

January 12, 2012

Dear C-NLOPB;

Please consider these comments for the Western NL Strategic Environmental Assessment. While I recognize that the first comment is outside of the Board's jurisdiction, I think it is important point to state.

1. A piecemeal approach to a SEA, such as dividing out western NL, is seriously flawed given the highly mobile organisms that exist in the Gulf of St. Lawrence (GoSL). The scoping document itself points to the idea that SEAs are suppose to be "larger ecological settings" yet, this SEA identifies the boundaries within the C-NLOPB's jurisdiction rather than considering the ecological connectivity of the whole GoSL (Figure one is an example of this where the boundary is in the middle of the GoSL). I request that the Board ask the federal government to conduct a full SEA for the GoSL in the context of offshore oil and gas activities.
2. I request that the criteria be clearly identified which would "Assist the Board in determining whether exploration rights should be issued in whole or in part in the SEA Update Area." What data/information would be necessary for the Board to exclude areas? Would it be financial information outlining the possible effects, on fishing communities for example? Or environmental data - that which clearly demonstrates a negative effect on a population, or multiple populations? Or both? I think it is very important to clearly articulate the standards which would be used to prohibit offshore oil and gas activities in the western SEA area (all or part).
3. Under "Objectives" I request that species listed under the Species at Risk Act be specifically identified as an issue that requires addressing. Specifically:
 - a) What are the potential conflicts with the recovery plans for species which use the GoSL in licensing offshore exploration?
 - b) What mitigation measures (seasonal restrictions, noise level limits, observers etc.) will be implemented with respect to seismic testing, particularly on the boundaries of the Board's jurisdiction (given that sound travels beyond the boundaries)?
 - c) For each SARA species present in the GoSL, what would constitute population level effects (for example, if one blue-whale had the potential to be exposed to seismic noise, (sub-lethal effects), is that enough to restrict activities to prevent that from happening)?

Thank you for considering these comments.

Sincerely,

Dr. Gail Fraser
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