



Elizabeth Young
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Canada-Newfoundland Offshore Petroleum Board
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Dear Ms. Young

Please find enclosed my comments on Western Newfoundland draft Strategic Environmental Assessment update, prepared on behalf of the Newfoundland and Labrador chapter of the Canadian Parks and Wilderness Society (CPAWS).

1. The report offers a thorough environmental background document for the region, which has been appropriately updated to include recent additions to our scientific knowledge of the area. For example, the section on corals (my expertise) references and maps recently published coral occurrences based on both scientific surveys and interviews with local fishermen. While minor spelling errors were found in the section on corals, the basic scientific content was correct and fairly complete. One item the report could have highlighted more is the importance of benthic structure-forming biota (such as sea pens) for fisheries. Similarly, the summaries of bedrock and surficial geology, oceanography, climate, fishery species, sensitive habitats, EBSA's etc. appear to be both correct and fairly complete.
2. The report includes maps showing the locations of existing terrestrial and existing and proposed marine protected areas in the region, as well as important bird areas (IBA's) and marine mammal and marine reptile sightings. The report should mention areas that are recommended for protection in the province's draft terrestrial natural areas system plan, although this plan has not yet been publicly released by the government.
3. The report emphasizes the importance of natural hydrocarbon seeps to total flux of hydrocarbons to the marine environment. While these seeps may be locally important, as the report points out, and may even be used as exploration guides (as the report also points out), they cannot readily be compared to catastrophic oil spills (or chronic sea-surface oil sources such as ship-based bilge oil) on land or at sea, because they are longstanding components of the local environment to which biota

- will have already reacted ecologically or biogeographically. The emphasis in the report on the nature and distribution of catastrophic and chronic anthropogenic releases of hydrocarbons is much more useful. In particular, the catalog of the number and volume of different spills in the NL region is useful as a guide to the frequency and intensity of spills the Western Newfoundland region will likely experience should additional exploration and production drilling occur in the region.
4. The report includes a thorough analysis of the marine fishing activities in the region, including both aggregate landings and total landed value. These economic values are indicated in the summary report.
 5. The report a summary of tourism activities, especially marine and coastal tourism, in the region, and a general statement of the high economic value associated with tourism in the region. This economic value is not mentioned in the summary report. It might improve the full report to more fully document the economic value of coastal and marine tourism activities in the region. The economic value of nature-based tourism in the region is important to emphasize as an economic activity that could be negatively affected by offshore oil and gas development and the associated onshore activities, whether or not an accidental spill occurs.
 6. In considering the potential environmental impacts of offshore oil and gas exploration and production in the region, the report considers both the planned activities and the possibility of accidental spills. The report mentions the potential for increased vehicular traffic associated with onshore drilling sites that could be used to access offshore petroleum resources via directional drilling and hydraulic fracturing. This increase in vehicular traffic is a known and immediate potential impact of exploration on protected areas and wilderness values in the region. Such impacts are of great concern to CPAWS for protecting the ecological integrity of existing and recommended parks and wilderness areas, especially Gros Morne National Park, the parks around the Port-au-Port peninsula, Codroy Valley and Codroy estuary, and area surrounding Humber Arm.
 7. Other potential auxiliary impacts of offshore oil and gas development not related to accidental spills or gas flaring should be considered, in addition to vehicular traffic. A particular concern is integrity of existing groundwater supplies if hydraulic fracturing is used. The report maps municipal groundwater wells in the region, and describes the importance of groundwater to domestic water supplies.

Dr. Evan Edinger.
CPAWS board member