

G-016

March 28, 2008



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

Re: Department of the Navy - Draft Environmental Impact Statement/Overseas
Environmental Impact Statement for Atlantic Fleet Active Sonar Training along the East
Coast and in the Gulf of Mexico - of Interest to the State of Florida

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To Whom It May Concern:

[The Florida Fish and Wildlife Conservation Commission (FWC) has coordinated agency review of the Department of the Navy's Atlantic Fleet Active Sonar Training (AFAST) Draft Environment Impact Statement/Overseas Environmental Impact Statement (EIS/OEIS). This letter outlines our concerns and recommendations based on the preferred No Action Alternative as described in the EIS/OEIS.] 827

[The draft AFAST EIS/OEIS analyzes the potential environmental effects associated with the designation of sonar use areas and use of active sonar technology and the improved extended echo ranging system during Atlantic Fleet training exercises. The proposed action would support and maintain Navy Atlantic Fleet training, as well as provide maintenance and research, development, test, and evaluation for mid- and high-frequency active sonar that is coincident and substantially similar to Atlantic Fleet training activities.] The preferred No Action Alternative can be regarded as continuing with the present course of action. Under the No Action Alternative, the Navy would continue conducting active sonar activities within and adjacent to existing operating areas rather than designate active sonar areas or areas of increased awareness. 851

[A portion of the Jacksonville Operating Area (JAX OPAREA) site off the Florida coast is within the nearshore block of the federally designated critical habitat and calving grounds of the endangered North Atlantic right whale (*Eubalaena glacialis*), which is used primarily by reproductive females and calves from December through April. As specified in the EIS/OEIS, AFAST activities in the southeast North Atlantic right whale critical habitat may include: object detection/navigational sonar training and maintenance activities for surface ships and submarines while entering and exiting ports located in Kings Bay, Georgia, and Mayport, Florida. In addition, helicopter dipping sonar would occur off of Mayport, Florida, in the established training areas within the right whale critical habitat.] 830

[While there is uncertainty in predicting right whale occurrence offshore and north of the customary aerial survey routes, data and anecdotal evidence indicate right whales can occur anywhere from within sighting distance of shore to distances greater than 55 kilometers along the eastern seaboard and outside the critical habitat area along the mid-Atlantic coast.] Due to weather and visibility issues, the ability of Navy observers to detect marine mammals is limited, and their ability to detect right whales is further 832

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compounded by the animal's lack of a dorsal fin. The ability to aurally detect right whales in the calving areas is unsure as their vocalization behavior has not been researched extensively enough.]

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[The increase of vessel traffic due to AFAST as specified in the EIS/OEIS (Tables 2-2 and 2-3) would increase risk of ship strikes to right whales during their migration and while in calving grounds. Additional noise levels and vessel traffic could jeopardize breeding-age females and juveniles of an already extremely endangered population. Based on the information above, we recommend that the preferred No Action Alternative include the following provisions:]

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[1. Because of the proximity to right whale calving grounds, training activities at the JAX OPAREA near Mayport, Florida should be avoided from December to April.]

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[2. If any cetacean strandings take place near or at the time of the training events, or if an injured or dead marine mammal is sighted by Navy observers, all sonar training activities should be halted (delayed) until the cause of stranding, injury, or death is determined and addressed.]

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[3. All training sites and potential sonar activities, especially those conducted during the right whale calving season, should (as specified in the EIS/OEIS) undergo National Marine Fisheries Service Section 7 consultation.]

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[Also, in addition to those measures proposed in Chapter 5, we recommend the Navy consider the following mitigation for potential impacts:

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1. Because the proposed methods for detection of cetaceans are limited in effectiveness, the Navy should use passive acoustic monitoring (e.g., use of hydrophone arrays) as has been used previously by the Navy and other researchers. These arrays should be compiled routinely in naval exercises.]

[2. Navy assistance in funding research on satellite tagging to improve knowledge of the migratory patterns, both spatial and temporal, of right whales along the eastern U.S. seaboard.]

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[3. Navy collaboration and funding to improve methods of detecting cetaceans and recording their behavioral responses to noise exposure.]

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[4. Navy assistance in funding research on the auditory characteristics of baleen whales, especially right whales, as well as physiological and behavioral responses to sounds. More refined information, together with a good model of sound propagation and detection of marine mammal locations are needed to understand and mitigate the potential impacts of these proposed activities.]

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[We appreciate the opportunity to continue to provide input on this project. If you or your staff would like to coordinate further on the recommendations contained in this letter, please contact me at (850) 410-5272 or email me at maryann.poole@MyFWC.com, and I will be glad to help make the necessary arrangements. If your staff has any specific

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questions regarding our comments, please contact Dr. Ellen Hines at (727) 896-8626 or
by email at ellen.hines@myfwc.com. }

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Sincerely,

Mary Ann Poole

Mary Ann Poole, Director
Office of Policy and Stakeholder Coordination

map/eh

Atlantic Fleet Active Sonar, 1316

PNV 1-3-2

cc: Barb Zoodsma, NOAA, Fernandina Beach