



## FISHERIES JOINT MANAGEMENT COMMITTEE

Joint Secretariat – Inuvialuit Renewable Resource Committees

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May 13, 2002

Bill Klassen, Chair  
Environmental Impact Screening Committee  
Box 2120  
Inuvik, NT  
X0E 0T0

Dear Mr. Klassen:

### **Re: Comments on Western Geco's Mackenzie River Delta 2D Seismic Program 2002 Submission before EISC in May**

During our teleconference on May 9, 2002, members of the Fisheries Joint Management Committee<sup>1</sup> had the opportunity to discuss Western Geco's submission- *Mackenzie River Delta 2D Seismic Program 2002*.

As a general comment, I think it is fair to say that Committee members have significant concerns related to this project, concerns that are in part based on the material presented in the project description, but as well, that relate to the fact that in our view the project description is incomplete both in breadth and depth. Western Geco's proposal for a 2D river seismic program is a major undertaking that will encompass not only the delta waters of the Inuvialuit Settlement Region but also a significant portion of the Mackenzie River. Its scope, magnitude and potential for adverse impact are different from any other water-based seismic program that we have seen to date, and we feel it should be approached with caution.

For brevity, I have grouped our concerns under three headings.

#### **Scope of Project Description**

The limited Mackenzie-Delta focus of Western Geco's project submission to EISC is inadequate. Assessment of cumulative impacts is critical for a complete EIA and the cumulative effects of a project that covers a large majority of the Mackenzie River must be considered. The environmental impacts of such a trans-boundary project can not be properly assessed by EISC, MVEIRB, government regulators, and co-management agencies when presented as two separate proposals - one referred to the EISC for the ISR portion of the project, and the other referred to the Mackenzie Valley Environmental Impact Review Board for the remainder. This split proposal approach disregards EISC's mandate under the IFA [ Section 13.(7) ] to screen any development of consequence to the ISR that is likely to cause a negative environmental impact. Clearly, since anadromous fish living in the Mackenzie River may range freely along its length as part of their annual lifecycle, impacts on fish resulting from Western Geco's up-river operations in July will probably have effect in the ISR. Thus, while we do not relish the thought of an even thicker document, our Committee feels quite strongly about

<sup>1</sup> FJMC members and staff present for teleconference – Robert Bell (Chair), Don Dowler (Vice Chair), Max Kotokak Sr. (Member), Burton Ayles (Member), Ed McLean (Resource Biologist and Recording Secretary)

the need to assess the entire project prior to coming to conclusions about its potential impact on subsistence and other harvests within the ISR.

### **Adequacy of the Knowledge Base**

It is our view, and apparently the proponent agrees, that there are few examples of projects similar to the one being proposed, i.e. an air-gun seismic program being conducted along the length of a river. The proponent makes reference to anecdotal accounts of past river seismic programs conducted in the tropical developing world (Amazon River) and from other work conducted almost 30 years ago on the Mississippi River. They also cite as a comforting example, a 3D seismic program that **crossed** the North Saskatchewan with no obvious detrimental effects. However, the proponent has not provided actual data or results from any of these afore mentioned projects so their value to help us better understand what is being proposed for the Mackenzie River is questionable. These examples are then supplemented with inferences made from extensive work experience in ocean-based seismic programs, as well as model-based information. Clearly, there are no examples of well-monitored seismic programs that have been carried out in other river systems that we could look to for guidance to properly assess potential impacts of this project.

### **Monitoring Provisions**

Common sense suggests that the potential for adverse impacts on fish of a seismic project that is carried out within the confines of a river channel is greater than for similar programs conducted in large lakes or in the offshore. Thus, in our view, the initial monitoring programs should be comprehensive. The described monitoring provisions for this project are obviously inadequate, since as far as we can tell, they seem to be limited to looking for dead or dying fish. If this project were to proceed as is, we would know little more about its impact on fish than we do at the moment. The proponent has not described an effective, science-based program to actually study the impacts of a river seismic program, nor have they described impact thresholds or shutdown protocols that would be employed should impacts become obvious.

In summary, it is clear from this submission that the proponent can only make educated inferences about the impacts of their program in the Mackenzie River on its fauna. Therefore, this Committee recommends that only a very small-scale, well-monitored pilot program limited to a short length of the Mackenzie River be considered for 2002 to answer the multitude of unknowns associated with the submission. As was the case with winter seismic programs conducted in ISR water bodies in the winter of 2002, we would expect strict monitoring, the involvement of DFO personnel in monitoring pilot design and conduct, as well as the employment of peer-reviewed scientific protocols to assess impacts.

On behalf of the Committee, thank you for giving the FJMC this opportunity to comment on these proposals before EISC in May 2002.

Yours truly,



Robert K. Bell  
Chairman

cc: Ron Allen, DFO; Redmond Clarke, DFO; Peter Cott, DFO; John Korec, NEB; Laura VanHam, NEB; Todd Burlingame, MVEIRB; Robert Hornal, EIRB; Larry Carpenter, WMAC-NWT; Lindsay Staples, WMAC-NS; Duane Smith, IGC; Norm Snow, JS; James Thorburne, ILA.

## Joe Acorn

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**From:** Roland Semjanovs  
**Sent:** Wednesday, May 15, 2002 11:39 AM  
**To:** Alan Ehrlich; Executive Director; Joe Acorn; Louie Azzolini  
**Subject:** FW: Comments on Western Geco 2D Mackenzie River Seismic Submission

**Importance:** High



FJMC review of  
May 02 EISC pro...

-----Original Message-----

**From:** Ed McLean [mailto:mcleane@jsdomain.jointsec.nt.ca]  
**Sent:** Monday, May 13, 2002 11:33 AM  
**To:** Linda Graf  
**Cc:** allenr@dfo-mpo.gc.ca; clarker@dfo-mpo.gc.ca; charlies@dfo-mpo.gc.ca;  
cottep@dfo-mpo.gc.ca; jkorec@neb-one.gc.ca; lvanham@neb-one.gc.ca;  
General; Jonathon Allen; Katherine Thiesenhausen; wmacns@web.net; Duane  
Smith; Nelson Perry; Norm Snow; jthorbourne@irc.inuvialuit.com  
**Subject:** Comments on Western Geco 2D Mackenzie River Seismic Submission  
**Importance:** High

<<FJMC review of May 02 EISC project proposals- WGeco Mackenzie River  
2D Seismic (051302).doc>>

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