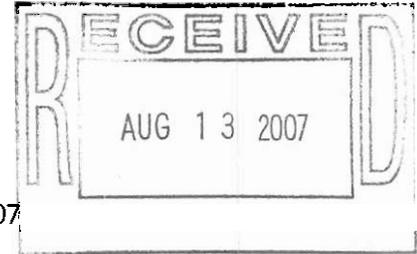


Maniilaq Association

P.O. Box 256
Kotzebue, Alaska 99752
(907) 442-3311



July 30, 2007

Mr. Michael Payne
Chief, Permits, Conservation and Education Division
Protected Resources
National Marine Fisheries Service
1315 East-West Highway
Silver Spring, MD 20910-3225
Pr1.alaskaeis@noaa.gov

Re: Draft EIS Seismic Surveys in the Beaufort & Chukchi Seas

Dear Mr. Payne:

Maniilaq Association, a regional non-profit tribal organization serving the Northwest Alaska submits the following comments on the above Draft PEIS. We are seriously concerned about the risks posed to the important subsistence marine and coastal environments from the proposed oil and gas activities in the Chukchi and Beaufort seas. We are not only concerned about the coastal communities adjacent to the proposed lease areas but to other communities that will be impacted if the subsistence resources that migrate from their area into the lease area are adversely impacted by the proposed activities.

1. Minerals Management Service uses old data in analyzing the potential impacts from the seismic activity and the estimates of seals, walrus whales and polar bears are based dated information.
2. Particularly troubling is the lack of addressing the cumulative impacts from the proposed activity and effects to the species from climate change. Mitigating measures proposed in the plan cannot be depended on unless there is better baseline data.
3. Research has shown that seismic noise can be particularly harmful to many marine mammals and fish species and will also cause behavioral changes which will cause harm to the species. NMFS and MMS should encourage and require the industry to develop techniques for exploration that are less harmful to the marine environment. Without such incentive the industry will continue to use current techniques which will cause "serious concern" to bowhead whales according to the International Whaling Commission Scientific Committee.
4. There is little or no concern on the impact or effects on the Pacific walrus, which are already stressed from the effects of diminishing ice. MMS fails to consider the possibility "all reasonably foreseeable" impact and therefore must conduct a more thorough analysis of impacts from seismic surveys.
5. Impacts must not be solely limited to seismic surveys but also from increased vessel traffic, helicopters, fuel vessels, and associated support vessels. Potential or risks from fuel spills needs to be more adequately spelled out and what mitigating measures the industry is taking to respond to such risks.

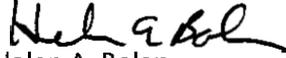
Member Villages

Ivisaappaat, Nunatchiaq, Ipnatchiaq, Katyaak, Kivaliniq, Laugviik, Qikiqtagrak, Nautaaq, Nuuroik, Akuligaq, Isinnaq, Tikigaq, Ambler, Buckland, Deering, Kiana, Kivalina, Kobuk, Kotzebue, Noatak, Noorvik, Selawik, Shungnak, Pt. Hope

6. No public hearings were held in the Northwest Alaska area and therefore fails to meet the "Environmental Justice" required for input from the disadvantaged or affected people.

We strongly suggest that PEIS is inadequate and more documentation and time for public hearing is necessary.

Sincerely,



Helen A. Bolen

President/CEO

Maniilaq Association



Jackie M. Hill
Administrator
Tribal Government Services