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November 12, 2000

Chief, Marine Mammal Division
Office of Protected Resources
National Marine Fisheries Service
1315 East-West Highway
Silver Springs, MD 20910

Re: Federal Actions Associated with Management and Recovery of
Cook Inlet Beluga Whales
Draft Environmental Impact Statement

Dear Sir or Madam:

I am writing this letter to provide my comments on the Draft Environmental Impact Statement (DEIS) for Federal Actions Associated With Management and Recovery of Cook Inlet Beluga Whales. My comments are based on my own personal knowledge and observations of Cook Inlet beluga whales as well as my review of the DEIS. I am a lifetime Alaskan and have over 30 years of professional experience in environmental and engineering issues throughout the State of Alaska. I have also worked on projects specifically within Cook Inlet since the early 1970's (including my Master's Thesis on oceanographic conditions in upper Cook Inlet).

I have the following specific comments with regards to the DEIS and the Cook Inlet beluga whales:

1. I concur with the DEIS that there has been a documented decline in the Cook Inlet beluga whale population in recent years. It appears quite obvious that the decline is a direct result of past subsistence harvests of this population. Based on the analysis presented in the DEIS, it could be concluded that subsistence harvests could account entirely for the observed decline in population.

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2. Information presented in the DEIS suggest that other natural and man-induced factors may have resulted in mortalities of the Cook Inlet beluga whales. These include:
 - Strandings,
 - Predation by killer whales, and
 - Entanglement in gill nets.

It is apparent that the impacts from these factors are minor when compared to those resulting from subsistence harvests.

3. Based on the DEIS information, one could reasonably conclude that there are some man-induced activities that have resulted in disruption of beluga whales. The most notable activity appears to be noises from high speed, erratic operations of outboard motors that are commonly associated with subsistence harvest activities.
4. The DEIS addressed a number of man-induced activities for possible adverse effects, but there were no demonstrated or documented adverse impact that have occurred in Cook Inlet as a result of the activities. These activities included:
 - Oil and Gas Development including oil spills, produced water discharges, drilling mud and cuttings discharges, heavy metals and organic compounds, noise from offshore drilling and production operations, and noise from geophysical operations.
 - Commercial/subsistence fishing, except as identified in Item 2 above.
 - Vessel/boat operations and shipping, except as identified in Item 3 above.
 - Noise from air traffic operations.
 - Municipal waste discharges and urban runoff.
 - Tourism activities.

The lack of demonstrated adverse impacts from these operations seems to also be supported by observations of beluga behavior in other areas of the world.

5. The lack of prey does not appear to be a factor in the decline of the Cook Inlet beluga whales; and associated further regulation or restrictions on Cook Inlet commercial, subsistence or recreational fisheries does not seem appropriate.

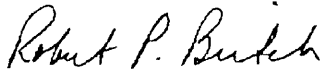
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6. Based on the information presented in the DEIS, I would support implementation of the Preferred Alternative (Alternative 4). I would concur with the National Marine Fisheries Service (NMFS) that implementation of more restrictive alternatives (Alternative 1, 2, or 3) is probably not appropriate at this time; instead these alternatives should be considered only if the population decline is not halted by implementation of Alternative 4. Implementation of the No Action Alternative (Alternative 5) would appear at face value to be an irresponsible management approach that could lead only to a further decline in the population of Cook Inlet beluga whales.

7. It clearly does not appear to be appropriate to impose more stringent restrictions on the Cook Inlet beluga whale, such as protection under the Endangered Species Act (ESA), based on the DEIS information and above comments. The problem has been identified, and there are defensible methods proposed to remedy this situation. I agree with the NMFS position that protection of the Cook Inlet beluga whale as a Depleted Stock under the Marine Mammal Protection Act (MMPA). I would also agree that implementation of Alternative 4 would likely result in no "significant" impacts. I believe that implementation of Alternative 5 would lead to the continued decline of the population, eventual listing under the ESA, and subsequent significant and adverse impacts for all coastal communities and industry operations in Cook Inlet.

In summary, I agree with the DEIS and also recommend implementation of the Preferred Alternative (Alternative 4).

Sincerely,



Robert P. Britch, P.E.
President

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