July 13, 2017

Secretary Ryan Zinke
Department of the Interior
1849 C St. NW
Washington, D.C. 20240

Sent by email to: ITP.Laws@noaa.gov

RE: Comments on Takes of Marine Mammals Incidental to Specified Activities; Taking Marine Mammals Incidental to Geophysical Surveys in the Atlantic Ocean; RIN 0648–XE283, 82 Fed. Reg. 26,244 (June 6, 2017)

Dear Secretary Zinke:

The League of Women Voters of Florida is a nonpartisan political organization which encourages the informed and active participation of citizens in government and influences public policy through education and advocacy. We oppose seismic airgun blasting in the Atlantic Ocean. In accordance with the Marine Mammal Protection Act (MMPA), we ask the National Marine Fisheries Service (“Fisheries Service”) to deny the Incidental Harassment Authorization (“IHA”) applications and oppose 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:

- Authorize a take limit of less than 12% rather than 30%, in keeping with federal court guidance. Mandate less than 12% for each species for all proposed IHAs. A federal court has clarified congressional intent of MMPA to be less than 12% take.

- The proposed maximum take limit of 30% is specified for 13 of the 14 mammal species evaluated. That is, permittees estimate they will impact maximum number of mammals, as proposed to Fisheries Service.

We ask, in the least, that Fisheries Service reconsider proposed IHAs with these contingencies:

- Limit Incidental Harassment Authorization to 12%

- Account for overlap of seismic surveys in time, geographic extent, and survey companies

- Account for low visibility, night time, and marine mammal non-vocalizing.

- Reevaluate exclusion and buffer zones with respect to minimizing harassment.
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,

[Signature]

Pamela S. Goodman, President
League of Women Voters of Florida

Cc:
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