

MARINE MAMMAL COMMISSION
4340 East-West Highway, Room 700
Bethesda, MD 20814-4447

7 July 2008

Cleve Cowles, Ph.D.
Regional Supervisor
Office of Leasing and Environment
Minerals Management Service
Alaska OCS Region
3801 Centerpoint Drive, # 500
Anchorage, Alaska 99503-5820

RE: Comments on the Notice of Intent for Proposed Sale 214

Dear Dr. Cowles:

The Marine Mammal Commission, in consultation with its Committee of Scientific Advisors on Marine Mammals, has reviewed the Minerals Management Service's 8 April 2008 notice of intent to prepare an environmental impact statement for sale 214 in the North Aleutian Basin (73 Fed. Reg. 19095). The Commission does not usually comment on notices of intent, but the North Aleutian Basin encompasses a good portion of the southeastern Bering Sea, which is one of the most productive areas of the world's oceans. This region supports the world's largest single-species fishery (pollock) and is prime habitat for a diverse assemblage of marine mammals and birds. It also supports a number of Alaska Native communities that depend on hunting and fishing for subsistence. If oil and gas resources in the area are to be exploited, then exploration and development will require extraordinary care to protect the health and stability of the affected marine ecosystem.

To achieve its purpose, the National Environmental Policy Act and associated regulations require that the proposed environmental impact statement describe and analyze the affected environment (including its physical, biological, and ecological aspects), the nature of the proposed action (including the methods that will be used to explore for, exploit, and transport oil and gas from the affected environment) and supporting activities (e.g., construction activities and vessels, support vessels, vessels to transport supplies and crews, helicopter support), the individual and cumulative risks associated with the proposed and related actions, and the measures to prevent, minimize, mitigate, or otherwise respond to those risks. Analyses of cumulative effects must take into account other human activities in the area including fishing, commercial shipping, and military operations. To be realistic and accurate, these analyses should include—to the extent possible—the expected physical, biological/ecological, and human-related effects of climate change.

The Physical Environment

The physical aspects of the North Aleutian Basin will present considerable challenges to oil and gas operations. The basin includes an area of shallow waters, moderate and seasonally variable currents, cold winters, and occasional sea ice, none of which appears to be unmanageable with current technology. However, the action area also is known for its severe storms and sea surface conditions, which will pose a significant hazard for oil and gas infrastructure, including platforms,

vessels, and pipelines. Furthermore, the Aleutian Islands region is subject to considerable seismic activity, which will require planning and preventative measures to ensure that the associated infrastructure will withstand expected activity. A comprehensive description of the physical environment is necessary for anticipating risk factors (natural and development-related), designing infrastructure, projecting the fate of spilled oil, and developing prevention and response measures.

The Biological/Ecological Environment

Wind-driven mixing over the shallow continental shelf results in the suspension of nutrients in the water column and a high level of primary and secondary productivity. This productivity provides the basis for the complex food web of the Bering Sea, including well-described mid and upper trophic levels of groundfish (e.g., pollock, Pacific cod, Atka mackerel, various flatfish, sablefish, various rockfish, herring, anchovy, sandlance), anadromous fish (e.g., chum, sockeye, chinook, coho salmon), pelagic and benthic invertebrates (e.g., squid, king crab, tanner crab, a variety of mollusks), marine mammals (e.g., Steller sea lions, northern fur seals, harbor seals, spotted seals, sea otters, walruses, fin whales, humpback whales, North Pacific right whales, gray whales, beluga whales, killer whales, Pacific white-sided dolphins, Dall's porpoises, harbor porpoises), seabirds (e.g., albatrosses, shearwaters, fulmars, storm petrels, cormorants, pelagic gulls, kittiwakes, murrelets, guillemots, auklets, murrelets, puffins), migrating waterfowl (e.g., ducks, geese, swans, eiders), shorebirds (e.g., turnstones, godwits, curlews, plovers, dowitchers, sandpipers), and other birds (e.g., eagles, falcons, cranes, buntings, terns). A large number of these species concentrate in the southeastern Bering Sea during a part of their annual cycles and could be particularly vulnerable to the effects of oil and gas development. Some have been listed as endangered or threatened under the Endangered Species Act or designated as depleted under the Marine Mammal Protection Act and may be at heightened risk if oil and gas operations add significantly to the risks from other factors (e.g., fishing).

Risk Associated with Oil and Gas Operations

The major risk factors associated with oil and gas development in this region will involve (1) generation of noise during seismic studies, construction, and general operations, (2) collisions between oil and gas-related vessel traffic and marine mammals, (3) risks of oil spills and leaks, and (4) habitat degradation related to contamination. These risks will be a function of the geographical extent and frequency of seismic studies, the amount and location of construction and drilling operations, the types and extent of transport systems, the adequacy of prevention measures and response capabilities, the severity of environmental conditions, and the ability to avoid simple human error.

Other Risk Factors and Cumulative Effects

Additional human-related environmental risk factors in this area not directly related to oil and gas exploration, development, and production include fisheries, commercial shipping, and climate change. The effects of fishing are still a matter of considerable contention but may affect the biological/ecological environment through both direct (e.g., bycatch) and indirect (e.g., competition)

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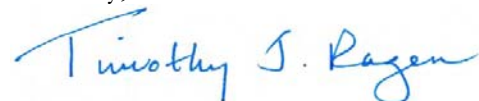
interactions. Commercial shipping, which is likely to increase over time—perhaps dramatically with the opening of the Northwest Passage—poses risks related to noise, disturbance, ship strikes, and contamination from vessel accidents or discharges. The expected route from the Bering Strait to the western coast of North America would not take ships directly through the North Aleutian Basin, but their routes would be relatively close. However, oil and gas ships from the basin, fishing vessels, and commercial ships in the area all will likely funnel through Unimak Pass. The pass is relatively shallow with swift tidal currents and often must be navigated under conditions of poor visibility from fog and bad weather. Climate change likely will alter the physical, biological, and chemical environment, perhaps dramatically, during the lifetime of any oil and gas efforts in this region. Perhaps the most severe changes to be anticipated would be an increase in the frequency and severity of storm events that, as noted earlier, are already known for their severity in this region. Such an increase has been predicted for a great many areas and may already be evident in some (e.g., the western Atlantic). Other human activities likely will expand in this region secondary to climate change (e.g., tourism, coastal development) or human population growth and expansion.

Consultation

In addition to setting forth the requirements of an environmental impact statement, the National Environmental Policy Act also requires that “[p]rior to making any detailed statement, the responsible Federal official shall consult with and obtain the comments of any Federal agency which has jurisdiction by law or special expertise with respect to any environmental impact involved.” The Marine Mammal Commission has such expertise pertaining to marine mammals and their habitat, both of which will almost certainly be affected by the planned activity. Therefore, to achieve the purpose and satisfy the requirements of the National Environmental Policy Act, the Marine Mammal Commission requests that the Service and Commission meet to discuss how we might consult during the development of the environmental impact statement. Although we normally have limited resources to devote to such discussions, we believe that an exception is warranted in this case because the North Aleutian Basin encompasses an area of particular importance to marine mammals and a marine ecosystem of national and international biological and ecological significance.

Please contact me at your convenience to discuss how we might usefully carry out such a consultation.

Sincerely,



Timothy J. Ragen, Ph.D.
Executive Director