

Cordova District Fishermen United  
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January 24, 2010

Naval Facilities Engineering Command Northwest  
Attn: Mrs. Amy Burt  
Gulf of Alaska EIS/OEIS Project Manager  
1101 Tautog Circle, Suite 203  
Silverdale, WA 98315-1101

Dear Mrs. Burt,

I am writing in response to the Draft Environmental Impact Statement relating to the Gulf of Alaska Navy Training activities. Cordova District Fishermen United (CDFU) would like to clearly state for the record that we support the U.S. Navy in their efforts to defend our great country, however we are strongly opposed to an increase in U.S Navy training exercises in the Gulf of Alaska (GOA), and in particular the use of mid-frequency sonar. We support the No Action Alternative and support a review of existing practices.

CDFU is a nonprofit political advocacy organization that directly represents the commercial fishing interests of over 1,000 fishermen in Prince William Sound, and indirectly supports the economic livelihood of the community of Cordova. For over 75 years, CDFU has strived to protect the health and sustainability of species that inhabit our waters and errs on the side of caution when assessing potential risks to these species.

As you should be aware through your extensive EIS process, Alaska has one of the richest ocean environments in the world, and the sustainability of our fisheries resources is of highest priority to our State – both from an economic and cultural perspective.

Thank you for the opportunity to comment on the Draft EIS. CDFU looks forward to reviewing the Final EIS and requests inclusion on the Navy postal mailing list to receive a full, printed copy when it is published.

Additionally, CDFU would like to request that the comment period for the Final EIS be increased to provide sufficient time for Alaska communities to respond – longer than the timeframe given during the comment period for the draft EIS, and at least 90 days.

Sincerely,

Rochelle van den Broek  
Executive Director

# CDFU COMMENTS

## Section: 4.1.3.1 Fishing & Section 2.6 FISH

During the explanation of commercial fishing activities there is a vague mention that a number of fisheries are at very depressed levels or are closed (referencing Richardson and Erickson 2005). The remainder of this section goes on to describe those fisheries that are currently in operation.

As acknowledged in the Draft EIS, Pacific Herring (*Clupea Pallasii*) are present in the GOA.

Despite the fact that this commercial fishery is currently not in operation, Pacific Herring are an ecologically and commercially significant species in the Gulf of Alaska and Prince William Sound ecosystem. Few species are of greater combined ecological and economic importance in Prince William Sound (and in many other coastal ecosystems) than is the Pacific herring<sup>1</sup>.

Pacific Herring are central to the marine food web; providing food to marine mammals, birds, invertebrates and other fish. The Exxon Valdez Oil Spill Trustee Council (EVOSTC), a council charged with overseeing the restoration of the injured ecosystem through the use of the \$900 million civil settlement and which consists of three state and three federal trustees (or their designees), has classified Pacific Herring as damaged and “Not Recovering”<sup>2</sup>. Pacific herring have not met their recovery objective. No strongly successful year class has been recruited into the population and health indices suggest that herring in the Sound are not fit.

Pacific herring are the subject of ongoing Trustee Council-funded research. Through this research, and the work of the Alaska Department of Fish and Game, Prince William Sound communities are hopeful for the return of a viable herring fishery in the future and are actively working towards this goal.

The collapse of the Pacific Herring fishery following the *ExxonValdez* oil spill indicates that this species is not particularly resilient to changes in their immediate marine environment. CDFU is concerned that the effects of mid-frequency sonar use in the GOA will stress an already weakened population and do not feel that this species was adequately addressed in the Draft EIS.

## Acoustic Effects of Underwater Sounds to Fish

Despite their lack of resilience to changes in their environment, Pacific Herring

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<sup>1</sup> Brown ED and MG Carls. 1998. Pacific Herring *Clupea Pallasii*. Restoration Notebook, Sept. 1998. Exxon Valdez Oil Spill Trustee Council.

<sup>2</sup> Exxon Valdez Oil Spill Trustee Council. Nov, 2006. Exxon Valdez Oil Spill Restoration Plan. Update on Injured Resources and Services 2006.

(Clupeidae) have the highest hearing range indicated of all marine species identified in the GOA, at 5 kHz. Some studies, however, demonstrate that the hearing range of the Pacific Herring is in fact much greater. Wilson and Dill (2002) reported that Pacific herring (*Clupea pallasii*) responded to sounds up to 140 kHz. As hearing “specialists”, Pacific Herring have the ability to hear over a much wider frequency range than most other fish.

Of grave concern to CDFU is the lack of available research that demonstrates the short and long term impacts to fish and marine mammals. It is apparent that there is very limited research available that focuses on the impacts of mid-frequency sonar use to fish, Pacific Herring in particular and the limited research that is available suggests that there is not only variation in effects of intense sound sources on different species of fish, but that there may also be differences based on genetics or development. Indeed, one can go even further and suggest that there may ultimately be differences in effects of sound on fish (or lack of effects) that are related to fish age as well as development and genetics, as was demonstrated by Popper et al. (2005).

Many references included in this section cite data based on freshwater fish, species not included in the GOA, and entirely different environmental conditions. These references do not fully describe the impacts to GOA specific species as there simply is not research available in this area.

Since the collapse of the herring fishery in 1996, millions of dollars have been expended to help scientists understand more about the inability of Pacific Herring to fully recover from the impacts of the *Exxon Valdez* oil spill. The ultimate goal of this research is to work towards the restoration of the Pacific Herring fishery returning it to its former abundance.

The lack of adequate research on mid-frequency sonar on Pacific Herring, and other fish species in the Gulf of Alaska is alarming. It is incomprehensible that a Department of U.S. Government (EPA or the DOD) would support any alternative other than the No Action alternative based on this lack of information and available research.

#### **4.2.8.2 Ship Strikes**

This section states that releasing individual expended materials would not have any significant effects on the environment, but does not indicate whether the cumulative effect of adding specific contaminants into the marine environment was fully analyzed. Elevated concentrations of certain chemicals can cause adverse effects on aquatic biota including reduced survival, impaired reproduction, and reduced growth. Release of toxic substances in the water may be quickly diluted; however, some toxic substances have the potential to bioaccumulate in the food chain.

Information included in the Draft EIS is not sufficient to detail the myriad of toxic chemicals that will be released into GOA waters, and the tendency of each specific chemical to bioaccumulate. A table describing each chemical's tendency to bioaccumulate (or not) would more accurately demonstrate the long-term environmental impacts of the proposed training activities. Currently, this area is severely lacking

despite the extreme quantities of foreign chemicals that are proposed to be expended in the GOA. It is likely that this too is an area where research is lacking.

**Table 3.2-2: Failure and Low-Order Detonation Rates of Military Ordnance**

The failure rate of guns, grenades, rockets, etc. ranges from 1.78% to 8.23%. Representation as a percentage does not clearly articulate the amount of ordnance that is left in an unexploded state. As indicated in the Draft EIS, the training activities will take place in an area frequented by commercial fishermen. An increase in training activities will increase the percentage of unexploded ordnance left on the ocean floor. While the training area is large, there is no way to predict where a commercial fisherman will place their net. The fishing process can include dragging nets across the ocean floor. Unstable, unexploded ordnance poses the potential for significant risk to commercial fishermen. It is incomprehensible that the Draft EIS does not include any information on this inherent risk to public safety.

**3.7.8 At-Sea Explosions**

Mitigation measures used to protect marine mammals may be inadequate. The Navy uses visual inspection and passive sonar to detect marine mammals prior to and during training activities. Passive sonar does not indicate the location of marine mammals, only that they are in the vicinity. The Navy will not cease training activities simply because they detect a marine mammal on the passive sonar; they will primarily rely on visual inspections to detect marine mammals and will only cease activities if the marine mammal comes within 200 yards. Marine mammals will only be detected when they come to the water's surface, thus they may have already entered the critical threshold area before they are spotted. Migration patterns should be studied and training exercises should occur outside of their migration routes.

Ordnance cannot be released and explosives cannot be detonated until the target area is determined to be clear. Training activities are halted immediately if cetaceans, pinnipeds, or sea turtles are observed in the target area. The Gulf of Alaska is prone to extreme weather and severe storms occurring regularly during the intended training exercise timeframe. The Draft EIS is lacking information relating to adverse weather conditions and how this would significantly impede Navy's ability to visually detect marine mammals and large schools of fish. This topic is briefly mentioned in *Operating Procedures & Collision Avoidance* however mitigation in this scenario is not well defined.

**Other**

Information on the migration patterns of fish is not sufficient. More information is needed in this area to fully describe the potential impact an increase in training activities might have to salmon returning to Prince William Sound and the Copper River.

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