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Dear Madame Premier, Mr. Tessier,

This letter gives reference to the application by Shoal Point Energy and Black Spruce Exploration Corp. for an exploration and delineation program along the west coast of Newfoundland and to the Western NL Offshore Area Strategic Environmental Update process enabling public comment and input. I include the Government of Canada, by mandate to protect Gros Morne National Park as a UNESCO World Heritage Site, in this correspondence due to the probable impact on the property and visitor experience of it that this project would have, should it proceed. My knowledge of and experience with western Newfoundland is Gros Morne National Park, the enclave communities, and climate change action planning. I therefore focus on these themes in the context of the possible exploration activity. Many other people have presented their perspectives on the myriad possible issues associated with this exploration project. Thank you for this opportunity to present my perspective.

I am adding my voice to those expressing concerns about the potential exploration activity along the west coast and, with them, respectfully requesting that the Government of Canada and the Government of Newfoundland and Labrador, through the Canada-Newfoundland and Labrador Offshore Petroleum Board, stay exploration permitting until such time as the provincial government: 1) establishes regulations to protect human and environmental health and economic interests, directed specifically to the practice of hydraulic fracturing; 2) determines environmentally appropriate activity locations along the west coast, if any, for oil and gas exploration or development, and especially in the context of locating this industrial development in a coastal zone shared with Gros Morne National Park (GMNP) and UNESCO World Heritage Site; and 3) reconciles the contradiction of unconventional oil and gas development with provincial commitments to climate change action.

Regulation: The debate around unconventional oil and gas development - extraction from shale through fracking - is vigorous because opinions diverge on the suitability of this industry, as it is proposed in the application of interest, for western Newfoundland. One thing people do agree on, however, is the need for regulation of hydraulic fracturing to ensure responsible development, should it occur, and to protect human and environmental health. And, it is obvious that regulation needs to be in place before issuing permits for fracking-based exploration. Little more needs to be said on this point. Many voices presenting different perspectives on the industry and practice have already expressed the need for regulations.

Gros Morne National Park and the industrial coastline

The emergence of oil and gas exploration in this area represents the industrialization of the west coast of Newfoundland. Shoal Point Energy holds exploration leases along half the coastline of Western Newfoundland. I acknowledge that there may be locations along this coastline appropriate for primary resource industrialization, but there are also places where it is not appropriate. Gros Morne National Park sits at the centre of the application area and any siting of exploration and development activity near the park is of great concern. Although the proposed drilling sites are located outside the park boundary, the proposal locates the activity at the park doorstep so would involve a shared natural environmental and community context and coastal zone. The proponent's application document does not mention or acknowledge GMNP, even in describing the geographic context of the proposed exploration activity. It does identify, however, at least one park enclave community. In this particular case (Sally's Cove, which is surrounded by the park), the proposed drilling site would be in close proximity to the park boundaries. Furthermore, the proponent has identified three other sites in other communications on the planning for exploration, two of which are also enclave communities, namely: St. Pauls and Trout River. The third, Chimney Cove is south of Trout River.

The enclave communities of GMNP – from Trout River to Cow Head – are not simply border territories; they are intimately connected physically, culturally, visually, and economically with the park. Their economic fortunes rise and fall with the success of the park. Similarly, the success of GMNP, as a world class destination, depends on the quality and ambience of these communities and the experiences they offer residents and visitors alike. Any oil and gas industry-related activity in the enclave communities must be compatible with the environmental and service quality required of residential and commercial places, and with existing industries (fishery, tourism, education and healthcare, among others). How are oil and gas extraction, and especially fracking, compatible with the existing land uses in these communities?

In the event that oil and gas exploration and development occur, it will be necessary to implement a buffer to protect the park and services from the negative impacts of the industrial activity. Questions that will need to be answered are: How will a buffer be determined? How extensive will it be in space and time? What are the concerns for the park and the enclave communities that a buffer would control? A buffer will need to protect the park and surrounding interacting environment from impacts through air and water contamination, and protect from interference the region's flora and fauna, terrestrial and marine. It will need to protect against visual impacts and preserve the park visitor experience. One can see very great distances along the coastal plain and out to sea from the heights of coastal cliffs or the Tablelands. All visitors travel in the shoreland coastal zone not only in the park but also in the enclave communities that are potential locations of on-shore development activity. A buffer will need to address strain on municipal infrastructure capacity and services between residents, tourists and industry workers. A buffer will need to address traffic impacts: the National Park highway is not an easy road to travel, especially for people unfamiliar with it – park visitors. Cliffs, harrowing curves, steep grades, and spectacular scenery, as well as occasionally appalling weather, and many moose, create a demanding route. The road is definitely not suited to a general mixing residential and tourist traffic with industrial equipment. What are the priorities of the Provincial government and Parks Canada/Federal Government for this highway and the residents and visitors who use it? The issues are complex and protecting the area will require complex spatial and temporal boundaries and schedules.

Resource industrial development is not new to national parks and their border lands. There is frequent accommodation for extraction industries, particularly local, traditional activities, both inside and outside - but near - park boundaries that existed prior to park designation. Introducing a new, expansive industry – immediately adjacent the park, and even enclosed by the park - is another matter entirely,

however. And, when it is an industry that is fundamentally at odds with the existing, dominant industry of the region, as well as the image the area projects to the world, it is certainly a matter of concern and attracts wide interest.

UNESCO is scrutinizing how this application plays out and the potential impacts of oil and gas development on the Gros Morne National Park landscape and experience. The park became a UNESCO world heritage site in 1987, celebrating the area's exceptional geologic structures and splendid landscapes. Gros Morne National Park enjoys recognition internationally because of this world heritage status. The international reputation increases the economic value of the park which in turn benefits the park communities and the Province: people who visit Gros Morne National Park typically do not confine their travels to the park; they travel south and north to visit other communities and outstanding landscapes all along the west coast. And, they travel east to the rest of the Province.

Furthermore, the opportunity exists for the coast of the Great Northern Peninsula and the Strait of Belle Isle to become one very substantial natural and cultural heritage destination. Bonne Bay and Gros Morne National Park, together, anchor one end, Red Bay and L'Anse aux Meadows anchor the other. Port-aux-Choix completes the line. Where else in the world, in such close proximity to one another, does such a capital of internationally significant natural and cultural heritage exist?

Gros Morne National Park as a World Heritage site is the gateway to this heritage coast. Compromising the natural values of this World Heritage Site with inappropriately located industrial development could affect these values for the entire region and undermine the expansion of the heritage industry. The 1970 agreement that led to designating Gros Morne National Park was hotly contested in western Newfoundland; the desire for a national park was not unanimous. But, one cannot argue about the benefits accrued to the region as a result of the designation. The modern debate is not dissimilar to that of the 1960s. Will politicians and community and industry leaders of the 2010s, 40 years later, commit to expanding the west coast economic legacy founded on environmental sustainability? Where does oil and gas exploration and development, and especially fracking and the myriad questions surrounding this practice, fit in that plan?

When a place seeks, and then accepts the UNESCO designation, the responsible jurisdiction carries the duty to protect the integrity of those features that define the place and contribute to the designation. Degradation of the attributes that support World Heritage Site designation – including the physical place and the ambiance of the place – could result in UNESCO revoking world heritage status which could, in turn, have significant economic consequences. The Government of Canada, the Province of NL and the local municipal councils are the keepers of this place and, if they wish to continue reaping the benefits of international recognition, they have an obligation to ensure that shared and adjacent land uses do not negatively impact the world heritage values of this landscape. Is oil and gas exploration and development on the park doorstep compatible with a world heritage designation based on the integrity of a grand and pristine natural landscape?

Climate change policy

The Province of Newfoundland and Labrador has launched an impressive climate change action campaign called "Turning back the tide". The province has committed to climate change action across government (the Climate Change Action Plan), and extends the responsibility to municipalities, to industry and business, and to citizens. The Bonne Bay municipality of Glenburnie-Birchy Head-Shoal Brook, enclave to GMNP, is a Provincial leader in climate change adaptation. This small municipality was an early participant in climate change action planning and GBS council has adopted a climate change action plan as municipal policy, well in advance of other Newfoundland and Labrador or even other Canadian communities. GBS and other park enclave municipalities have, or are now, adopting initiatives promoted in the "Turning back the tide" campaign and, with the presence of Gros Morne

National Park, have been pursuing an economic development agenda based on environmental sustainability.

Climate change action involves, among other things, adopting energy conservation strategies to limit greenhouse gas emissions and promoting the development of renewable energy resources over non-renewable ones. Unconventional oil and gas development in Western Newfoundland is an expansion of the fossil fuel industry and is therefore not a typical component of a climate change action agenda. Furthermore, the expansion is predicated on the extraction of oil from the Green Point shale formation through fracking; the environmental consequences of fracking are under vigorous debate around the world. There are many potential environmental issues arising from the technique, among which the impacts of methane and other gases, particulates, and industrial chemicals released into the environment during the fracturing and extraction processes are important concerns. The potential for groundwater contamination has drawn a lot of attention; air quality and greenhouse gas emissions are also issues. Methane leakage is a concern.

Methane is a potent greenhouse gas. Like carbon dioxide, methane concentrations have increased since pre-industrial times and although it occurs in lower concentrations than CO₂ in the atmosphere, it produces at least 20 times as much atmospheric warming, so controlling any further build-up is an important climate change mitigation strategy. It is possible to reverse methane build-up because the gas is short-lived (unlike CO₂ which persists in the atmosphere). The strategy requires preventing methane seepage from industrial and agricultural activity and using natural gas efficiently. We did recently experience a few years over which the rate of increase of methane in the atmosphere slowed; scientists suggest that changes in rice-paddy agriculture and using natural gas, rather than treating it as waste, contributed to the improvement. But methane concentrations are rising again, for reasons unknown, probably multiple, and certainly complex. Thus, any new or growing source of methane release is a concern. Fracking is drawing criticism for contributing to greenhouse gas emissions, methane among them. Reports from industry, government and the scientific community are conflicting on methane leakage and its significance. Essentially, there is no scientific consensus on the climate change implications of natural gas fuel development, generally, nor on unconventional oil and gas exploration and development activity (involving fracking), specifically. The situation right now is very unclear. Hence, the wise approach would be to employ the precautionary principle and be conservative in using fracking to expand the oil and gas industry. Even better would be to commit solidly to the climate change action strategy of energy conservation, fostering the growth of the renewable energy sector and tightly controlling greenhouse gas emissions.

It does appear contradictory that while serious efforts are being made by the NL government, communities, businesses and citizens to follow a climate change action plan, the government and energy sector are at the same time pursuing a program to expand the non-renewable energy sector. Obviously the NL government has a great challenge to balance growth in the fossil fuel energy sector, an industry that has brought prosperity to the province, with climate change mitigation. No doubt, it will need to be strict with greenhouse gas emission controls and energy conservation. The contradiction is even more obvious, however, when the location of interest has, at its centre, a core economy based on an international reputation for environmental sustainability and an emerging commitment to climate change action. Western Newfoundland, and the Gros Morne region in particular, are poised to become focal locations for an environmentally sustainable and climate smart economy. Unconventional oil and gas development reliant on fracking does not fit this agenda.

Conclusion

I am appealing to you as a Canadian citizen with a professional and personal attachment to west coast Newfoundland. My initial involvement with the Gros Morne area was through professional work: in a volunteer capacity with the Canadian Institute of Planners, I assisted the municipality of Glenburnie-

Birchy Head-Shoal Brook in developing a climate change adaptation strategy, one of the first, if not *the* first such strategy in Canada adopted into municipal legislation. Subsequent to that work (2009-10), I have returned as a visitor and as an educator. I have led field trips in the area with students in the School of Planning at Dalhousie University, Halifax, and I have supervised student projects in the Bonne Bay area on climate change adaptation planning and on community-based transportation (in the interest of climate change mitigation). The Gros Morne National Park region is a gem, surely one of the most beautiful, authentic and inspiring parts of our country and one that, for its blend of culture and nature, must rival other mountainous sea-coasts around the world.

I have been following the debates about this particular application. We have our own debates on shale gas exploration in the Maritime Provinces and Nova Scotia, where I live, so I understand the controversies surrounding unconventional hydrocarbon development techniques. But this exploration proposal along the west coast of Newfoundland is in a class of its own. At stake are an international reputation and the sustained economic opportunity that can be realized through a truly innovative tourism agenda built on an extraordinary place, unlike any other in the settled parts of Canada. Clearly, fracking needs regulation; the impacts of west coast oil and gas development on the experience and place of Gros Morne National Park cannot be understated and must be avoided; and the conflicting programs of fossil fuel industry expansion, on one hand, and climate change mitigation on the other must be reconciled.

Madame Premier and Mr. Tessier, fracking is contested and contentious enough but to conduct it within the context of such a vulnerable place with an evolving industry and reputation founded on exceptional environmental quality and cultural heritage and rooted in sustainability only heightens the risks and focuses the spotlight. Please, put unconventional oil and gas exploration in western Newfoundland on hold until the too many unknowns and contradictions are dealt with.

Respectfully yours,

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