

United States Senate
WASHINGTON, DC 20510

July 21, 2017

The Honorable Wilbur Ross
Secretary
Department of Commerce
1401 Constitution Ave., NW
Washington, DC 20230

Dear Secretary Ross,

We write to oppose the issuance of five Incidental Harassment Authorization (IHA) permits that are under consideration by the National Oceanic and Atmospheric Administration for companies planning to conduct seismic surveys in the Atlantic along the outer continental shelf (OCS).

Our opposition reflects the profound concern of our coastal communities to the use of seismic testing air guns and their unanimous opposition to it, as reflected in city council resolutions from the Delaware communities of Bethany Beach, Dewey Beach, Fenwick Island, Lewes, Milton, Rehoboth Beach and South Bethany. Their opposition has been amplified by a letter sent by over 40 state and local elected officials from Delaware to the Department of the Interior in August 2016 in opposition to proposed seismic surveys. Elected officials from coastal communities throughout the Atlantic seaboard have added their voices to this chorus of concern.

Their concerns are well-founded. While offshore oil and gas development could present economic benefit in selected areas along the coast, these areas are already the beneficiaries of greater economic benefits derived from and contingent on a healthy, vital and sustainable ocean environment off their shores. Clean coastal waters and the ocean ecosystems they support draw millions of coastal visitors and billions of dollars invested in coastal recreation and coastal communities. These communities do not take lightly the prospect of compromising those values, which, with care, will continue to support these communities.

We also find it very difficult to understand the drive to conduct these surveys when offshore drilling is not currently permitted along the Atlantic Coast as the current OCS 5-year oil and gas leasing program prohibits such development.

In addition to the concerns outlined above, we oppose the issuance of these IHA permits because the science on the impacts of the air-gun technology used to conduct seismic surveys is increasingly concerning. Recent assessments show that the North Atlantic right whale (*Eubalaena glacialis*), one of the most endangered large whales in the world, is in decline.¹

¹ Pettis, H.M. and Hamilton, P.K. 2016. North Atlantic Right Whale Consortium annual report card. Report to the North Atlantic Right Whale Consortium, November 2016.

Evidence shows that these whales are more sensitive to noise than previously understood. One study demonstrates that the exposure threshold assumed by the National Marine Fishery Service (NMFS) to cause behavior disruption amongst right whales may be as much as six orders of magnitude too high, based on recent research on bowhead whales (a close relative of right whales).²

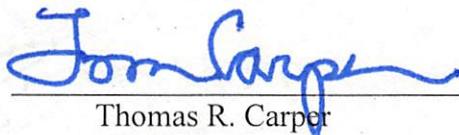
The science is also showing that humpback whale mother-calf pairs are likely to be more sensitive to noise sources than previously understood due to their use of very quiet signals to mediate reunions and nursing behavior.³ Researchers have this same concern for right whale mother-calf pairs.

This evidence is all relevant because the right whale population of only 500 or so individuals, beset by other stressors like entanglement in fishing gear and vessel strikes and highly dependent on sound to communicate and coordinate critical behavior amongst individuals, may lack the resilience to respond to extra stress from seismic air-gun surveys.

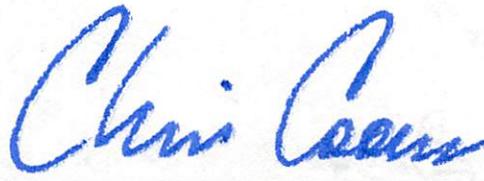
Perhaps most concerning is very recent evidence that seismic survey operations have substantial impacts on plankton (notably zooplankton) community structure and abundance. The authors of this study suggest that the effects of these operations have “enormous ramifications for larval recruitment processes, all higher order predators and ocean health in general.”⁴ Zooplankton, including krill larvae and copepods, feed countless species of fish and are the primary source of food for right whales. Copepods in particular are also at risk from increasing acidification of ocean waters, thus amplifying the negative implications of widespread and repetitive seismic survey activity along the Atlantic Coast.

All these studies point to a direct and deeply concerning negative impact on marine mammals and the marine ecosystems that support them, and consequent harm to Delaware’s economic and environmental interests. Thus, we urge you not to issue permits to companies seeking to conduct seismic surveys along the Atlantic Coast.

Sincerely,



Thomas R. Carper
U.S. Senator



Christopher A. Coons
U.S. Senator

² Blackwell S. B. *et al.* Effects of Airgun Sounds on Bowhead Whale Calling Rates: Evidence for Two Behavioral Thresholds. *PLoS ONE* 10(6): e0125720. doi:10.1371/journal.pone.0125720 (2015).

³ Videsen, S. K. A. *et al.* High suckling rates and acoustic crypsis of humpback whale neonates maximise potential for mother–calf energy transfer. *Functional Ecology* doi: 10.1111/1365-2435.12871 (2017).

⁴ McCauley, R. D. *et al.* Widely used marine seismic survey air gun operations negatively impact zooplankton. *Nat. Ecol. Evol.* 1, 0195 (2017).