

Preassessment Data Report #4

Results of a Drift Experiment to Estimate Seabird Carcass Deposition on Beaches at Unalaska Island, Alaska, in the Vicinity of the Wreck of the M/V *Selendang Ayu*

COMMENTS OF THE RESPONSIBLE PARTY

Page 3; Paragraph 2; Methods

“...also know as...”

Change to “known”.

Page 4; Paragraph 4; Discussion

“The drift block release was relatively near shore, similar to the source of the oil, and conducted during onshore winds. Thus the relatively higher recovery rate, compared to other published studies, was not unexpected. However, while 16% is higher than the median experimental recovery rate, four of every five blocks released in the spill zone remained unrecovered in the subsequent surveys.”

The weather conditions following the grounding were very different from the conditions following the block releases. Based on a comparison of wind speed and direction data during the two time periods it is not appropriate to use the recovery rate determined from the drift block study as a valid rate for the recovery of birds following the incident. We offer the following support for our position.

The station at Dutch Harbor Airport (PADU) and a station near Volcano Bay (SKNa2), put in place after the incident, provide the best data to evaluate the weather (Figure 1).

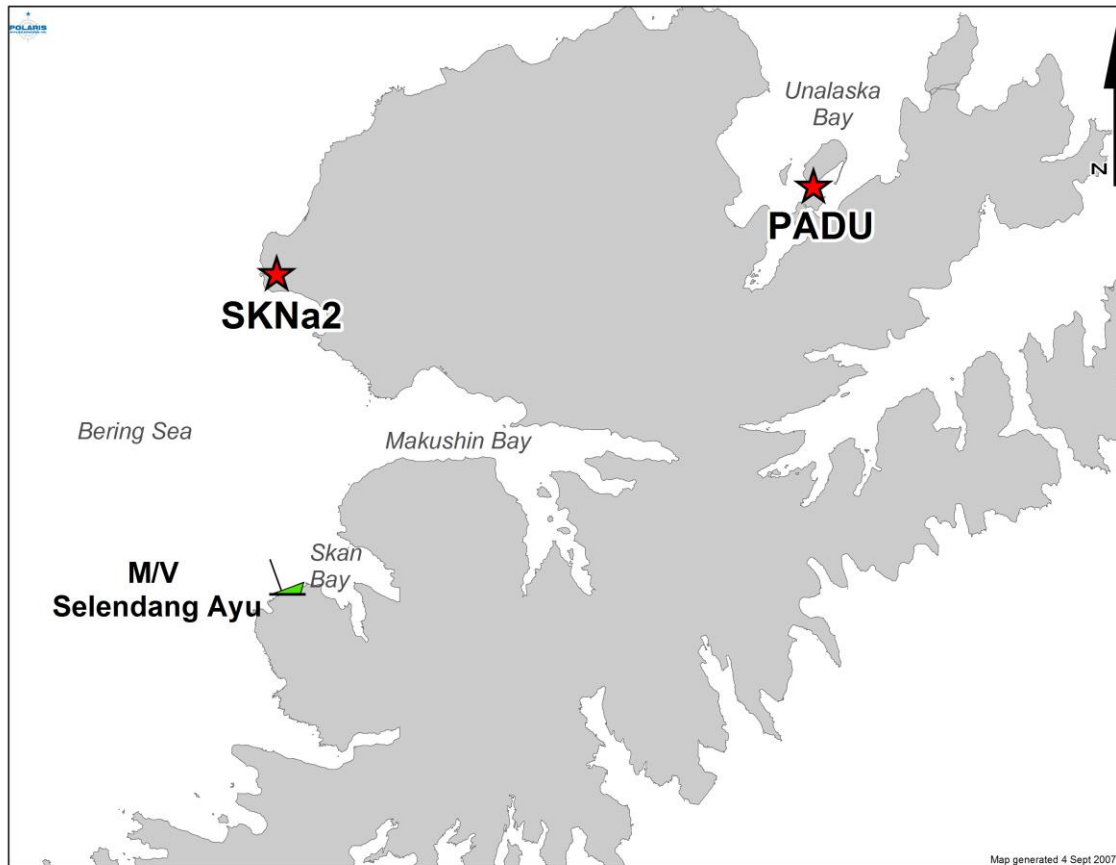


Figure 1. Locations of the PADU and SKNa2 weather stations.

The SKNa2 station was not in place until 14 December, therefore, the only data available during the incident comes from the PADU station. As Figures 2 and 3 show, however, the wind conditions at the two stations are very similar. In the figures the direction of the arrow corresponds to the actual wind direction and the length of the arrow represents the speed of the wind. Starting on 14 December the winds are predominately from the north with speeds increasing up to 23 December at both locations.

Based on data from PADU at the time of the incident (8 December 2004) the wind direction is from the northwest with speeds of 20-25 knts. Strong winds from the northwest and southwest continue for 4 days after the incident. Since the two stations show similar wind speeds later in the month the conditions at PADU are likely similar to what was occurring at SKNa2 and also at the site of the M/V *Selendang Ayu* grounding locations.

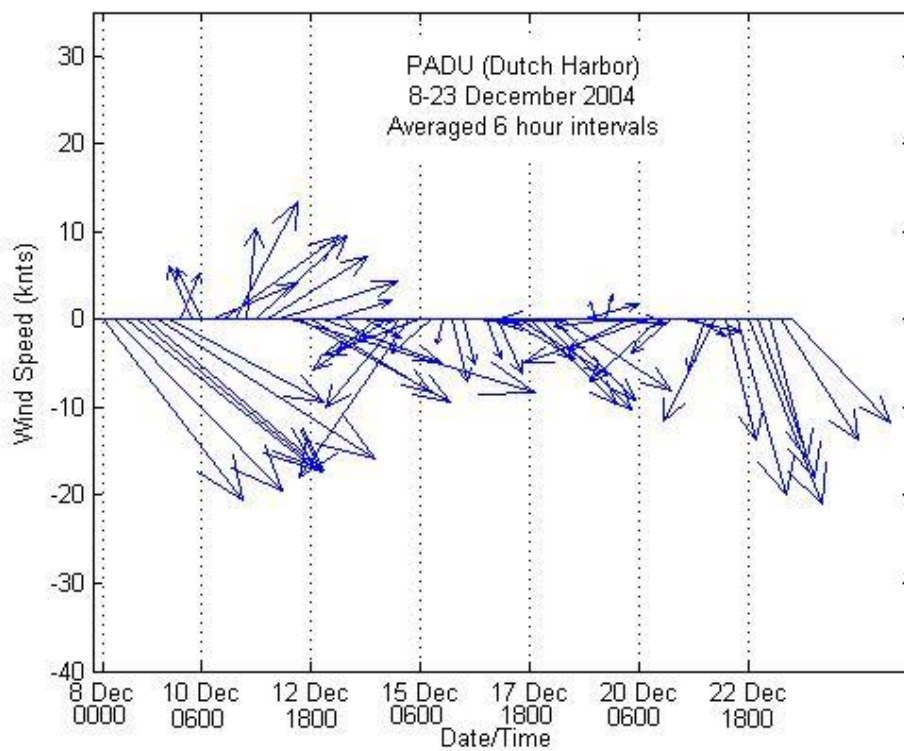


Figure 2. Vector chart of wind data from PADU from 8 Dec to 23 Dec 2004.

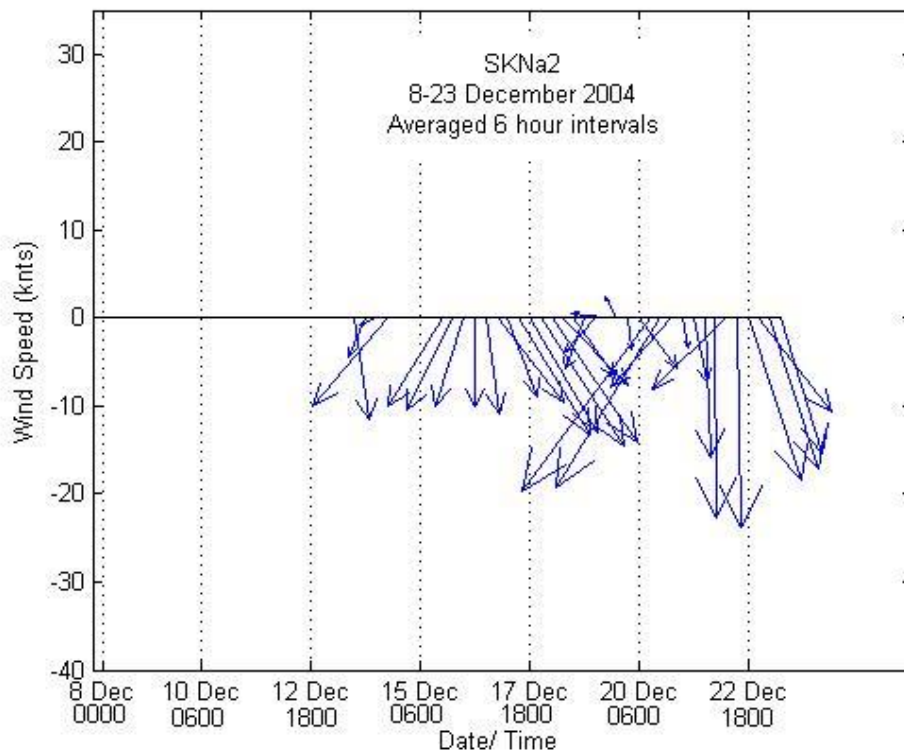


Figure 3. Vector chart of wind data from SKNa2 from 8 Dec to 23 Dec 2004.

The USFWS drift block study was started on 4 January 2005 and ended 14 days later. As Figure 4 shows, the wind conditions during this time period at SKNa2 were very different from what occurred during the incident. During the first couple of days of the study the wind direction varied greatly and was very inconsistent. Over the entire study period the predominate wind direction was from the southeast. Figure 5 shows similar conditions observed at PADU.

The USFWS drift block study appears to have been performed during a period where wind conditions were not similar to conditions observed during and after the incident. Strong westward winds were present during the incident and up to 4 days afterwards, presumably forcing any oiled carcasses onto shore. Wind conditions during the study were mainly from the east and likely forced many of the blocks out to sea. Based on comparing wind speed and direction during the two time periods it is not appropriate to use the recovery rate determined from the drift block study as a valid rate for the recovery of birds following the incident.

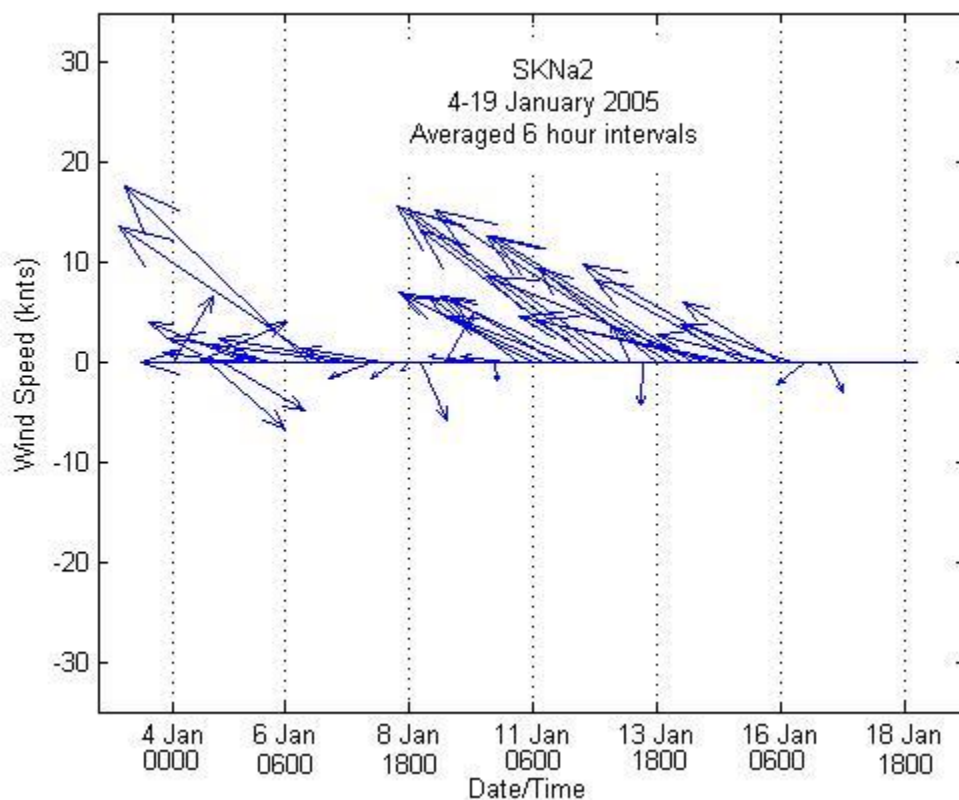


Figure 4. Vector chart of wind data from SKNa2 from 4 January to 19 January 2005.

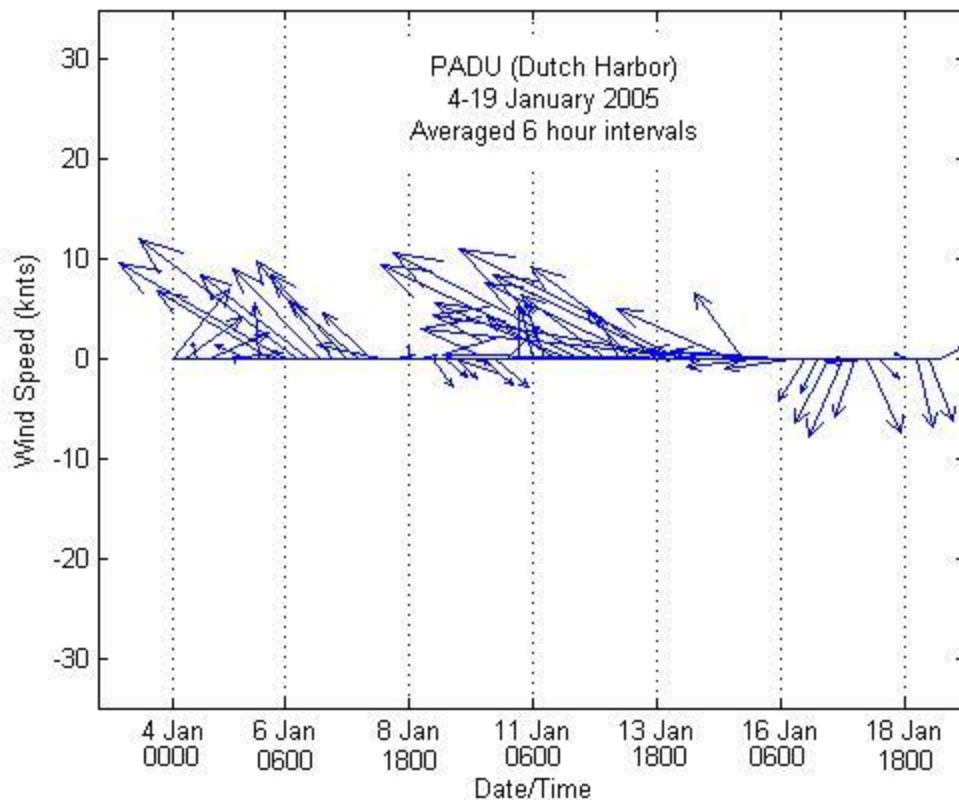


Figure 5. Vector chart of wind data from PADU from 4 January to 19 January 2005.

Comment:

The study assumed birds were oiled in the vicinity of the wreck, and the drift blocks were dropped between 1 to 3 km northeast of the wreck. While some birds may have been oiled in this area, others would likely have been oiled in other areas such as in Makushin Bay and further inside Skan Bay. The relevance of the drift block study to the fate of carcasses of birds oiled outside of the narrow area where the blocks were dropped is questionable.