

Public Scoping Summary

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G PUBLIC SCOPING SUMMARY

G.1 GENERAL SUMMARY OF THE SCOPING PERIOD

The scoping period for the Navy Training Activities in the Gulf of Alaska (GOA) Environmental Impact Statement (EIS)/Overseas EIS (OEIS) began with publication of a Notice of Intent in the Federal Register on March 17, 2008. The scoping period began on this date and lasted 45 days, concluding on April 30, 2008. Three public scoping meetings were held on April 1, 2 and 3 in the cities of Kodiak, Anchorage, and Cordova, Alaska, respectively. The scoping meetings were held in an open house format, with informational posters and written information provided to participants and Navy staff and project experts were available to answer participants' questions. Additionally, a tape recorder was available to record participants' oral comments. The interaction during the information sessions was productive and helpful to the Navy.

Scoping participants could submit comments in five ways:

- Oral statements at the public meetings (as recorded by the tape recorder);
- Written comments at the public meetings;
- Written letters (received any time during the public comment period);
- Electronic mail (received any time during the public comment period); and
- Comments submitted directly on the project website (received any time during the public comment period).

In total, the Navy received comments from 77 individuals or organizations. These comments included 52 comments via the website, 18 comments via mail, and 7 comments made in person during the public scoping meetings. This summary gives an overview of comments received during the scoping period. Comments are organized by issue area.

G.2 AIR QUALITY

Comments in this category expressed concern about the effects of military activities on air quality, specifically from carbon dioxide (CO₂) and greenhouse gases and their effects on global warming. Additional commenters expressed concerns with black carbon exhaust emissions from Navy vessels and their warming impact in the Arctic. Compliance with the Clean Air Act (CAA) was also mentioned. Commenters noted that the EIS/OEIS should discuss which areas do not meet National Ambient Air Quality Standards.

G.3 ALTERNATIVES

Comments regarding alternatives suggested that the Navy consider other sites to conduct its activities. Several commenters expressed that, of the three alternatives, they could only support the No Action Alternative. Additional comments expressed general disappointment with use of the term "No Action Alternative" to refer to continuing activities at current levels.

G.4 BIOLOGICAL RESOURCES – MARINE MAMMALS, FISH, BIRDS AND MARINE HABITAT

The majority of comments received in this focus area expressed concerns about impacts to marine life. Many of these comments specifically raised concerns about the effect of Navy sonar on marine life, such as marine mammals, fish, sea turtles, sea invertebrates and zooplankton. Numerous comments were made about the number of endangered species in the GOA, particularly whales (seven whale species in total) and the North Pacific Right Whale specifically, and the presence of North Pacific Right Whale critical habitat in the GOA. Participants frequently requested that the EIS/OEIS consider alternative technologies

to mid-frequency active (MFA) sonar, while others stated that MFA and other forms of sonar are not required for training and should not be used within the GOA based upon “common knowledge” of the effects of sonar. Other commenters quoted previous EIS/OEIS’s such as the Hawaii Range Complex Supplemental Draft EIS to state that the Navy, in this EIS, “...found that the use of MFA sonar and high-frequency active (HFA) sonar was harassment to a variety of whale species which included the endangered blue whale, fin whale, humpback and sperm, also Stellar Sea Lion.” Several comments addressed protective and mitigation measures that are used now and that could be used for marine mammals when sonar is in use. Still, other comments voiced concern over the effects of all forms of sonar on migration patterns of whales, marine mammals, fish, and birds. A few comments expressed concern about potential negative impacts from sonar, both short- and long-term, to fish and the developing eggs/embryos of salmon and other commercial species (halibut, herring, haddock, pollock and crab). Other comments concerned sonar effects on the marine mammal food chain, including fish and zooplankton.

Several comments expressed general concern about Navy impacts, other than sonar, such as habitat quality and water quality, on marine life, while others identified specific policies that must be considered in the Navy’s analysis, such as the Marine Mammal Protection Act, the Endangered Species Act, the Coastal Zone Management Act, the Magnuson-Stevens Fisheries Conservation Management Act, the Migratory Bird Treaty Act, and Executive Order 13158.

G.5 BIOLOGICAL RESOURCES—ONSHORE

A few comments suggested that the EIS/OEIS should also evaluate impacts on plant species and habitats, and indirect impacts outside the defined project boundary. Several comments addressed the protection of birds, including shorebirds, seabirds and migratory birds. Potential stressors to birds mentioned in the comments included noise disturbance. Among other terrestrial issues were general concerns about impacts to Alaska’s ecosystem and resources.

G.6 CULTURAL RESOURCES

Participants commenting on cultural resources were primarily concerned with preserving the integrity of sport and subsistence activities to include native subsistence. A few comments also addressed the issue of pollution and potential damage to ancestral homelands.

G.7 CUMULATIVE IMPACTS

Comments in this category expressed concern about the overall impact of past and present military activity in the GOA. One specific commenter asked “how the cumulative impact of noise from other sources (military, fisheries, ship traffic and other commercial and industrial sources) can be measured and monitored while the Navy sonar exercises are going on.” Another commenter asked that the “...cumulative impacts on local communities, subsistence, endangered species, marine mammals, fish, birds, and the ecosystem, among others, to include the EXXON Valdez oil spill, be fully evaluated and presented to the public”. Finally, one commenter noted that cumulative impacts should include the consideration of how Navy actions may impact climatic changes, given concerns about how climate change may already be stressing many species.

G.8 ENVIRONMENTAL JUSTICE

Commenters requested that the EIS/OEIS disclose what efforts were taken to meet environmental justice requirements consistent with Executive Order 12898, Federal Actions to Address Environmental Justice in Minority and Low-Income/Populations. These commenters also requested information describing the methodology and criteria for identifying low-income and minority populations as well as sources and references used within the DEIS analysis. Comments were also made in reference to making a complete analysis of impacts, including cumulative impacts, to low-income and minority communities, as well as

methods of input for low-income populations and the means of outreach to these potentially affected communities.

G.9 HAZARDOUS MATERIALS/HAZARDOUS WASTE

Of the comments regarding hazardous materials and waste, the primary concerns articulated were over spills, specifically fuel oil, other toxic liquids, wastewater ballast and other bilge water discharges. Another area of concern was the effects of depleted uranium use in munitions on the environment in general. Other comments were in regard to chemical composition of the munitions that would be released. Additionally, a few individuals commented on World War II dump sites that are designated on some marine charts. These individuals want these areas to be re-identified, the types and quantities of materials and containers revealed to the public, and this information factored in to the DEIS analysis as previous military impacts on top of present and future proposed activities, as well as used to establish a baseline for cumulative impacts analysis.

G.10 HEALTH AND SAFETY

One comment expressed concern about safety implications to recreational swimmers and divers from mid-frequency active sonar.

G.11 NOISE

Several commenters expressed concern about noise from ordnance, mid-frequency sonar, sonar jamming signals, low-frequency communication and surveillance sonar, mid- and high- frequency communication sonars and mechanical noises associated with warfare exercises, to include engine noises, explosions and munitions firing. Another commenter wanted to know what the seismic and sonic noise impacts will be to marine mammals, especially whales, walrus, and seals, and to fish and birds. Another commenter stated that the EIS should describe the impacts of noise on human and wildlife health and behavior, as well as the measures that will be employed to mitigate those impacts, such as physical controls, operations plans and flight corridors. Commenters stated that noise analysis methodologies should be explained and the single-event and cumulative noise metrics utilized in the analysis should be defined. One commenter was concerned about air or noise pollution in ancestral homelands – on or off shore.

G.12 MISCELLANEOUS

Several comments were received that stated that the Navy was, in effect, moving to Alaska to conduct training, specifically sonar training, because “Court orders and lawsuits ran the Navy out of both California and Hawaii for similar tests and now you are making (a) move on our Alaskan waters.” One commenter wanted to inform the Navy of vital telecommunication cables on the seafloor and indicated that Navy activities must be conducted away from these cables.

G.13 MITIGATION MEASURES

Most comments regarding mitigation measures focused on marine mammals. For example, several comments expressed concern that spotting marine mammals is extremely difficult for even expert observers, and those commenters doubted that shipboard lookouts could detect animals in adverse sea conditions and especially at night. One commenter proposed that the Navy should use infrared imaging devices at night. Other commenters expressed concern about the effectiveness of the Navy’s training program for spotting animals. One commenter believed that it would be impossible to avoid encounters with whales and other marine animals no matter how many lookouts the Navy utilizes or what time of the year training is conducted. Others questioned how the Navy is going to mitigate sonar’s possible adverse impacts on marine mammals. Additionally, others asked that the Navy aggressively consider ways to expand, improve, and employ better protective measures in future sonar exercises, such as conducting more monitoring and enforcing larger safety zones around ships. Finally, comments were made that the

Navy needs to better identify clear monitoring goals and objectives with specific parameters for measuring success and provide a feedback mechanism for the public to view information on mitigation effectiveness and monitoring results.

G.14 MEETINGS/NATIONAL ENVIRONMENTAL POLICY ACT PROCESS

Comments on the National Environmental Policy Act (NEPA) process included several that felt the information available during the scoping process was inadequate to provide informed comments or that the “poster” session was not the best format. Other commenters desired a more open forum type format, where all questions voiced could be heard by all. One commenter was disappointed that the Navy chose to hold scoping sessions in only three Alaska communities. Another requested that an additional scoping meeting be held in Homer, Alaska. Still other commenters desired the Navy to shift its meetings to later in the year (August), when there is less activity in the various fisheries.

G.15 RECREATION

One comment expressed concern about preserving the integrity of commercial, sport and subsistence activities, including fishing and traditional harvesting of animals. Another comment concerned the possibility of being subjected to sonar while diving. Still others mentioned whale watching activities and how Navy activities might affect them.

G.16 SOCIOECONOMICS

Comments regarding socioeconomic concerns included questions about the effects and impacts on commercial fishing, tourism, and the economy in general.

G.17 SONAR AND UNDERWATER DETONATIONS

Many comments mentioned concerns about the effect of Navy sonar on marine life, such as marine mammals, fish, sea turtles, and invertebrates. Others mentioned recent reports that fish suffer from hearing loss and widespread disorientation following loud noise intrusions and that catch rates of commercial species of fish have plummeted in the vicinity of noise sources. Some specific references to additional studies were received via comments. Others said that noise has been shown in several cases to kill, disable or disrupt the behavior of invertebrates and that little is known about the effects of MFAS on lower marine trophic levels such as phytoplankton and zooplankton. Participants frequently requested that the EIS/OEIS consider alternative technologies to sonar. Many felt that sonar activity is not necessary or appropriate for Alaska waters and that training could be accomplished through simulation and/or use of alternate technologies. Several comments addressed protective and mitigation measures for marine mammals when sonar is used. A few comments specifically mentioned concerns about possible acute and/or chronic effects on benthic and pelagic marine life from munitions discharges and explosions. Some commenters also discussed that analysis of possible impacts to the seafloor from expended materials during training exercises would need to be discussed.

G.18 WATER RESOURCES

Comments regarding water resources included general concerns about the potential effects on quality of both fresh and marine waters, not only in the designated training areas, but also in the land-based areas utilized for logistical support of the exercises, and areas adjacent to the training areas to be affected by military activities. Of specific concern were graywater (waste water from sinks, baths, showers, laundry, etc) and blackwater (waste water from human body wastes) that will be discharged from all vessels engaged in Northern Edge exercises, to include ballast water drawn from areas that may contain invasive species. A few of these comments quoted specific provisions of the Clean Water Act.

G.19 SUMMARY OF COMMENTS

Table G-1 provides a breakdown of areas of concern based on comments received during scoping. Because most commenters provided comments on several issues, and because some commenters chose to comment via multiple means, with only slight variations in their comments, the total count well exceeds the total number of 77 comments received.

Table G-1: Breakdown of Scoping Comments by Resource Area

Resource Area	Count	Percent of Total
Biological Resources - Marine Mammals	88	19.04%
Sonar and Underwater Detonations	74	16.01%
Biological Resources - Fish & Marine Habitat	45	9.74%
Mitigation	36	7.79%
Policy/NEPA	31	6.70%
Threatened and Endangered Species	30	6.49%
Commercial Fishing	27	5.84%
Alternatives	26	5.62%
Hazardous Materials / Hazardous Waste	24	5.19%
Socioeconomics	15	3.24%
Cumulative Impacts	11	2.38%
Water Resources	10	2.16%
Air Quality	8	1.73%
Biological Resources - Onshore	7	1.51%
Noise	6	1.29%
Miscellaneous	6	1.29%
Cultural Resources	5	1.08%
Proposed Action	5	1.08%
Coastal Zone Management Act	3	0.64%
Recreation	2	0.43%
Health and Safety	2	0.43%
Environmental Justice	1	0.21%
TOTAL	462	

Table G-2: Notice of Intent/Notice of Scoping Meeting Advertisements

Newspaper	Publish Date
Anchorage Daily News	Tuesday, March 18 th 2008
	Wednesday, March 19 th 2008
	Thursday, March 20 th 2008
	Tuesday, April 1 st 2008
	Wednesday, April 2 nd 2008 (Day of Meeting)
Peninsula Clarion	Tuesday, March 18 th 2008
	Wednesday, March 19 th 2008
	Thursday, March 20 th 2008
	Tuesday, April 1 st 2008
	Wednesday, April 2 nd 2008 (Day of Meeting)
Kodiak Daily Mirror	Tuesday, March 18 th 2008
	Wednesday, March 19 th 2008
	Thursday, March 20 th 2008
	Monday, March 31 st 2008
	Tuesday, April 1 st 2008 (Day of Meeting)
Cordova Times	Tuesday, March 18 th 2008
	Wednesday, March 19 th 2008
	Thursday, March 20 th 2008
	Thursday, March 27 th 2008
	Thursday, April 3 rd 2008 (Day of Meeting)