

From [Sheldon Brower <arctic4inuk@msn.com>](mailto:arctic4inuk@msn.com)
Sent Friday, June 29, 2007 3:11 am
To PR1.ALASKAEIS@noaa.gov
Cc
Bcc
Subject Comments RE: PEIS Seismic in Beaufort and Chukchi Seas for Minerals Management Service, National Marine Fisheries Service, U.S. Fish and Wildlife Service

Mr. P. Michael Payne,
Chief of Permits, Conservation and Education Division,
Office of Protected Resources, NMFS,
1315 East-West Highway, Sliver Spring, MD 20910-3225.

Sheldon Kiasik Brower
Whaler, Hunter Of The Beaufort Sea
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PEIS Seismic in Beaufort and Chukchi Seas
Comments to the Minerals Management Service, National Marine Fisheries Service, U.S. Fish and Wildlife Service (June-July 2007)

June 28, 2007

To all concerned,

Please accept this letter on behalf of the comments regarding the PEIS Seismic in Beaufort and Chukchi Seas. As a whaler & of an Inupiaq that depends on the sea for our subsistence way of life, I am fully opposed to offshore oil develeopment in the Beaufort Sea. The value of our livihood is very much at stake & at risk for catastophy in an event of an oil spill. There is no proven way to safely clean up an oil spill & that would intensify in the Arctic Ocean. I just cannot see an oil covered ice flow cleaned easily. Especially with the elements we face such global warming impacts, unpredictable ice flow ridges & weather.

The seismic activities frighten the marine life that we depend on, causing them to go further off. Making us also go further to face the elements as well. To have to drag a bowhead whale back home through the ice flows or 20 miles off is time consuming & often spoils the whale meat by the time it is pulled in. Resulting in exhuasted whaling supplies for spoils of a whale & dog feed. The very things that ties our traditional & cultural activities are being compromised by oil development.

We are the people who depend upon the land, the air & the sea up here, we cannot depend on store bought foods all the time. The cost is just too high up on the North Slope for many of the basic nessecities. Relying on store bought processed foods is not a very healthy diet. As our people are already facing obesity, diabetes & other health ailments due to diet & lifestyle that that have been thrust upon us when we don't get enough natural foods we generally harvest. Relying on processed foods all winter also disrupts our financial situations. If we have work all winter to feed our families due to low harvest may in turn result in not being able to get the new items that we use to harvest our foods the next season.

So a large portion of our diet comes from what we get fom subsistence. Throughout the spring until fall we harvest what we can of ducks, seals, whales, & walrus to sustain us throughout the winter. I feel you are just taking our food off our table & making it harder for us to acquire our food plates. The cost of gas is already high as it is, that we have to exhaust our finances

further to go further to find our subsistence resources.

A large part of our livelihood is being compromised at the your & economies stake. We are the ones who suffers at the consequence of offshore development

Last year our summer subsistence harvest was unusually low, we didn't get very many fish or seals through out the summer into the fall. This resulted in us having to buy meat packs to sustain us through the winter. All the while we were seeing many marine vessels pass by. Canadian hunters to the East also reported low fish & beluga catches as well.

I have a son who is 8 years old & the day cannot come soon enough when he is old enough to go whaling. He understands the impacts in an event of an oil spill. He says he doesn't want oil here. He is afraid of an oil spill hurting the whales. Why? "Cause I like uunaliq". Which is freshly boiled bowhead muktuk. His reasons are simple.

As with many of us who are opposed to oil development, our reasons are simple but very valid reasons. Unfortunately for many of you who do not live here it's hard to make you understand where we are coming from. Many of you simply will never understand. But quite frankly all the oil & revenue is not worth what the land & the ocean holds for us who have depended on it for centuries. Its far more valuable than any profit. No deal No sale. I Oppose oil development in the Beaufort Sea.

Sincerely,

Sheldon Kiasik Brower

Whaler & Hunter Of the Beaufort Sea

From [Sheldon Brower <arctic4inuk@msn.com>](mailto:arctic4inuk@msn.com)
Sent Friday, June 29, 2007 3:51 am
To PR1.ALASKAEIS@noaa.gov
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Subject Comments Re: Seismic Beaufort and Chukchi Sea DEIS-to the Minerals Management Service, National Marine Fisheries Service, U.S. Fish and Wildlife Service

Mary Margaret Brower
P.O.Box 111
Kaktovik, Alaska 99747
Email: mary_margaretbrower@msn.com

June 28, 2007
To All Concerned,

Please accept this letter on my behalf, I am an Inupiaq that lives in Kaktovik. I am a mother, a provider to my family. I have a personal responsibility to provide for my family & my people. One of those personal responsibilities is my subsistence way of life which is being compromised by oil development. I oppose offshore oil development in the Beaufort Sea. Right now we are in the middle of spring harvest and the subsistence activities that sustain our culture. Across the Slope people are busy, for example cutting ugruk (bearded seal) which provides everything for whaling? skins for boats and meat for people. People are setting fishnets. The bowhead whales and beluga whales, walrus, polar bears, birds, fish and other marine mammals in the Chukchi and Beaufort Sea are essential for our way of life. We are concerned that so much seismic, drilling, barging, and other noisy industry activities taking place in the Chukchi and Beaufort will have significant adverse impacts on migrating marine mammals and on our subsistence resources and activities. There will be effects on animals in the ocean from oil spills, noise disturbance and other activities from the planned oil and gas seismic exploration surveys, oil drilling, and lease sales in our ocean and cumulative impacts with global warming. Therefore, we oppose offshore oil and gas leasing, exploration and development in the Chukchi and Beaufort Seas.

Programmatic Environmental Impact Statement; Seismic Surveys in the Beaufort and Chukchi Seas, Alaska (due 6/29/07).

Request: The cumulative impacts and other analysis needs to be expanded. No seismic surveys should be permitted in the Chukchi until better baseline information is available.

We have very serious concerns that the oil and gas industry's proposed seismic activities will have significant impacts to marine life and Native communities and adverse impact on the availability of the marine mammals for subsistence use by Alaska Natives.

The bowhead, Pacific Right, and beluga whales, marine mammals, and fish that we subsist upon depend on sound to navigate, find food, locate mates, avoid predators and communicate with each other. The proposed seismic surveys will harm this. There needs to be better analysis of important subsistence resources including bowhead, beluga, and walrus, and the EIS should include information from the monitoring reports of last year.

We are concerned that EPA has found that the EIS is not adequate.

The Subsistence Harvest, Sociocultural Systems, and Environmental Justice Significance Thresholds Are Inappropriate and ignore major impacts there would be on our people

This DPEIS must adequately analyze the alternatives for adverse impacts to subsistence, rather than relying on the MMPA IHA process to consider no unmitigable adverse impact.

The DPEIS fails to adequately address human health impacts; the DPEIS must analyze whether the use of vessel-based marine mammal observers is an effective mitigation strategy.

This EIS needs to be finalized before any seismic survey permits, IHAs or LOAs should be considered for the Beaufort and Chukchi Seas.

Proposed polar bear and walrus incidental take regulations for Chukchi Sea, draft Environmental Assessment, and proposed IHAs for 2007 open-water seismic exploration (due 7/2/07).

Request: Please do a full EIS on the proposed regulations. Please do not issue an IHA until this full review is complete and regulations finalized.

We are worried because in Point Hope no walrus were harvested last year and people reported dead sea life washing onshore.

Adequate baseline information on polar bear and walrus populations and effects of sea ice loss and other impacts of climate change is needed prior to finishing draft regulations.

This is a major action that will have significant impacts on our subsistence resources.

For the proposed Shell Oil 2007 exploration activities, there has been insufficient consultation with potentially affected Alaskan Native communities and user groups specifically addressing issues related to walrus and polar bears.

FWS must analyze whether the use of vessel-based marine mammal observers is an effective mitigation strategy; and more specific monitoring requirements are needed.

It is not right to rush the process and issue an IHA prior to completing the regulations and NEPA review.

Small takes of Marine Mammals incidental to Seismic Surveys in the Beaufort and Chukchi Seas -- Shell's summer 2007 open-water seismic work (due 7/9/07).

Request: Deny Shell's request for an incidental harassment authorization.

There is a lack of information from Shell about the number of animals likely to be harassed (taken), impacts to bowhead and beluga whales and subsistence resources and access would be significant.

Effects on walrus and polar bears and subsistence uses of these resources have not yet been sufficiently analyzed.

There is lack of consideration of impacts on subsistence harvest, culture, and human health impacts.

The Programmatic EIS needs to be finalized before any seismic survey permits or IHAs should be considered for the Beaufort and Chukchi Seas.

Chukchi Sea Oil and Gas Lease Sale 193 and Seismic Surveying

Activities in the Chukchi Sea Final Environmental Impact Statement (due 7/16/07)

Request: Please do not offer Chukchi in a lease sale (Support Alt. II, Cancel Sale 193).

Please cancel all 3 Chukchi Sea sales in the Five-Year Plan.

The Chukchi is one of the most productive areas of the Arctic Ocean and provides important habitat for many species of marine mammals, birds and fish that are critical to many Alaska Native subsistence users.

We have relied on its resources for thousands of years and oil spill and noise disturbance risks are too high.

The Chukchi is far from existing infrastructure, and it would present many ice hazards and technological challenges that threaten our land and ocean animals and harvests.

The EIS does not provide much information about fish and marine mammal species, cumulative impacts, climate change, or the impacts of seismic surveys or mitigation measures.

Thank you for taking the time to review this.

Sincerely,

Mary Margaret Brower

From [Rosemary Ahtuanguaruak <rahtuanguaruak@astacalaska.net>](mailto:rahtuanguaruak@astacalaska.net)

Sent Friday, June 29, 2007 1:29 pm

To "PR1.ALASKAEIS@noaa.gov" <PR1.ALASKAEIS@noaa.gov>

Cc

Bcc

Subject Beaufort and Chukchi Sea Lease Seismic Plan

The proposed sale is detrimental to our traditional and cultural activities of the area. We are at risk for our activities with the proposed plan. We are in our busy subsistence harvest times and we are undercut with concerns for the proposed sale. We can't help but wonder with the plan when will the "big one" happen like it did in Valdez.

Our culture has sustained us with our lifestyle and now we face changes being brought to us that goes against our traditions and culture. We teach our children from infancy the importance of protecting our future generations by working hard to harvest the many animals we depend on for sustenance. The ugruk, walrus, polar bears, birds, fish and other marine mammals are essential to us and our way of life.

The seismic, drilling, barging, and other industrial noises from equipment and personnel will have significant adverse impacts on the animals in the Chukchi and Beaufort Seas which we are depended upon for our subsistence resources and activities. The risk to the animals from oil spills, noise disturbance and other activities from the plan are in our ocean, and create our cumulative impacts and contribute to global warming affecting our daily lives.

The proposed plan is opposed.

The Draft Programmatic Environmental Impact Statement: Seismic Surveys in the Beaufort and Chukchi Seas is not good enough. There needs to be major improvements to the cumulative impacts and other analysis needs to be expanded. Better baseline information is needed before seismic surveys are permitted.

The plan gives us very serious concerns that the activities will have impacts to the marine life and rebound to us in our communities and adverse impacts have already caused us impacts risking the availability of the animals for subsistence for us and future generations.

The plan exposes animals to noise that is different then the way they use sound for navigation, finding food, locate mates, avoid predators and communicate with out understanding how it effects them. There needs to be better analysis before the harm is shown to us with loss of resources, harm to animals and our subsistence including the bowhead, beluga, and walrus and should include information from monitoring reports of last year.

We are concerned with the laxicity of the group effort with the push to get this sale out there and EPA finding the EIS not adequate. We are very concerned with the ignoring of major impacts to our people with the inappropriate thresholds to the subsistence harvest, sociocultural Systems and Environmental Justice Significant Thresholds.

The process for the DPEIS is to get adequate analysis of the alternatives for adverse impacts not using the MMPA IHA process to consider no unmitigable adverse impacts. Why are shortcuts allowed to increase the impacts to us when the process is to allow a review of alternatives to come up with the best possible way?

We have expressed increasing concerns to adverse health situations with increases to asthma and upper respiratory issues. We are concerned that the DPEIS fails to adequately address the human health impacts and lack of analysis of whether the use of vessel based marine mammal observers is the most effective mitigation strategy. We are cut short with this process because the information is not included for the public in the area to comment effectively in the decision process. We are cut short for working with the decision makers lacking adequate information to make informed decisions. The EIS needs to be finalized before any activities for survey permits, IHA or LOAs are considered in the Beaufort and Chukchi Seas.