# ENCANA SHALLOW GAS INFILL DEVELOPMENT IN THE SUFFIELD NATIONAL WILDLIFE AREA:

WILDLIFE REVIEW







Prepared by Whidden Environmental Ltd.

## EnCana Suffield Review Purpose

- To assist Joint Review Panel (JRP) to fulfill its mandate
- To make recommendations for management of wildlife
- To address the overarching question:
- "Is there enough quality information to gauge the potential impacts to wildlife from EnCana's proposed project in the EIS?"

# EnCana Suffield Review Objectives WILDLIFE REPORT 1

- Advise JRP on the regulatory setting in which the Environmental Impact Statement (EIS) was formulated.
  - Focus on evaluation of project impacts on wildlife.

Advise JRP on the EIS issues, analysis, impacts, and proposed mitigation measures relating to wildlife.

# EnCana Suffield Review Objectives WILDLIFE REPORT 1

Determine relative level of uncertainty associated with impact predictions and proposed mitigation measures.

- Determine how EnCana dealt with potential impacts to and effects on wildlife.
  - Consider special management concern, provincially listed and SARA species.

- Facilitate design and implementation of formal EMP for Suffield NWA.
  - Need wildlife conservation goals to gauge project.

Facilitate clarification of regulatory spiderweb covering Suffield NWA.

- Explain process behind finalizing EIS Guidelines.
  - Timing of EnCana field work?
  - Consideration of stakeholder input?
- Request formal guidance for species at risk in Suffield NWA.
  - Include recovery plans and definition of critical habitat.

- Have EnCana discern between VEC 'habitat suitability' and SAR 'critical habitat'.
  - What are the legal and environmental consequences of their loss?
- Examine 'baseline' databases to ensure sufficient power for statistical testing for monitoring program.

Involve Responsible Authority and stakeholders in design and implementation of monitoring programs.

- Determine how expected monitoring results will demonstrate the effectiveness of mitigation measures.
  - Targets reached?

- 9. Determine successful mitigation:
  - How will testable questions be developed?
  - What quantifiable approaches will be employed?

- Determine how many PDAs required and which species covered in each.
  - How are data used in monitoring project-wildlife interactions at landscape scale?

Consider arthropod species and assemblages as key indicators of environmental impacts to wildlife.

Examine use of Before-After-Control-Impact (BACI) approach to gauge cause-and-effect relationships between project activities and wildlife.

Request detailed discussion and analysis of consequences of linear disturbance on all wildlife VECs.

- Obtain information on timing of disturbance in winter ranges of ungulates in Suffield NWA.
  - Winter timing requires attention and acceptable mitigation strategies.

- Consider impacts from increased traffic in sufficient detail for all VECs.
  - Dust impacts should also be assessed.
- Determine why pellet groups surveys were not conducted to gauge ungulate habitat use and distance from roads.
  - Particular attention to pronghorn antelope.

- Do not permit dug-outs or water holes to be constructed in or around wetlands.
  - Hydrology/hydrogeology compromised.
- Clarify Environmental Construction Reporting System to ensure that SEAC sees all environmental reporting documentation.
  - Clarify Figure 2 of EPP.

# EnCana Suffield Review Objectives WILDLIFE REPORT 2

Advise JRP on formal intervener hearing submissions submitted in response to the EIS filed by EnCana.

- 2. Advise JRP on supplemental submissions and information requests.
  - Focus on intervener positions related to wildlife and wildlife habitat.

# EnCana Suffield Review Documents WILDLIFE REPORT 2

- Submissions by the Department of National Defense and Environment Canada.
- Submissions by the Environmental Coalition:
  - AWA, Grassland Naturalists and Nature Canada.
- Submissions by SIRC and SEAC.
- Information Requests.
- Supplemental Submissions.

- Ensure past, present, and future surface disturbance in Suffield NWA is quantified.
- 2. When considering potential effects to SARA-listed species, other wildlife species, and their habitat, consider ecological context or the fact that an NWA is involved.

- Clearly define the PDA review and assessment process.
  - PDA not a substitute for systematic surveys.
- Address outstanding issue of regulatory guidance from federal or provincial representatives.

- Determine and publicize why AENV and ASRD have not acknowledged responsibility to ecological resources of Suffield NWA.
- Suggest SEAC be provisioned with resources to monitor NWA user activities, should the project proceed.

- Suggest that SIRC work with SEAC in monitoring oil and gas activities in NWA, if project proceeds.
- 8. Consider scientific certainty of impact predictions relating to wildlife.

- Facilitate design and implementation of an environmental management plan for the Suffield NWA.
  - Goals for wildlife conservation need to be formalized.

- Require a clear definition of sustainable ecosystems within the NWA.
  - This should be done by the RA for all NWA users.

Streamline and clarify regulations relating to grazing, fire suppression and hydrocarbon activities in NWA.

Suggest systematic investigation of the impact of roads, traffic, and trails on wildlife in the NWA.

- Have all wetlands in NWA delineated and classified.
  - Will facilitate avoidance and mitigation by all landusers.

- <sup>14.</sup> Ensure EnCana demonstrates mitigation effectiveness from its past activities.
  - Gather, analyze and apply empirical data.

- Determine number of PDAs required and species-specific surveys included in each PDA.
  - How is the data used to monitor project-wildlife interactions?

- Suggest increase in SEAC staffing to accommodate increased workload due to project.
  - Revisit SEAC's role and mandate.

Suggest detailed discussion and analysis of effects of linear disturbances on all wildlife VECs.

- Request more information on the impact of winter oil and gas activities on winter herds.
  - Antelope, elk, mule deer, & white-tailed deer.

Consider impact of increased traffic, in detail, for all VECs.

- 20. Do not permit dug-outs or water holes to be constructed in or around wetlands.
  - Hydrology/hydrogeology compromised.

 A detailed management plan for the NWA is required – should include specific conservation goals, objectives and targets for wildlife and wildlife habitat.

- Close scrutiny of all project activities should be required under any approval conditions.
- Follow-up and monitoring program details are required if the project proceeds– How will mitigation success be gauged?

 Heightened attention and effort in designing mitigation measures should be expected.

□ The PDA process needs to be reviewed and finalized should the project proceed. The proposed PDA process (including management framework) requires input from the RA, SEAC and the JRP.

"Is there enough quality information to gauge the potential impacts to wildlife from EnCana's proposed project in the EIS?"

Without a formal management plan, it remains difficult to gauge the success of wildlife management in the NWA.