



KENAI PENINSULA BOROUGH

Coastal Management Program

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**JOHN J. WILLIAMS
BOROUGH MAYOR**

February 5, 2007

Mr. Ben A. Greene, PhD.
Alaska Coastal Management Program
Office of Project Management and Permitting
550 West 7th Avenue, Suite 1660
Anchorage, Alaska 99501

Subject: Chevron/UOCC Granite Point Onshore/Offshore 3D Seismic Survey,
AK 2007- 0104

Dear Mr. Greene:

Kenai Peninsula Borough (KPB) Coastal District staff reviewed the above referenced project for consistency with KPB Coastal Management Program enforceable policies. The District proposes to object to the above referenced project and provide alternative measures that will enable the project to become consistent with borough enforceable policies.

Project Location

The proposed seismic survey is located within a 39 square mile area, in various onshore and offshore sections of T. 10 & 11 N., R. 11 & 12 W., Seward Meridian, in western Cook Inlet, near Old Tyonek, Alaska. Offshore activities proposed by UOCC encompass a 28.2 km² (10.9 mi²) area in northwestern Cook Inlet, paralleling the shoreline of Granite Point, extending from shore into the inlet to an average of about 1.6 km (1 mile). The approximate boundaries of the region of the proposed project area are 61° 00.827'N, 151° 24.071'W; 61° 02.420'N, 151° 15.375'W; 61° 00.862'N, 151° 15.313'W; and 61° 57.979'N, 151° 23.946'W. There are no major rivers flowing in the open water seismic project area. Water depths range from 0 to 18 m (60 ft).

Project Description and Scope

Chevron/Union Oil Company of California (UOCC) proposes to acquire seismic data during spring 2007 from the onshore/offshore transition zone around Granite Point in Upper Cook Inlet on lands managed by the State, Native Corporation and Private ownership. UOCC would conduct an ocean bottom-cable seismic (OBC) survey immediately offshore and northwest of

Granite Point. The offshore portion of the operation would be confined to a single 28.2 km² (10.9 mi²) block bordering the shoreline, extending to a water depth of 18 m (60 ft). Offshore operations would involve a 900 cu in BOLT airgun array with two sub-arrays of 3,225 cu in guns and 3,75 cu in guns. The seismic operation would be active 24 hours per day, but the airguns would only be active for 1-2 hours during each of the 3-4 slack tide periods. Vessels will lay and retrieve cable on the bottom between periods of acquiring seismic data. The seismic vessel currently planned for use is the *M/V Peregrine Falcon*, supported by 3-4 bow pickers. The project is anticipated to require 30 days, starting as early as 1 May and ending no later than 15 June depending on the completion date of ConocoPhillips Beluga River seismic program and weather conditions. The proposed Granite Point seismic operation would be conducted immediately after ConocoPhillips completes its Beluga River seismic survey, as the same vessels and equipment would be used.

Scope of the Project under Review

The present review will determine if those proposed activities requiring the issuance of State of Alaska Geophysical Exploration Permit; Temporary Water Use Permit; and Title 41 Anadromous Fish Habitat Permit(s) would be consistent with the statewide standards of the Alaska Coastal Management Program at 11 AAC 112.200 - 11 AAC 112.990 and the enforceable policies of the Kenai Peninsula Borough Coastal Management District. Note that issuance of Temporary Water Use Permit(s) covering Water use for ice-road /pad/air-strip construction would be authorized via GCD-8, and are thus outside of the scope of this ACMP review.

Findings

Kenai Peninsula Borough Coastal Management Program (KPBCMP) enforceable policy 5.9(a)(b)(c), Geophysical Surveys, requires that geophysical surveys will, to the extent feasible and prudent, be located, designed and conducted in a manner so that fish and wildlife populations, habitats and harvests will not be disturbed. Vessels engaged in offshore geophysical exploration will conduct their operations to avoid significant interference with commercial fishing activities. Survey methods allowable are airguns, gas exploders or other sources that have been demonstrated to be harmless to fish and wildlife.

With regard to this policy the applicant's evaluation of this policy relative to the work planned states,

“there should not be seismic operations conducted in marine waters of Cook Inlet during regularly scheduled or emergency commercial fishery. For seismic operations between May 15 and September 15 UOCC will provide timely written notification to a list of fishing organizations provided by the Kenai Peninsula Borough to apprise commercial fishing interests of the conduct of the seismic activities prior to beginning the activities.”

Simply notifying fishing organizations of the conduct of seismic activity is not sufficient to meet the intent of this policy.

Because commercial fishing begins in the area UOCC intends to survey on May 25, 2007 for a single 12-hour day until June 15, 2007 when the regular season begins and runs through the summer and into fall, as an alternative measure the applicant should be required to limit seismic activities to those days commercial fishing is not permitted. Once having identified these dates and coordinating seismic work accordingly, the applicant's activity will be consistent the commercial fishing aspect of this policy.

Subsistence fishing activities occur in the area during the time the applicant intends to conduct seismic surveying. As an alternative measure, in order to be consistent with this policy, the applicant must show that subsistence users have been contacted and based on those contacts the applicant has negotiated periods of time during which the conduct of seismic activities will not adversely effect subsistence harvest activities.

Another alternative measure that the applicant may adopt to be consistent with this policy is to conduct seismic activities before or after commercial and subsistence harvesting season in the area.

Thank you for the opportunity to comment.

Sincerely,



Gary Williams

Kenai Peninsula Borough
Coastal District Coordinator