



## ☒ North Carolina Wildlife Resources Commission ☒

Gordon Myers, Executive Director

### MEMORANDUM

**TO:** Daniel Govoni, Federal Consistency Coordinator  
Division of Coastal Management  
North Carolina Department of Environmental Quality

**FROM:** Maria T. Dunn, Coastal Region Coordinator  
Habitat Conservation Division

**DATE:** May 24, 2019

**SUBJECT:** Consistency Submission WesternGeco Seismic Survey, North Carolina Coast.

Biologists with the North Carolina Wildlife Resources Commission (NCWRC) reviewed the consistency determination with regard to impacts on fish and wildlife resources. Our comments are provided in accordance with provisions of the Coastal Area Management Act (G.S. 113A-100 through 113A-128), as amended, and the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.).

WesternGeco proposes to conduct two-dimensional (2D) seismic exploration activities in the Mid- and South Atlantic Outer Continental Shelf (OCS) Area of Interest (AOI) managed by the Bureau of Ocean Energy Management (BOEM). The proposed 2D survey area within the scope of the North Carolina consistency review is geographically located from approximately 34°N to 36.5°N and from 72.5°W to 77°W. North Carolina has identified the following areas as South Atlantic Fishery Management Council designated HAPCs: The Point; Ten Fathom Ledge; Big Rock; and the shoals of Cape Lookout, Cape Fear, and Cape Hatteras. One seismic vessel is proposed for this 2D survey. This vessel will tow a seismic source array and a single 10.5 km long streamer. The seismic vessel will be accompanied by two smaller chase vessels and a supply vessel. The purpose of the chase vessels is to keep vigil and ensure the safety of the streamer, by warning and keeping nearby vessels away from the vicinity of the streamer. The two chase vessels may also help to transport field personnel to and from shore, and to tow the seismic vessel in case of emergency due to engine power loss. The chase and supply vessels will make periodic port calls. The exact port(s) used will be determined in coordination with East Coast state authorities. Exact survey timing is unknown due to regulatory review processes and market interest.

The NCWRC has reviewed the information provided in the proposal and is concerned there is insufficient information to determine the impacts the project may have on aquatic and wildlife resources under the purview of the NCWRC. While we defer comments with regard to marine resources and marine fishery related tourism to the NC Division of Marine Fisheries, we have concerns that expand outside the area of

marine fisheries. The expansive area within the proposal, the level of activity, the lack of specified minimization measures, and the unknown project timing may have impacts on these resources. Fish species that are within the project area but travel into estuarine and inland waters of North Carolina include the Atlantic sturgeon, shortnose sturgeon, blueback herring, American shad, hickory shad, striped bass and American eel. Numerous species of sea turtles also nest on North Carolina beaches and migrate through the waters of the seismic exploration area. These species include Kemp's ridley, hawksbill, leatherback, loggerhead, and green sea turtles. In addition to fishery and sea turtle resources, several avian species should also be addressed. Seabirds considered should include open water species such as northern gannet, common loon, red-throated loon and horned grebe as well as sea ducks such as scoters, scaups, and red-breasted mergansers. High priority species such as Bermuda petrel, Audubon's shearwater and black-capped petrel should also be included. Risks to these species include nighttime collision with lighted ships and debris entanglement risk.

We appreciate the opportunity to review and comment on this consistency determination and look forward to any forthcoming information. If you need further assistance or additional information, please contact me at (252) 948-3916 or [maria.dunn@ncwildlife.org](mailto:maria.dunn@ncwildlife.org)