UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Southeast Regional Office
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St. Petersburg, Florida 33701-5505
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June 15, 2015 F/SER47:ZS/pw

(Sent via Electronic Mail)

Mr. Michael Blaylock
Chief, Natural Assets, PAFB
Department of the Air Force, 45th Space Wing
1224 Jupiter Street, Mail Stop 9125
Patrick Air Force Base, Florida 32925

Attention: Keitha Dattilo-Bain

Dear Mr. Blaylock:

NOAA's National Marine Fisheries Service (NMFS) reviewed the Draft *Environmental Assessment for the 920th Rescue Wing Training Operations* (EA) prepared by the Department of the Air Force (USAF), 45th Space Wing Command, Patrick Air Force Base (PAFB), Florida. The EA evaluates the potential environmental consequences from modifying and modernizing training operations conducted by the 920th Rescue Wing (920 RQW), headquartered at PAFB, Brevard County. Specifically, the USAF proposes to enhance and modernize its use of water training areas, landing zones, drop zones, air refueling tracks, and areas used for munitions testing and tactical simulations. Proposed training locations in Brevard, Osceola, Orange, Polk, and Highland Counties include PAFB, Cape Canaveral Air Force Station/Kennedy Space Center, the Banana River, Tosohatchee Wildlife Management Area/St. Johns River Water Management District Conservation 32 Areas, Avon Park Air Force Range, Malabar Transmitter Annex, and the Atlantic Ocean. The great majority of the proposed training and locations would be a continuation of current activities at their current locations. In only a few cases are new activities or locations proposed. The USAF's initial determination is the proposed training described in the Draft EA and establishment of a new boat ramp in the Banana River would have a less than significant impact on federally managed fishery species or essential fish habitat (EFH). As the nation's federal trustee for the conservation and management of marine, estuarine, and anadromous fishery resources, the following comments and recommendations are provided pursuant to authorities of the Fish and Wildlife Coordination Act and Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act).

The Draft EA notes training activities proposed for the Banana River and Atlantic Ocean have the higher probability of impacting EFH, and NMFS agrees with this conclusion. Consequently, this review focuses on these two areas.

Banana River
The activities proposed for the Banana River include pararescue training, drops from helicopters of equipment and personnel, and amphibious vehicle training. These activities would occur in an area known as Drop Zone Judy, about 1.5 nautical miles northwest of PAFB. The Draft EA does

not provide water depths at Drop Zone Judy, however, the USAF subsequently noted the depths are 3.0 to 3.5 meters (9 to 11.5 feet) and the Final EA will include this information. The Draft EA provides the expected number of training events for Drop Zone Judy and notes this drop zone would not be used during portions of the spring and fall to reduce the potential for collisions with birds. The EFH designations most relevant for the proposed activities in the Banana River are in the fishery management plans (FMPs) for penaeid shrimp, the snapper/grouper complex, and coastal migratory pelagic species. Within these FMPs, the specific habitats identified as EFH most relevant to the proposed activities are seagrass, mangroves, oysters, and coral, and these habitats are designated Habitat Areas of Particular Concern (HAPCs), a subset of EFH warranting special protection based on rarity, susceptibility to human-induced degradation, ecological importance, or location in an environmentally stressed area. In additional to these specific habitat designations, the Banana River Aquatic Preserve is a state-designated nursery area and, accordingly, an HAPC or EFH, depending on the FMP.

Sections 3.6.2.1, 3.6.2.3, and 4.6.2 of the Draft EA provide general descriptions of the seagrass and mangroves within the Banana River; the Draft EA does not provide specific descriptions of these habitats at Drop Zone Judy. The relatively deep waters at Drop Zone Judy, necessary for trainees to safely perform drops and jumps, make seagrass and mangroves unlikely at the site. The Draft EA neither describes coral and oyster habitats generally within the Banana River nor specifically at Drop Zone Judy. The Draft EA notes the USAF "makes every reasonable effort to avoid contact or interaction with fauna in the [water training areas]." Specific best management practices (BMPs) noted in the Draft EA include:

- Briefings to familiarize trainees with issues related to seagrass avoidance when using propellers.
- Assessing proper water depth and draft clearance prior to launching amphibious vehicles to prevent impacts to potential seagrass, manatee, and fisheries resources.
- Only using existing Patrick Air Force Base boat ramps or the boat launch area (behind Facility 689) to launch vessels/zodiacs (future boat ramp location).
- Raising boat propellers while entering the water until appropriate depths are reached to prevent propeller drag on the estuary bottom that may destroy seagrass, if present in the area.

While these BMPs focus on seagrass, they also would be protective of mangroves, coral, oysters, and habitat complexes serving as nursery habitat. The NMFS requests the USAF expand the briefings and training on these BMPs to note they also should be followed when mangroves coral, oysters, and shallow-water areas are present in addition to seagrass. The NMFS also requests the Final EA describe the benthic habitat at Drop Zone Judy.

New Boat Ramp: The Draft EA and a supplementary email from the USAF dated April 28, 2015, describe one new boat ramp (0.03 acres of in-water impact), constructed with pre-fabricated concrete, is planned for the Banana River shoreline of PAFB (Figure 2-4 and Section 2.2.2). The USAF indicates, based on surveys conducted during 2012 and 2014, the shoreline is sparsely vegetated at this location and no hardbottom or seagrass occurs within 20 meters of the site of the proposed boat ramp, which has a sandy bottom. To construct the boat ramp, the USAF would grade (dredge) the area to a maximum depth of -4.0 feet mean low water, removing 48 cubic yards of material. A land-based excavator would be used, and all spoil material would

be placed in an upland area. No docks, pilings, riprap, or moorings are proposed as part of this project. The USAF would use turbidity curtains to minimize construction-related sedimentation of nearby habitat and comply with the Sea Turtle and Smalltooth Sawfish Construction Conditions dated March 23, 2006, developed by the NMFS. The projected construction duration is five to seven days. The NMFS believes the impact minimization measures proposed by the USAF are likely sufficient to protect EFH and federally managed fishery species.

Atlantic Ocean

In the Atlantic Ocean, pararescue training and drops from helicopters of equipment and personnel would be done in five existing water training areas offshore of South Patrick Shores and one new water training area offshore from Cocoa Beach, Nicholas McCaskill. All six of the training areas are in federal waters. The Draft EA provides the expected number of training events for each training area. In addition to the FMPs mentioned for the Banana River, FMPs with EFH designations relevant to the Atlantic Ocean water training areas include the FMP for coral, coral reef, and hardbottom and the NMFS FMP for highly migratory species (see EA Table 3-6).

Sections 3.4.2 and 4.6.2 of the Draft EA provide general descriptions of the habitats within Atlantic Ocean near the water training areas; however, localized information about each water training area is not included. The NMFS presumes the depths are about 50 feet for areas closer to shore and over 150 feet for the Ronnie Cavallo water training area. Data the NMFS obtained from the South Atlantic Fishery Management Council show coral and hardbottom habitat are not likely within the five more shoreward water training areas (Nicholas McCaskill, Bill Sutton, WP-44, WP-45 and Rick Smith). The center of the Ronnie Cavallo water training area is between the Oculina Bank and the Stetson/Savannah and East Florida Lithoherms/Miami deepwater coral management area; both of these areas are designated HAPCs through the FMP for coral, coral reef, and hardbottom. Based on the center coordinates and 26,400-foot radius provided by the USAF, the Ronnie Cavallo water training overlaps the Stetson/Savannah and East Florida Lithoherms/Miami deepwater coral management area.

The Draft EA does not discuss the BMPs the USAF would follow when using the Atlantic Ocean water training areas other than to note, as it did for Banana River, the USAF "makes every reasonable effort to avoid contact or interaction with fauna in the [water training areas]" and the marine debris control plan from 2003 would remain in effect. By email dated June 10, 2015, the USAF proposed to include in the Final EA and the within briefings the following BMPs to protect the Oculina Bank and Stetson/Savannah and East Florida Lithoherms/Miami deepwater coral management area:

- Familiarization of trainees with the importance of avoiding coral and hardbottom habitat when anchoring and deploying materials within the Ronnie Cavallo water training area.
- Maintaining the latitudes and longitudes of the locations of the Oculina Bank and Stetson/Savannah and East Florida Lithoherms/Miami deepwater coral management area and using GPS devices to avoid anchoring within these protected areas to the maximum extent practicable.
- Minimizing use of materials in the Ronnie Cavallo water training area that are difficult to retrieve.

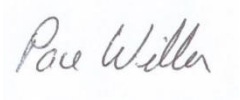
- Reporting to the NMFS Habitat Conservation Division when training activities may have affected coral or hardbottom habitat. Reports should include the locations, areas, and characterizations of the impacts so the need for habitat restoration actions can be assessed.

Given the water depths and likely absence of coral and hardbottom habitat from the five shoreward water training areas, the general impact minimization approaches discussed by the USAF should be sufficiently protective of EFH and federally managed fishery species during the proposed uses of these Atlantic Ocean water training areas. Similarly, the BMPs proposed for the Ronnie Cavallo water training area should be sufficiently protective of EFH and federally managed fishery species during the proposed uses of this Atlantic Ocean water training area.

Recommendations
The NMFS concludes the proposed modernization of training operations conducted by the 920 RQW would not adversely impact EFH due to the proposed BMPs. Accordingly, no EFH conservation measures are recommended. As noted above, the NMFS requests the documentation, briefings, and training on BMPs for activities occurring in the Banana River note the BMPs apply when mangroves, coral, oysters, and shallow-water areas are present in addition to seagrass.

The NMFS appreciates the opportunity to provide these comments. Please direct related questions to the attention of Mr. Brandon Howard in our West Palm Beach Field Office, located at 400 North Congress Avenue, Suite 120, West Palm Beach, FL 33401. He also may be reached by telephone at (561) 249-1652, or by email at Brandon.Howard@noaa.gov.

Sincerely,



/ for

Virginia M. Fay
Assistant Regional Administrator
Habitat Conservation Division

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