

Impact Assessment Agency of Canada  
200-1801 Hollis Street  
Halifax, Nova Scotia  
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January 19, 2024

Re: Cooper Cove Marine Terminal Expansion Project

Impact Assessment Agency of Canada,

We would like to thank you for the opportunity to provide comments on the Summary of the Initial Project Description for the Cooper Cove Marine Terminal Expansion Project, proposed by the Port of Argentia.

Humber Arm Environmental Association, commonly known as ACAP Humber Arm, is a community-based, not-for-profit organization established in 1991. With a focus on aquatic environments, both marine and fresh water, ACAP Humber Arm is continuously engaged in multiple initiatives contributing to the environmental, social, and economic well-being of our province. ACAP Humber Arm is governed by a volunteer Board of Directors representing a diverse cross section of stakeholders (academia, fishers, recreational users, industry, government, municipalities, members of the public) and regularly partners with First Nations, other ENGO's, government and academia.

The expansion of the Cooper Cove Marine Terminal could result in positive economic growth for that region and province through the creation of new jobs, strengthening transportation links between Newfoundland and Labrador and the rest of Canada, and upgrading infrastructure for green energy projects in the region surrounding the Port of Argentia. Economic growth cannot, however, come at the expense of our environment.

Eelgrass (*Zostera marina*) is designated an ecologically significant species and provides critical fish habitat throughout the coastal regions of Placentia Bay. It is a highly productive marine angiosperm that forms extensive intertidal and subtidal meadows along the east coast of North America. Eelgrass meadows support diverse communities of fish and marine invertebrates, making them ecologically valuable habitats. These meadows provide nursery habitat for juvenile fish and invertebrates including Atlantic cod (*Gadus morhua*), Atlantic herring (*Clupea harengus*), and American lobster (*Homarus americanus*). It is also an important foraging habitat for shoreline and migrating birds. Disappearing or diminishing eelgrass meadows result in

significant declines in marine fish and invertebrate abundance and biomass including Atlantic cod, American lobster, flounder, and white hake (*Urophycis tenuis*).

From 2018-2022, ACAP Humber Arm characterized intertidal and subtidal habitats at sites located throughout Placentia Bay, NL. This work involved collecting data on eelgrass presence, distribution, and abundance, as well as other marine vegetation, structure-providing species, water quality, sediment, shoreline characteristics, aquatic invasive species, and nearshore species diversity. As part of this six-year study fifteen sites were established and monitored, two of which were near the proposed marine terminal expansion area. These sites were Fox Harbour (approximately five kilometers from the proposed marine terminal expansion area) and Ship Harbour (approximately ten kilometers from the proposed marine terminal expansion area). Eelgrass meadows were documented at both locations.

During this multi-year study ACAP Humber Arm also identified fish species utilizing eelgrass and eelgrass adjacent habitats. Some of the species documented in this region included species assessed as threatened by COSIWIC, such as the American eel (*Anguilla rostrata*), lumpfish (*Cyclopterus lumpus*), and white hake. Atlantic herring, a significant commercial species, was also documented at these sites.

We believe it is critical, as noted in the Initial Project Description, that detailed benthic habitat surveys are conducted throughout the proposed marine terminal expansion area as part of the preliminary investigation component. The identification and quantification of fish habitat in the proposed development area is required, as dredging and infilling activities associated with possible marine terminal expansion could destroy fish habitat in the area. Offsetting measures should be put in place based on these benthic habitat surveys to restore or create similar fish habitat near the project development area.

Eelgrass meadows are sensitive habitats and require specific conditions to remain viable. These habitats are susceptible to changes in water quality, turbidity, light availability, sedimentation rates, currents, and littoral drift. As eelgrass habitat is known to occur near the project development area, including Argentia Harbour itself, it is important that known eelgrass meadows in proximity to the proposed project development area be monitored throughout the course of the project to ensure that no harm occurs within this habitat as a result of the project taking place.

We look forward to further engagement and consultation with you as this impact assessment moves forward.

Regards,

<Original signed by>

Sheldon Peddle  
Executive Director