



LEAGUE OF WOMEN VOTERS® OF FLORIDA

July 13, 2017

PRESIDENT
Pamela Goodman

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

FIRST VICE PRESIDENT
Patricia Brigham

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

SECOND VICE PRESIDENT
Cecile M. Scoon

**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:

TREASURER
Theresa Francis-Thomas

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:

SECRETARY
Patricia Drago

- 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.

BOARD OF DIRECTORS
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The Hon. Mark Pafford
Marty Sullivan

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

EXECUTIVE DIRECTOR
Penny Walker Bos
2507 Callaway Road
Suite 102A
Tallahassee, FL
32303
(850)224-2545

- 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.

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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,

A handwritten signature in black ink, appearing to read 'Pamela S. Goodman', written in a cursive style.

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

Cc:
Department of the Interior
Timothy Williams, Deputy Director of External Affairs

Bureau of Ocean Energy Management
Connie Gillette, Acting Chief
Blossom Robinson, Stakeholders/Social Media
Walter Cruikshank, Acting Director
Keely Hite, Division of Environmental Assessment

NOAA Fisheries
Wilbur Ross, Secretary
Chris Oliver, Assistant Administrator for NOAA Fisheries
Samuel Rauch, NOAA Fisheries
Donna Wieting, Director, Office of Protected Resources
Jonathan Shannon, Outreach Specialist
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National Marine Fisheries Service
1315 East-West Highway, Silver Spring, MD 20910

Bureau of Safety and Environmental Enforcement
Staci King, Manager, Public Engagement and Intergovernmental Affairs
Matthew Manning, Legislative Specialist, Office of Congressional and International Affairs