

Alaska Beluga Whale Committee

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5 May 2007

Mr. P. Michael Payne, Chief
Permits, Conservation and Education Division
Office of Protected Resources
National Marine Fisheries Service
1315 East-West Highway, Silver Spring, MD 20910-3225.

Dear Mr. Payne:

The Alaska Beluga Whale Committee is submitting comments on the Draft Programmatic Environmental Impact Statement (DPEIS) for Seismic Surveys in the Beaufort and Chukchi Seas, Alaska.

The Alaska Beluga Whale Committee is an association that represents Alaska Native subsistence hunters who hunt beluga whales in western and northern Alaska, and also includes scientists and Federal, State and local government representatives. In 1999, the Alaska Beluga Whale Committee signed a Cooperative Agreement with the National Marine Fisheries Service for the co-management of the western Alaska beluga whale population. That agreement specifies that "The ABWC and NMFS shall consult on an as-needed basis concerning matters related to management of Western Alaska beluga whales...this will include matters which have the potential to affect any Western Alaska beluga whale stock or the Native subsistence hunting of Western Alaska beluga whales." We believe that the proposed seismic survey activities clearly have the potential to affect both belugas and subsistence hunting for belugas in northern and western Alaska.

It was surprising to the Alaska Beluga Whale Committee that belugas receive so little attention in the DPEIS, and that the marine mammal focus is limited almost entirely to bowhead whales. The Minerals Management Service's DEIS for the Outer Continental Shelf Oil and Gas Leasing Program: 2007-2012 was even worse, and completely omitted mention of beluga whales in the section called "Arctic Region Marine Mammals, Non-threatened and Non-endangered Marine Mammals." It was particularly disappointing to see no mention of belugas in the DEIS and little mention in the DPEIS, since MMS and NMFS have funded or cooperated in multiple studies of beluga whales in this region. We think that belugas are very likely to be impacted by increasing noise levels associated with seismic surveys, due to their highly vocal nature and demonstrated sensitivity to noise.

The Alaska Beluga Whale Committee makes the following comments and recommendations on the DPEIS:

Recommendations

- The DPEIS should be revised to include a thorough discussion of beluga subsistence hunting, and potential impacts of seismic surveys and associated activities on that hunting, in Section II.B.3.e on Subsistence-Harvest Patterns. Currently there is not even any mention of beluga hunting in this section.
- The DPEIS should be revised to include a dedicated discussion in Section II on potential effects of seismic survey-related noise and disturbance on beluga whales. It should include a more complete analysis of the likely impacts of seismic surveys, including associated vessel and ice breaker traffic, on beluga whales as well as clear conclusions about the likelihood of significant and/or adverse impacts on belugas;
- All seismic surveys should be required to have scientifically sound monitoring programs to record the responses of belugas to seismic activities. Detailed results of these programs should be available for review within 90 days of the termination of the seismic surveys.
- The Additional Proposed Mitigation Measures for MMS G&G Permits should be revised to include a statement saying: "Aircraft shall be required to maintain a 1,000 ft minimum altitude when flying over beluga whales."
- The Additional Proposed Mitigation Measures for MMS G&G Permits should be revised to include a statement saying: "No seismic survey activity will be permitted within 50 miles of the Chukchi Sea coast north of Cape Lisburne until after July 20th."
- We recommend that NOAA/MMS select alternative 8 as the preferred alternative in the Final PEIS and that time/area closures be included to protect subsistence hunting for belugas at Point Lay and Wainwright.
- MMS and NOAA should fund studies of beluga abundance and habitat use in the Chukchi Sea, as well as studies of the effects of seismic survey, vessel, and other industrial noise on belugas. These studies should begin immediately.

Other comments

Belugas are an integral part of the subsistence economies of Point Lay and Wainwright. Hunters from both communities conduct annual hunts for belugas, and the hunts are important for both nutritional and cultural reasons. Point Lay hunters normally harvest 30-50 belugas each year, and hunters from Wainwright harvest up to 40 per year. These hunts usually take place during late June to mid-July, although hunts at Wainwright can sometimes be later. Even small disturbances are known to impact the hunt and alter behavior of the whales at this time of year and in these areas. It is remarkable that subsistence harvest of belugas is not even mentioned in the DPEIS under Environmental Impacts of Alternatives: Subsistence Harvest Patterns. The revised DPEIS should correct this omission. In addition, time area closures should be implemented to protect the beluga hunts at Point Lay and Wainwright.

Satellite tagging and aerial surveys have shown that eastern Chukchi Sea belugas make extensive use of the waters within 50 miles of the Chukchi Sea coast during June and July (see attached map of satellite tagged beluga movements). More than 1,000 belugas may concentrate at passes along Kasegaluk Lagoon at this time. The Chukchi Sea stock of belugas may feed, calves, and molts – all vital biological functions – along the nearshore Chukchi Sea coast in June and July.

Belugas also occur in the offshore Chukchi Sea pack ice during summer. Little is known about the relative use of nearshore and offshore areas.

Belugas have good hearing sensitivity across a relatively wide frequency band. They are known to be sensitive to noise from human activities. Traditionally, village residents were required to stay away from the shoreline and maintain silence near the shoreline as the time for beluga hunting approached, so as not to deflect the belugas away. Hunters in Kotzebue Sound, to the south of Kasegaluk Lagoon, have observed that belugas avoid areas of high boat traffic, noise from the shore, or frequent overflights by aircraft.

Aerial surveys of belugas during seismic operations have recorded much lower sighting rates for belugas near seismic vessels. Icebreakers cause behavioral disturbance in belugas at distances of 25-40 miles (basically whenever audible), and may mask or interfere with communication at ranges of 10-40 miles. Thus, even when icebreakers and seismic survey vessels are 50 miles offshore, the noise may be audible to and may affect belugas within the nearshore area where critical biological activities take place. For these reasons, the ABWC recommends the DPEIS be revised to include prohibition of seismic surveys and associated vessel activities within 50 miles of the Chukchi Sea coast until after July 20th in order to fulfill the MMPA requirement for a negligible impact on belugas. Protection of the Chukchi Sea coastal zone is consistent with the proposed deferral of nearshore Chukchi Sea blocks in the MMS DEIS for the 2007-2012 Oil and Gas Leasing Program.

Seismic surveys will likely also affect belugas outside the June-July period. It appears that seismic surveys in 2006 raised ambient noise levels in the Chukchi Sea roughly 20 dB compared to pre-seismic levels, although final reports on these levels are not yet available. The Chukchi and Beaufort Seas are becoming increasingly ensonified and industrialized. Not enough is known about the effects of increasing background noise, or direct effects of seismic surveys, on these whales that depend so much on sound. Operational and monitoring plans for seismic surveys must include the same types of responses and rigor for belugas as they do for bowheads.

The DPEIS repeatedly states that little or nothing is known about the effects of seismic surveys and vessel traffic on belugas. Not only are there no studies on seismic impacts on belugas, but we have only rudimentary knowledge of habitat use and no adequate abundance estimates for Chukchi Sea belugas. The Alaska Beluga Whale Committee strongly recommends that MMS and NMFS incorporate studies of Chukchi Sea belugas into their research plans. These studies should include beluga abundance, habitat use, and effects of noise (seismic surveys, vessels, etc.) on beluga behavior. All seismic surveys should be required to have scientifically sound monitoring programs to record the responses of belugas to seismic activities. Standards for these studies should be developed by experts in marine mammals and sound, and the data should be made available to the scientific community for review and additional analysis. All-too-often, monitoring studies are poorly designed, do not produce useful data and are not readily available to the scientific community.

The DPEIS states that "NMFS and MMS believe that seismic surveys during the open-water period have the potential to cause large numbers of bowheads to avoid using areas for resting and feeding for long periods of time (days to weeks) while active surveying is occurring." It also states that "the potential exists, without appropriate mitigation, for seismic activities to displace (beluga) whales from these areas." However, for a reason not at all obvious to the Alaska Beluga Whale Committee the DPEIS concludes that while impacts on bowheads are likely to be

significant "seismic activity at these areas potentially would result in adverse but not significant impacts to beluga whales." The Alaska Beluga Whale Committee does NOT agree with this conclusion. We think it is highly likely that seismic survey activity may have significant effects on both belugas and beluga hunters by displacing the whales from biologically important areas and from traditional hunting areas.

Thank you for your consideration of the Alaska Beluga Whale Committee's comments regarding the DPEIS.

Sincerely,

Willie Goodwin
Chairman

cc:
John Bengtson, NMML
Kaja Brix, NMFS
John Goll, MMS Alaska Region
Tim Ragen, Marine Mammal Commission

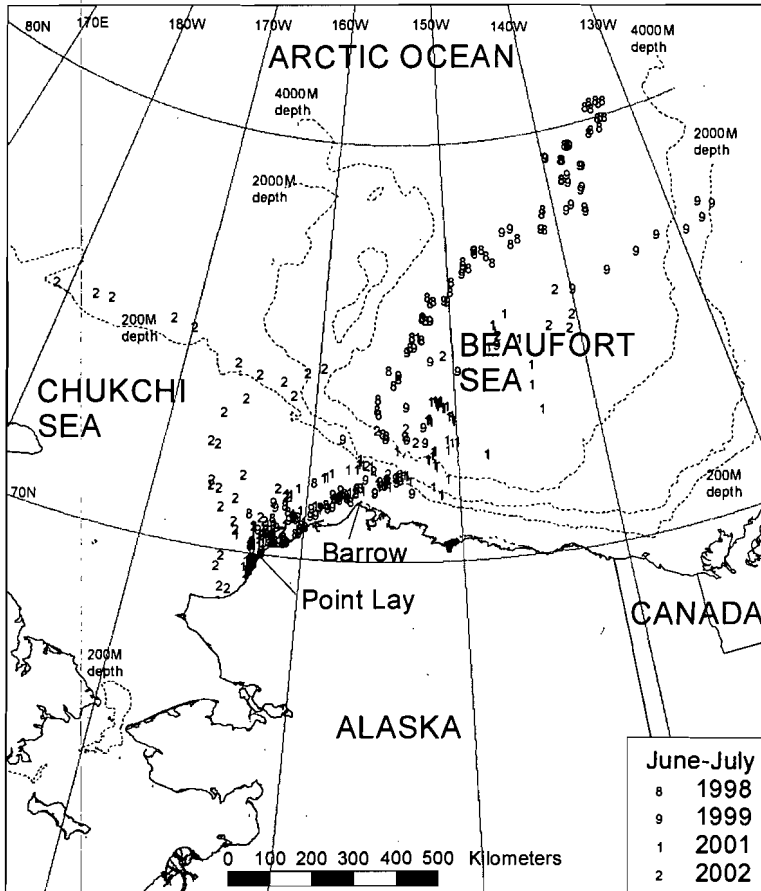
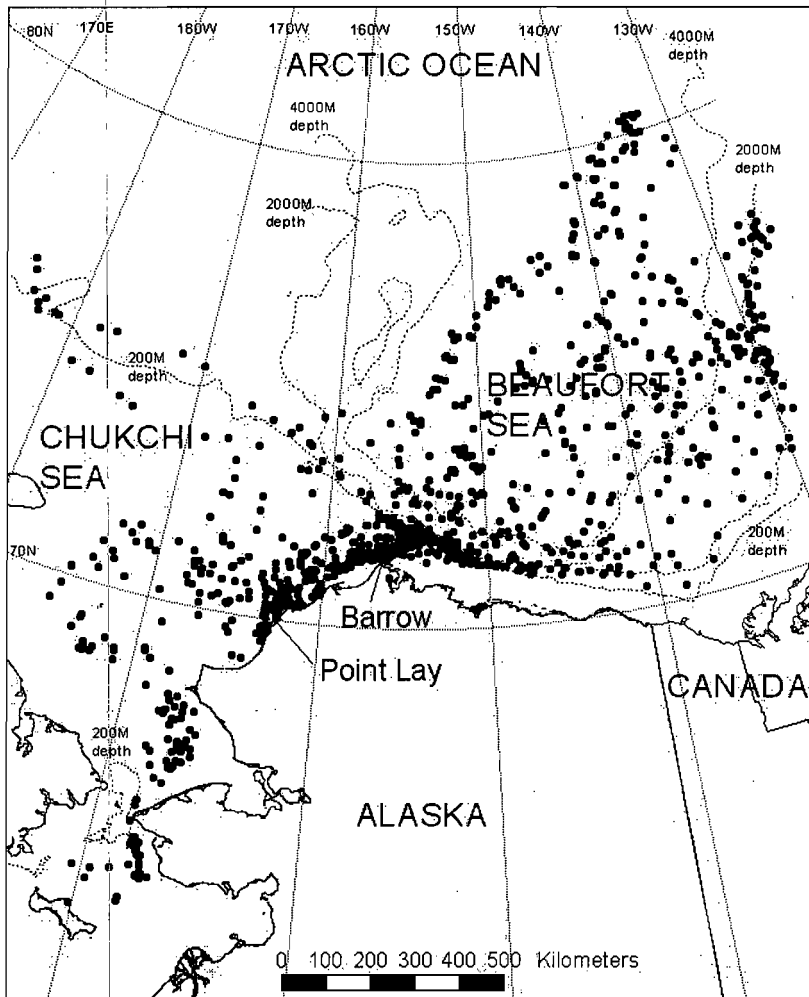


Figure 6. Locations of beluga whales satellite tagged at Point Lay, Alaska, in June and July 1998-2002.



Locations of beluga whales satellite tagged at Point Lay, Alaska 1998-2002.