

Dear Ms. Harrison,

We oppose seismic airgun blasting in the Atlantic Ocean. We ask the National Marine Fisheries Service (“Fisheries Service”) to deny the Incidental Harassment Authorization (“IHA”) applications and refuse to allow the taking of marine mammals during activities related to seismic airgun blasting for offshore oil and gas exploration in the Atlantic Ocean for the following reasons:

Under the Marine Mammal Protection Act (“MMPA”), the Fisheries Service must deny the IHA applications because the proposed takes exceed the “small numbers” requirement, and the Fisheries Service’s proposed take authorization limit of 30 percent of a stock abundance is simply not in keeping with federal court guidance determining that taking 12 percent or more of a marine mammal species’ population clearly goes against the congressional intent to limit takes to “small numbers” under the MMPA;

Under the MMPA, the Fisheries Service must deny the IHA applications because seismic airgun blasting by five (and possibly more) seismic survey companies in approximately the same geographic area, whether consecutively or concurrently, will have more than a “negligible impact” on the populations of marine mammals as the potential biological removal rate for several species will be exceeded by the proposed takes; and

The mitigation measures proposed by the Fisheries Service are inadequate because (1) the cumulative impacts on marine mammals of five (and possibly more) seismic surveys occurring at or around the same time over the course of six months to a year are not properly taken into account; (2) the proposed visual and acoustic monitoring will not protect all marine mammals in the survey area from seismic airgun blasting, especially at night and during low visibility conditions and/or when the animals are not vocalizing; and (3) the proposed 500 meter exclusion zone and 1000 meter buffer zone are insufficient to protect marine mammals from the impacts of seismic airgun blasting.

Because the proposed IHAs do not meet the “small numbers” or “negligible impact” standards of the MMPA, and because the proposed mitigation measures are inadequate to protect marine mammals, the Fisheries Service should deny all proposed IHAs related to oil and gas exploration seismic surveys in the Atlantic.

Sincerely,























