



# International Game Fish Association Fishing Hall of Fame & Museum

300 Gulf Stream Way, Dania Beach, Florida, 33004 U.S.A.

Phone: 954-927-2628 • Fax: 954-924-4299 • Museum Fax: 954-924-4220

May 1, 2014

## Officers

Paxson H. Offield

*Chairman*

Robert E. Rich Jr.

*Vice Chairman*

Rob Kramer

*President*

Michael L. Fariior

*Secretary/Historian*

Charles W. Duncan III

*Treasurer*

George G. Matthews

*At Large*

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 70123-2394

Dear Mr. Goeke,

The International Game Fish Association would like to offer the following comments in response to the Programmatic Environmental Impact Statement (PEIS) to evaluate potential environmental effects of multiple geologic and geophysical (G&G) activities in the Mid- and South Atlantic OCS Planning Areas.

The proposed G&G activities will have significant environmental impacts but the PEIS fails to provide specific detail on how it will affect marine mammals, fish and benthic communities. We feel that, if these impacts cannot be properly quantified, the risk of undertaking this project is not defensible.

Marine resources in this area support a large job base that generates important revenue. Recreational fishing, in particular, is a very significant economic entity in the Mid and South Atlantic regions. Each year recreational fishing in these two areas generates over 10 million dollars in angler expenditures and supports nearly 80,000 jobs.

The area under consideration in the PEIS is enormous and includes the entire continental shelf along the Mid- and South Atlantic. In addition, much of the shelf is shallow (<50 m) and would place the entire water column within the "lethal range" of the array. While large fish have the ability to avoid the airgun array, we feel that it may substantially affect migration patterns of fish. Marine mammals, including endangered Atlantic right whales, may also be at risk from this project.

In short, we do not feel that the PEIS fully assesses the potential risks associated with seismic testing. The Mid and South Atlantic region harbors a rich and complex marine ecosystem that supports a large job force and contributes greatly to the economy of this area. As such, we feel that there is simply too much at risk in going forward with seismic testing.

Sincerely,

Jason Schratwieser  
Conservation Director

## Board of Trustees

Pierre Affre

Terri K. Andrews

Jose "Pepe" Anton

Martin Arostegui, M.D.

Gary Carter

Roy W. Cronacher Jr.

Charles W. Duncan III

Michael L. Fariior

Robert E. Fondren

Guy Harvey, Ph.D.

Sean M. Healey

Michel Marchandise

George G. Matthews

Paxson H. Offield

K. Neil Patrick

Carlos F. Pellas

Robert E. Rich Jr.

William Shedd

Ralph "Agie" Vicente

Joan Salvato Wulff

## Past Chairmen

William K. Carpenter

Elwood K. Harry

Michael Lerner

Michael J. Levitt

George G. Matthews

## Trustee Emeritus

Pamela S. Basco

Jose Luis Beistegui

Maumus F. Claverie Jr.

Peter S. Fithian

Floyd D. Gottwald, Jr.

Ruben Jaén C.

John L. Morris

*The International Game Fish Association is a not-for-profit organization committed to the conservation of game fish and the promotion of responsible, ethical angling practices through science, education, rule making and record keeping.*

Email: [hq@igfa.org](mailto:hq@igfa.org) • Website: [www.igfa.org](http://www.igfa.org)