



THE BILLFISH FOUNDATION
CONSERVATION THROUGH RESEARCH, EDUCATION AND ADVOCACY
5100 N. Federal Hwy., Suite 200 • Fort Lauderdale, Florida 33308
(954) 938-0150 • (800) 438-8247 • Fax (954) 938-5311

Wednesday, May 7, 2014

Gary D. Goeke
Chief, Regional Assessment Section
Office of Environment (GM23E)
Bureau of Ocean Energy Management
Gulf of Mexico OCS Region
1201 Elmwood Park Boulevard
New Orleans, Louisiana 70123

Dear Mr Goeke,

Thank you for the opportunity to comment on the Programmatic Environmental Impact Statement (PEIS) to evaluate the potential environmental impacts from multiple geologic and geophysical (G&G) activities within the area of interest (AOI) in the Mid-Atlantic and South Atlantic Planning Areas. This PEIS will have great impacts not only on marine life within federal waters, but also within state waters adjacent to the AOI. A thorough, program-wide analysis of the environmental impacts is pertinent to potential future site-specific programs. Since it is thought that seismic airguns will be the most extensively used method of G&G activities, impacts directly resulting from these processes must be handled in a way that minimizes the impacts on both marine mammals as well as other marine life. In the current status, TBF does not believe the PEIS assesses the potential environmental impacts in enough depth to make an informed decision for future site-specific projects and should not proceed until this is done.

Specifically, The Billfish Foundation (TBF) has grave concerns about the thoroughness of impacted environment evaluation for Highly Migratory Species (HMS) and the Essential Fish Habitat (EFH) within Table 4-25, particularly for billfish. Without proper analysis of EFH for these species within the PEIS, the potential impacts of the G&G activities cannot be fully evaluated. The information for blue marlin, white marlin, sailfish, spearfish, and swordfish within Table 4-25 does not encompass the large essential fish habitat (EFH) for billfish at all life stages and misrepresents the areas that could potentially be impacted. Additionally, the information provided strongly contradicts the EFH for billfish as determined by the National Marine Fisheries Service (NMFS) and should be re-analyzed for billfish, and for all impacted species for that matter, using the most recent information such as the Essential Fish Habitat Mapper v3.0 as provided by NMFS¹. The maps generated by the Essential Fish Habitat Mapper clearly show that the EFH for blue marlin, white marlin, sailfish, and swordfish are far greater than what is stated within Table 4-25 for the AOI in the PEIS and therefore raises great concern to the thoroughness and legitimacy of evaluation within the PEIS all of the impacted environment.

¹ <http://www.habitat.noaa.gov/protection/efh/habitatmapper.html>

Furthermore, the National Marine Fisheries Service “ has determined a Programmatic Fish Habitat (EFH) consultation is not an appropriate mechanism and that potential impacts must be evaluated in subsequent, more specific consultations.” (PEIS, pg. viii) TBF does not agree with this statement and believes that consultation for EFH is a very important factor and must be performed on both programmatic and site-specific levels.

An additional concern of The Billfish Foundation is to how the G&G activities will impact recreational fishing within the AOI. As the importance of recreational fishing within the AOI is stated within the PEIS, NOAA estimated in 2011 that recreational fishing in the Mid-Atlantic and South-Atlantic regions generated more than \$9.8 billion in trip and durable expenditures and supported nearly 79,000 jobs. The importance of these activities cannot be ignored and any future activities should aim to reduce activities that negatively impact the success and number of recreational fishing trips due to their large economic importance. In addition to the potential impacts caused by changes in migratory patterns and normal predator/prey interactions, the direct Impact Producing Factors (IPFs) resulting from the G&G activities such as acoustic sounds, vessel traffic, and vessel exclusion zones will directly impact recreational fishing and must be evaluated more specifically on a programmatic and future site-specific levels.

In conclusion, The Billfish Foundation does not believe that the Programmatic Environmental Impact Statement for potential G&G activities within the Mid-Atlantic and South-Atlantic regions fully evaluates the potential environmental impacts. Before moving further, additional programmatic analysis is needed to reduce the potentially negative impacts on important marine ecosystems as well as economically important activities such as recreational fishing.

Sincerely,

A handwritten signature in cursive script, appearing to read "Andrew Cox".

Andrew Cox
Science and Policy Specialist, The Billfish Foundation