

Robert Edwardson,  
Regional Manager  
Department of Natural Resources  
Division of Mining Land & Water  
Southeast Regional Land Office  
P.O. Box 111020  
Juneau, AK 99811-1020

RE: Project Name LAS 30209, Allen Marine Tours, Inc.

June 3, 2015

Dear Mr. Edwardson,

It is imperative for Alaska Natives to continue our ancient marine mammal hunting practices. It provides us with the nutritional needs that keep us healthy and spiritually strong. Harbor seals play a crucial role in the culture and diet of many Alaska Natives. The seal oil and meat provide high amounts of iron and other important nutrients. According to current research, the seal's blubber contains elements that act as antibiotics and antioxidants in the human body. Studies indicate that vessel presence and/or approach can cause frequent flushing of seals from ice floes, separation of mothers and pups, and prolonged exposure in cold water which can have energetic consequences for pups.

The ANHSC also supports the findings and publication of Jansen, J. K., J. L. Bengtson, P. L. Boveng, S. P. Dahle, and J. Ver Hoef. 2006. Disturbance of harbor seals by cruise ships in Disenchantment Bay, Alaska: an investigation at three spatial and temporal scales. *AFSC Processed Report 2006-02. 75 p. Alaska Fisheries Science Center, National Marine Fisheries Service, NOAA, Seattle, Washington, USA.*

We strongly oppose issuing a permit to Allen Marine Tours for anchoring a 140' landing craft to serve as a base of operations for hovercraft tours to Taku Glacier. Fjords such as Tracy Arm is an important habitat for harbor seals which extensively use the fjord from May – September for giving birth, caring for young and molting. Summer activities are critical needs of harbor seals that require undisturbed time at haulouts to rest and conserve energy. Many harbor seals migrate seasonally to the face of glaciers in Alaska to have their pups. The ice floes provide floating platforms for the nursing mother seals and their pups, and offer two big advantages over hauling out on shore. Land-based haulouts can leave seals vulnerable to terrestrial predators, and often submerge at high tide. Seals that can safely float on ice for the three-week nursing period can nurse uninterrupted and better attend to their pups.

Hovercraft are extremely loud and noisy. Operations over the tidal flats will be apparent to the seals causing a substantial source of further stress and disturbance. Tourism activities associated with the landing craft can disturb seals at land haulouts, provide access to protected habitats near the glacier and will have a high probability of causing disturbance to the seals and other wildlife. This activity should not be supported by the issuance of the requested permit.

Respectfully,

Joni Bryant,  
CEO/Executive Director