Section 3.7
§3.7, page 7: The rock sizes specified for the berms appear to consist primarily of cobble/small boulders and is absent of any larger boulders (i.e. 50 cm – 1 m). In order to ensure habitat complexity for a multi species reef, DFO recommends adding a percentage of larger boulders to the berm composition as well as creating areas with varying vertical relief along the top of the berm (i.e. the top of the berm should not be flat).	This issue will be addressed and discussed with DFO in the context of developing the Habitat Compensation Strategy and Plan for this project
§8.3, page 50: The document states that Husky's ongoing EEM program is the appropriate mechanism to integrate any of the effects of the rock berm construction in the field. However, no further details are provided to demonstrate how this will actually be accomplished.	Husky considers the original statement to be correct in the context it was written i.e., that the effects of the berm construction and existence , if any, would be reflected in the variables measured in the project's approved EEM program (e.g., sediment quality triad including benthic response and fish species contaminant body burden and MFO response) is considered correct. The project's approved EEM program does not address fish habitat compensation issues which will be addressed in the context of the HADD authorization required for this project.
Please be advised that a compensation monitoring program must also be developed. **The monitoring program will need to evaluate the amount of habitat created and its structural stability as well as changes in productivity/colonization. A control site should also be selected near the berm, but at a sufficient distance to avoid any productivity influences from the reef.** **The control site does not have to be the same size as the reef. Typically, dive surveys are the key tool used in conducting artificial reef monitoring. As this will be impossible, Husky Energy must ensure that appropriate data is collected using the ROV. Photographic and video surveys must also be conducted.** **The attached "*Rock Reef Factsheet*" provides information on the duration of a typical monitoring program as well as the appropriate data to be collected. Please note that the ROV should follow transect lines, which should extend at least 30 m beyond the margins of the reef to allow for an assessment of the productivity of a potential edge effect.**	Husky has reviewed these comments and the "Rock Reef Factsheet" provided and will take these concepts into consideration in the context of the Habitat Compensation Strategy and Plan required for this project.