

From: EC  
Sent: Thursday, May 08, 2014 10:49 AM  
To: Hicks, Darren  
Cc: EC  
Subject: EC Response 2011-355: MKI 2014 EA Update for NE NL Slope Seismic program, 2012-2017

Darren,

As requested in your e-mail of 5 May 2014, Environment Canada (EC) has reviewed MKI 2014 EA Update for NE NL Slope Seismic program, 2012-2017 - Update Report: Environmental Assessment For Marine 2-D Seismic 2012-2017 Reflection Survey Northeast Newfoundland Slope Multi Klient Invest AS (YOLO Environmental Inc. [on behalf of RPS Energy] March 2014). The report provides an update of the environmental assessment report (Environmental Assessment of MKI INVEST AS's Northeast Newfoundland Slope 2-D Seismic Survey Programme 2012-2017 [YOLO Environmental 2012]).

The Canadian Wildlife Service of Environment Canada (EC-CWS) offers the following comments with regards to the above mentioned Update Report:

#### EC-01: Section 2.8.4 Light Emissions

In Atlantic Canada, nocturnal migrants and night-flying seabirds (e.g. storm-petrels) are the migratory birds most at risk of attraction to lights. Attraction to lights at night or in poor visibility conditions during the day may result in collision with lit structures or their support structures, or with other migratory birds. Disoriented migratory birds are prone to circling light sources and may deplete their energy reserves and either die of exhaustion or be forced to land where they are at risk of depredation.

To minimize risk of incidental take of migratory birds due to human-induced light, Environment Canada recommends at minimum the following beneficial management practices:

- \* The minimum amount of pilot warning and obstruction avoidance lighting should be used on tall structures.
- \* The use of only strobe lights at night, at the minimum intensity and minimum number of flashes per minute (longest duration between flashes) allowable by Transport Canada, is recommended.
- \* Using the minimum number of lights possible is recommended.
- \* The use of solid-burning or slow pulsing warning lights at night should be avoided.
- \* Lights should completely turn off between flashes.
- \* Lighting for the safety of the employees should be shielded to shine down and only to where it is needed, without compromising safety.

#### EC-02: Table 8. VEC-Specific Mitigation Measures and Follow-Up

It should be noted that the Bird Handling Permit is empowered by Migratory Birds Convention Act, not the Species at Risk Act. It would be more appropriate to list this under the "Marine Birds" VEC rather than the "Species at Risk" VEC. Or alternately, the "Marine Birds" title should be added to the VEC column.

Please contact me if you have any questions regarding our comments.

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