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No. 5550 P. 1

To: Naval Facilities Engineering **Date:** March 31, 2008
Fax #: 888-875-6781 **Pages:** Three, including this cover sheet
From: David Fox
Subject: AFAST DEIS

COMMENTS:

Connecticut Department of Environmental Protection comments enclosed. Hard copy being mailed today.

If you did not receive the number of pages indicated above, or experience any problems with the transmission of this FAX, contact David Fox at (860) 424-4111.

Mar. 31, 2008 2:28PM

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STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION



March 31, 2008

Naval Facilities Engineering Command, Atlantic
Attn: Code EV22 (AFASST Project Manager)
6506 Hampton Boulevard
Norfolk, Virginia 23508-1278

Dear Commander:

The Connecticut Department of Environmental Protection has reviewed the *Draft Atlantic Fleet Active Sonar Training Environmental Impact Statement Overseas Environmental Impact Statement (DEIS)* prepared to analyze the potential environmental effects associated with Atlantic Fleet active sonar training (AFASST) exercises, maintenance, research, development, test and evaluation activities. The following comments are submitted for your consideration.

Under any of the studied alternatives, AFASST activities in Connecticut waters would apparently consist of object detection/navigation training in established submarine transit lanes entering/exiting the Groton submarine base. The continuation of this limited activity does not appear to pose a threat for significant adverse impacts. However, the Department is more concerned with the potential impacts to sea turtles and marine mammals of more extensive training exercises conducted in the various Operating Areas (OPAREAs). These include several species of sea turtles, harbor porpoises and harbor seals that migrate in and out of Long Island Sound on a seasonal basis or are more occasional visitors.

The preferred alternative, the No-Action Alternative, would continue active training throughout existing OPAREAs. Alternative 1, Designated Active Sonar Areas, would delineate fixed active sonar areas using an environmental analysis to determine locations that would minimize environmental effects to biological resources while still meeting operational requirements. The modeling of acoustic effects to marine mammals in section 4.4 revealed some striking differences in impacts to certain species between these two scenarios. Most notable was that for the harbor porpoise, a species of special concern, listed by the State pursuant to section 26-306 of the Connecticut General Statutes. As stated on page 4-121, "acoustic analysis indicates that up to 286,132 harbor porpoises may be exposed to levels of sound likely to result in Level B harassment under the No-Action Alternative, 28 under Alternative 1." Reductions in modeled exposure levels, although less dramatic, were reported for a number of other species, while exposure levels actually increased for a few species, particularly the common dolphin.

The rationale for selection of the No-Action Alternative is summarized on page 2-83. While Alternative 3 is dismissed due to the relative insignificant differences in impacts between it and the preferred alternative, Alternatives 1 and 2 are reported to severely limit the ability to train in areas similar to potential threats and require the relocation of 30% of current training

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AFAST DEIS

Differences in impact between Alternatives 1, 2, and the No-Action Alternative are implied but not discussed.

Although the conclusion for each species discussed in section 4.4.1.1 is that "in accordance with NEPA, there will be no significant impact to [the species] from AFAST activities in territorial waters under the No-Action Alternative, Alternative 1, Alternative 2, or Alternative 3," there do appear to be some significant differences in modeled acoustic impacts, as noted above. The DEIS should more thoroughly discuss these differential impacts, particularly those of Alternative 1, and weigh them against the benefits of the No-Action Alternative. As described in section 2.8, Alternative 1 was apparently developed to meet the Navy's operational requirements.

Table 4-1 documents the materials that will be expended as a result of AFAST exercises. Well over 30,000 sonobuoys, with their lead chloride, cuprous thiocyanate, lithium iron disulfide or silver chloride batteries and parachute assemblies, will be lost. The Navy should consider the feasibility of taking steps to retrieve the sonobuoys and particularly the parachutes as part of the training exercises.

As summarized on page 4-138, "sea turtle auditory capabilities and sensitivity is not well studied, though a few investigations suggest that it is limited to low-frequency bandwidths, such as the sounds of waves breaking on a beach. The role of underwater low-frequency hearing in sea turtles is unclear." The research efforts supported by the Navy described in section 5.1.3.2 as Conservation Measures rightly focus on marine mammals. However, this program does not include any funding to address the data gap for sea turtles.

As a final note, the Department appreciates the paper savings realized by distributing such voluminous documents electronically. However, review of this DEIS was somewhat cumbersome. Reading the DEIS on the CD provided could have been expedited by more extensive use of bookmarks in the PDF document. Bookmarks should be created for each section listed in the Table of Contents that would direct the reader to those portions of the document of individual interest.

Thank you for the opportunity to review this project. If there are any questions regarding these comments, please contact me at (860) 424-4111 or david.fox@et.gov.

Sincerely,
David I. Fox
David I. Fox
Senior Environmental Analyst
Office of Environmental Review

cc: Robert Kaliszewski, DEP/OPPD
Jenny Dickson, DEP/WD
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