Background of Geophysical Activity in the Gulf of Mexico
For nearly eight decades, geophysical surveys have been conducted in the Gulf of Mexico (GOM), including extensive activity for the past fifty years. Activity that has taken place alongside successful fishing and tourism industries, and within a thriving ecosystem with an abundance of marine life.

- 1937 Western Geophysical begins marine survey operations in the Gulf
- 1944 Extensive marine operations began
- 1981 there were 50 marine crews in the Gulf
- 1976 saw the first 3D seismic survey
- To date, over 1 million line-miles of seismic data have been acquired in the Gulf

Gulf of Mexico Draft Programmatic Environmental Impact Statement – Summary
Purpose: The Draft Programmatic Environmental Impact Statement (DPEIS) serves three primary purposes:

1) BOEM will use the DPEIS to establish a framework to guide subsequent NEPA analyses of site-specific Geological & Geophysical (G&G) actions and to inform which packages of mitigation measures to require for future G&G activities on the Gulf of Mexico (GOM) Outer Continental Shelf (OCS).
2) NMFS will use the DPEIS to respond to BOEM’s request for incidental take regulations and to inform the issuance of incidental take authorizations under the MMPA for G&G activities in the GOM.
3) The DPEIS will also inform Section 7 Consultations on impacts to ESA-listed species.

Geographic Scope of Analysis: The DPEIS evaluates G&G survey activities in both federal and state waters of the GOM -- Western, Central and Eastern Planning Areas. The “area of interest” analyzed for the Eastern and Central Planning Areas extends out to the Exclusive Economic Zone (EEZ).

Activities Evaluated: The DPEIS assesses potential environmental impacts of BOEM’s oil and gas, renewable energy, and marine mineral resource programs and focuses on the impacts of off-lease and on-lease geological (bottom sampling and test drilling) and geophysical surveys (deep-penetration, high-resolution geophysical, electromagnetic, deep stratigraphic, and remote sensing). The DPEIS considers activities over a 10-year period.

Alternatives Analyzed: BOEM analyzes seven different alternatives (A-G) in the DPEIS.
- The alternatives include maintaining the status quo, which is Alternative A, -- i.e. pre-settlement activity levels and standard mitigation measures;
- Alternative B proposed conducting activities as described in the settlement agreement and amended stipulation;
- Alternative C includes a series of alternatives that progressively and cumulatively include additional protective measures -- i.e. more mitigation measures;
- Alternative D includes Alternative C plus additional shutdowns;
• Alternative E proposes a 10-25 percent reduction in deep-seismic/multi-client activities; and
• Alternative F proposes area closures. The additional mitigation measures include area and/or seasonal closures, expanded passive acoustic monitoring and protected species observer requirements, minimum separation distances, and shut down requirements for non-bow riding marine mammals.
• Alternative G contemplates no new activities or permits.

Comments on the DPEIS
The geophysical industry has been successfully coexisting with multiple industries, tourism and within a thriving ecosystem under mitigation measures and practices similar to those included in the DPEIS Alternative A for many years. As a member of the geophysical industry I generally support Alternative A as the preferred course of action. Data acquisition through seismic surveys are a proven, environmentally sound technology with a track record around the globe that extends for decades. Seismic surveys and geophysical activities help make offshore energy development safer and more efficient. They are essential in the U.S. and around the world to locate potential new sources of energy. In addition to the oil and natural gas industry, seismic surveys are commonly used by the U.S. Geological Survey, the National Science Foundation, and the offshore wind industry.

BOEM’s environmental analysis should accurately reflect the best available science and research and industry’s operational experience, which indicates that seismic surveys have little-to-no impact on marine mammal and wildlife populations. Neither industry’s operational experience nor the best available science justifies the precautionary approach BOEM has proposed in some of the alternatives considered in the EIS.

The DPEIS relies upon the unilateral adoption of an untested process for generating marine mammal population statistics, early application of the process indicates overestimation of some marine mammal species. I encourage BOEM to calibrate population estimates through comparison to Stock Assessment Reports (SARs) and other peer reviewed scientific sources.

There is no evidence that the sound produced by exploring for oil and gas with seismic sources has resulted in any injury to marine mammals or negatively impacted marine mammal populations in the GOM. In fact, marine life, commercial fishing and seafood production have thrived in the GOM for decades alongside geophysical surveys.

The restrictive and arbitrary nature of some of the proposed mitigations outlined in the DPEIS alternatives would threaten the economic and operational feasibility of performing geophysical surveys in the GOM. Specifically, near-shore seasonal restrictions included throughout the EIS alternatives have no basis in science and should be precluded from the final preferred alternative. Further, arbitrary reductions in seismic survey activities of 10 – 25% (Alternative E) are a nonstarter, without environmental merit and should be removed from any final preferred course of action.
The geophysical industry implements many mitigation measures as standard business practice, including marine mammal observers (MMOs), passive acoustic monitoring (PAM), and exclusion zones – all in an effort to avoid any potential impacts on marine mammals. The energy industry has invested over $60 million in research on the impacts of sound and marine life, including advances in technology that may lead to more efficient data acquisition in the future.

As BOEM moves through the PEIS process, including consultation with the National Marine Fisheries Service (NMFS) and U.S. Fish and Wildlife Service (USFWS), IAGC encourages an adherence to scientifically valid mitigation measures, while recognizing the proven track record of the geophysical industry in the GOM. Mitigation measures for the sake of ‘precaution’ are based on unsubstantiated claims from anti-energy development interests and have no backing in U.S. statute or regulation.

Continuing to conduct geophysical surveys in the GOM will produce known discoveries safely and more efficiently and will help uncover new sources of oil and natural gas. This data will allow people to make informed decisions about the potential for continued job creation and economic growth from offshore energy production in the Gulf.

The geophysical industry remains committed to improving the scientific understanding of the potential impacts of our operations on marine life. Seismic and other geophysical surveys in the GOM are a critical part of the safe offshore energy development that is necessary to harness our nation’s energy potential for the benefit of American energy consumers.

**HOW TO SUBMIT COMMENTS**

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- **In person at one of the five scheduled public meetings (11/9 – New Orleans, LA; 11/10 – Gulfport, MS; 11/14 Fort Walton Beach, FL; 11/15 – Mobile, AL; 11/17 – Houston, TX)**