ATTACHMENT A

BOEM'S PRECAUTIONARY MODEL VS BEST AVAILABLE SCIENCE (BAS) MODEL

BOEM

BAS

1

Sound Source

According to the Precautionary Model, the sound source is 1.5 - 2 times bigger than in reality.

Actual size of a seismic sound source.

2

SOUND FIELD

Precautionary Method Sound Field 10-60 Times Bigger

Best Available Science Actual Sound Field

3

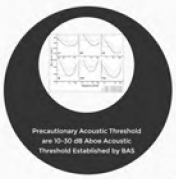
AFFECTED ANIMAL POPULATION

The Precautionary Model Shows 2-60 Times as Many Affected Animals

BAS Population Estimate for Affected Animals

4

ACOUSTIC THRESHOLDS



Precautionary Acoustic Threshold are 10-30 dB Above Acoustic Threshold Established by BAS

BAS Acoustic Threshold

5

MITIGATION

No Reduction for Mitigation on Precautionary Method

Some Reduction for Mitigation on BAS

Results

FINAL RESULTS OF PRECAUTIONARY METHOD VS. BAS

The results of over-statements in the precautionary method equation results in millions of estimated takes.

The results of a realistic equation based on Best Available Science shows a much more realistic number of takes.

BOEM has analyzed a strawman through the DPEIS by relying on unrealistic assumptions as opposed to the best available science as U.S. law requires. The above graphic shows how precautionary assumptions stacked upon each other lead to a multiplicative over estimation of impacts that will never occur.

Total Multiplicative Precautions (short list)

[Precautionary Sound Source (10.5-15x)] × [Precautionary Sound Field (10-60x)] × [Precautionary threshold criteria (100-10,000x)] × [Precautionary Acoustic (10-100x)] × [no allowance for aversion (6.7 x Level A)] × [no mitigation (1.1 - 2x)] = 1.3 million to 3.2 billion takes than the number that would be produced by using average or most likely values for all variables.