



Fisheries and Oceans
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Your file *Votre référence*

Our file *Notre référence*
BAB 3990-30

January 9, 2008

Ms. Kim Coady
Environmental Assessment Officer
Canada-Newfoundland and Labrador Offshore Petroleum Board
5th Floor, TD Place
140 Water Street
St. John's NL A1C 6H6

Dear Ms. Coady:

Subject: Environmental Assessment of the PDI Production Inc. Port au Port Peninsula Ocean Bottom Cable Seismic/VSP Program 2009-2014

As requested, Fisheries and Oceans Canada (DFO) has reviewed the document entitled, '*Environmental Assessment of the PDI Production Inc. Ocean Bottom Cable Seismic/VSP Program 2009-2014*', dated October 2008. The following comments are provided for your review and consideration.

Section 5.0: Biological Environment

The section is almost entirely focused on commercially important species, with very little consideration of the ecological perspective. Given that the EA is attempting to assess potential impacts and that the Project Area is within one of five Large Ocean Management Areas in Canada identified for unique ecological importance, a more ecological view of the Study Area seems warranted. Otherwise, the limitations of the effects assessment should be acknowledged.

This section should include a subsection dedicated to Sensitive and Special Areas, as per other EA documents produced for the NL offshore areas. The Cod Spawning Box is briefly mentioned in subsections 5.2.1 and 5.6.1.15, however there are no mitigations listed to avoid this area even though Figure 5.1 clearly illustrates that the project will overlap a portion of the box.

Also, DFO has recently released a listing of ecologically and biologically significant areas (EBSAs) in the Gulf of St. Lawrence (http://www.dfo-mpo.gc.ca/csas/Csas/status/2007/SAR-AS2007_016_E.pdf). At least one of these areas is adjacent to the study area and should be noted and discussed in the report.

Section 5.2: Commercial Fisheries

The second paragraph on page 148 refers back to section 5.2 stating “Commercial fishing has been discussed and assessed in detail in subsection 5.2”. In fact, section 5.2 provides only a description of the commercial fisheries within and adjacent to the PDIP areas. The statement should be changed to read “Commercial fishing has been discussed in Subsection 5.2 and assessed in subsection 7.3.2.”

Section 8.4: Monitoring and Follow-up

The commitment to a monitoring program for lobster is reasonable given the effects on feeding and serum parameters noted in pilot studies carried out by DFO (Payne et al. 2007. *Can. Tech. Rep. Fish. Aquat. Sci.* 2712: v+46; Payne et al. 2008. *Bioacoustics* 17: 262-265.). The value of a monitoring program also seems especially important given that much of the survey area is fairly shallow water lobster habitat and airguns having fairly high source levels (around 255 dB 0-peak) is planned for use. DFO looks forward to participating in the study design as well as the final study.

Thank you for providing DFO the opportunity to comment on this document. Should you have any questions or comments regarding the above, please contact James Meade by phone at 772-3521 or by e-mail (james.meade@dfo-mpo.gc.ca).

Yours truly,

original signed by C. Grant

Carole Grant
Section Head – Habitat Evaluation
Marine Environment and Habitat Management
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jm

cc J. Payne
C. Mullins