

# ATTACHMENT C

## Targeted Detailed Comments — IAGC/API/NOIA/OOC

No.	Page	DPEIS Language	Comment/Question
1	1-9	This Programmatic EIS is being prepared to serve as the programmatic NEPA analysis from which BOEM will tier its site-specific NEPA analysis for BOEM to permit and authorize G&G activities under the OCSLA.	This indicates that site-specific EA's will be required for G&G activities. The industry would appreciate greater clarity on what the future permit application and supporting NEPA process will look like for individual applicants.
2	1-15	<b>Exposure Versus Take</b> BOEM and NMFS do not believe that every exposure to sound results in a "take". ... And/or, in extreme cases, habitat avoidance or even death.	Saying habitat avoidance is an extreme case and including it alongside "death" is not appropriate and misleading. Neither long-term nor permanent habitat avoidance has been observed in conjunction with seismic surveys. No mortalities have ever been confirmed, despite extensive effort to detect such effects. It is unreasonable and not consistent with best available information to infer these effects are possible just because they are imaginable. Contrast with sonar sound, in which association with strandings and mortalities are well-documented. Just because one sound source might have an effect does not mean that other very different sources, used in very different contexts, might have the same effect, especially when the sources in question have been in widespread use for over 50 years.
3	1-16	Significant strides have been made in quantifying the effects of noise on marine mammals (cites Atlantic final PEIS)	Using the Atlantic G&G PEIS as a reference for showing that significant strides have been made in quantifying the effects of noise on marine mammals is not useful or appropriate. That document used a similar approach to estimated exposures as used in this DPEIS for the GOM, but there are no data to indicate how accurate these methods are in representing actual exposures or impacts from the modeled activities.
4	1-16	The efficacy of the proposed mitigation finally selected for implementation as part of the Record of Decision will be examined under the Adaptive Monitoring Plan discussed in Chapter 1.2.3 above.	Text in the Adaptive Monitoring Plan section of Chapter 1.2.3 does not include any materials that address the efficacy of proposed mitigation measures.
5	2-33	Therefore, depending on whether or not a collision did occur, nominal to moderate impacts are expected for Alternatives A-F	The potential for a single mortality from a vessel strike causing a jump from nominal to moderate impact is inconsistent with arguments made on the previous pages that changes in impacts to a single species/stock are insufficient to warrant a change in