
APPENDIX F:
RESPONSE TO PUBLIC COMMENTS ON THE DRAFT SSEA

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COMMENT RESPONSE MATRIX
 DRAFT SITE-SPECIFIC EA FOR NSF-FUNDED OOI
 PUBLIC COMMENT PERIOD: AUGUST 9 – SEPTEMBER 30, 2010

<i>Comment Number</i>	<i>Commentor</i>	<i>Date</i>	<i>Comment</i>	<i>NSF Response</i>
FEDERAL AGENCIES – WEST (FAW)				
FAW-1	Jeffrey Cross Chief, Ocean & Coastal Resources Branch Natural Resource Prog. Ctr. National Park Service Fort Collins, CO	15 Sep	The National Park Service has reviewed this document and supports the Ocean Observatories Initiative (OOI). "...None of the planned installations are near our ocean and coastal parks, so I'm not concerned about direct or indirect impacts on park resources. I support NSF's Ocean Observatories Initiative because it will advance our understanding of the coastal oceans, which will benefit our ocean and coastal parks".	<i>Thank you for your comments.</i>
FAW-2	Ed Bowlby, Research Coordinator NOAA, Olympic Coast National Marine Sanctuary 115 E Railroad Ave., Suite 301 Port Angeles, WA	17 Nov	<p>First off I appreciate that you were able to give me additional time to review. Thanks. Sorry that I'm not able to do a more detailed review but my quick browse of the proposal makes it obvious that this had great scientific merits and deserves support.</p> <p>Since almost all of the operations for the Endurance Array will be south of the Olympic Coast National Marine Sanctuary boundaries, we don't have any issues with permits, etc. That's good.</p> <p>The one thing that I see is missing and should be addressed is whether the cabling/burying routes may or may not be crossing over the Grays Canyon Sponge Reef. This area is an existing EFH Conservation Area and there is a pending proposal thru PFMC to expand the boundaries (http://www.pcouncil.org/wp-content/uploads/Olympic_2_Grays_Canyon_EFH.pdf). It looks like this is in the general vicinity of the cable route.</p> <p>Also there has been very recent surveys in 2010 using both multibeam and AUV to further map out the sponge area. Three contacts that can provide more details on this are: Elizabeth Clarke <Elizabeth.Clarke@noaa.gov> Paul Johnson <johnson@ocean.washington.edu> Joe Schumacker <jschumacker@quinault.org></p> <p>Lastly I state again that I am very supportive of this project.</p>	<i>Thank you for your comments and notes on the OOI with respect to the OCNMS. As currently proposed, a cable is not part of the Grays Harbor Line and there would therefore be no cable burying in the area of Grays Canyon. The proposed cable and burying is only associated with the RSN component of OOI and it is further south off the coast of Oregon, beginning in Pacific City (refer to Figure 2-1b in the Final SSEA).</i>

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STATE AGENCIES – WEST (SAW)				
SAW-1	Dennis Griffin, State Archaeologist, Oregon State Historic Preservation Office Salem, OR	19 Aug	Our office recently received a request to review the proposal for the project referenced above. In reviewing the project EA I see that most of the work is to be done far offshore of Oregon's coastline. After looking through the analysis of potential effects I would like to clarify some of our office's concerns with the proposed scope of work. If I understand the project maps correctly, all work zones will be located many miles off the coast, whether these are the "inshore" or "offshore" components. The possibility of cultural resources site being located off shore, inundated due to past seismic changes along Oregon's coastline, exists and has recently been the subject of research efforts through the Oregon State University Anthropology Department (Dr. Loren Davis). For any work within a minimum five mile area of our coastline consideration should be made regarding submerged landforms and the possibility of earlier protected environments. Bathymetric and sonar studies are encouraged for all work affecting lands in these areas so that sufficient information on submerged terrain features can be assessed in regards to the location of potential submerged prehistoric sites.	<i>Thank you for your comments. Rick Spaulding, TEC Project Manager for the SSEA, spoke to Dr. Griffin via telephone to obtain further clarification regarding his comments. Based on the discussion, the University of Washington provided their bathymetric survey data for the proposed RSN cable route to the Oregon SHPO. Nothing further was requested.</i>
SAW-2	Juna Hickner, Coastal State-Federal Relations Coordinator, Ocean and Coastal Management Program, Oregon Department of Land Conservation and Development (DLCD), Salem, OR	7 Sep	Thank you for the opportunity to review this proposed project and to offer our assistance. The project is occurring partially within the boundaries of the Oregon Coastal Program, and can be expected to have effects on coastal uses and resources. The Oregon Coastal Management Program (OCMP) will be reviewing the project under the federal consistency provisions of the Coastal Zone Management Act of 1972, as amended. The regulations applicable to this project can be found at 15 CFR §930, Subpart C. To be consistent with the OCMP, the proposed project must be consistent 'to the maximum extent practicable' with: 1) the statewide planning goals; 2) the applicable acknowledged city or county comprehensive plan; and 3) selected state authorities (e.g. those governing removal-fill, water quality, beach and dune management, and fish & wildlife protections).	<i>Thank you for your comments. The portion of the proposed OOI that would be within Oregon state waters will be consistent to the maximum extent practicable with the OCMP (refer to Table 4-1 of the Final SSEA). In addition, in a Dec 23, 2010 letter to Tom Taylor, USACE, Portland District, your office concurred with the OCMP consistency certification for the Temporary Test Buoy 1 mile south of Yaquina Head to be installed by OSU. In addition, the DLCDC confirmed that the RSN component is consistent with the OCMP on Dec 6, 2010.</i>
SAW-3	Erik Thorsgard Cultural Resources Dept. Confederated Tribes of Grand Ronde Grande Ronde, OR	25 Oct	No comments or concerns.	<i>NSF appreciates receiving the input of the Confederated Tribes of Grand Ronde.</i>

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SAW-4	Dennis Griffin, State Archaeologist, Oregon State Historic Preservation Office, Salem, OR	12 Oct	<p>Our office recently received a request to review the proposal for the project referenced above. In checking our statewide cultural resource database, I find that there have been no previous cultural resource surveys completed near the proposed project area. However, the project area lies within an area generally perceived to have a high probability for possessing archaeological sites and/or buried human remains.</p> <p>While not having sufficient knowledge to predict the likelihood of cultural resources being within your project area, extreme caution is recommended during future ground disturbing activities. ORS 358.905 and ORS 97.740 protect archaeological sites and objects and human remains on state public and private lands in Oregon. If any cultural material is discovered during construction activities, all work should cease immediately until a professional archaeologist can assess the discovery. If your project has a federal nexus (i.e., federal funding, permitting, or oversight) please coordinate with your federal agency representative to ensure that you are in compliance with Section 106 of the NHPA.</p>	<p><i>Per a telephone conversation with Dr. Griffin on 19 Oct 2010, he understands that this project is the same as that which he commented on in Comment SAW-1. That is, SHPO case numbers 10-1858 (19 Aug) and 10-2085 (12 Oct) are the same project. TEC explained in more detail the proposed onshore activities associated with HDD and the RSN cable route. As there would be no ground-disturbing activities, his concerns provided in this comment were resolved.</i></p>
STATE AGENCIES – EAST (SAE)				
SAE-1	Deerin Babb-Brott, Director Massachusetts Office of Coastal Zone Management, Boston, MA	21 Sep	<p>In terms of the site-specific design, installation, and operation of the Ocean Observatories Initiative, based on our review of the Draft SSEA, CZM has determined that there are no significant foreseeable coastal effects to Massachusetts uses or resources at this time, and therefore federal consistency review is not required. If the above-referenced project is modified, including any changes resulting from permit, license or certification revisions, including those ensuing from an appeal, or the project is noted to be having effects on coastal resources or uses that are different than originally proposed, it is incumbent upon the proponent to notify CZM and submit an explanation of the nature of the change. CZM will use this information to determine if further federal consistency review is required.</p>	<p><i>Thank you for your comments. NSF will follow the direction provided in the comment.</i></p>
SAE-2	Brian Thomas, Director Office of Long Island Sound Programs State of Connecticut Dept. of Environmental Protection, Hartford, CT		<p>This Office submitted scoping comments in response to a memorandum prepared by TEC Inc. and dated January 7, 2008 announcing the preparation of the Programmatic Environmental Assessment (PEA) for the 001. Our letter, dated January 21, 2008, confirmed the State of Connecticut’s support for the deployment of ocean observing systems for the purposes of monitoring ambient environmental conditions and aiding in the study and management of ocean resources. We also indicated, however, that the</p>	<p><i>Thank you for your comments. Based on comments on the Draft SSEA, NSF has coordinated with the fishing groups listed in your comment letter and will continue to consult with the fishing community potentially impacted by the proposed Pioneer Array. NSF has actively engaged the public, including the regional fishing</i></p>

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			<p>mentioned memorandum contained insufficient information with which to assess the potential environmental impacts of the proposed activities. We subsequently received the PEA, which contains an assessment of the environmental consequences of the Pioneer Array. The SSEA describes the activities that would occur within the project area, but does not contain an individual environmental assessment of the Pioneer Array, instead referring to that found in the PEA.</p> <p>It does not appear that the Pioneer Array or the proposed associated activities, as described in the SSEA and the PEA, would have significant impact on resources of concern to the State of Connecticut. Marine mammals and reptiles that may occasionally utilize the waters of Long Island Sound may migrate through the proposed project area, although there is no means of tracking individuals, and it appears that both the fixed structures and mobile equipment could be effectively avoided by those animals. The proposed activities may, however, create a potential use conflict affecting the Connecticut coast. Connecticut-based commercial fishermen utilize the waters within the project area, and any restriction of existing fishing access or displacement of existing fishing activities related to OOI implementation could have adverse socioeconomic impacts on the state's fishing industry and coastal communities. Accordingly, Section 2.2.1.2 of the SSEA should include among the list of marine users with whom site-specific placement of hardware would be coordinated, the Connecticut Lobsterman's Association and the Southern New England Fisherman's and Lobstermen's Association, Inc.</p>	<p><i>community, in a process, known as micro-siting, to help NSF identify the placement of the proposed Pioneer Array moorings in a manner that considers potential impacts to the fishing community to the greatest extent practicable. Micro-siting meetings were held at the University of Rhode Island on Oct. 5 and Nov. 15, 2010 (refer to Appendix G of the Final SSEA). The micro-siting process will be ongoing with additional meetings as necessary and additional coordination with potentially affected marine users and stakeholders.</i></p> <p><i>In addition, based on other comments on the Draft SSEA, NSF prepared a Socioeconomic Impact Analysis Report (SIAR) to assess potential socioeconomic impacts to the fishing community with the installation and operation of the proposed Pioneer Array. The SIAR is included in the Final SSEA (see Section 3.3.1 and Appendix I). The micro-siting process will be ongoing with additional meetings, as necessary, and other coordination with potentially affected marine users and stakeholders.</i></p>
SAE-3	<p>Jeffrey Willis Deputy Director Rhode Island Coastal Resources Management Council Wakefield, RI</p>	4 Nov	<p>In accordance with Title 15 of the code of Federal Regulations, Part 930, subpart C (Consistency for Federal Activities) and review of plans entitled <i>Draft Site Specific Environmental Assessment for the National Science Foundation-Funded Ocean Observing Initiative</i> (OOI), the Coastal Resources Management Council hereby concurs with the determination that the referenced project is consistent with the Federally approved Rhode Island Coastal Resources Management Council Program and applicable regulations therein.</p>	<p><i>Thank you for your comments and concurrence with NSF's "no effects" determination under the CZMA.</i></p>

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SAE-4	<p>W. Michael Sullivan, Director Rhode Island Dept. of Environmental Management Providence, RI</p>		<p>The Rhode Island Department of Environmental Management offers the following comments on the DSEA for the Ocean Observatories Initiative.</p> <p>We recognize that the intent of this project is to provide for near real-time acquisition of oceanographic and meteorological data critical to managing our oceans. The initiative has the potential to provide a powerful database for ocean planning. We support the concept of a network of underwater ocean observing laboratories using new technologies. We further understand that the nodes of these observing systems will need to be placed in strategic areas where ocean dynamics are most informative. Still, there needs to be consideration of fishery uses of the sites with appropriate accommodations made to ensure that access to historic, productive fishing areas is not unduly impacted. As explained below, we feel strongly that the proposed site off southern New England poses major impacts to the RI fishing industry, and for that reason, we strongly urge that the proposal not move forward until all fishery interests are fully considered and addressed.</p> <p>This Department was not made aware of this major project proposal until last month (late August 2010), when we were notified by a member of the RI commercial fishing industry. We scrambled to learn what we could about the proposal, attended a meeting in Narragansett, RI on August 30, and struggled to compile comments prior to the initial September 15 deadline. While we appreciate the decision to extend the comment period to September 30, we believe that a project of this magnitude, with profound potential impacts on the RI commercial and recreational fisheries, should have been reviewed with RI fisheries interests long before it was presented to the National Science Board for approval.</p> <p>Our concerns regarding the apparent lack of transparency and lack of input during the design portion of the project appear to be shared concerns. We reach this conclusion based on our recent discussions with colleagues from neighboring states and local fishing industry representatives. It seems that none of the southern New England or Mid-Atlantic states was aware of or involved in the review process for this project, since almost all comments</p>	<p><i>Thank you for your comments.</i></p> <p><i>NSF took steps to make the NEPA process a very public one, including noticing the availability of NEPA documents in the Federal Register and local newspapers and sending documents to interested members of the public, federal and state agencies, and others with a potential interest in the process. NSF also advertised the availability of the NEPA documents in newspapers and commercial fishing magazines in an attempt to notify as many potentially interested members of the public as possible about the OOI and NSF's NEPA process (refer to Appendices D and E of the Final SSEA).</i></p>

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			<p>received to date have emanated from the West Coast. We further note that there have been no comments received to date from any fishing organizations along the entire East Coast. Our local fishery industry representatives feel completely blindsided by the proposal. Since the proposed project could lead to extensive closures of historical fishing grounds, local fishermen are expressing strong and justifiable concerns over how the project could affect their livelihoods.</p> <p>Oddly, it is our understanding that the one RI-based comment submitted to date came from the RI Coastal Resources Management Council (RI CRMC). For the record, we must note that the RI CRMC did not consult with us, or with any RI fishery interests. As far as we know, no one from RI knew that the RI CRMC commented on the project until well after their letter was submitted.</p> <p>RI is home to a large commercial fishing fleet that targets numerous fisheries using multiple gear types in a large portion of the continental shelf off southern New England –precisely the area where the project is proposed for placement. RI commercial landings of all species were valued at close to \$62 million in 2009, with an average value of over \$76 million over the past ten years. A significant portion of these commercial landings come from the area where the project is proposed for placement.. RI recreational fisheries are also highly valued. While the majority of recreational fishing occurs in close proximity to the RI shoreline, offshore fisheries for tunas, marlin, swordfish, and sharks do occur throughout the area where the project is proposed for placement.</p> <p>Specific commercial fisheries that utilize the proposed area are:</p> <ul style="list-style-type: none"> ➤ Lobster Pot fishery ➤ Red Crab Pot Fishery ➤ Monkfish Gillnet Fishery ➤ Pelagic Longline Fishery ➤ Otter Trawl fisheries for squid (<i>loligo & illex</i>), whiting, mackerel, monkish, butterfish, scup, summer flounder 	<p><i>NSF informed the Rhode Island Coastal Resources Management Council about the PEA in January 2008 and about the SSEA in May 2010 (see Appendix D of the Final SSEA). NSF received a response from Jeff Willis, RI Coastal Resources Management Council in June 2010 affirming that the proposed OOI is consistent with the coastal zone management program of RI.</i></p> <p><i>Based on comments on the Draft SSEA, NSF prepared a Socioeconomic Impact Analysis Report (SIAR) to assess potential socioeconomic impacts to the fishing community with the installation and operation of the proposed Pioneer Array (see Section 3.3.1 and Appendix I of the Final SSEA).</i></p>

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			<p>The proposed area also encompasses extensive Essential Fish Habitat (EFH) for numerous species; specifically, the area may include EFH designations for:</p> <ul style="list-style-type: none"> • Red Hake • Offshore Hake • Silver Hake • White Hake • Monkfish • Redfish • Tile fish • Yellowtail Flounder <p>We suggest that the project coordinator work with the New England Fisheries Management Council (NEFMC) Habitat Committee and the National Marine Fisheries Service Northeast Regional Office, Habitat Conservation Division to obtain more information regarding the EFH process and whether the DSEA should include EFH determination(s). The following links may also be useful to view EFH designated area: Essential Fish Habitat Mapper v2.0 http://sharpfin.nmfs.noaa.gov/website/EFH_Mapper/map.aspx</p> <p>The area has been designated a Habitat Area of Particular Concern (HAPC) by the NEFMC, and thus it is imperative that the NEFMC also be consulted on this particular designation. Under the Magnuson-Stevens Fisheries Conservation and Management Act, the New England and Mid-Atlantic Fisheries Management Councils should have been consulted for fisheries impacts during the DSEA process.</p> <p>It is clear to us that this project should not proceed unless and until stakeholder workshops are conducted throughout the region, and consensus recommendations from those workshops are incorporated into the proposal. The workshops should allow for a thorough evaluation of the current proposal, full discussion of all critical issues, and consideration of alternative locations for siting. It is imperative that the states, industry, regional fisheries management councils, and NMFS all be involved in this stakeholder review process.</p>	<p><i>Due to the nationwide extent of the proposed OOI, NSF coordinated with Karen Abrams, NMFS, Habitat Conservation Division, Washington, DC, regarding potential impacts to EFH under the MSA. In email and telephone conversations with her, she stated that she coordinated with local NMFS offices that oversee EFH within the proposed OOI project areas. Based on these discussions, she confirmed that since NSF determined that the proposed OOI would not have adverse effects on EFH, further consultation with NMFS is not required under MSA (refer to Appendix H of the Final SSEA).</i></p> <p><i>Based on the EFH Mapping site, the project area is not designated an HAPC. The closest HAPC is for tilefish, approx. 18 nm to the east and associated with Atlantis Canyon.</i></p> <p><i>Based on comments on the Draft SSEA, NSF has actively engaged the regional fishing community in a process, known as micro-siting, to help NSF identify the placement of the proposed Pioneer Array moorings in a manner that considers potential impacts to the fishing community to the greatest extent practicable. Micro-siting meetings were held at the University of Rhode Island on Oct. 5 and Nov. 15, 2010 (see Appendix G of</i></p>

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			<p>The RI Department of Environmental Management stands ready to participate in the above-described process and otherwise assist in any way that we can. We value the significant scientific benefits offered by the proposed project, but we caution that such benefits cannot outweigh the costs to the commercial and recreational fishing industries.</p>	<p><i>the Final SSEA). The micro-siting process will be ongoing with additional meetings as necessary and additional coordination with potentially affected marine users and stakeholders.</i></p>
SAE-5	<p>John Farrington Interim Dean and Professor Univ. of Massachusetts, Dartmouth School for Marine Science and Technology New Bedford, MA</p>		<p>I write in regard to the plans for the Pioneer Array of OOI. In my present position as Interim Dean of the School for Marine Science and Technology (SMAST), University of Massachusetts Dartmouth, I am aware of the concerns of the local fishing industry based in the New Bedford-Fairhaven, Massachusetts' area with respect to co-location of some of the Pioneer Array activities with fishing areas in the Georges Bank region and to the south.</p> <p>Faculty, graduate students, postdocs and staff of our Department of Fisheries Oceanography, SMAST have developed a close working relationship with the fishing industry, while maintaining academic objectivity, to advance scientific research underpinning sustainable fishing on Georges Bank and contiguous areas. Several of them have communicated concerns of the fishing people about the location and extent of the Pioneer Array.</p> <p>At the same time, we all recognize the benefits that can accrue from advances in knowledge of the fisheries habitat from the Pioneer Array. I am familiar with the scientific research efforts of colleagues at WHOI, having been on the Scientific Staff there from 1972 until I retired in March, 2006 and having been Dean there from August 1990 to November 2005.</p> <p>I am supportive of the efforts you outlined in our telephone conversations to have a series of planning-information meetings to increase the interactive flow of information between stakeholder communities such as the fishing communities and the scientists and engineers carrying out the objectives of the Pioneer Array. This will maximize the probability of avoiding misunderstandings about the scope and benefits of the Pioneer Array and minimize interference with other uses of the planned geographic location. If I can be of assistance in facilitating communications between NSF, stakeholders and the Pioneer Array researchers, please call on me.</p>	<p><i>Thank you for your comments. NSF has actively engaged with the local fishing community to obtain their input as to the placement, or micro-siting, of the proposed Pioneer Array moorings. Micro-siting meetings were held at the University of Rhode Island on Oct. 5 and Nov. 15, 2010 (see Appendix G of the Final SSEA). The micro-siting process will continue and the local fishing community will be given the opportunity to provide additional input and assist NSF in the placement of the moorings so as to avoid and minimize potential impacts to the fishing community to the greatest extent practicable.</i></p>

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INTERESTED PARTIES – WEST (IPW)				
IPW-1	Douglas Fricke President Washington Trollers Assoc. Westport, WA	1 Sep	Any midwater or bottom equipment <u>must</u> have a surface marker to prevent fishermen from entangling their fishing gear in the mid water or bottom equipment. Strongly suggest a workshop in Nov 2010 with the Coalition of Coastal Fisheries which represent the major fishing gear types in the area off of Ocean Shores, WA. The workshop should target how the fishermen can work with the siting and placement of the sensor location.	<i>Thank you for your comments. NSF held a public meeting at the Westport Maritime Museum, Westport, WA on Nov. 17, 2010 during which it sought input from the local fishing community as to the placement, or micro-siting, of the proposed Grays Harbor Line moorings off of Washington (see Appendix G of the Final SSEA).</i>
IPW-2	John Lavrakas Co-Chair, Yaquina Bay Ocean Observing Initiative Newport, OR	2 Sep	Our region has formed a task force to advance our region as a hub for ocean observing, leveraging the activities of OSU and Hatfield Marine Science Center. Such an activity would involve the development of local businesses and workforce in the deployment, operations, and maintenance of ocean observing sensors, as well as development and operation of systems to make use of ocean observing data. What steps are being taken to engage with local initiatives such as ours so that we may help us partner with the OOI.	<i>Thank you for your comments. NSF and OSU, Hatfield Marine Science Center have and will continue to coordinate with local and regional organizations such as the Yaquina Bay Ocean Observing Initiative as to the progress of the proposed OOI.</i>
IPW-3	John Lavrakas Co-Chair, Yaquina Bay Ocean Observing Initiative Newport, OR	2 Sep	Ensure the process for defining data formats and dissemination standards is open to permit those involved in complementary programs (e.g., development of salmon fisheries databases) are able to participate. This will help in harmonizing data standards and could help drive the types and frequencies of data being distributed.	<i>Thank you for your comment. OSU is addressing the data format and compatibility needs of multiple end user groups in collaboration with the OOI Cyberinfrastructure Implementing Organization located at the University of California San Diego.</i>
IPW-4	Chuck Pavlik, President Coastal Conservation Assoc., Central Coast Chapter, Waldport, OR	2 Sep	Oral comments were made during the public hearing (<i>refer to the Newport, OR public hearing transcript</i>)	<i>Refer to response to Comment NPH-2 below.</i>
IPW-5	Paul Hanneman, Co-Chair Craig Wenrick, Co-Chair Pacific Dorymens Assoc. Pacific City, OR	6 Sep	The proposed project at Pacific City, Oregon, crosses directly through our traditional and historic recreational and commercial dungeness crab fishery, our salmon troll fishery, and our groundfish area, specifically halibut. This section of the Oregon coast is one of the most heavily-used between Seattle, WA, and San Diego, CA. <i>[The following is from an attached letter dated 17 Feb 2010:]</i> The proposed cable landing at Pacific City, Oregon, is within our traditional and historic fishery area. We were under the impression, from previous contacts, that no net loss to our fishery would occur.	<i>Thank you for your comments. NSF has coordinated with the regional fishing community regarding the placement, or micro-siting, of the proposed OOI moorings and the cable route off the coast of Oregon. In addition to a meeting on Nov. 17, 2010 with local and regional fishing interests regarding the micro-siting of the proposed OOI moorings (see Appendix G of the Final SSEA), NSF is also coordinating with the</i>

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			<p>The Association does not support a cable landing or associated facilities between 45° 21' to 45° 02' N that jeopardizes the social, economic, or environmental values of this area.</p>	<p><i>Oregon Fishermen's Cable Committee (OFCC) regarding the proposed RSN cable route from Pacific City. No net loss to any fishery is expected with the installation and operation of the proposed cable, particularly since the cable will be buried below the sediment to a depth of 1.3 m (~4 ft) out to the 700-fathom contour.</i></p>
IPW-6	John Lavrakas Newport, OR	15 Sep	<p>The NSF seeks to understand the environmental effects of the Ocean Observatories Initiative. One such effect not being adequately considered is the economic and social impact to the Newport, Oregon region by the deployment of the Endurance Array. It is not possible to invest hundreds of millions of dollars in developing, operating and maintaining an ocean observatory infrastructure off the coast of Newport, Oregon without profoundly affecting this rural region. Consider the following:</p> <ol style="list-style-type: none"> 1. Newport has 10,000 residents with an economic base tied to commercial fishing, tourism, retirement, and work in the marine sciences. 2. Newport has one elementary school, one middle school, one high school, and a community college. 3. The region has modest hospital facilities for general care and well being, although many people requiring specialty care such as cancer treatment still must travel an hour into the Willamette Valley for treatment. 4. The economy of its county (Lincoln County) is depressed with higher than average unemployment and lower than average wages. 5. Affordable family housing is in limited supply, with the price of many homes on the coast driven up by higher than normal real estate costs. <p>The development of the OOI will require a workforce for the construction, deployment, operations, and maintenance of the system. Either these personnel will come from the existing labor pool, or personnel will need to be brought into the region. In the first case, specialty training will be required to qualify the individuals to work. In the second case, the region must be able to support the short term and long term influx of workers and families. If both cases apply, then each will have corresponding impacts on the region. These impacts are not known, because they have not yet been investigated.</p>	<p><i>Thank you for your comments. While the placement and operation of the proposed OOI off the coast of Oregon will involve a large financial investment, the potential impact to regional services such as medical care, schools, etc. will not be impacted. There will be no major construction effort associated with OOI in Newport, OR. The main effort in the installation of the proposed moorings would involve the installation of moorings and cabling from an OSU-contracted ship. Although some jobs will be generated to support the installation and operation & maintenance of the proposed OOI, the majority of the effort will be accomplished with existing personnel at OSU or with local fishermen.</i></p>

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			<p>For this reason, I recommend resources be applied toward understanding the social and economic impact the OOI will have on the region about Newport, Oregon. In particular:</p> <ol style="list-style-type: none"> 1. Assess the workforce needs, including size, skill sets, experience levels, and duration of employment for each phase of the life cycle. 2. Coordinate with Newport leaders, including the economic development authorities, educational institutions, health and human services to identify actions that can be taken to prepare for the workforce needs that will occur. 3. Identify the capabilities the regions has to support the construction, deployment, and O&M needs. 4. Identify shortfalls or gaps that need to be addressed prior to commencing the buildout in the region. <p>By these comments, I am not implying that the deployment of the Endurance Array will have a negative effect for Newport. In fact, it should be quite the opposite, bringing jobs and opportunity to many in this region. But I do feel to affect the region responsibly and most advantageously, the factors I have cited should be taken into account.</p>	
IPW-7	John Sherman Newport, OR	21 Sep	<p>In general, I support the Ocean Observatories Initiative. The Pacific Ocean, including near shore, is largely a science unknown territory very much in need of a systematic, long term program of readily available, real time ocean water and seabed physical, chemical, and biological data. The first two needs seem to be part of this program. Am not certain about any biological data.</p> <p>But, even necessary and scientifically rewarding programs may have unintended, adverse consequences. That is what concerns me. My comments center on possible harm to aquatic life particularly cetaceans and pinnipeds from acoustic sensors.</p> <p>Whales are highly sensitive to low frequency sounds and use sound waves to communicate over long distances. Any low frequency acoustic device that harms whale hearing or interferes with their communication can jeopardize them.</p> <p>Between late April and late October, in most years, gray whales, female and young ones, feed near shore along the Oregon coast.</p> <p>I have not been able to contact the cetacean acoustic expert at the</p>	<p><i>Thank you for your comments. The proposed OOI would collect and provide physical, chemical, and biological data for the inshore and offshore areas in the vicinity of the OOI infrastructure.</i></p> <p><i>Low frequency is generally defined as active acoustics operating at a frequency less than 1,000 hertz or 1 kilohertz. The proposed OOI would not utilize any low-frequency active acoustics (see Table 2-7 in the Final SSEA) and therefore would not impact whales that utilize low frequencies.</i></p> <p><i>Based on the analysis presented in the</i></p>

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			<p>NOAA Marine Fisheries office in the Newport Hatfield Marine Science Center, so, I cannot express more than very general concerns about acoustic affects. I did contact the pinniped expert in that office showing him your Initiative Draft document. He believes there will be no specific harm to seal and sea lion acoustic sensibilities.</p> <p>Regarding electromagnetic energy sensitivities of sharks, rays and skates my marine science reference materials state the following. By means of ampullae of Lorenzini, jelly filled pores in a sharks head, they are sensitive to weak electrical currents of their prey contracting muscles and can detect electric fields as weak as five billionths of a volt per centimeter. These sensitivities are essential to shark, ray and skate hunting prowess. Any man-caused harm to these sensitivities could jeopardize their lives. A Bodega, California marine lab biologist believes that hammerhead sharks follow minute geomagnetic lines when moving from place-to-place. Other shark species likely use the same means to migrate. Electrical interference could harm shark migratory skills. I hope that acoustic and electrical potential hazards to marine life from the array of ocean observatory devices have been thoroughly examined by marine and other appropriate scientists in the course of preparing the Environmental Assessment document and that these possibilities have not merely been ignored under findings of “no significant impact”.</p> <p>Public confidence in the scientific expertise and ethical objectivity and adherence to environmental and other law requirements in [word not readable in original handwritten letter] this and other project evaluations is not something to be lightly dismissed.</p> <p>I hope Ocean Observatories program will in NO way jeopardize marine species survival or their habitat quality.</p> <p>I am pleased the public comment period has been extended to September 30th. Please keep me informed about future Ocean Observatory activities and studies.</p>	<p><i>Programmatic EA and the Final SSEA, proposed OOI activities would not jeopardize marine species. This conclusion was supported by the Letters of Concurrence from the National Marine Fisheries Service regarding potential impacts to marine mammals, including all species listed under the Endangered Species Act. Refer to Appendix H of the Final SSEA.</i></p> <p><i>Based on a review of EMF effects from OOI cables by the University of Washington 2010, the magnetic and electric fields associated with the proposed OOI infrastructure would be less than those found naturally in the world’s oceans. For example, since the proposed RSN cable would be buried to a depth of 1.3 m out to the 700-fathom depth, there would be no detectable electric fields. The expected magnetic field (0.076 micro Tesla) would be significantly less than the Earth’s natural magnetic field (70 micro Teslas). Additional information regarding EMF impacts to marine species can be found in Section 3.2.2.1 of the PEA and Section 3.2.4.2 of the Final SSEA.</i></p>

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IPW-8	Douglas Fricke, President, Washington Troller Assoc.	18 Aug	<p>Hi Jean, I finally have a day off the Ocean to review the “Draft Site Specific EA and Attachment”. In couple of evening hours, I only have a chance to skim the document, but I am very disappointed that you are charging ahead with this process before our local fishing representatives will have a chance to give local knowledge into making this a successful scientific process. You have been working with the fishermen off of Oregon since the first of the year where WA fishermen were informed of the project in late May. One dramatic shortcoming that I noticed in the EA is that there is no recognition of the Hook and Line commercial salmon troll fishery that will be affected by the deployment off of Grays Harbor. This leads me to wonder what else has been left out of the EA. Did you receive my Email comments as to suggested revisions that I sent to you and the review process? I noticed that they were not listed in the Attachment with the other comments that you received. Now you have set a Sept 1 date for the next meeting of the Grays Harbor Fishermen which is still during our summer fisheries. We have indicated to you that most of our fishermen will not be winding down the summer fisheries until October. Don’t know what else to say – you are not making it very easy for our Grays Harbor commercial community to participate in making the project a success. This is too important to rush and have someone inadvertently damage equipment because they wanted to transit or fish where the equipment is placed.</p>	<p><i>Thank you for your comments. Based on comments on the Draft SSEA, NSF has coordinated with the fishing groups listed in your comment letter and will continue to consult with the fishing community potentially impacted by the proposed Endurance Array through the micro-siting process. This process is designed to actively engage the regional fishing community in a process to help NSF identify the placement of the proposed Grays Harbor Line moorings off of Washington in a manner that considers potential impacts to the fishing community to the greatest extent practicable. Micro-siting meetings were held at the Westport Maritime Museum, Westport, WA on Nov. 17, 2010 (refer to Appendix G of the Final SSEA). The micro-siting process will be ongoing with additional meetings as necessary and additional coordination with potentially affected marine users and stakeholders.</i></p>

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INTERESTED PARTIES – EAST (IPE)				
IPE-1	Anthony Faciano, Wakefield, RI	30 Aug	My name is Tony Faciano, Captain of the V/V Shelby Ann. She is a 70 foot steel dragger. I have been operating in Area 537 for over 25 years. I know that bottom very well. I would like to suggest placing the moorings on many of the local shipwrecks or hangs. I can provide GPS coordinates of many possible locations. I communicate with all of the offshore mobile gear fisherman and know certain areas we avoid. I'm very excited with the prospect of knowing the bottom temperature and a 3D layer of water column. I fish for squid and look for temp breaks all the time. It would save a lot of steaming time. Let me know if I can help you with my local knowledge.	<i>Thank you for your comments and for offering to share your local knowledge with NSF. Proposed OOI moorings cannot be placed on local shipwrecks as that would potentially impact historical resources protected under federal law. In addition, due to the need for the mooring to be on an even, sandy bottom, it is not possible to place the moorings on known hangs.</i>
IPE-2	Peg Parker, Executive Director, Commercial Fisheries Research Foundation, Saunderstown, RI	8 Sep	Extend the comment period. Pause this process. Bring the fishing community in in a real way.	<i>Thank you for your comments. The comment period was extended to Sep. 30, 2010. NSF has actively engaged with the local fishing community to obtain their input as to the placement, or micro-siting, of the proposed Pioneer Array moorings. Micro-siting meetings were held at the University of Rhode Island on Oct. 5 and Nov. 15, 2010 (see Appendix G of the Final SSEA). The micro-siting process will continue and the local fishing community will be given the opportunity to provide additional input and assist NSF in the placement of the moorings so as to avoid and minimize potential impacts to the fishing community to the greatest extent practicable.</i>
IPE-3	Nicholas A. Vincelette, Constituent Caseworker, U.S. Senator S. Whitehouse Providence, RI	9 Sep	Thank you for your time last night at the Ocean Observatories Public Hearing. Per your request, I am sending the contact information for two fishing industry organizations in Rhode Island that you may want to reach out to for any comments to include in the draft SSEA. They are: Rich Fuka, President , Rhode Island Fisherman's Alliance and Tina Jackson, President, American Alliance of Fishermen and their Communities	<i>Thank you for the contact information for the fishing organizations. They have been added to our OOI SSEA distribution list and will be informed of any and all meetings and public documents related to the proposed OOI, particularly with respect to the on-going micro-siting process for the Pioneer Array.</i>

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IPE-4	<p>Gary Mataronas, President Mataronas Lobster Co., Inc. F/V Edna May Little Compton, RI</p> <p>James Mataronas Sakonnet Lobster Company F/V Sakonnet Lobster</p>	9 Sep	<p>I, and my brother Jim own two offshore lobsterboats and have lobstered in the area since 1974 where the planned Pioneer Array is going to be placed. We fought with the Russian, Polish, Japanese and other foreign draggers over this bottom before the 200 mile limit was put in place. We then had many gear conflicts with domestic draggers trying to hold onto this very productive lobster bottom. About 20 years ago the draggers and lobstermen met at the 1st Coast Guard District in Boston to hammer out a solution to reduce fixed gear versus mobile gear conflicts. We came up with a solution where draggers would fish outside 110 fathoms and lobstermen would stay inside 100 fathoms with a 10 fathom buffer zone in the summer and it would be reversed in the winter.</p> <p>So as you can see there has been a considerable amount of interaction amongst user groups in this area. The Pioneer Array will only add to the gear conflict problems. My fear is if there are several unintentional conflicts the fishermen will surely be made to leave the area, which will put us out of business. (Lobstermen just can't move to other areas because the entire Continental Shelf has been taken up by other lobstermen and if you move into their areas you run the risk of getting your gear cut up. Lobstermen stake out their bottom and generally don't allow other boats into their area, a practice that is respected by all.)</p> <p>We certainly feel the most important stakeholders are the fishermen, and we have been left out of the process. We hope this wasn't done on purpose, but it certainly puts us at a disadvantage in a process that seems to be sailing right along.</p> <p>We think you should be upfront with the fishermen and let them all know about this project and not keep it under a vale of secrecy, which seems to be occurring. The process should be slowed down and get the fishermen together with NSF,OOI for a round table discussion to go over the locations of the moorings and attached equipment and the what-ifs if there are gear entanglements.</p> <p>The fishermen cannot lose anymore productive bottom under any circumstances.</p>	<p><i>Thank you for your comments. NSF took steps to make the NEPA process a very public one, including noticing the availability of NEPA documents in the Federal Register and local newspapers and sending documents to interested members of the public, federal and state agencies, and others who expressed an interest in the process. NSF also advertised the availability of the NEPA documents in newspapers and commercial fishing magazines in an attempt to notify as many potentially interested members of the public as possible about the OOI and NSF's NEPA process (refer to Appendices D and E of the Final SSEA).</i></p> <p><i>Based on comments on the Draft SSEA, NSF has actively engaged the regional fishing community in a process, known as micro-siting, to help NSF identify the placement of the proposed Pioneer Array moorings in a manner that considers potential impacts to the fishing community to the greatest extent practicable. Micro-siting meetings were held at the University of Rhode Island on Oct. 5 and Nov. 15, 2010 (refer to Appendix G of the Final SSEA). The micro-siting process will be ongoing with additional meetings as necessary and additional coordination with potentially affected marine users and stakeholders. In addition, based on comments on the Draft SSEA, NSF prepared a Socioeconomic Impact Analysis Report (SIAR) to assess potential socioeconomic impacts to the fishing community with the installation and operation of the proposed Pioneer Array (Section 3.3.1 and Appendix I of the Final SSEA).</i></p>

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IPE-5	Crista Bank Fisheries Research Technician SMAST - UMass Dartmouth Fairhaven, MA	13 Sep	<p>I was at the Ocean Observatories Initiative Public Hearing in New Bedford, MA on Sept. 8, 2010 to learn about the Pioneer Array. It sounds like a great program and a worthwhile endeavor, however I am concerned about the location of the site designated for the Pioneer Array and my first comment is to suggest extending the comment period beyond Sept 15, 2010 and providing outreach to the fishing community. My reasoning for this extension is the group of people most effected by this - fishermen: gillnetters, lobstermen, and draggermen are not aware of the project and this is an area that is heavily fished by all of them.</p> <p>I work at UMass Dartmouth's School for Marine Science and Technology and I've been working with a group of gillnetters who target monkfish and fish throughout the area where you want to put movable gear, from Veatch's Canyon past Block Canyon. The gillnets used for monkfish are bottom sink gillnets, fixed gear with tie downs, so they are not very high in the water column but they are still fixed and soak time can range from 3 to 5 days. If your equipment, gliders and AUVs are constantly moving throughout the water column I can see potential problems of your gear getting hung up in the gillnets causing damage to both pieces of equipment not to mention the loss of the fish catch. All of the fishermen I work with who I've contacted know nothing about this project. This winter I'll be working with scientists from the Gulf of Maine Research Institute and gillnet fishermen to tag monkfish in the area around Atlantis Canyon. Most of the tagging work with monks we've done so far has been inshore, but we are extending the tagging work and targeting the offshore population which extends into the canyons along the shelf, the same area where you want to put movable gear. Although this is the first year we will be tagging in this area we hope to continue working in this area in the following years. In conclusion, my two comments are:</p> <ol style="list-style-type: none"> 1) Extend the comment period and make an effort to get the fishing industry involved since they are the ones effected by this project. 2) Consider locating the array in an area that is not heavily fished. Talk to fishermen of all different gear types and figure out where those areas are. There are many areas where fishermen can't fish due to regulations, closures, management measures, etc. So there's a good chance you might be able to find an area that still suits your needs and doesn't impact the fishing industry. 	<p><i>Thank you for your comments. In response to your comment that the comment period be extended, please note that the comment period was extended to Sep. 30, 2010.</i></p> <p><i>NSF took steps to make the NEPA process a very public one, including noticing the availability of NEPA documents in the Federal Register and local newspapers and sending documents to interested members of the public, federal and state agencies, and others who expressed an interest in the process. NSF also advertised the availability of the NEPA documents in newspapers and commercial fishing magazines in an attempt to notify as many potentially interested members of the public as possible about the OOI and NSF's NEPA process (refer to Appendices D and E of the Final SSEA).</i></p> <p><i>Based on comments on the Draft SSEA, NSF has actively engaged the regional fishing community in a process, known as micro-siting, to help NSF identify the placement of the proposed Pioneer Array moorings in a manner that considers potential impacts to the fishing community to the greatest extent practicable. Micro-siting meetings were held at the University of Rhode Island on Oct. 5 and Nov. 15, 2010 (see Appendix G of the Final SSEA). The micro-siting process will be ongoing with additional meetings as necessary and additional coordination with potentially affected marine users and stakeholders.</i></p> <p><i>In addition, based on comments on the Draft SSEA, NSF prepared a Socioeconomic Impact Analysis Report (SIAR) to assess potential socioeconomic impacts to the</i></p>

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				<p><i>fishing community with the installation and operation of the proposed Pioneer Array. The SIAR is included in the Final SSEA (see Section 3.3.1 and Appendix I).</i></p>
IPE-6	<p>Keith Chasse F/V Capt. Bligh of Abundant Fisheries South Kingstown, RI</p>	27 Sep	<p>Knowledge and understanding of the oceans around us is imperative. It gives us clues to climate and biological changes that are taking place right before us. I can understand the need for the data that will be retrieved from the buoys and instrumentation that you are seeking to install, but question your placement.</p> <p>Commercial fishermen are the only ones that are going to be displaced by your equipment. We work and live in the very place you seek. Lobster gear is set on the exact latitude and longitude of the instruments you want to set on the edge of the continental shelf. A half mile safe zone will be taking hundreds of thousands of dollars directly out of the pockets of the men who fish there. Dragger-men also work the "edge". There is a closed area that had to be developed to keep mobil gear (draggers tow nets) from interfering with fixed gear (lobstermen and gill netters set gear that remain on the bottom). The 150 to 200 fathom range along the edge has restricted times of gear for specific times of year. Lobstermen set their traps between 150 ftm and 200 ftm from thanksgiving to June 15. That means the draggers can tow their nets shoal of 150 ftm or deeper than 200 ftm. The opposite occurs from June 15 through thanksgiving.</p> <p>Educated and professional fishermen will be able to fish in a close proximity to your equipment with no interference. It is those that don't know it is there or don't care that it is there that are going to be the problem. If your gear is set on the 150 and 200 fathom contours there are fewer chance of incidence occurring. On top of the shelf it will be easier to avoid. The biggest concern is that if one or multiple of you sensors gets entangled with fishing gear that we are going to be shut out of "the box". There are all ready enough boxes that we are shut out of. The ocean as commercial fishermen know it is getting smaller and smaller as the uses for it increase.</p> <p>The commercial fishing industry has already conceded to many interest groups and are running out of patience. In reality no one</p>	<p><i>Thank you for your comments. Based on comments on the Draft SSEA, NSF has actively engaged the regional fishing community in a process, known as micro-siting, to help NSF identify the placement of the proposed Pioneer Array moorings in a manner that considers potential impacts to the fishing community to the maximum extent practicable. Micro-siting meetings were held at the University of Rhode Island on Oct. 5 and Nov. 15, 2010 (see Appendix G of the Final SSEA). The micro-siting process will be ongoing with additional meetings as necessary and additional coordination with potentially affected marine users and stakeholders.</i></p> <p><i>In addition, based on comments on the Draft SSEA, NSF prepared a Socioeconomic Impact Analysis Report (SIAR) to assess potential socioeconomic impacts to the fishing community with the installation and operation of the proposed Pioneer Array. The SIAR is included in the Final SSEA (see Section 3.3.1 and Appendix I).</i></p>

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			<p>owns the ocean, but fishermen work it the most and have the most at stake to lose. The boats that fish the area you are seeking are half to one million dollar operations that provide millions of pounds of seafood to the public creating a multi-billion dollar industry. The majority of the country enjoys the high quality of seafood we deliver, but not many understand the reality of what we do, or where we do it. I understand why you want to know the science behind the reason we the fishermen work where we work, and the significance of it's geographical location in relation to biological diversity and climatology. With that said please keep in mind that this is not a game. You are jeopardizing incomes for families and the viability of small businesses in a hard economic time.</p> <p>Please keep me and my fellow fishermen informed as your project progresses. If you or any of your associates needs an open decked vessel to move equipment or people please keep me in mind. I am a licensed captain with vessel for hire.</p>	
IPE-7	<p>Michael Marchetti, President, Eastern New England Scallop Assoc. Wakefield, RI</p>	28 Sep	<p>I am writing on behalf of the Eastern New England Scallop Association in response to your request for comments on the Site-Specific Environmental Assessment (SSEA) for the National Science Foundation-Funded Ocean Observatories Initiative (OOI).</p> <p>The fishing industry was taken completely off-guard by this project; and this entire Environmental Assessment has circumvented the procedures set up by the government to fully vet the social and economic issues surrounding large scale projects such as this. As a strong participant in the RI OSAMP process, I find this course of action is both odd and unjust; it is unfathomable to imagine that a mere environmental assessment was approved for a project of this magnitude. There are a multitude of questions and severe environmental and economic impacts that have not yet been considered, nor explored.</p> <p>Both public notice and stakeholder input, to date, can be considered minimal at best. Had we not "stumbled" upon it and contacted the agency, it is likely that it would have proceeded devoid of any stakeholder input at all, indifferent to the NEPA process. The public hearing was poorly attended due to inadequate public notice. Those who did attend, however, were very articulate in their comments to the project participants; they all commented</p>	<p><i>Thank you for your comments. NSF took steps to make the NEPA process a very public one, including noticing the availability of NEPA documents in the Federal Register and local newspapers and sending documents to interested members of the public, federal and state agencies, and others who expressed an interest in the process. NSF also advertised the availability of the NEPA documents in newspapers and commercial fishing magazines in an attempt to notify as many potentially interested members of the public as possible about the OOI and NSF's NEPA process (refer to Appendices D and E of the Final SSEA).</i></p> <p><i>Based on comments on the Draft SSEA, NSF has actively engaged the regional fishing community in a process, known as micro-siting, to help NSF identify the placement of the proposed Pioneer Array moorings in a manner that considers potential impacts to the fishing community to the greatest extent</i></p>

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			<p>similarly that the project should be halted until the project participants collaborated with a stakeholder advisory group, who would then, ultimately, require written assurances guaranteeing that the areas encompassing the Pioneer Array would not become exclusive, and that fishing would continue indefinitely (barring fishery regulations), without any sort of interruption. The extension of the comment period and the lack of any communication to the fishing industry by the project participants, since the public hearing, demonstrate how serious those comments were taken by the NSF.</p> <p>This project encompasses thousands of square nautical miles, expressly in the center of one of the most fertile commercial fishing grounds in the northeast.</p> <p>Other than lobster fishing, there is groundfishing, red crabbing, gillnetting, and surface and bottom longlining taking place in the specific area on which the NSF is planning to locate their ocean observatory. It is unthinkable that any federal agency should expect to "drop" a project in the middle of the ocean, without thought or consideration of those who will be displaced from the area. This is not a matter the fishing community is taking lightly, and continues to request that meetings between the project participants and a fishery advisory group take place to mitigate this plan, in order for it to be acceptable to both the NSF and the fishing community.</p>	<p><i>practicable. Micro-siting meetings were held at the University of Rhode Island on Oct. 5 and Nov. 15, 2010 (see Appendix G of the Final SSEA). The micro-siting process will be ongoing with additional meetings as necessary and additional coordination with potentially affected marine users and stakeholders.</i></p> <p><i>In addition, based on comments on the Draft SSEA, NSF prepared a Socioeconomic Impact Analysis Report (SIAR) to assess potential socioeconomic impacts to the fishing community with the installation and operation of the proposed Pioneer Array (see Section 3.3.1 and Appendix I of the Final SSEA).</i></p>
IPE-8	<p>Bob and Dennis Colbert F/V Virginia Marie, Trebloc Seafood, Inc. F/V Miss Julie, Colbert Seafood, Inc. F/v Chelsea Girl, Manomet Seafood, Inc. Manomet, MA</p>	28 Sep	<p>We are writing to you in response to your request for comments on the Site-Specific Environmental Assessment (SSEA) for the National Science Foundation-Funded Ocean Observatories Initiative (OOI).</p> <p>We just found out about this through our association (AOLA) and are absolutely stunned by how this process is happening. We absolutely stand behind AOLA's statement: "This course of action is both odd and unjust; it is unfathomable to imagine that a mere environmental assessment was approved for a project of this magnitude. There are a multitude of questions and severe environmental and economic impacts that have not yet been considered, nor explored."</p>	<p><i>Thank you for your comments. In response to your comment that the comment period be extended, please note that the comment period was extended to Sep. 30, 2010.</i></p> <p><i>NSF took steps to make the NEPA process a very public one, including noticing the availability of NEPA documents in the Federal Register and local newspapers and sending documents to interested members of the public, federal and state agencies, and others who expressed an interest in the process. NSF also advertised the availability of the NEPA documents in newspapers and</i></p>

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			<p>We also agree 100 % with AOLA’s following statements: “Both public notice and stakeholder input, to date, can be considered minimal at best. No fishing entities the east coast were made aware of this project. Had we not “stumbled” upon it and contacted the agency, it is likely that it would have proceeded devoid of any stakeholder input at all, indifferent to the NEPA process. The public hearing was poorly attended due to inadequate public notice. Those who did attend, however, were very articulate in their comments to the project participants; they all commented similarly that the project should be halted until the project participants collaborated with a stakeholder advisory group, who would then, ultimately, require written assurances guaranteeing that the areas encompassing the Pioneer Array would not become exclusive, and that fishing would continue indefinitely (barring fishery regulations), without any sort of interruption. The extension of the comment period and the lack of any communication to the fishing industry by the project participants, since the public hearing, demonstrate how serious those comments were taken by the NSF.”</p> <p>We are a family owned and run fishing business out of Sandwich Massachusetts, and cannot believe how this project is being pushed through without adequate time to allow us to attend meetings and respond and participate in a plan that may work for all parties concerned. We fish in this area and this is where we try to make a living and support our families and the families of the crews from each boat.</p> <p>Please allow the fishing community to participate in the process.</p>	<p><i>commercial fishing magazines in an attempt to notify as many potentially interested members of the public as possible about the OOI and NSF’s NEPA process (refer to Appendices D and E of the Final SSEA).</i></p> <p><i>Based on comments on the Draft SSEA, NSF has actively engaged the regional fishing community in a process, known as micro-siting, to help NSF identify the placement of the proposed Pioneer Array moorings in a manner that considers potential impacts to the fishing community to the greatest extent practicable. Micro-siting meetings were held at the University of Rhode Island on Oct. 5 and Nov. 15, 2010 (refer to Appendix G of the Final SSEA). The micro-siting process will be ongoing with additional meetings as necessary and additional coordination with potentially affected marine users and stakeholders.</i></p> <p><i>In addition, based on comments on the Draft SSEA, NSF prepared a Socioeconomic Impact Analysis Report (SIAR) to assess potential socioeconomic impacts to the fishing community with the installation and operation of the proposed Pioneer Array (see Section 3.3.1 and Appendix I).</i></p>
IPE-9	Bro Cote FV William Bowe Cote Fisheries Inc. Marshfield, MA	28 Sep	<p>I am writing you in response to your request for comments on the Site-Specific Environmental Assessment (SSEA) for the National Science Foundation-Funded Ocean Observatories Initiative (OOI), Pioneer Array.</p> <p>I am a commercial fishermen and boat owner who has fished commercially for 35 years from Hyannis, Massachusetts. I am concerned how this project will displace different user groups and fishermen from the very large and extensive area of the proposed OOI. I know for a fact that the site location will greatly impact lobster, scallop, crab, tilefish, squid, whitting, butterfish,</p>	<p><i>Thank you for your comments. NSF took steps to make the NEPA process a very public one, including noticing the availability of NEPA documents in the Federal Register and local newspapers and sending documents to interested members of the public, federal and state agencies, and others who expressed an interest in the process. NSF also advertised the availability of the NEPA documents in newspapers and commercial fishing magazines in an attempt</i></p>

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			<p>swordfish, tuna, groundfish and charter boat fishermen. There doesn't appear to be any effort to determine what the social and economic impact would be to the different user groups that have accessed the area where you intend to locate the OOI. In the environmental assessment it was determined the project had a finding of no significant impact. Given proper notice, the finding might have been different.</p> <p>Public notice concerning this project has been minimal with no directed notice to the user groups that will be most affected by the OOI. It is unbelievable that a project of this magnitude, encompassing thousands of miles of very actively used fertile fishing grounds could be taken away without any consideration for those user groups. It is unimaginable.</p> <p>As a taxpayer and a fisherman, I don't want to believe that congress gave the National Science Foundation 130 million dollars to disregard the different user groups that would be displaced by this project and the effect it would have on our industry. I think that the project should be halted until the project participants can work with the different user groups to work through the issues that have not been brought to discussion.</p>	<p><i>to notify as many potentially interested members of the public as possible about the OOI and NSF's NEPA process. (refer to Appendices D and E of the Final SSEA).</i></p> <p><i>Based on comments on the Draft SSEA, NSF has actively engaged the regional fishing community in a process, known as micro-siting, to help NSF identify the placement of the proposed Pioneer Array moorings in a manner that considers potential impacts to the fishing community to the greatest extent practicable. Micro-siting meetings were held at the University of Rhode Island on Oct. 5 and Nov. 15, 2010 (see Appendix G of the Final SSEA). The micro-siting process will be ongoing with additional meetings as necessary and additional coordination with potentially affected marine users and stakeholders.</i></p> <p><i>In addition, based on comments on the Draft SSEA, NSF prepared a Socioeconomic Impact Analysis Report (SIAR) to assess potential socioeconomic impacts to the fishing community with the installation and operation of the proposed Pioneer Array (see Section 3.3.1 and Appendix I of the Final SSEA).</i></p>
IPE-10	Peg Petruny-Parker, Executive Director, Commercial Fisheries Research Foundation, Saunderstown, RI	29 Sep	<p>I am writing on behalf of the Commercial Fisheries Research Foundation (CFRF) to offer comments on the NSF funded Ocean Observatories Initiative (OOI), specifically the proposed Pioneer Array component to be located off the coast of southern New England. Our comments fall under two major categories: 1) process; and 2) research applications.</p> <p>In terms of process, the CFRF offers the following observations: 1. It appears that until most recently, the process under which this proposed project has been developed and reviewed has not included the southern New England fishing community, including</p>	<p><i>Thank you for your comments. In response to your comment that the comment period be extended, please note that the comment period was extended to Sep. 30, 2010.</i></p> <p><i>NSF took steps to make the NEPA process a very public one, including noticing the availability of NEPA documents in the Federal Register and local newspapers and sending documents to interested members of the public, federal and state agencies, and</i></p>

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			<p>both members of the commercial fishing industry as well as fisheries scientists and managers. The project has proceeded without their input, and there has not been any effort made to collaborate on the design, scientific protocol, and placement of the Pioneer Array system.</p> <p>2. There is an urgent need to simply pause the process as it is now proceeding and correct this oversight. More specifically, there is an urgent need to develop a sense of openness, inclusion, and trust.</p> <p>3. There appears to have already been a significant investment of public funds without the involvement of the most important stakeholder group in the area – commercial fishermen. And the project calls for a much more significant investment of public funds to implement the proposed design. To continue to proceed without the involvement of fishing industry leaders, fisheries scientists, and fisheries managers appears to be a direct route to a major user conflict situation, and an unjustified science endeavor, with the project now gathering more opposition than support.</p> <p>On terms of research applications, the CFRF offers the following observations:</p> <p>1. There appears to be have been little if any thought given to the potential applications of the information to be gathered beyond lower level trophic modeling. There is a growing need to better understand the flow of energy and productivity through all levels of the food chain, and the impacts of these ever changing dynamics on important commercial fishery resources.</p> <p>2. The data planned to be collected may begin to lead to a better understanding of ecosystem dynamics at the continental shelf area but will be very limited in its scope and application without being coupled with fisheries data from the same area. Working collaboratively and cooperatively with the fishing community offers a much better chance of producing a complete picture of shelf dynamics, and integrating project results into a real world ocean management system.</p> <p>3. There is a need to re-direct this project from the “pure science” realm into the applied science realm to justify the amount of public</p>	<p><i>others who expressed an interest in the process. NSF also advertised the availability of the NEPA documents in newspapers and commercial fishing magazines in an attempt to notify as many potentially interested members of the public as possible about the OOI and NSF’s NEPA process (refer to Appendices D and E of the Final SSEA).</i></p> <p><i>Based on comments on the Draft SSEA, NSF has actively engaged the regional fishing community in a process, known as micro-siting, to help NSF identify the placement of the proposed Pioneer Array moorings in a manner that considers potential impacts to the fishing community to the greatest extent practicable. Micro-siting meetings were held at the University of Rhode Island on Oct. 5 and Nov. 15, 2010 (see Appendix G of the Final SSEA). The micro-siting process will be ongoing with additional meetings as necessary and additional coordination with potentially affected marine users and stakeholders.</i></p> <p><i>In addition, based on comments on the Draft SSEA, NSF prepared a Socioeconomic Impact Analysis Report (SIAR) to assess potential socioeconomic impacts to the fishing community with the installation and operation of the proposed Pioneer Array (see Section 3.3.1 and Appendix I of the Final SSEA).</i></p> <p><i>The proposed OOI Network is designed to serve as a research facility providing the infrastructure and basic environmental data to support a broad range of multi-disciplinary marine research. The OOI design includes an initial “core” set of</i></p>

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			<p>resources being invested. This means developing now, in the beginning, a better understanding of the end uses of the information and its application to real world ocean management tasks. The project as currently portrayed is extremely weak in this area.</p> <p>4. There is a need for the researchers and funding entity involved to think more comprehensively and to work more closely with other scientists, particularly scientist within NOAA's National Marine Fisheries Service. There is also a need to work with the commercial fishing industry to better connect the project scope of work with the fields of fisheries science and management.</p> <p>5. The project could provide an opportunity to conduct research through a more wholistic approach, and could ultimately make a meaningful contribution to the understanding of ecosystem dynamics, but not if the fishery resource component is left out.</p> <p>In conclusion, the CFRF would recommend that the NSF and others involved in this project simply step away from the standard public hearing format they are now employing, and instead develop a meaningful way to establish ongoing communication and working partnerships with leaders in the southern New England fishing community, as well as with scientists and managers working in the realm of fisheries management in the region. To proceed otherwise may simply result in unnecessary user conflicts, and a missed opportunity to truly advance the field of marine research.</p>	<p><i>sensors and instrumentation to provide that basic background data that will be freely accessible to scientists and the public via the Internet. The OOI network is also designed to be capable of supporting additional sensors/instrumentation. When the OOI installation is completed and the network commissioned, researchers can propose to add additional sensors and instrumentation to the OOI network to support a variety of research interests.</i></p>
IPE-11	Grant Moore Broadbill Fishing Inc. Westport, MA	29 Sep	<p>My name is Grant Moore owner operator of the F/V Direction. I have fished the continental shelf for over thirty years and this proposal is absolutely insane. The fact that this project has been kept from the largest user group is a travesty. I strongly oppose this project and suggest that you find better ways to spend these types of funds.</p>	<p><i>Thank you for your comments. NSF took steps to make the NEPA process a very public one, including noticing the availability of NEPA documents in the Federal Register and local newspapers and sending documents to interested members of the public, federal and state agencies, and others who expressed an interest in the process. NSF also advertised the availability of the NEPA documents in newspapers and commercial fishing magazines in an attempt to notify as many potentially interested</i></p>

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				<p><i>members of the public as possible about the OOI and NSF's NEPA process (refer to Appendices D and E of the Final SSEA).</i></p> <p><i>Based on comments on the Draft SSEA, NSF has actively engaged the regional fishing community in a process, known as micro-siting, to help NSF identify the placement of the proposed Pioneer Array moorings in a manner that considers potential impacts to the fishing community to the greatest extent practicable. Micro-siting meetings were held at the University of Rhode Island on Oct. 5 and Nov. 15, 2010 (see Appendix G of the Final SSEA). The micro-siting process will be ongoing with additional meetings as necessary and additional coordination with potentially affected marine users and stakeholders.</i></p> <p><i>In addition, based on comments on the Draft SSEA, NSF prepared a Socioeconomic Impact Analysis Report (SIAR) to assess potential socioeconomic impacts to the fishing community with the installation and operation of the proposed Pioneer Array(see Section 3.3.1 & Appendix I of the Final SSEA).</i></p>
IPE-12	<p>Gregory DiDomenico, Executive Director, Garden State Seafood Assoc. Trenton, NJ</p>	30 Sep	<p>Please accept these comments on behalf of the Garden State Seafood Association (GSSA); GSSA is comprised of commercial fishermen, shore-based processors, commercial dock facilities, seafood markets, restaurants, and various industry support businesses from New Jersey. Our members actively participate in the fishery management process and are heavily reliant upon the fisheries that exist in the area where your research will be conducted.</p> <p>GSSA is responding to your request for comments on the Site-Specific Environmental Assessment (SSEA) for the National Science Foundation-Funded Ocean Observatories Initiative (OOI).</p>	<p><i>Thank you for your comments. NSF took steps to make the NEPA process a very public one, including noticing the availability of NEPA documents in the Federal Register and local newspapers and sending documents to interested members of the public, federal and state agencies, and others who expressed an interest in the process. NSF also advertised the availability of the NEPA documents in newspapers and commercial fishing magazines in an attempt to notify as many potentially interested</i></p>

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			<p>The fishing industry will suffer both social and economic impacts, typically associated with large scale projects that often occur with projects like the OOI. It is hard to imagine that a mere environmental assessment was approved for a project of this magnitude. The immediate spatial conflict, loss of fishing opportunity, dislocation from traditional fishing areas and subsequent loss of income will be significant and irreparable. There are a multitude of questions and severe environmental and economic impacts that have not yet been considered, nor explored.</p> <p>Due to there being no public notice that I am aware of, the stakeholder input has been nonexistent. With all the means of communication and numerous academic, NGO, state and federal entities and myriad of commercial fishing organizations involved in ocean issues, how is it possible we were all unaware of this? In fact, we had to be told by another group who stumbled upon this project. I know of one public hearing that took place. While it was poorly attended, those that were there all commented similarly that the project should be halted until the project participants collaborated with a stakeholder advisory group. The lack of any communication to the fishing industry by the people associated with the OOI demonstrate a lack of understanding or regard by the NSF.</p> <p>This project encompasses thousands of square nautical miles, expressly in the center of one of the most fertile commercial fishing grounds in the northeast. It is unthinkable that any entity should expect to “drop” a project in the middle of the ocean without thought or consideration of those who will be displaced from the area. We will continue to request that meetings between the your staff and a fishery advisory group take place to mitigate this plan.</p>	<p><i>members of the public as possible about the OOI and NSF’s NEPA process (refer to Appendices D and E of the Final SSEA).</i></p> <p><i>Based on comments on the Draft SSEA, NSF has actively engaged the regional fishing community in a process, known as micro-siting, to help NSF identify the placement of the proposed Pioneer Array moorings in a manner that considers potential impacts to the fishing community to the greatest extent practicable. Micro-siting meetings were held at the University of Rhode Island on Oct. 5 and Nov. 15, 2010 (see Appendix G of the Final SSEA). The micro-siting process will be ongoing with additional meetings as necessary and additional coordination with potentially affected marine users and stakeholders.</i></p> <p><i>In addition, based on comments on the Draft SSEA, NSF prepared a Socioeconomic Impact Analysis Report (SIAR) to assess potential socioeconomic impacts to the fishing community with the installation and operation of the proposed Pioneer Array (see Section 3.3.1 and Appendix I of the Final SSEA).</i></p>

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IPE-13	Joyce Rowley Acushnet, MA	30 Sep	<p>I am concerned about the potential acoustic impacts from the arrays on marine mammals and sea turtles.</p> <p>Although the Draft SSEA states that the Pioneer array comment period closed at the end of the Programmatic Environmental Assessment (PEA) review, there were changes to the configuration of the array, as well as to the systems and infrastructure to be used since the PEA was adopted. Three AUVs were added and four gliders dropped. The array was re-configured to an 'L' from an 'H'.</p> <p>Further, neither the PEA nor the Draft SSEA reviewed the impact of the active sonar percussion on marine mammals and sea turtles, including endangered species.</p> <p>Active Sonar/Acoustics Impacts: Appendix A, the PEA, states the sensor duty cycle is low, and that there would be a narrow time when fish or marine mammals would be in the beam. However, the Pioneer array will have seven sensor beams, plus six gliders and three AUVs with active sonar circulating in the water column in a highly utilized fish habitat. Further, it will operate 24/7 for five years. My concern is that the unpredictable yet persistent sound pattern will cause avoidance of a prime feeding ground for many marine mammal, sea turtle, and fish species, including endangered species protected under the Endangered Species Act.</p> <p>Lack of Assessment or Modeling of Acoustic Impacts: None of the environmental assessments evaluated the effect of percussion (sound pressure level or SPL) on marine mammals, fish, or sea turtles, including endangered species. In the Department of Navy Atlantic Fleet Active Sonar Testing (AFAST) EIS, a basement of 120 dB re 1µ Pa @1 meter SPL was used for Level B marine mammal harassment risk modeling for mid- and high-frequency ranges (AFAST EIS, December 2008, Section 4.4.5.3.10). The basement was selected based on modeling in Hawai'i, and had been criticized for not being low enough during the modeling review process. AFAST held to the 120 dB. Nonetheless, AFAST acknowledged that harbor porpoises clearly have behavioral responses to mid-frequency sounds at 120 dB re</p>	<p><i>NSF clarifies that three AUVs were not added since the PEA or SER (see Table 2-3 of the Final SSEA). The reduction in the number of proposed gliders would have no impact. The overall relative configuration and location has not changed (see Figure 2-8a in the Final SSEA).</i></p> <p><i>The PEA and Draft SSEA did assess the potential impacts of the use of proposed active acoustics on marine animals, particularly endangered species (see Sections 3.2.2.1 and 4.2.2.1 in the PEA). The U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS), the federal agencies responsible for regulatory compliance under the Endangered Species Act (ESA) and Marine Mammal Protection Act (MMPA), provided Letters of Concurrence (LOCs) supporting the findings of no effects to ESA-listed species and marine mammals as provided in the PEA and Draft SSEA (refer to Appendix Appendix H of the Final SSEA). In the LOCs issued by NMFS, it was concluded that the proposed active acoustic sources as assessed in the PEA and SSEA are not likely to result in harassment or take of marine mammals.</i></p> <p><i>Note that sea turtles and fish are unlikely to be able to hear any of the active acoustics since most if not all are outside the known frequency of hearing for sea turtles and fish.</i></p>

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			<p>1 μ Pa @1 meter. This may have a greater impact on the Endurance array, which is in closer to shore than Pioneer.</p> <p>In fact, for the AFAST EIS, Marine Mammal Protection Act standards were set as follows where TTS is the temporary threshold shift in behavior which would indicate Level B harassment (behavioral disturbance) and PTS is the permanent threshold shift in behavior which would indicate Level A harassment (onset of injury):</p> <p>Cetaceans: 195 dB re 1 μPa²-s received EL for TTS; and 215 dB re 1 μPa²-s received EL for PTS. Pinnipeds: 183 dB re 1 μPa²-s received EL for TTS; and 203 dB re 1 μPa²-s received EL for PTS.</p> <p>Where energy flux level through an area (EL) is measured as SPL + 10log₁₀(duration). (AFAST Final EIS, Section 4.4.5.1, PTS (Level A) and TTS (Level B), p. 4-42). A lower TTS reference of 192 dB re 1 μPa²-s received EL was used as a minimum level for small cetaceans (Id., p. 4-44, 4-45).</p> <p>In particular, the Altimeters emit a 4 second pulse at 170 kHz and 206 dB re 1 μ Pa @1 meter or 212 dB re μPa²-s received EL, when the formula is applied to acoustic data in Table 2-7 of the Draft SSEA, and Appendix A, PEA, Table 2-6, p. 46. This exposure level is precariously close to the 215 PTS limit accepted by the NOAA, the Marine Mammal Commission and NMFS for the AFAST EIS. It falls clearly within the TTS/Level B harassment criteria. Similarly, the ADCPs at mid- and high-frequency ranges emitting a 1.5 ms pulse at 220 dB re 1 μ Pa @1 meter, produces an EL of 191.76 dB re μPa²-s, which is extremely close to the TTS/Level B harassment criteria.</p> <p>According to Table 2-7, “the proposed MBES and SBP would transmit a chirp pulse (i.e., a long, linearly swept pulse that changes in frequency linearly over time).” Since I did not have a specific duration for these systems, I used a standard 1-second duration to calculate the exposure level for these active sonar sources as their frequency ranges are well within that of marine mammals. The SBP at 203 dB re 1 μ Pa @1 meter produces an EL</p>	

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			<p>of 203 dB re $\mu\text{Pa}^2\text{-s}$ in the low frequency range (2-7 kHz) and is within the TTS/Level B harassment criteria. I'd also note that SURTASS, the Naval system of dragging low frequency active sonar (LFA), is currently being challenged in court for its affect on marine mammals and endangered species.</p> <p>Unfortunately, I was unable to perform further calculations to take into account multiple events on individuals, as the data provided was insufficient. However, it can be said that exposure to multiple pings would increase the level of harassment even for lower SPLs.</p> <p>Further, rather than use a threshold level, the AFAST EIS looked at the potential risk and derived a mean of 165 SPL which corresponded to behavioral responses to active sonar. Based on that alone, all of the active sonar sources would cause behavioral reactions among the cetaceans.</p> <p>Resources Affected The Pioneer array location is a prime feeding ground for the 40 or so marine mammals, many of whom are already stressed by increasing ambient noise levels in the ocean, excessive fishing, pollution, and dwindling food supplies. This would add a persistent and unpredictable sound and percussion source every day, every week, every month for five years. The moored sensors would travel up and down the water column and the gliders and AUVs would be moving through the area randomly. It is possible that the cumulative noise and SPL would cause enough harassment to cause behavioral responses including avoidance from the feeding grounds. Some of the ELs are strong enough to cause physical injury.</p> <p>A close analogy would be a scenario where a person walks to get groceries every day. One day, while walking through the neighborhood, someone jumps out from behind a bush and blows an airhorn in the person's ear at close range. The person is startled, but the sound stops and so they continue. It happens again further down the street, so they change to the opposite side of the street. Again, an airhorn goes off near them. They move further away but return to their usual route the next day. Suddenly, a flying creature swoops down and blasts them. The person's ears are bloodied, but</p>	

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			<p>they're still alive. They get ill and disoriented. Walking to get food becomes a terrifying act where they are always on edge. This happens over and over, every day and night. Eventually, they move away.</p> <p>I'm particularly concerned that there will be a deterrent effect on the Atlantic Right Whale which is already at a precarious stock level. NMFS has estimated that at 325 individuals left, the Western Atlantic population of the Right Atlantic Whale is near extinction. Although the frequency is higher than their sensitivity range, they are still at risk for noise percussion and entanglement in the sensor mooring wires.</p> <p>These impacts may be greater in the Endurance array area, as those areas are closer to landforms and channels. Those geologic formations were deemed a contributing factor in the strandings of 14 beaked whales in the Bahamas in 2001.</p> <p>While it is very important to obtain the data that the Ocean Observatories Initiative hopes to gain from these systems, a complete evaluation of the impacts of the acoustic noise and percussion on marine mammals, sea turtles, and fish should be performed before placing the arrays for any duration.</p>	
IPE-14	Bonnie Spinazzola, Executive Director, Atlantic Offshore Lobstermen's Assoc. (AOLA), Bedford, NH	16 Sep	<p>I am writing on behalf of the Atlantic Offshore Lobstermen's Association in response to your request for comments on the Site-Specific Environmental Assessment (SSEA) for the National Science Foundation-Funded Ocean Observatories Initiative (OOI).</p> <p>The fishing industry was taken completely off-guard by this project; and this entire Environmental Assessment has been a travesty of the procedures set up by the government to fully vet the social and economic issues surrounding large scale projects such as this. This course of action is both odd and unjust; it is unfathomable to imagine that a mere environmental assessment was approved for a project of this magnitude. There are a multitude of questions and severe environmental and economic impacts that have not yet been considered, nor explored.</p> <p>Both public notice and stakeholder input, to date, can be considered minimal at best. No fishing entities the east coast were</p>	<p><i>Thank you for your comments. In response to your comment that the comment period be extended, please note that the comment period was extended to Sep. 30, 2010.</i></p> <p><i>NSF took steps to make the NEPA process a very public one, including noticing the availability of NEPA documents in the Federal Register and local newspapers and sending documents to interested members of the public, federal and state agencies, and others who expressed an interest in the process. NSF also advertised the availability of the NEPA documents in newspapers and commercial fishing magazines in an attempt to notify as many potentially interested members of the public as possible about the</i></p>

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			<p>made aware of this project. Had we not “stumbled” upon it and contacted the agency, it is likely that it would have proceeded devoid of any stakeholder input at all, indifferent to the NEPA process. The public hearing was poorly attended due to inadequate public notice. Those who did attend, however, were very articulate in their comments to the project participants; they all commented similarly that the project should be halted until the project participants collaborated with a stakeholder advisory group, who would then, ultimately, require written assurances guaranteeing that the areas encompassing the Pioneer Array would not become exclusive, and that fishing would continue indefinitely (barring fishery regulations), without any sort of interruption. The extension of the comment period and the lack of any communication to the fishing industry by the project participants, since the public hearing, demonstrate how serious those comments were taken by the NSF.</p> <p>This project encompasses thousands of square nautical miles, expressly in the center of one of the most fertile commercial fishing grounds in the northeast. Other than lobster fishing, there is groundfishing and longlining taking place in the specific area on which the NSF is planning to locate their ocean observatory. It is unthinkable that any federal agency should expect to “drop” a project in the middle of the ocean, without thought or consideration of those who will be displaced from the area. This is not a matter the fishing community is taking lightly, and continues to request that meetings between the project participants and a fishery advisory group take place to mitigate this plan, in order for it to be acceptable to both the NSF and the fishing community.</p>	<p><i>OOI and NSF’s NEPA process (refer to Appendices D and E of the Final SSEA).</i></p> <p><i>Based on comments on the Draft SSEA, NSF has actively engaged the regional fishing community in a process, known as micro-siting, to help NSF identify the placement of the proposed Pioneer Array moorings in a manner that considers potential impacts to the fishing community to the greatest extent practicable. Micro-siting meetings were held at the University of Rhode Island on Oct. 5 and Nov. 15, 2010 (see Appendix G of the Final SSEA). The micro-siting process will be ongoing with additional meetings as necessary and additional coordination with potentially affected marine users and stakeholders.</i></p> <p><i>In addition, based on comments on the Draft SSEA, NSF prepared a Socioeconomic Impact Analysis Report (SIAR) to assess potential socioeconomic impacts to the fishing community with the installation and operation of the proposed Pioneer Array (see Section 3.3.1 and Appendix I of the Final SSEA).</i></p>

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IPE-15	John Pappalardo, Chairman, New England Fishery Management Council Newburyport, MA	7 Oct	<p>The New England Fishery Management Council (NEFMC) offers the following comments on the DPEA for the Ocean Observatories Initiative as well as the ongoing micro-siting process. We understand that the formal comment period on the DPEA closed on September 30, but due to a Council meeting last week we were unable to assemble comments in time to meet that deadline. Based on our reading of the DPEA document, as well as our attendance at the siting meeting on October 5, we offer the following for your consideration.</p> <p>First, we support the general concept of ocean observing arrays, and hope the data gathered from this specific initiative will benefit regional ocean science and management efforts over the long term. However, as you are aware, the same oceanographic features that make the array location ideal for studying transport properties and ecosystem dynamics contribute to the area's importance as habitat for economically-significant finfish and invertebrates, and the fisheries that they support.</p> <p>As noted in similar correspondence you have received from the state of Rhode Island DEM, various bottom tending fishing gears are deployed in the proposed array location, including fixed gears (longlines, gillnets, traps) and mobile gears (otter trawls). Some of the target species, including deep-sea red crab, monkfish, and whiting, are managed or co-managed by NEFMC, while others are managed by the Mid-Atlantic Fishery Management Council and the Atlantic States Marine Fisheries Commission.</p> <p>Upon consultation with National Marine Fisheries Service Northeast Regional Office Habitat Conservation Division staff, we concur with the findings in Section 4.2.2.1 of the DPEA that placement of the proposed moorings and sensors will not adversely affect essential fish habitat, as the impacts to the seabed will be both minimal in their spatial scope, and temporary in duration. However, the DPEA does not specify the extent to which commercial fisheries operations would be restricted in the area immediately surrounding the array, and it is unclear to us why socioeconomic (fisheries) were not evaluated as a valued environmental component for the Pioneer Array. We understand that you have received other comments on this issue and are</p>	<p><i>Thank you for your comments. We understand that your comments are on the Draft SSEA and not the 2008 Draft PEA as stated in your letter.</i></p> <p><i>NSF took steps to make the NEPA process a very public one, including noticing the availability of NEPA documents in the Federal Register and local newspapers and sending documents to interested members of the public, federal and state agencies, and others who expressed an interest in the process. NSF also advertised the availability of the NEPA documents in newspapers and commercial fishing magazines in an attempt to notify as many potentially interested members of the public as possible about the OOI and NSF's NEPA process (refer to Appendices D and E of the Final SSEA).</i></p> <p><i>Based on comments on the Draft SSEA, NSF has actively engaged the regional fishing community in a process, known as micro-siting, to help NSF identify the placement of the proposed Pioneer Array moorings in a manner that considers potential impacts to the fishing community to the greatest extent practicable. Micro-siting meetings were held at the University of Rhode Island on Oct. 5 and Nov. 15, 2010 (see Appendix G of the Final SSEA). The micro-siting process will be ongoing with additional meetings as necessary and additional coordination with potentially affected marine users and stakeholders.</i></p> <p><i>In addition, based on comments on the Draft SSEA, NSF prepared a Socioeconomic Impact Analysis Report (SIAR) to assess potential socioeconomic impacts to the</i></p>

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			<p>encouraged that you plan to respond with a socioeconomic analysis.</p> <p>Obviously, the potential for fisheries interactions will be less for the Mid-Atlantic components of the OOI as compared to the Pacific components, as there are no buried submarine cables, but we believe that there could still be significant fisheries impacts depending on the restrictions placed on fishing operations in the vicinity of the moorings. As discussed at the October 5 meeting at URI, impacts on the fishing industry could vary depending on the extent of the buffer zone required around each fixed array, and although 0.5 nm radius buffers were proposed by NSF, the buffer zone required will ultimately be determined by the Coast Guard. We would encourage you to consult with the Coast Guard as you develop an appropriate range of options for your socioeconomic assessment. We would be happy to put you in touch with the Coast Guard personnel that participate in our Council process.</p> <p>We are pleased to see that NSF's is engaging regional fisheries stakeholders during the micro-siting process, and we strongly encourage you to consider the location and magnitude of fishing operations in and around the array location as you proceed. As the Pioneer Array is intended to be moved every 3-5 years, we hope that efforts to engage regional fisheries interests will be ongoing. We would strongly encourage you to at least consider the scientific feasibility of other similar sites along the Mid-Atlantic shelf/slope break as an array location, given the importance of the currently proposed area to regional fisheries. Short of development of another siting alternative, we encourage you to better justify why the selected location meets the scientific needs of the project as you update the draft PEA (<i>note: incorrect reference to the PEA, NSF will be updating the Draft SSEA</i>).</p> <p>I understand that you have already been in contact with David Preble, who chairs the Council's Habitat/MPA/Ecosystems Committee. We hope that you will continue to consult with us as you further develop your efforts to work with the fisheries community on siting issues for the Pioneer Array.</p>	<p><i>fishing community with the installation and operation of the proposed Pioneer Array (see Section 3.3.1 and Appendix I of the Final SSEA).</i></p> <p><i>Regarding the size of the proposed buffer zones associated with the Pioneer Array moorings, the USCG does not determine buffer zones. It is up to the owning agency to determine the appropriate buffer zone to safeguard both fishing and scientific equipment from accidental damage. This buffer zone is then provided in NM and LNM updates. NSF, and its contractors, have been coordinating with the USCG and will continue to do so during the Pioneer Array siting process.</i></p> <p><i>The Pioneer Array region south of Cape Cod has been an area of long standing scientific interest. It is an area of complex dynamic circulation, intense variability, and greatly enhanced biological productivity relative to the adjacent areas of the shelf and slope. The scientific questions driving the location of the array are centered on understanding the processes controlling the transport of heat, salt, nutrient and carbon fluxes across the shelfbreak front; the relationship between variability in the shelfbreak frontal jet and the along-front structure in phytoplankton distributions (the latter being the base of the marine food web); and the aspects of interannual variability that are most important for influencing shelf-slope exchange. Understanding the diverse productivity of this region of the shelf is an overarching driver for this location. The distance offshore makes it extremely difficult to</i></p>

Comment Number	Commentor	Date	Comment	NSF Response
				<p><i>collect continuous data sets using research vessels. The sustained presence of an array will provide a unique opportunity to understand (and ultimately model) this dynamic shelf ecosystem. An additional diver for this location will be to imbed the Pioneer Array in existing coastal observing assets, including National Data Buoy Center (NDBC) weather buoys.</i></p>
IPE-16	John Peabody F/V Lady Clare Wakefield, RI	27 Sep	<p>I am writing on behalf of the Atlantic Offshore Lobstermen's Association in response to your request for comments on the Site-Specific Environmental Assessment (SSEA) for the National Science Foundation-Funded Ocean Observatories Initiative (OOI).</p> <p>It is no wonder that there is so little respect for the governmental and scientific communities when foolishness like this occurs. You jump in out of nowhere with a proposal for a massive project that you propose to drop in the middle of our main fishing grounds without really notifying anyone. Do you really think the ocean is empty of activity and you can just drop that mess in there without bothering anyone? Tunafishing, swordfishing, red crabbing, lobstering, dragging, and sportfishing. There is a lot going on there. You need to give time for comment. You apparently don't care or are a bunch of fools. I have a big book of this project that I just got today. I need time and most people have not even heard of this mess. Extend the comment time. If you want any support whatsoever from the fishing community you need to let everyone know about this. If it is such a great thing you are doing, you need not worry about support. Stop the secrecy and give us some time.</p>	<p><i>Thank you for your comments. In response to your comment that the comment period be extended, please note that the comment period was extended to Sep. 30, 2010.</i></p> <p><i>NSF took steps to make the NEPA process a very public one, including noticing the availability of NEPA documents in the Federal Register and local newspapers and sending documents to interested members of the public, federal and state agencies, and others who expressed an interest in the process. NSF also advertised the availability of the NEPA documents in newspapers and commercial fishing magazines in an attempt to notify as many potentially interested members of the public as possible about the OOI and NSF's NEPA process (refer to Appendices D and E of the Final SSEA).</i></p> <p><i>Based on comments on the Draft SSEA, NSF has actively engaged the regional fishing community in a process, known as micro-siting, to help NSF identify the placement of the proposed Pioneer Array moorings in a manner that considers potential impacts to the fishing community to the greatest extent practicable. Micro-siting meetings were held at the University of Rhode Island on Oct. 5 and Nov. 15, 2010 (see Appendix G of the Final SSEA). The micro-siting process</i></p>

Comment Number	Commentor	Date	Comment	NSF Response
				<p><i>will be ongoing with additional meetings as necessary and additional coordination with potentially affected marine users and stakeholders.</i></p> <p><i>In addition, based on comments on the Draft SSEA, NSF prepared a Socioeconomic Impact Analysis Report (SIAR) to assess potential socioeconomic impacts to the fishing community with the installation and operation of the proposed Pioneer Array (see Section 3.3.1 and Appendix I of the Final SSEA).</i></p>
IPE-17	Jan Margeson Board Member, Georges Bank Fixed Gear Sector	10 Oct	<p>I am deeply concerned that after hearing industry issues over the location of this project it is still full speed ahead. I am asking you to go back and open another public comment period to improve communications between user groups and yourselves. As i now see by you draft, that only 1 public meeting on the East Coast was held in New Bedford. Our organization was unaware that there was a proposed plan until after the comment period was over. You have been in the planning stages for years and failed to consult the very fisherman that use this area. It is extremely frustrating to us that you seem to be fast tracking this project with disregard to the consequences fisherman will face. I will ask again to reopen the public comment period and meet again with industry representatives.</p>	<p><i>Thank you for your comments. In response to your comment that the comment period be extended, please note that the comment period was extended to Sep. 30, 2010.</i></p> <p><i>NSF took steps to make the NEPA process a very public one, including noticing the availability of NEPA documents in the Federal Register and local newspapers and sending documents to interested members of the public, federal and state agencies, and others who expressed an interest in the process. NSF also advertised the availability of the NEPA documents in newspapers and commercial fishing magazines in an attempt to notify as many potentially interested members of the public as possible about the OOI and NSF's NEPA process (refer to Appendices D and E of the Final SSEA).</i></p> <p><i>Based on comments on the Draft SSEA, NSF has actively engaged the regional fishing community in a process, known as micro-siting, to help NSF identify the placement of the proposed Pioneer Array moorings in a manner that considers potential impacts to the fishing community to the greatest extent</i></p>

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				<p><i>practicable. Micro-siting meetings were held at the University of Rhode Island on Oct. 5 and Nov. 15, 2010 (see Appendix G of the Final SSEA). The micro-siting process will be ongoing with additional meetings as necessary and additional coordination with potentially affected marine users and stakeholders.</i></p> <p><i>In addition, based on comments on the Draft SSEA, NSF prepared a Socioeconomic Impact Analysis Report (SIAR) to assess potential socioeconomic impacts to the fishing community with the installation and operation of the proposed Pioneer Array (see Section 3.3.1 and Appendix I of the Final SSEA).</i></p>
IPE-18	Lanny Dellinger, President Rhode Island Lobstermen's Assoc.	24 Sep	<p>I am writing on behalf of the Rhode Island Lobstermen's Association in response to your request for comments on the Site-Specific Environmental Assessment (SSEA) for the National Science Foundation-Funded Ocean Observatories Initiative (OOI).</p> <p>I am writing to request that there be a meaningful stakeholder process undertaken before any area of the ocean is cited for a project of this magnitude. The area you have identified for this project is extremely important fishing grounds for the RI lobster industry and other sectors as well. This project was only just recently brought to industry attention. The economic and social impacts to the Rhode Island fishing community could be devastating if there is any type of exclusion zones that arise because of this project.</p> <p>There are many other issues that need to be completely vetted thru a stakeholder process before this project should go forward.</p>	<p><i>Thank you for your comments. Based on comments on the Draft SSEA, NSF has actively engaged the regional fishing community in a process, known as micro-siting, to help NSF identify the placement of the proposed Pioneer Array moorings in a manner that considers potential impacts to the fishing community to the greatest extent practicable. Micro-siting meetings were held at the University of RI on Oct. 5 and Nov. 15, 2010 (see Appendix G of the Final SSEA). The micro-siting process will be ongoing with additional meetings as necessary and additional coordination with potentially affected marine users and stakeholders. In addition, based on comments on the Draft SSEA, NSF prepared a Socioeconomic Impact Analysis Report (SIAR) to assess potential socioeconomic impacts to the fishing community with the installation and operation of the proposed Pioneer Array (see Section 3.3.1 and Appendix I of the Final SSEA).</i></p>

Comment Number	Commentor	Date	Comment	NSF Response
IPE-19	Norbert Stamps Captain I/VS Debbie Ann Vice President AOLA	29 Sep	<p>AS per our conversation. I want to make sure it is understood, The proposed area for the Pioneer array, is very heavily fished area. Not only by lobster fisherman, but also bottom fin fishermen. as well as longliners. With My experience of thirty plus years of fishing the area, I can tell you most assuredly that The array and the fisheries will not cohabitate well. I can not see how we would be able to use that fishing ground we have come to depend on with the array in that proposed location. Gliders will not fair well with the constant presence of fishing activities. Entanglement with lobster gear will be often. I can foresee damage to our expensive gear as well as too the array. Will fishermen be held responsible for damage to the array? I can most definitely say we do not have the recourses to pay for damages. Will congress appropriate more funds to make repairs or replace sensors? With the knowledge that this will occur will it be recommended that the area be closed to fishing all together?. If so one must realize that the fishing effort is in that location because that is were the fish are. Fish do not populate the ocean bottom equally as some my think. Just as there are more people in NY.NY per Square mile that are in a square mile in upstate NY .We also know that there will be more fish in the area with the array. Fish are attracted to structure. It will change the behavior of many species. I hope that we can work together on finding a less intrusive location for the array. I do realize the magnitude of the project and hope we may be able to find an equitable solution. The fishing industry is struggling in many ways. Please to not burdon us more.</p>	<p><i>Thank you for your comments. Based on comments on the Draft SSEA, NSF has actively engaged the regional fishing community in a process, known as micro-siting, to help NSF identify the placement of the proposed Pioneer Array moorings in a manner that considers potential impacts to the fishing community to the greatest extent practicable. Micro-siting meetings were held at the University of Rhode Island on Oct. 5 and Nov. 15, 2010 (see Appendix G of the Final SSEA). The micro-siting process will be ongoing with additional meetings as necessary and additional coordination with potentially affected marine users and stakeholders.</i></p> <p><i>In addition, based on comments on the Draft SSEA, NSF prepared a Socioeconomic Impact Analysis Report (SIAR) to assess potential socioeconomic impacts to the fishing community with the installation and operation of the proposed Pioneer Array (see Section 3.3.1 and Appendix I of the Final SSEA).</i></p>

Comment Number	Commentor	Date	Comment	NSF Response
IPE-20	Bonnie Brady Executive Director Long Island Commercial Fishing Assoc. Montauk, NY	30 Sep	<p>On behalf of the Long Island Commercial Fishing Association, we request that any further forward movement to the OOI project be stopped until a full review of the OOI project can be undertaken by a consortium of East Coast fishermen of all gear types to determine where this project should be sited in the Atlantic Ocean so as not to affect the traditional commercial and recreational fishing user groups who depend on this area.</p> <p>As it stands, it appears as if this project will move forward and displace traditional user groups, which is unacceptable. Instead of site, and then spin the naysayers, a full, open and transparent process that incorporates meetings at commercial and recreational fishing ports in each state throughout the area affected is the only fair way to move this project forward.</p> <p>Commercial fishermen are not against scientific research, and the data that ultimately this project may uncover, but cannot support any scientific research study that further limits and or cuts off access for all user groups to their traditional fishing grounds.</p>	<p><i>Thank you for your comments. Based on comments on the Draft SSEA, NSF has actively engaged the regional fishing community in a process, known as micro-siting, to help NSF identify the placement of the proposed Pioneer Array moorings in a manner that considers potential impacts to the fishing community to the greatest extent practicable. Micro-siting meetings were held at the University of Rhode Island on Oct. 5 and Nov. 15, 2010 (see Appendix G of the Final SSEA). The micro-siting process will be ongoing with additional meetings as necessary and additional coordination with potentially affected marine users and stakeholders.</i></p> <p><i>In addition, based on comments on the Draft SSEA, NSF prepared a Socioeconomic Impact Analysis Report (SIAR) to assess potential socioeconomic impacts to the fishing community with the installation and operation of the proposed Pioneer Array (see Section 3.3.1 and Appendix I of the Final SSEA).</i></p>
IPE-21	Palombo Fishing Corp. Newport, RI	30 Sep	<p>I have been actively engaged in the offshore Lobster fishery for 39 years since 1971. Today I own three boats with offshore lobster licenses. I am writing on behalf of my company, Palombo Fishing, Corp. in response to your request for comments on the Site-Specific Environmental Assessment (SSEA) for the National Science Foundation Funded Ocean Observatories Initiative (OOI). My and other livelihood depends on fishing in traditional areas.</p> <p>I personally have spent many years as President of AOLA and on many councils, boards and coalitions trying to bring reasonable and long lasting conservation practices to the Lobster Industry. You might not be aware that I strongly believe that conservation of the lobster resource is imperative, not only for the survival of lobsters, but for the industry's survival, as well. I believe in good science and the need for scientific projects, especially as it relates</p>	<p><i>Thank you for your comments. In response to your comment that the comment period be extended, please note that the comment period was extended to Sep. 30, 2010.</i></p> <p><i>NSF took steps to make the NEPA process a very public one, including noticing the availability of NEPA documents in the Federal Register and local newspapers and sending documents to interested members of the public, federal and state agencies, and others who expressed an interest in the process. NSF also advertised the availability of the NEPA documents in newspapers and commercial fishing magazines in an attempt</i></p>

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			<p>to creating a long tenn sustainable lobster fishery.</p> <p>The fishing industry was taken completely off-guard by this project; and this entire Environmental Assessment has been a travesty of the procedures set up by the government to fully vet the social and economic issues surrounding large scale projects such as this. This course of action is both odd and unjust; it is unfathomable to imagine that a mere environmental assessment was approved for a project of this magnitude. There are a multitude of questions and severe environmental and economic impacts that have not yet been considered, nor explored.</p> <p>Both public notice and stakeholder input, to date, can be considered minimal at best. No fishing entities the east coast were made aware of this project. Had we not "stumbled" upon it and contacted the agency. it is likely that it would have proceeded devoid of any stakeholder input at all indifferent to the NEP A process.</p> <p>The public hearing was poorly attended due to inadequate public notice. Those who did attend, however, were very articulate in their comments to the project participants; they all commented similarly that the project should be halted until the project participants collaborated with a stakeholder advisory group, who would then, ultimately, require written assurances NSF guaranteeing that the areas encompassing the Pioneer Array would not become exclusive, and that fishing would continue indefinitely (barring fishery regulations), without any sort of interruption.</p> <p>The extension of the comment period and the lack of any communication to the fishing industry by the project participants, since the public hearing, demonstrate how serious those comments were taken by the NSF.</p> <p>This project encompasses thousands of square nautical miles, expressly in the center of one of the most fertile commercial fishing grounds in the northeast. Other than lobster fishing, there is ground fishing, red crabbing, gillnetting, and surface and bottom long lining taking place in the specific area on which the NSF is planning to locate their ocean observatory.</p>	<p><i>to notify as many potentially interested members of the public as possible about the OOI and NSF's NEPA process (refer to Appendices D and E of the Final SSEA).</i></p> <p><i>Based on comments on the Draft SSEA, NSF has actively engaged the regional fishing community in a process, known as micro-siting, to help NSF identify the placement of the proposed Pioneer Array moorings in a manner that considers potential impacts to the fishing community to the greatest extent practicable. Micro-siting meetings were held at the University of Rhode Island on Oct. 5 and Nov. 15, 2010 (see Appendix G of the Final SSEA). The micro-siting process will be ongoing with additional meetings as necessary and additional coordination with potentially affected marine users and stakeholders.</i></p> <p><i>In addition, based on comments on the Draft SSEA, NSF prepared a Socioeconomic Impact Analysis Report (SIAR) to assess potential socioeconomic impacts to the fishing community with the installation and operation of the proposed Pioneer Array (see Section 3.3.1 and Appendix I of the Final SSEA).</i></p>

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			<p>It is unthinkable that any federal agency should expect to "drop" a project in the middle of the ocean, without thought or consideration of those who will be displaced from the area. This is not a matter the fishing community is taking lightly, and continues to request that meetings between the project participants and a fishery advisory group take place to mitigate this plan, in order for it to be acceptable to both the NSF and the fishing community.</p>	
IPE-22	Malcolm McClintock V/v Rhonda Denise	30 Sep	<p>To claim that this project would have "no significant impact" is downright laughable. Luckily many commercial fisherman have government mandated vehicle monitoring systems that will clearly show just how significant these areas are to us. See you in court.</p>	<p><i>Thank you for your comments. Based on comments on the Draft SSEA, NSF prepared a Socioeconomic Impact Analysis Report (SIAR) to assess potential socioeconomic impacts to the fishing community with the installation and operation of the proposed Pioneer Array (see Section 3.3.1 and Appendix I of the Final SSEA). The SIAR was prepared using the National Marine Fisheries Service (NMFS) Vessel Trip Report (VTR) data that you mention in your comment.</i></p>

Comment Number	Commentor	Date	Comment	NSF Response
PUBLIC HEARING TRANSCRIPTS				
Westport Public Hearing (WPH), Westport, WA – Sep 1, 2010 (Note: refer to Appendix E for the complete public hearing transcripts)				
WPH-1	Ray Toste Westport, WA	1 Sep	<p>I suppose my number one concern representing the crabbers is the crab industry. I also shrimp. I also fish all four states on the West Coast.</p> <p>All this is very important. It was the speed that this showed up. There was a notice. There was a telephone call. There was this package when I got home in the mail.</p> <p>The one in 13 fathoms really concerns me. I think if you moved it up eight miles from Point Chehalis you would find out that it would then concern Quinault, who right now thinks it's a great thing in a great spot. They do not fish, even though they are U&A, which is going to be contested shortly, runs from Point Chehalis to, I'm not quite sure where. They have SMA, special management ethics. That area of the south end is seven miles above Point Chehalis. So when they go fishing a month to six weeks ahead of us, they are not in that area from Point Chehalis north seven miles. And it appears that green dot is south of that seven miles. If it was at nine miles, you would have a tough time putting it there. Right now it appears to them, in their shoes, to be in a good spot. Thirteen fathom is heavily, heavily crab, and the weather there is vicious beyond belief. Gear not only sticks there, gear moves there.</p> <p>Two years ago we had what we call here on this coast a typhoon, which would be a hurricane on the East Coast. We don't know how hard it blew. We knew the wind gauge in Naselle went away at 160 miles an hour. So we know it got that high. I see real problems there with crab gear. But the area to the north of us, that SMA is not fished nearly as hard - tribal SMA - as the non-tribal areas, where we are 228 boats and they are about, I think, 23 boats. This is not badmouthing anybody. It's just not huge amounts.</p> <p>There are areas to the north of us that are not near as crab conducive once you get above Destruction Island. There is crab up there, but it's only two out of every 10 years. I don't know how many fathom that red line is, what we call the red line, the south side, the buoy line. I'm looking at that and thinking maybe in between those, because nobody -- even though we get really close</p>	<p><i>Thank you for your comments.</i></p> <p><i>Based on comments on the Draft SSEA, NSF has actively engaged the regional fishing community in a process, known as micro-siting, to identify the placement of the proposed Endurance Array moorings in a manner that considers potential impacts to the fishing community to the maximum extent practicable. A micro-siting meeting was held at the Westport Maritime Museum on Nov. 17, 2010 (see Appendix G of the Final SSEA). This meeting assisted in the identification of additional potential mooring sites off the Washington coast including many of the sites mentioned in the comment. The micro-siting process will be ongoing with additional meetings as necessary and additional coordination with potentially affected marine users and stakeholders.</i></p>

<i>Comment Number</i>	<i>Commentor</i>	<i>Date</i>	<i>Comment</i>	<i>NSF Response</i>
			<p>to that fishing, that's something we want no part of for crab gear. We would lose everything. We are very careful. Super careful.</p> <p>Is that in that 14 fathom? Because I don't think the green dot is very far away from the red line, and you've got soft bottom there. You take that green line right there and bring it right straight down and I do believe -- are we looking at 18 fathom there?</p> <p>If you have a ship and you are coming in and you are going to come in the south side, you go right along there. That is navigational buoys known as the red line. These over here that are marked red are the green line. They should be green. So as you come in, red on the right when returning. So when you are going out it's vice versa. Somewhere in here I'm sure there's 13, 14 fathom. Tribal ground starts right here, Point Chehalis. That's known as the U&A, the usual and accustomed. But they don't crab. When they start six weeks before us, they start up here somewhere, seven miles above there. That's because the fisheries management is not going to allow the tribe from here to take all the easy pickings -- all the easy pickings six weeks ahead of us. We have to have some for our small boats.</p> <p>So move it up eight miles and you will no doubt still have debate amongst us guys, but you will really have it up there. Less fish up there. Eighty percent of the Washington coast in the crab fishery belongs to the tribes. We have 20 percent. We've lost more crab to the tribes than what's even close to being lost in the Gulf oil spill.</p> <p>So I you can tell our concern when something like this could upset several boats and gear. Now, the first thing I saw the first time was a big box. Now, one buoy is put in. I heard from Quinalt: Oh, it's great, wonderful, one buoy, (inaudible). Well, it's not in his back yard. That's number one. And if it is that, then we are probably not quite as upset about it. But if it was where I first saw this big box, where you can't get anywheres near it... And it's not that we don't trust people -- yeah, it is. We don't trust them.</p> <p>You think of a big box and all of a sudden you can't go there, it would kind of be like some of these (inaudible) gas chambers: You can't get anywheres near them for one activity or another. So that's</p>	

<i>Comment Number</i>	<i>Commentor</i>	<i>Date</i>	<i>Comment</i>	<i>NSF Response</i>
			<p>kind of what we've got. And it is a concern.</p> <p>I think more -- we are not trying -- it's not that we are against everything new or modern or change. We know things have to go on. But that spot, that's a nasty one, folks. You are going to play (inaudible), would be my opinion. Get a bunch of crab gear wrapped around it, and you are going to have a problem; not as much if you were on that red line, I don't believe.</p> <p>The shrimpers work from about -- realistically, I've been in the 42 fathom and caught shrimp. They realistically work from about 55 fathom out to what we call the slope, which is different from what you call the slope. And that's where we get out in the deep 80s and 90s, where it really falls off. We work that (inaudible). And they work out there. There is quite a bit of difference. It's not a big thing picking up anchors. They can tow around. (Inaudible.) Besides, I don't shrimp anymore.</p> <p>That's kind of where we look at it. I think if you had a meeting that addresses the entire coalition of ocean fishermen, which Bill was the president of... Doug and I and Bill and a couple others kicked that off the ground quite a few years ago. What does it look like (inaudible), I have no idea.</p> <p>Number one priority, according to Ocean Policy in the state of Washington, is the user groups. And the first user group on that list, whether it's alphabetical or just put there, is the fishing industry. So there is a process we need to work through. It's not just in this room. We are going to have to work with the County and the State and the governor's office. So we know there's a process at work.</p>	
WPH-2	Douglas Fricke, President, Washington Troller Assoc.	1 Sep	Refer to written comment IPW-1. The written comment was read aloud by Mr. Fricke during the public hearing.	<i>Refer to response to comment IPW-1.</i>

<i>Comment Number</i>	<i>Commentor</i>	<i>Date</i>	<i>Comment</i>	<i>NSF Response</i>
WPH-3	Mark Cedergreen, Executive Director, West Coast Charter Boat Assoc.	1 Sep	Our major concern is that these not be sited within, say, a quarter of a mile proximity of a rocky structure or rock pile where we would fish. And that's our major concern.	<i>Thank you for your comment. Based on comments on the Draft SSEA, NSF has actively engaged the regional fishing community in a process, known as micro-siting, to help NSF identify the placement of the proposed Endurance Array moorings in a manner that considers potential impacts to the fishing community to the maximum extent practicable. A micro-siting meeting was held at the Westport Maritime Museum on Nov. 17, 2010 (see Appendix G of the Final SSEA). This meeting assisted NSF in the identification of additional potential mooring sites off the Washington coast including the avoidance of rocky sites as mentioned in the comment. The mooring siting criteria includes the avoidance of rocky areas for proposed moorings. The micro-siting process will be ongoing with additional meetings as necessary and additional coordination with potentially affected marine users and stakeholders.</i>
Summary of General Comments/Concerns Raised during the Oral Portion of the Westport, WA Public Hearing		1 Sep	Concern that there will be an area “cordoned off” around the buoys.	<i>OOI is working on buffer zone radius requirements for the moorings. The buffer zones would be used to alert fishermen that the mooring can be anywhere within the buffer zone. We are trying to minimize impacts to fishing and do not want to create restricted fishing zones.</i>
			Gear entanglement is likely at the inshore mooring location during big storms. During storms gear moves around, especially crab pots, and may get hung up on the mooring.	<i>OOI scientists do realize that the inshore mooring will be in a high energy environment.</i>
			Requested clarification on fiber optic cable location.	<i>The cabled OOI assets would only be deployed off of OR. There are only three uncabled, stand-alone mooring sites proposed for deployment off of WA.</i>

<i>Comment Number</i>	<i>Commentor</i>	<i>Date</i>	<i>Comment</i>	<i>NSF Response</i>
			<p>Meeting attendees provided possible locations for the moorings, such as the “red line” for the inshore mooring.</p>	<p><i>Based on comments on the Draft SSEA, NSF has actively engaged the regional fishing community in a process, known as micro-siting, to help NSF identify the placement of the proposed Endurance Array moorings in a manner that considers potential impacts to the fishing community to the maximum extent practicable. A micro-siting meeting was held at the Westport Maritime Museum on Nov. 17, 2010 (see Appendix G of the Final SSEA). This meeting assisted NSF in the identification of additional potential mooring sites off the Washington coast. The micro-siting process will be ongoing with additional meetings as necessary and additional coordination with potentially affected marine users and stakeholders.</i></p>

<i>Comment Number</i>	<i>Commentor</i>	<i>Date</i>	<i>Comment</i>	<i>NSF Response</i>
Newport Public Hearing (NPH), Newport, OR – Sep 2, 2010 (Note: refer to Appendix E for the complete public hearing transcripts)				
NPH-1	John Lavrakas, President, Advanced Research Corp., Newport, OR and Co-Chair, Yaquina Bay Ocean Observing Initiative	2 Sep	I have two comments. One's a question so I'll save it for the second. The first comment is we encourage you all to work with other organizations that might use the data in defining the data formats and content -- and this is a comment I've discussed with you all before -- so that we can harmonize data flow from the observing arrays into other databases that can make use of it. An example would be fisheries' databases where scientists and fishermen are interested in seeing how -- what behaviors are of the fish relative to physical oceanographic activity. All right? So that's the comment. As the second one, I'll go ahead and read this.	<i>Thank you for your comment. OSU is addressing data format and compatibility needs of multiple end user groups in collaboration with the OOI Cyberinfrastructure Implementing Organization located at the University of California San Diego.</i> <i>(This comment was submitted as a written comment; refer to Comment IPW-2)</i>
NPH-2	Chuck Pavlik, President, Central Coast Chapter of the Coastal Conservation Association	2 Sep	We represent sports fishermen. And my question to you is -- and being late, you may have already answered my question. What impact is this going to have on the sport fisheries off the Oregon coast?	<i>Thank you for your comment. Based on comments on the Draft SSEA, NSF has actively engaged the regional fishing community in a process, known as micro-siting, to help NSF identify the placement of the proposed Endurance Array moorings in a manner that considers potential impacts to the fishing community to the maximum extent practicable. A micro-siting meeting was held at the Westport Maritime Museum on Nov. 17, 2010 (see Appendix G of the Final SSEA). This meeting assisted in the identification of additional potential mooring sites off the Washington coast. The micro-siting process will be ongoing with additional meetings as necessary and additional coordination with potentially affected marine users and stakeholders.</i>

<i>Comment Number</i>	<i>Commentor</i>	<i>Date</i>	<i>Comment</i>	<i>NSF Response</i>
NPH-3	John Sherman	2 Sep	I've done some volunteer work here at the Marine Science Center and I have a copy of your draft -- August draft of the Site-Specific Environmental Assessment and I notice in here you repeatedly say "no significant impact." How do you arrive at that conclusion? What criteria -- what's the basis for "no significant impact"?	<i>Thank you for your comment. Significance criteria vary from resource to resource. The impact assessment methodology and the definitions of impact levels or significance are provided at the beginning of the environmental resources section of each resource. For example, refer to Section 3.2.2.2 for the impact methodology for Geological Resources.</i>
Summary of General Comments/Concerns Raised during the Oral Portion of the Newport, OR Public Hearing		2 Sep	Will the acoustic instruments interfere with marine mammals (e.g. whales)?	<i>Based on NSF's assessment of active acoustic sources in the PEA (Section 3.2) and Final SSEA (Section 3.2.4) there will be no significant impacts to marine mammals. Further, NSF provided its assessment to NMFS for review under the Marine Mammal Protection Act and the Endangered Species Act and they concurred with NSF's conclusions that there would be no impacts to marine mammals due to the use of these acoustic sources (refer to Appendix H of the Final SSEA).</i>
			Will the buoy mooring cables pose an entanglement problem for whales?	<i>There have been no incidences of marine mammals being entangled in mooring lines and there will only be six mooring lines for the proposed Newport line (two moorings at each of three sites) (see Section 3.2.2 in the PEA and Section 3.2.4.2 in the Final SSEA). Additionally, the mooring lines would be made of a stretch hose material which will maintain a positive tension on the mooring line, thereby reducing the amount of required mooring line scope. This design minimizes mooring line slack and so prevents marine mammal entanglement. NMFS concurred with this determination and issued Letters of Concurrence (LOCs) that our proposed action would not significantly impact marine mammals (refer to Appendix H of the Final SSEA).</i>

<i>Comment Number</i>	<i>Commentor</i>	<i>Date</i>	<i>Comment</i>	<i>NSF Response</i>
			Request to clarify the term “maximizing cable burial” for RSN	<i>The RSN cable would be buried under the sediment to an approximate depth of 1.3 m in soft bottom all the way out to the 700 fm depth. The cable route purposefully goes around rocky areas since the cable cannot be buried in rocky areas. Surveys have been conducted along the entire proposed RSN cable route so as to help NSF identify a route that would avoid rocky areas and allow maximum burial in soft sediments.</i>

Comment Number	Commentor	Date	Comment	NSF Response
New Bedford Public Hearing (NBPH), New Bedford, MA – Sep 8, 2010 (Note: refer to Appendix E for the complete public hearing transcripts)				
NBPH-1	Fred Mattera	8 Sep	<p>I'm a commercial fisherman, 38 years. I fish out of Point Judith, Rhode Island. This proposed area site is probably one of the heaviest fished areas for mixed fishermen on the East Coast. I think Allen demonstrated that when he showed you the profile of all the nutrients and everything else and the species there.</p> <p>You know, I think that we're going to have a major problem here. I'm trying to think of how we co-exist. Fixed gear is one thing. I'm a mobile gear fisherman, throwing trawls on the bottom. You've got gliders going up and down through the water. You've got AUVs moving around. You got these buoys, subsurface buoys. And you're saying, oh, gees. We need half a mile around these. What happens when you start trawling the bottom and we start setting out in areas that are shot out from the surface to the bottom and then you're trawling back. I know that there would be times when there will be 20 to 40 vessels fishing right amongst those five moorings. If you tell me we're not going to have an interaction, I just find it very difficult to believe.</p> <p>So my concern is that this area is -- potentially could be shut down to fishermen. You know, I need -- I feel -- and after last Monday's meeting, I sat down with numerous fishermen and personally, they just don't want it. They just don't want it. We need to build trust, and trust starts with notification and being part of this process.</p> <p>Jean, you may have sent notices out. I called the fishing agency in New Haven, Paul from New England Council. Those are the two places I would have certainly gone to first. Neither one of them have heard about it.</p> <p>You heard our DEM, the representative in Rhode Island. They don't know anything about it. Massachusetts didn't know anything about it. The largest port, you know, generating funds here in New Bedford, they didn't know anything about it. So for the industry and state to co-exist, they have to be brought into this process, and I think they need to be brought into this process.</p> <p>I sent out a lot of e-mails to fishermen here. Well, this is what happens sometimes, you know. Until we get down to the nitty</p>	<p><i>Thank you for your comments. Based on comments on the Draft SSEA, NSF has actively engaged the regional fishing community in a process, known as micro-siting, to help NSF identify the placement of the proposed Pioneer Array moorings in a manner that considers potential impacts to the fishing community to the greatest extent practicable. Micro-siting meetings were held at the University of Rhode Island on Oct. 5 and Nov. 15, 2010 (see Appendix G of the Final SSEA). The micro-siting process will be ongoing with additional meetings as necessary and additional coordination with potentially affected marine users and stakeholders.</i></p> <p><i>With regard to your concern about the USCG being able to "shut down" areas to fishing, please note that the USCG stated, while in attendance at the Nov 15, 2010 micro-siting meeting held in RI, that they have no statutory authority to close areas off to fishing or navigation beyond the 12 nm limit. The proposed Pioneer Array is well outside the 12 nm limit. Please also note that NSF is not a regulatory agency and, as such, has no authority to shut down areas to fishing. NSF has stated that the agency has no interest in seeing fishing areas closed by deploying OOI, and will continue to emphasize this point with its USCG contacts, state and federal officials, and the public.</i></p> <p><i>NSF and the USCG agreed to the following actions to reduce the potential for collision or entanglement with OOI infrastructure:</i> – OOI moorings will be included on the</p>

Comment Number	Commentor	Date	Comment	NSF Response
			<p>gritty, a lot of times, you know, they don't come. We had a hurricane last week, supposedly a hurricane, and a lot of them are back out fishing, so a lot of them are probably out fishing on the grounds.</p> <p>But we need to build this trust. You're 50 percent of the way through this. You're dealing with an environmental assessment. That's only because you have to comply with NEPA. And had that not been happening, again, I feel blind-sided through this process. And yet we're supposed to just say, well, let's find a way to co-exist.</p> <p>So I think we either need an MoU of some sort from all the agencies involved that, you know, makes it understood that we can co-exist, and I think we need to bring together stakeholders. I think you need to slow this process down right now and get a group of stakeholders as an advisory committee. I think you need to bring in the New England Council and you need to bring in council for the habitat agency, and I think we need to get the message out on the internet.</p> <p>I don't want to be the only person here speaking for 100 fishermen that fish in this area, but I've been fishing here since 1980. That's 30 years. I know what's out there. I know how many boats are out there. And I know as soon as somebody hits one of those arrays that are millions of dollars, Coast Guard and everybody else is going to shut us down and we're going to lose more grounds. So until we go through that process, we need to stop or slow this process down and get back to the table and have stakeholders sitting in on this process in order to accomplish this environmental assessment, and then move forward. Okay. That's all.</p>	<p><i>Light List, NM and LNM.</i></p> <ul style="list-style-type: none"> - <i>The OOI project will work through the USCG, via the permit path, to get mooring locations on NOAA charts.</i> - <i>The OOI project will work with the USCG to develop guidance (to appear in LNM and NM or chart annotations) regarding the suggested buffer zone (as voluntary "areas to be avoided") from OOI moorings to reduce the potential for gear entanglement.</i> - <i>The OOI project will give advanced notice to the USCG of glider and AUV deployments, operating area, instructions if found, and a point of contact, and AUV and glider operations areas will be charted on LNM and NM.</i> <p><i>In addition, based on comments on the Draft SSEA, NSF prepared a Socioeconomic Impact Analysis Report (SIAR) to assess potential socioeconomic impacts to the fishing community with the installation and operation of the proposed Pioneer Array (see Section 3.3.1 and Appendix I of the Final SSEA).</i></p>
NBPH-2	Gary Mattaronas	8 Sep	<p>I fish out of Judith, Rhode Island. My brother and I own two offshore lobster boats. I couldn't concur with Fred more about what he said. It seems like the cart's been put before the horse here. I think you should have come to the fishermen first and said where is an area out there where we can get along and co-exist, if there is one. I'm not sure there is one.</p> <p>But I've been fishing here since 1974 and I fought with my brother for boundaries. Okay. And then our area came about. And then we</p>	<p><i>Thank you for your comments. Please also note that the comment period was extended to Sep. 30, 2010.</i></p> <p><i>Based on comments on the Draft SSEA, NSF has actively engaged the regional fishing community in a process, known as micro-siting, to help NSF identify the placement of the proposed Pioneer Array moorings in a</i></p>

Comment Number	Commentor	Date	Comment	NSF Response
			<p>had some draggers, and we got together and set boundaries for each other. So we co-exist out there, but we fish with twin trawls that are a mile long, and when I see these gliders all over this box here going from 15 to 20 miles a pop, I don't know how those aren't going to get tangled in our gear.</p> <p>And as Fred said, maybe once or twice we'll get away with it. If it gets hung up in our lines, what's going to happen is the Coast Guard is going to get involved with that. They're going to say, okay. Fishermen got to go because those fishermen have to go. It's not the public agencies. It's never the people that are supported by the government. It's always the fishermen, the lowly fishermen who are just trying to go out there and survive.</p> <p>You've got \$700 million. You could have bought us all out. You could have had all of the ocean, the whole ocean. You could have done anything you wanted.</p> <p>As I said before, you put the cart before the horse. We should have been involved from day one so we could have sat down. Right now we feel like we're getting screwed. I've talked with Al to see if we can come to some conclusions out there to work with, but we feel like we've been stabbed in the back here. We really do.</p> <p>The point with me was when we just had met last week that I was there. Mark Griffin from DEM was overwhelmed. He hadn't been involved with this. He hadn't been involved with this situation. I mean, my question is, why didn't you come to the fishermen first and say, hey, what's going on out there. Can you give us an idea of where we can plant these things? There's closed areas you can put them in.</p> <p>I understand there's protective fishing grounds and that's -- we're just hanging on by a thread right now. You people all read the paper. We're getting shut out here. We're getting closed out of all these marine protected areas. All these things are just put into a small box and now you've got a big box that you want to keep us out of.</p> <p>It's a situation where we are really, really concerned about this. I</p>	<p><i>manner that considers potential impacts to the fishing community to the maximum extent practicable. Micro-siting meetings were held at the University of Rhode Island on Oct. 5 and Nov. 15, 2010 (see Appendix G of the Final SSEA). The micro-siting process will be ongoing with additional meetings as necessary and additional coordination with potentially affected marine users and stakeholders. Please also see response to comment NBPH-1.</i></p> <p><i>In addition, based on comments on the Draft SSEA, NSF prepared a Socioeconomic Impact Analysis Report (SIAR) to assess potential socioeconomic impacts to the fishing community with the installation and operation of the proposed Pioneer Array (see Section 3.3.1 and Appendix I of the Final SSEA).</i></p>

Comment Number	Commentor	Date	Comment	NSF Response
			<p>think there's ways we might be able to work on it. I really think most of the fishermen aren't here, because we feel like they've got \$700 million, they're going to go forward. The government's not going to say shut them down because of a few fishermen's sake. We can't live with this project, and I've been fishing out there since '74. My brother's out fishing right now. My brother's boat is out there fishing right now. We are fishing out there. We'll probably take 200 traps out of there right now. So it goes from the ocean, both offshore and into the fishing area. So you guys are displacing an awful lot of people. You got three, four crew men out there, plus you got supplies, all this other stuff.</p> <p>So we're really concerned about once two or three of these gliders get hung up on us, we're going to say, okay. The Coast Guard's going to stop us. When they come after us with the Cutters, they got guns on them. When they board you, they're coming on with guns. There's no fooling around with them. First thing I'm ready to hear when they come on board, do you have any weapons on board. And you say, yes, which most of us don't because we're so afraid to get arrested for anything we have out there. They just come on like gang busters. They're just going to say, okay, give us your gear.</p> <p>We've just put out three or 4,000 pots over night. During this hurricane, what can I do? I can't do anything. It's got to stay out. It takes months to move that kind of gear. So we really have a concern about that and we'll make comments, also.</p>	<p><i>Scientists involved in the proposed OOI have been using gliders and AUVs on both coasts for over 20 years and have had minimal problems with entanglement of gliders or AUVs in fishing gear. When there is the rare entanglement event, it has not resulted in any damage to fishing gear. The gliders/AUVs are marked with a phone number that fishermen can contact if they do accidentally bring up a glider/AUV. The standard procedure is for the fisherman to place the AUV/glider back in the water.</i></p>
NBPH-3	David Spencer, Massachusetts Lobstermen's Association	8 Sep	<p>I'll echo what Fred and Gary said. Quite frankly, what I tried to get at earlier was, we have a list of notification letters in the state informational section. I'd be very interested to see who was sent that letter. I don't mean that rhetorically. I'd like to see that. The fact is if there had been no stakeholder meetings, we wouldn't have found out by accident. Right away there is a level of distrust. I can only assume this was unintentional. Nobody has been working on this for 15 years with that sort of a budget that goes to Woods Hole that have scientists that have a relationship with some of these organizations and didn't think to notify us. That's what you've said to me.</p> <p>What I think needs to be done is they should pause, stop the</p>	<p><i>Thank you for your comments. NSF took steps to make the NEPA process a very public one, including noticing the availability of NEPA documents in the Federal Register and local newspapers and sending documents to interested members of the public, federal and state agencies, and others who expressed an interest in the process. NSF also advertised the availability of the NEPA documents in newspapers and commercial fishing magazines in an attempt to notify as many potentially interested members of the public as possible about the</i></p>

Comment Number	Commentor	Date	Comment	NSF Response
			<p>permitting process, convene stakeholder groups, form an industry panel that sits at the decision making table, not a just for show table, not something just to satisfy the people, but have a real meaningful place at the table. Come up with a document, a signed document that says fishing actively will be allowed to take place within this area at the level that currently exists, and if another agency steps in and does not allow fishing, this project will not proceed. Before any fishermen or industry group sits down and start to cooperate, that's what has to be done first. I don't see any other way around it.</p> <p>I cannot believe an industrial sized construction project of this magnitude on the edge of the continental shelf which has critical habitat, has endangered species, has deep water coral, can go through and then just completely escape everybody's attention.</p> <p>So it's -- I'm at a loss for words. I personally will do everything I can to work against this project unless that format is followed.</p>	<p><i>OOI and NSF's NEPA process (refer to Appendices D and E of the Final SSEA)..</i></p> <p><i>Based on comments on the Draft SSEA, NSF has actively engaged the regional fishing community in a process, known as micro-siting, to help NSF identify the placement of the proposed Pioneer Array moorings in a manner that considers potential impacts to the fishing community to the maximum extent practicable. Micro-siting meetings were held at the University of Rhode Island on Oct. 5 and Nov. 15, 2010 (see Appendix G of the Final SSEA). The micro-siting process will be ongoing with additional meetings as necessary and additional coordination with potentially affected marine users and stakeholders.</i></p> <p><i>In addition, based on comments on the Draft SSEA, NSF prepared a Socioeconomic Impact Analysis Report (SIAR) to assess potential socioeconomic impacts to the fishing community with the installation and operation of the proposed Pioneer Array (see Section 3.3.1 and Appendix I of the Final SSEA).</i></p>
NBPH-4	Crista Bank, School for Marine Science and Technology at UMass Dartmouth	8 Sep	<p>I do a lot of project work with fish from New Bedford. Currently, I'm working with monkfish in areas that use this fishing area quite a bit. We're actually all planning some research trips this winter right in that same area. It's our first foray in deep water, and there are monkfish there, and I'm hoping to continue in future years.</p> <p>So, I guess I didn't know about this until a couple of weeks ago. I wasn't even sure what it was all about. Now I'm really glad I came. It definitely affects a lot of what I work on and my direct research. That's why I'm here, so thanks for having me.</p>	<p><i>Thank you for your comments. NSF took steps to make the NEPA process a very public one, including noticing the availability of NEPA documents in the Federal Register and local newspapers and sending documents to interested members of the public, federal and state agencies, and others who expressed an interest in the process. NSF also advertised the availability of the NEPA documents in newspapers and commercial fishing magazines in an attempt to notify as many potentially interested members of the public as possible about the</i></p>

Comment Number	Commentor	Date	Comment	NSF Response
				<p><i>OOI and NSF's NEPA process (refer to Appendices D and E of the Final SSEA).</i></p> <p><i>Based on comments on the Draft SSEA, NSF has actively engaged the regional fishing community in a process, known as micro-siting, to help NSF identify the placement of the proposed Pioneer Array moorings in a manner that considers potential impacts to the fishing community to the maximum extent practicable. Micro-siting meetings were held at the University of Rhode Island on Oct. 5 and Nov. 15, 2010 (see Appendix G of the Final SSEA). The micro-siting process will be ongoing with additional meetings as necessary and additional coordination with potentially affected marine users and stakeholders.</i></p> <p><i>In addition, based on comments on the Draft SSEA, NSF prepared a Socioeconomic Impact Analysis Report (SIAR) to assess potential socioeconomic impacts to the fishing community with the installation and operation of the proposed Pioneer Array (see Section 3.3.1 and Appendix I of the Final SSEA).</i></p>
NMPH-5	<p>Jim Bisagni, Ph.D. School of Marine Science & Technology UMass - Dartmouth</p>	8 Sep	<p>I just wanted to comment on the fact that I was involved with the US Globec Georges Bank Program. That was a large program that's been going on since the early 1990's. Since the early 1990's as well as 1999, there was a series of instruments in the southern bank and actually on the western side of the northeast bank. They were not my instruments. I did not deploy them. But they were there for a few years depending on which site you're actually looking at. In my mind, I don't think there's an area that is as heavily fished as Georges Bank. It's probably similar to the area we're looking at now. As far as I know, the collision problem was not too bad, as far as I can recall, but I don't know what the facts are.</p>	<p><i>Thank you for your comments.</i></p>

Comment Number	Commentor	Date	Comment	NSF Response
Summary of General Comments/Concerns Raised during the Oral Portion of the New Bedford, MA Public Hearing		8 Sep	Request for clarification on the cost of the moorings.	<i>The cost to design, build and deploy the entire OOI – the Endurance Array and fiber optic cable RSN on the west coast, the Pioneer Array, and the high latitude Global Arrays – is \$384.16 million. Estimates for initial operations are \$383 million for all of the Coastal (Pioneer and Endurance arrays), Global, and RSN components through 2017, subject to the NSF budget request and funding process.</i>
			Participants (Joyce Rowley and others) wanted to know how the project was funded (i.e. the approval process for the project).	<i>The OOI was conceptually developed, and then cost estimates for all of the components and their operation were obtained. The project went through several design reviews leading up to NSF approval and then up to the NSF’s oversight body, the National Science Board (NSB). On May 14, 2009, the NSB authorized the Director of NSF to award funds, at his discretion, for the construction and initial operation of the OOI. The NSF Director forwarded a funding request to the Office of Management and Budget for approval. Congress then approved and appropriated funds for the project.</i>
			Joyce Rowley: Will the project support private companies (e.g. oil and gas exploration)?	<i>NSF is an organization that funds cutting-edge science and technology. For the OOI, all of the funding goes to support science and scientific understanding of the marine environment. There is no connection whatsoever with the oil and gas industry.</i>
			Joyce Rowley: Does the project team have experience deploying arrays in high traffic fishing areas?	<i>OOI team members, such as Woods Hole Oceanographic Institution (WHOI), have deployed similar systems. Previous WHOI mooring deployments on or near the shelf were discussed during the meeting, including a project that took place in 2006 where 50 moorings, 4 gliders and several AUVs were deployed off of New Jersey. The mooring depths ranged from 30 – 250</i>

<i>Comment Number</i>	<i>Commentor</i>	<i>Date</i>	<i>Comment</i>	<i>NSF Response</i>
				<p><i>fathoms. For this deployment, there was a lot of coordination with fishermen, the fishing remained active, and there were no negative interactions between the fishermen, moorings, gliders or AUVs.</i></p>
			<p>Joyce Rowley: Will the mooring lines interfere with marine mammals (e.g. whales)?</p>	<p><i>There have been no incidences of marine mammals being entangled in mooring lines (see Section 3.2.2 in the PEA and Section 3.2.4.2 in the Final SSEA). Additionally, the mooring lines would be made of a stretch hose material which will maintain a positive tension on the mooring line, thereby reducing the amount of required mooring line scope. This design minimizes mooring line slack and so prevents marine mammal entanglement. NMFS concurred with this determination and issued Letters of Concurrence (LOCs) that our proposed action would not significantly impact marine mammals (refer to Appendix H of the Final SSEA).</i></p>

From: Roxanne_Runkel@nps.gov [mailto:Roxanne_Runkel@nps.gov]
Sent: Wednesday, September 15, 2010 6:41 PM
To: NSF NEPA Comments
Cc: Joe_Carriero@nps.gov; Marchelle_Dickey@contractor.nps.gov;
Sandy_Lardinois@contractor.nps.gov; Lisa_Treichel@ios.doi.gov
Subject: ER-10/0732 Draft Site-Specific Environmental Assessment for the Ocean Observatories Initiative (OOI), East and West Coast, USA - No Comment

Thank you for the opportunity to review this document.

The National Park Service has reviewed this document and supports the Ocean Observatories Initiative (OOI).

"...None of the planned installations are near our ocean and coastal parks, so I'm not concerned about direct or indirect impacts on park resources. I support NSF's Ocean Observatories Initiative because it will advance our understanding of the coastal oceans, which will benefit our ocean and coastal parks".

For further inquiry, please contact:
Jeffrey N. Cross, Ph.D.
Chief, Ocean & Coastal Resources Branch
Natural Resource Program Center
National Park Service
1201 Oakridge Drive, Suite 250
Fort Collins, CO 80525
jeffrey_cross@nps.gov

We appreciate the opportunity to review this document.

Sincerely,
Roxanne Runkel

Roxanne Runkel
Environmental Protection Specialist
Environmental Quality Division
WASO-2310
7333 W. Jefferson Avenue
Lakewood, CO 80235
Phone: (303) 969-2377 FAX: (303) 987-6782
roxanne_runkel@nps.gov

From: Ed Bowlby <Ed.Bowlby@noaa.gov>
To: McGovern, Jean M.
Sent: Wed Nov 17 08:48:06 2010
Subject: Re: Request to Resend Email - NSF Computer Problem

Jean, my apologies for this very late response. Too many other brush fires.

First off I appreciate that you were able to give me additional time to review. Thanks. Sorry that I'm not able to do a more detailed review but my quick browse of the proposal makes it obvious that this had great scientific merits and deserves support.

Since almost all of the operations for the Endurance Array will be south of the Olympic Coast National Marine Sanctuary boundaries, we don't have any issues with permits, etc. That's good.

The one thing that I see is missing and should be addressed is whether the cabling/burying routes may or may not be crossing over the Grays Canyon Sponge Reef. This area is an existing EFH Conservation Area and there is a pending proposal thru PFMC to expand the boundaries (http://www.pcouncil.org/wp-content/uploads/Olympic_2_Grays_Canyon_EFH.pdf). It looks like this is in the general vicinity of the cable route.

Also there has been very recent surveys in 2010 using both multibeam and AUV to further map out the sponge area. Three contacts that can provide more details on this are:

Elizabeth Clarke <Elizabeth.Clarke@noaa.gov>
Paul Johnson <johnson@ocean.washington.edu>
Joe Schumacker <jschumacker@quinault.org>

Lastly I state again that I am very supportive of this project. But I'm sorry that I won't be able to make the Westport meeting tonight.

Ed Bowlby wrote:

Jean, at this time I hadn't tried to schedule myself (or someone else from our office) for the Westport meeting. But as I begin my review, this could change. Or to follow-up with your suggestion for a call/teleconference whatever if warranted. More on that later. Again thanks for making the offer and your consideration.

McGovern, Jean M. wrote:

Great Ed,

I see that we invited you to the November 17th meeting for micro-siting the array in Westport.

If you cannot attend and want to have a separate teleconference after the meeting, I'd be happy to give you an update. We want to continue to collaborate with you both from an infrastructure perspective and a science perspective as well.

We look forward to your comments and any future communications.

Sincerely,

Jean McGovern
Program Director
Ocean Observatories Initiative
National Science Foundation
703.292.7591

From: Ed Bowlby [<mailto:Ed.Bowlby@noaa.gov>]
Sent: Wednesday, November 03, 2010 11:52 AM
To: McGovern, Jean M.
Subject: Re: Request to Resend Email - NSF Computer Problem

Jean, I'm certain I can provide you comments by Nov. 17. Thanks for the consideration.

McGovern, Jean M. wrote:

Hi Ed,

Here is the Draft Site specific EA for you to comment on:

http://www.nsf.gov/geo/oce/envcomp/ooi/ooi_draft_ssea_august_2010.pdf

I will try to call you to work out when you can get us comments. Would November 17th work out? I have a contractor working on the responses and I need to figure out a revised schedule for him. Let me know, I look forward to your comments.

Sincerely,

Jean McGovern

From: Ed Bowlby [<mailto:Ed.Bowlby@noaa.gov>]
Sent: Thursday, October 21, 2010 12:35 PM
To: McGovern, Jean M.
Subject: Re: Request to Resend Email - NSF Computer Problem

Hello Jean,

I believe I sent a message that I could not open the CD of the draft and asked if I could download it, etc. So I have not actually reviewed nor commented on the draft at this point. If I could still supply comments, I would need to have someone send or point me to a ftp site or whatever.

Ed Bowlby, Research Coordinator
NOAA, Olympic Coast National Marine Sanctuary
115 East Railroad Ave., Suite 301
Port Angeles, WA 98362-2925
360-457-6622, x17
ed.bowlby@noaa.gov
<http://www.ocnms.nos.noaa.gov/>

McGovern, Jean M. wrote:

Hi Ed,

My name is Jean McGovern. I am the Program Officer for the Ocean Observatories Initiative at the National Science Foundation. Our IT folks at NSF indicate to me that there were two emails from our OOI Draft Site Specific Environmental Assessment that did not get through to me for some reason. You were one of the two individuals. As luck would have it for me, both individuals were federal employees. I am hoping to appeal, "one fed to another" about understanding IT errors. Boy, was I astonished.....when I learned about what happened.

I am writing to request that you resend your comments/email to my personal email address. I am hoping that you have an email record. Here is what the system is telling me:

ed.bowlby@noaa.gov	nepacomments@nsf.gov	SSEA for OOI...	August 13, 2010 18:40:01 -0500	All quarantine processing for message is complete	nsf-ironport-01
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As I recall, Steve Gittings told me you were the research coordinator for OCNMS. When last I tried to contact you, I think you were on an extended cruise. If you are now back, let's talk about the project and your comments.

I appreciate your understanding in this matter.

Sincerely,

Jean McGovern, Program Director

Ocean Observatories Initiative, National Science Foundation



Oregon

Theodore R. Kulongoski, Governor

Parks and Recreation Department

State Historic Preservation Office

725 Summer St NE, Ste C

Salem, OR 97301-1266

(503) 986-0671

Fax (503) 986-0793

www.oregonheritage.org

8/19/2010

Ms. Jean McGovern
National Science Foundation
4201 Wilson BLvd
Arlington VA 22230



RE: SHPO Case No. 10-1858
Ocean Observatories Initiative Projs
Notice of draft site-specific enviro assessment
National Science Foundation/ARRA
Virginia

Dear Ms. McGovern:

Our office recently received a request to review the proposal for the project referenced above. In reviewing the project EA I see that most of the work is to be done far offshore of Oregon's coastline. After looking through the analysis of potential effects I would like to clarify some of our office's concerns with the proposed scope of work. If I understand the project maps correctly, all work zones will be located many miles off the coast, whether these are the "inshore" or "offshore" components. The possibility of cultural resources site being located off shore, inundated due to past seismic changes along Oregon's coastline, exists and has recently been the subject of research efforts through the Oregon State University Anthropology Department (Dr. Loren Davis). For any work within a minimum five mile area of our coastline consideration should be made regarding submerged landforms and the possibility of earlier protected environments. Bathymetric and sonar studies are encouraged for all work affecting lands in these areas so that sufficient information on submerged terrain features can be assessed in regards to the location of potential submerged prehistoric sites.

If you have any questions about my comments or would like additional information, please feel free to contact our office at your convenience. In order to help us track your project accurately, please be sure to reference the SHPO case number above in all correspondence.

Dennis Griffin, Ph.D., RPA
State Archaeologist
(503) 986-0674
dennis.griffin@state.or.us



Oregon

Theodore R. Kulongoski, Governor

Ocean and Coastal Management Program

Department of Land Conservation and Development

635 Capitol Street, Suite 150

Salem, Oregon 97301-2540

Phone (503) 373-0050

FAX (503) 378-6033

www.oregon.gov/LCD/OCMP

September 7, 2010

Jean McGovern
National Science Foundation
Division of Ocean Sciences
4201 Wilson Blvd.
Arlington, VA 22230

Dear Ms. McGovern:

This letter is in response to your August 10, 2010 **Notice of Public Hearing and Request for Comment on a Draft Site-Specific Environmental Assessment (SSEA) for the Ocean Observatories Initiative**.

Thank you for the opportunity to review this proposed project and to offer our assistance. The project is occurring partially within the boundaries of the Oregon Coastal Program, and can be expected to have effects on coastal uses and resources. The Oregon Coastal Management Program (OCMP) will be reviewing the project under the federal consistency provisions of the Coastal Zone Management Act of 1972, as amended. The regulations applicable to this project can be found at 15 CFR §930, Subpart C.

To be consistent with the OCMP, the proposed project must be consistent 'to the maximum extent practicable' with: 1) the statewide planning goals; 2) the applicable acknowledged city or county comprehensive plan; and 3) selected state authorities (e.g. those governing removal-fill, water quality, beach and dune management, and fish & wildlife protections).

Additionally, the OCMP anticipates incorporating the spatial footprint of your system into our maps for Oregon's Territorial Sea Plan (TSP).

If you have any questions or comments regarding the consistency review process or the Oregon Coastal Management Program, please contact me at 503-373-0050 ext. 253 or by e-mail at: juna.hickner@state.or.us. For questions or comments regarding the TSP, please contact Paul Klarin at paul.klarin@state.or.us or Andy Lanier at andy.lanier@state.or.us.

Sincerely,

/Juna Hickner/

Juna Hickner
Coastal State-Federal Relations Coordinator



Oregon

Theodore R. Kulongoski, Governor

Department of State Lands

775 Summer Street NE, Suite 100

Salem, OR 97301-1279

(503) 986-5200

FAX (503) 378-4844

www.oregonstatelands.us.

OCTOBER 25, 2010

CLL600/45663

CONSORTIUM FOR OCEAN LEADERSHIP
ATTN JEANINE HUBLER
1201 NEW YORK AVENUE NW 4TH FLOOR
WASHINGTON DC 20005

State Land Board

Theodore R. Kulongoski
Governor

Kate Brown
Secretary of State

Re: DSL Removal/Fill Permit Application No. 45663-RF
T. 4S, R. 11W, Section 25, Tax Lot 500, Pacific City, Tillamook County

Ted Wheeler
State Treasurer

Dear Ms. Hubler:

The Department of State Lands' 30-day public review period has closed for the permit application referenced above. We are enclosing copies of all written comments that we have received. Enclosed comments are provided for your information and do not require a response by the Department.

Please be aware that the Department of Environmental Quality (DEQ) has until December 7, 2010 to submit comments on your application (ORS 196.825(9)(b)) if a water quality certification is required. If DEQ submits comments requiring your response, we will contact you immediately.

We will make a permit decision on your application by December 22, 2010 unless you request to extend that deadline.

Please call me at 503-986-5285 if you have any questions.

Sincerely,

Carrie Landrum
Northern Region Resource Coordinator
Wetlands and Waterways Conservation Division
Oregon Department of State Lands

CC: Dominic Yballe, Portland Corps of Engineers
Cecile Durand, University of Washington



Comments for Application APP0045663 (Applicant: Consortium for Ocean Leadership)

NAME: Jim Grimes

EMAIL:

COMMENTS:

-- Yes, there are proprietary issues.

The applicant/agent is actively working with Land Management staff to secure the needed proprietary authorizations.

NAME: Eirik Thorsgard

CITY: Grand Ronde

STATE: OR

AGENCY: Confederated Tribes of Grand Ronde

COMMENTS:

-- No comment.

Comment Number: SAW-3

The Confederated Tribes of the Grand Ronde Community of Oregon Cultural Resources Department has reviewed this permit application and has no comments or concerns regarding this project at this time.

[Home](#) | [Agency Site](#)



Oregon

Theodore R. Kulongoski, Governor

RECEIVED

OCT 13 2010

DEPARTMENT OF STATE LANDS

Comment Number: SAW-4

Parks and Recreation Department

State Historic Preservation Office

725 Summer St NE, Ste C

Salem, OR 97301-1266

(503) 986-0671

Fax (503) 986-0793

www.oregonheritage.org

October 12, 2010

Ms. Carrie Landrum

DSL

775 Summer St NE

Salem, OR 97301-1279



RE: SHPO Case No. 10-2085

APP0045663

Removal/fill

DSL/COE/Consortium for Ocean Leadership

4S 11W 25AA, Pacific City, Tillamook County

Dear Ms. Landrum:

Our office recently received a request to review the proposal for the project referenced above. In checking our statewide cultural resource database, I find that there have been no previous cultural resource surveys completed near the proposed project area. However, the project area lies within an area generally perceived to have a high probability for possessing archaeological sites and/or buried human remains.

While not having sufficient knowledge to predict the likelihood of cultural resources being within your project area, extreme caution is recommended during future ground disturbing activities. ORS 358.905 and ORS 97.740 protect archaeological sites and objects and human remains on state public and private lands in Oregon. If any cultural material is discovered during construction activities, all work should cease immediately until a professional archaeologist can assess the discovery. If your project has a federal nexus (i.e., federal funding, permitting, or oversight) please coordinate with your federal agency representative to ensure that you are in compliance with Section 106 of the NHPA.

If you have any questions about my comments or would like additional information, please feel free to contact our office at your convenience. In order to help us track your project accurately, please be sure to reference the SHPO case number above in all correspondence.

Dennis Griffin, Ph.D., RPA

State Archaeologist

(503) 986-0674

dennis.griffin@state.or.us





THE COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENERGY AND ENVIRONMENTAL AFFAIRS
OFFICE OF COASTAL ZONE MANAGEMENT
251 Causeway Street, Suite 800, Boston, MA 02114-2136
(617) 626-1200 FAX: (617) 626-1240

September 21, 2010

Jean McGovern
OOI Project Director
National Science Foundation
Division of Ocean Services
4201 Wilson Blvd.
Arlington, VA

RE: Draft Site-Specific Environmental Assessment (Draft SSEA) for National Science Foundation-Funded Ocean Observatories Initiative (OOI)

Dear Ms. McGovern,

Thank you for sending the Draft SSEA for the Ocean Observatories Initiative. The Massachusetts Office of Coastal Zone Management (CZM) welcomes the opportunity to coordinate with the National Science Foundation (NSF) and the Woods Hole Oceanographic Institution's Martha's Vineyard Coastal Observatory on the future development of the project and the implementation of the Pioneer Array.

In terms of the site-specific design, installation, and operation of the Ocean Observatories Initiative, based on our review of the Draft SSEA, CZM has determined that there are no significant foreseeable coastal effects to Massachusetts uses or resources at this time, and therefore federal consistency review is not required. If the above-referenced project is modified, including any changes resulting from permit, license or certification revisions, including those ensuing from an appeal, or the project is noted to be having effects on coastal resources or uses that are different than originally proposed, it is incumbent upon the proponent to notify CZM and submit an explanation of the nature of the change. CZM will use this information to determine if further federal consistency review is required.

Sincerely,

Deerin Babb-Brott
Director





STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION



September 29, 2010

Jean McGovern
 National Science Foundation
 Division of Ocean Sciences
 4201 Wilson Blvd.
 Arlington, VA 22230

Re: Draft Site-Specific Environmental Assessment (SSEA) for the Ocean Observatories Initiative (OOI)

Dear Ms. McGovern:

This is in response to your request for comments, received on August 17, 2010, on the Draft Site-Specific Environmental Assessment (SSEA) for the Ocean Observatories Initiative (OOI). The component of the OOI of potential concern to Connecticut is the deployment and operation of the Pioneer Array in Federal waters south of Massachusetts and Rhode Island.

This Office submitted scoping comments in response to a memorandum prepared by TEC Inc. and dated January 7, 2008 announcing the preparation of the Programmatic Environmental Assessment (PEA) for the OOI. Our letter, dated January 21, 2008, confirmed the State of Connecticut's support for the deployment of ocean observing systems for the purposes of monitoring ambient environmental conditions and aiding in the study and management of ocean resources. We also indicated, however, that the aforementioned memorandum contained insufficient information with which to assess the potential environmental impacts of the proposed activities. We subsequently received the PEA, which contains an assessment of the environmental consequences of the Pioneer Array. The SSEA describes the activities that would occur within the project area, but does not contain an individual environmental assessment of the Pioneer Array, instead referring to that found in the PEA.

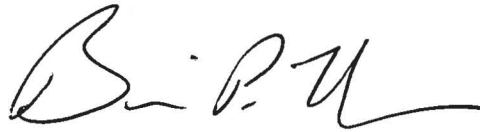
It does not appear that the Pioneer Array or the proposed associated activities, as described in the SSEA and the PEA, would have significant impact on resources of concern to the State of Connecticut. Marine mammals and reptiles that may occasionally utilize the waters of Long Island Sound may migrate through the proposed project area, although there is no means of tracking individuals, and it appears that both the fixed structures and mobile equipment could be effectively avoided by those animals.

The proposed activities may, however, create a potential use conflict affecting the Connecticut coast. Connecticut-based commercial fishermen utilize the waters within the project area, and any restriction of existing fishing access or displacement of existing fishing activities related to OOI implementation could have adverse socioeconomic impacts on the state's fishing industry and coastal communities. Accordingly, Section 2.2.1.2 of the SSEA should include among the list of marine users with whom site-specific placement of hardware would be

coordinated, the Connecticut Lobsterman's Association and the Southern New England Fisherman's and Lobstermen's Association, Inc.

If you have any questions about Connecticut's review of the SSEA, please contact Tom Ouellette of this Office at 860-424-3612 or tom.ouellette@ct.gov. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "B. P. U.", with a long horizontal flourish extending to the right.

Brian P. Thompson
Director
Office of Long Island Sound Programs

BPT/TO/o

cc: Julie Victoria, DEP Wildlife Div.

David Simpson, DEP Marine Fisheries Div.



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

COASTAL RESOURCES MANAGEMENT COUNCIL

Oliver H. Stedman Government Center
4808 Tower Hill Road, Suite 3
Wakefield, R.I. 02879-1900

(401) 783-3370
FAX: (401) 783-3767

November 4, 2010

National Science Foundation
Division of Ocean Sciences
4201 Wilson Boulevard; Suite 725
Arlington, VA 22230

RE: CRMC File No. A2010-09-057

Dear Sirs/Madam:

In accordance with Title 15 of the code of Federal Regulations, Part 930, subpart C (Consistency for Federal Activities) and review of plans entitled *Draft Site Specific Environmental Assessment for the National Science Foundation-Funded Ocean Observing Initiative (OOI)*, the Coastal Resources Management Council hereby concurs with the determination that the referenced project is consistent with the Federally approved Rhode Island Coastal Resources Management Council Program and applicable regulations therein.

Please contact this office upon initiation of construction, or if you should have any questions regarding this project.

Sincerely,

Jeffrey M. Willis, Deputy Director
Coastal Resources Management Council

/kc



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
235 Promenade Street, Providence, RI 02908-5767
Rhode Island Relay 711

To: Jean McGovern, OOI Program Director
National Science Foundation

From: W. Michael Sullivan, Director
Rhode Island Department of Environmental Management

A handwritten signature in black ink that reads "W. Michael Sullivan".

Date: September 30, 2010

Re: Comments on the Draft Site-Specific Environmental Assessment (DSEA) for the
Ocean Observatories Initiative

The Rhode Island Department of Environmental Management offers the following
comments on the DSEA for the Ocean Observatories Initiative.

We recognize that the intent of this project is to provide for near real-time acquisition of oceanographic and meteorological data critical to managing our oceans. The initiative has the potential to provide a powerful database for ocean planning. We support the concept of a network of underwater ocean observing laboratories using new technologies. We further understand that the nodes of these observing systems will need to be placed in strategic areas where ocean dynamics are most informative. Still, there needs to be consideration of fishery uses of the sites with appropriate accommodations made to ensure that access to historic, productive fishing areas is not unduly impacted. ***As explained below, we feel strongly that the proposed site off southern New England poses major impacts to the RI fishing industry, and for that reason, we strongly urge that the proposal not move forward until all fishery interests are fully considered and addressed.***

This Department was not made aware of this major project proposal until last month (late August 2010), when we were notified by a member of the RI commercial fishing industry. We scrambled to learn what we could about the proposal, attended a meeting in Narragansett, RI on August 30, and struggled to compile comments prior to the initial September 15 deadline. While we appreciate the decision to extend the comment period to September 30, we believe that a project of this magnitude, with profound potential impacts on the RI commercial and recreational fisheries, should have been reviewed with

RI fisheries interests long before it was presented to the National Science Board for approval.

Our concerns regarding the apparent lack of transparency and lack of input during the design portion of the project appear to be shared concerns. We reach this conclusion based on our recent discussions with colleagues from neighboring states and local fishing industry representatives. It seems that none of the southern New England or Mid-Atlantic states was aware of or involved in the review process for this project, since almost all comments received to date have emanated from the West Coast. We further note that there have been no comments received to date from any fishing organizations along the entire East Coast. Our local fishery industry representatives feel completely blindsided by the proposal. Since the proposed project could lead to extensive closures of historical fishing grounds, local fishermen are expressing strong and justifiable concerns over how the project could affect their livelihoods.

Oddly, it is our understanding that the one RI-based comment submitted to date came from the RI Coastal Resources Management Council (RI CRMC). For the record, we must note that the RI CRMC did not consult with us, or with any RI fishery interests. As far as we know, no one from RI knew that the RI CRMC commented on the project until well after their letter was submitted.

RI is home to a large commercial fishing fleet that targets numerous fisheries using multiple gear types in a large portion of the continental shelf off southern New England – precisely the area where the project is proposed for placement. RI commercial landings of all species were valued at close to \$62 million in 2009, with an average value of over \$76 million over the past ten years. A significant portion of these commercial landings come from the area where the project is proposed for placement. RI recreational fisheries are also highly valued. While the majority of recreational fishing occurs in close proximity to the RI shoreline, offshore fisheries for tunas, marlin, swordfish, and sharks do occur throughout the area where the project is proposed for placement.

Specific commercial fisheries that utilize the proposed area are:

- Lobster Pot fishery
- Red Crab Pot Fishery
- Monkfish Gillnet Fishery
- Pelagic Longline Fishery
- Otter Trawl fisheries for squid (*loligo & illex*), whiting, mackerel, monkfish, butterfish, scup, summer flounder

The proposed area also encompasses extensive Essential Fish Habitat (EFH) for numerous species; specifically, the area may include EFH designations for:

- Red Hake
- Offshore Hake
- Silver Hake
- White Hake
- Monkfish

- Redfish
- Tile fish
- Yellowtail Flounder

We suggest that the project coordinator work with the New England Fisheries Management Council (NEFMC) Habitat Committee and the National Marine Fisheries Service Northeast Regional Office, Habitat Conservation Division to obtain more information regarding the EFH process and whether the DSEA should include EFH determination(s). The following links may also be useful to view EFH designated area: Essential Fish Habitat Mapper v2.0

http://sharpfin.nmfs.noaa.gov/website/EFH_Mapper/map.aspx

The area has been designated a Habitat Area of Particular Concern (HAPC) by the NEFMC, and thus it is imperative that the NEFMC also be consulted on this particular designation. Under the Magnuson-Stevens Fisheries Conservation and Management Act, the New England and Mid-Atlantic Fisheries Management Councils should have been consulted for fisheries impacts during the DSEA process.

It is clear to us that this project should not proceed unless and until stakeholder workshops are conducted throughout the region, and consensus recommendations from those workshops are incorporated into the proposal. The workshops should allow for a thorough evaluation of the current proposal, full discussion of all critical issues, and consideration of alternative locations for siting. It is imperative that the states, industry, regional fisheries management councils, and NMFS all be involved in this stakeholder review process.

The RI Department of Environmental Management stands ready to participate in the above-described process and otherwise assist in any way that we can. We value the significant scientific benefits offered by the proposed project, but we caution that such benefits cannot outweigh the costs to the commercial and recreational fishing industries.



UMass

Dartmouth

SCHOOL FOR MARINE SCIENCE AND TECHNOLOGY

Comment Number: SAE-5

September 30, 2010

Dr. Jean McGovern
OOI Program Director
Division of Ocean Sciences
National Science Foundation
4201 Wilson Blvd.
Suite 725
Arlington, VA 22230

Dear Dr. McGovern,

I write in regard to the plans for the Pioneer Array of OOI. In my present position as Interim Dean of the School for Marine Science and Technology (SMAST), University of Massachusetts Dartmouth, I am aware of the concerns of the local fishing industry based in the New Bedford-Fairhaven, Massachusetts' area with respect to co-location of some of the Pioneer Array activities with fishing areas in the Georges Bank region and to the south.

Faculty, graduate students, postdocs and staff of our Department of Fisheries Oceanography, SMAST have developed a close working relationship with the fishing industry, while maintaining academic objectivity, to advance scientific research underpinning sustainable fishing on Georges Bank and contiguous areas. Several of them have communicated concerns of the fishing people about the location and extent of the Pioneer Array.

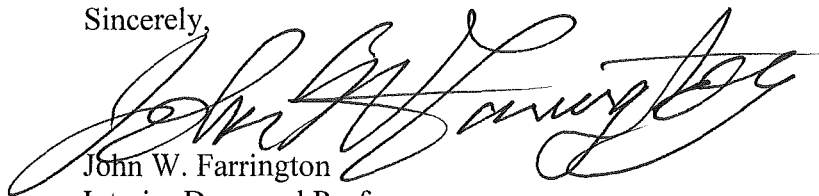
At the same time, we all recognize the benefits that can accrue from advances in knowledge of the fisheries habitat from the Pioneer Array. I am familiar with the scientific research efforts of colleagues at WHOI, having been on the Scientific Staff there from 1972 until I retired in March, 2006 and having been Dean there from August 1990 to November 2005.

I am supportive of the efforts you outlined in our telephone conversations to have a series of planning-information meetings to increase the interactive flow of information between stakeholder communities such as the fishing communities and the scientists and engineers carrying out the objectives of the Pioneer Array. This will maximize the probability of avoiding misunderstandings about the scope and benefits of the Pioneer Array and minimize interference with other uses of the planned geographic location.

Page Two
September 30, 2010

If I can be of assistance in facilitating communications between NSF, stakeholders and the OOI-Pioneer Array researchers, please call on me. Best wishes.

Sincerely,

A handwritten signature in black ink, appearing to read "John W. Farrington". The signature is fluid and cursive, with a large initial "J" and "F".

John W. Farrington
Interim Dean and Professor

cc:

Chancellor Jean MacCormack, University of Massachusetts Dartmouth

President Susan Avery, Woods Hole Oceanographic Institution

Provost Anthony Garro, University of Massachusetts Dartmouth

Executive Vice President Laurence Madin, Woods Hole Oceanographic Institution

Professor Avijit Gangopadhyay, Associate Dean, SMAST, UMass Dartmouth

Professor Kevin Stokesbury, Chair, Department of Fisheries Oceanography,
SMAST, UMass Dartmouth.

Professor Louis Goodman, Chair, Department of Estuarine and Ocean Science, SMAST,
UMass Dartmouth.

Dr. Robert Weller, Senior Scientist, Physical Oceanography Department, Woods Hole
Oceanographic Institution

Dr. Al Plueddemann, Senior Scientist, Woods Hole Oceanographic Institution



**NATIONAL SCIENCE FOUNDATION (NSF)
OCEAN OBSERVATORIES INITIATIVE (OOI)
DRAFT SITE-SPECIFIC ENVIRONMENTAL ASSESSMENT (SSEA)**

Public Hearing Comment Sheet

Location: Westport WA
Date: 9-2-10

Thank you for providing your comments on the Draft SSEA for the proposed installation and operation of the OOI. Public involvement is a fundamental part of the development of the OOI SSEA and NSF wants and appreciates your comments. Please provide comments no later than September 15, 2010 to ensure consideration in the Final SSEA. Comments may be submitted at this meeting, via email at nepacommments@nsf.gov, or via U.S. Postal Service to the address below. For more information go to <http://www.oceanobservatories.org>. The Draft SSEA can be downloaded from <http://www.nsf.gov/geo/oce/envcomp/> under "Ocean Observatories Initiative".

Any midwater ^{or bottom} equipment must have a surface marker to prevent fishermen from entangling their fishing gear in the midwater ^{or bottom} equipment.

Strongly suggest a workshop ^{in Nov. 2010} with the Coalition of Coastal Fisheries which represent the major fishing gear types in the area off of Ocean Shores, WA. The workshop should target how the fishermen can work with the siting and placement ^{***Please print - additional space is provided on back***} of the sensor location.

1. Name: Douglas Fricke, President Washington Trollers Assoc.
2. Address: P.O. Box 2402
Westport, WA 98595
3. Please check here if you would like to be on the mailing list.
4. Please check here if you would like your name/address kept private.
5. Would you like to receive a hard copy or CD of the Final SSEA?

Please give this form to one of the NSF representatives, place in the comment drop box, or mail by September 15 to:

**Jean McGovern
OOI Program Director, Division of Ocean Sciences
National Science Foundation
4201 Wilson Blvd, Ste 725, Arlington, VA 22230**



**NATIONAL SCIENCE FOUNDATION (NSF)
OCEAN OBSERVATORIES INITIATIVE (OOI)
DRAFT SITE-SPECIFIC ENVIRONMENTAL ASSESSMENT (SSEA)**

Public Hearing Comment Sheet

Location: Newport OR

Date: 9-2-10

Thank you for providing your comments on the Draft SSEA for the proposed installation and operation of the OOI. Public involvement is a fundamental part of the development of the OOI SSEA and NSF wants and appreciates your comments. Please provide comments no later than September 15, 2010 to ensure consideration in the Final SSEA. Comments may be submitted at this meeting, via email at nepacomments@nsf.gov, or via U.S. Postal Service to the address below. For more information go to <http://www.oceanobservatories.org>. The Draft SSEA can be downloaded from <http://www.nsf.gov/geo/occe/envcomp/> under "Ocean Observatories Initiative".

Our region has formed a task force to advance oPt region as a hub for ocean observing, leveraging the activities of OSU and Hatfield Marine Science center. Such an activity would include the development of local businesses and workforce in the deployment, operations and maintenance of ocean observing sensors, as well as development and operation of systems to make use of ocean observing data. What steps are being taken to engage with local ~~of~~ initiatives such as ours so that we may help as a partner with the OOI.

Please print - additional space is provided on back

1. Name: John Larrakas, co-chair, Yaquina Bay Ocean Observing Initiative
2. Address: ~~1234~~ PO Box 930
Newport OR 97365

3. Please check here if you would like to be on the mailing list.
4. Please check here if you would like your name/address kept private.
5. Would you like to receive a hard copy or CD of the Final SSEA?

Please give this form to one of the NSF representatives, place in the comment drop box, or mail by July 23 to:
Jean McGovern
OOI Program Director, Division of Ocean Sciences
National Science Foundation
4201 Wilson Blvd, Ste 725, Arlington, VA 22230



NATIONAL SCIENCE FOUNDATION (NSF)
OCEAN OBSERVATORIES INITIATIVE (OOI)
DRAFT SITE-SPECIFIC ENVIRONMENTAL ASSESSMENT (SSEA)

Public Hearing Comment Sheet

Location: Newport OR

Date: 9-2-10

Thank you for providing your comments on the Draft SSEA for the proposed installation and operation of the OOI. Public involvement is a fundamental part of the development of the OOI SSEA and NSF wants and appreciates your comments. Please provide comments no later than September 15, 2010 to ensure consideration in the Final SSEA. Comments may be submitted at this meeting, via email at nepacomments@nsf.gov, or via U.S. Postal Service to the address below. For more information go to <http://www.oceanobservatories.org>. The Draft SSEA can be downloaded from <http://www.nsf.gov/geo/oce/envcomp/> under "Ocean Observatories Initiative".

Ensure the process for defining data formats and dissemination standards is open to permit those involved in complementary programs (e.g. development of salmon fisheries databases) are able to participate. This will help in harmonizing data standards and could help drive the types and frequencies of data being distributed.

Please print - additional space is provided on back

1. Name: John Larrakas

2. Address: 1542 NW Mye St
Newport OR 97365

3. Please check here if you would like to be on the mailing list.

4. Please check here if you would like your name/address kept private.

5. Would you like to receive a hard copy or CD of the Final SSEA?

Please give this form to one of the NSF representatives, place in the comment drop box, or mail by September 15 to:

Jean McGovern
OOI Program Director, Division of Ocean Sciences
National Science Foundation
4201 Wilson Blvd, Ste 725, Arlington, VA 22230



Comment Number: IPW-4



NATIONAL SCIENCE FOUNDATION (NSF)
OCEAN OBSERVATORIES INITIATIVE (OOI)
DRAFT SITE-SPECIFIC ENVIRONMENTAL ASSESSMENT (SSEA)

Public Hearing Comment Sheet

Location: Newport OR
Date: Sep 2, 2010

Thank you for providing your comments on the Draft SSEA for the proposed installation and operation of the OOI. Public involvement is a fundamental part of the development of the OOI SSEA and NSF wants and appreciates your comments. Please provide comments no later than September 15, 2010 to ensure consideration in the Final SSEA. Comments may be submitted at this meeting, via email at nepacomments@nsf.gov, or via U.S. Postal Service to the address below. For more information go to http://www.oceanobservatories.org. The Draft SSEA can be downloaded from http://www.nsf.gov/geo/oce/envcomp/ under "Ocean Observatories Initiative".

Comments were made at meeting.

Please print - additional space is provided on back

- 1. Name: Chuck Paulik CCA - Central coast chapter President
2. Address: 785 Bayview Lp. Waldport OR. 97394
3. Please check here [X] if you would like to be on the mailing list.
4. Please check here [] if you would like your name/address kept private.
5. Would you like to receive a hard copy [X] or CD [] of the Final SSEA?

Please give this form to one of the NSF representatives, place in the comment drop box, or mail by September 15 to:

Jean McGovern
OOI Program Director, Division of Ocean Sciences
National Science Foundation
4201 Wilson Blvd, Ste 725, Arlington, VA 22230



The Pacific City Dorymens Assoc., Inc.

CRAIG WENRICK
CO-CHAIR

September 6, 2010

PAUL HANNEMAN
CO-CHAIR

Jean McGovern
NATIONAL SCIENCE FOUNDATION
Division of Ocean Sciences
4201 Wilson Blvd.
Arlington, VA 22230

TERRI ALLEN CAMPBELL
SECRETARY

ROB ROYSTER
TREASURER

TERRY LEARNED
DIRECTOR

Re: Draft Site-Specific Environmental Assessment (SSEA) for the Ocean
Observatories Initiative (OOI)

GARY GREGG
DIRECTOR

The proposed project at Pacific City, Oregon, crosses directly through our
traditional and historic recreational and commercial dungeness crab
fishery, our salmon troll fishery, and our groundfish area, specifically
halibut. This section of the Oregon coast is one of the most heavily-used
between Seattle, WA, and San Diego, CA.

DON GROTJOHN
DIRECTOR

"JJ" JOHNSON
DIRECTOR

STEVE JOHNSON
DIRECTOR

Our concerns may be found in the attachments to this letter.

RAY MONROE
DIRECTOR

Sincerely,

"SKIP" BAILEY
DIRECTOR

Two handwritten signatures in black ink. The first signature is 'Paul Hanneman' and the second is 'Craig Wenrick'. Both are written in a cursive, flowing style.

TOM DONOHUE
DIRECTOR

Paul Hanneman, co/chair Craig Wenrick, co/chair

TERRY APPLEBEE
DIRECTOR

Attachments:

PAUL HANNEMAN
REGISTERED AGENT

Letter, Arthur Nowell, Dean, UW
Email Report 03-09-2010, UW-PCDA

JERRY BUXTON
EMERITUS

new phanneman

From: "paul" <phanneman@wcn.net>
To: "Craig Wenrick" <seaq@oregoncoast.com>
Cc: <phanneman@wcn.net>; "Ray monroe" <doryfreshfish@embarqmail.com>
Sent: Tuesday, March 09, 2010 5:05 PM
Subject: Draft RSN / OOI email to Directors

**Conference On the RSN / OOI Program
 University of Washington et al
 and the
 Pacific City Dorymens Assoc. Inc.**

ATTENDING:

John R. Delaney, Program Professor of Oceanography, UW, Seattle
 Robert Collier, Professor, Marine Geochemistry, OSU, Corvallis
 Scott McMullen, Director, Oregon Cable Committee, Astoria
 Michael Kelley, RSN Program, UW, Seattle
 Peter Barletto, RSN Program, UW, Seattle
 Craig Wenrick, PCDA co/chair
 Paul Hanneman, PCDA co/chair
 Ray Monroe, Oregon Salmon Commission

The agenda included the following points of discussion:

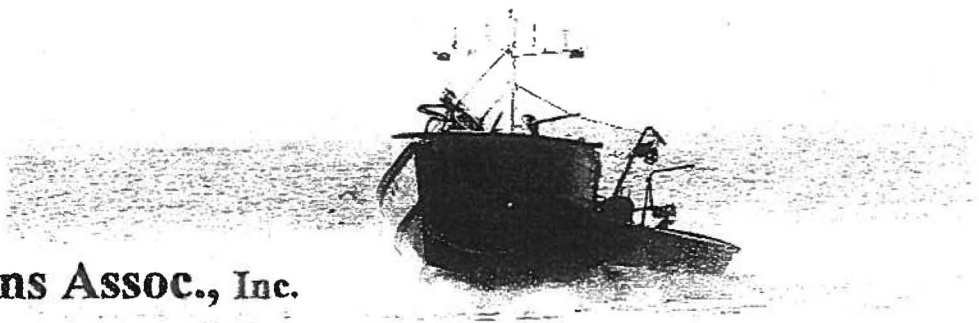
- > The cumulative Impacts relating to marine biology *over time*
- > The cumulative effects on socioeconomics, *over time*
- > Electromagnetic fields, deployment and use of cables, *long term effects*
- > Written agreements between the PCDA and responsible entities

The conference resulted from letter communications between the PCDA and Arthur Nowell, Dean of the University of Washington's College of Ocean and Fishery Sciences. The PCDA letters are dated January 11 and February 17, 2010. A reply from Dean Arthur Nowell is dated February 3. The letter offered a teleconference between the PCDA and the UW and a science and project presentation in Pacific City.

No virus found in this incoming message.

Checked by AVG - www.avg.com

Version: 9.0.733 / Virus Database: 271.1.1/2733 - Release Date: 03/09/10 11:33:00



The Pacific City Dorymens Assoc., Inc.

CRAIG WENRICK
CO-CHAIR

PAUL HANNEMAN
CO-CHAIR

RUSSELL SMITH
SECRETARY

ROB ROYSTER
TREASURER

TERRY LEARNED
DIRECTOR

GARY GREGG
DIRECTOR

DON GROTJOHN
DIRECTOR

"JJ" JOHNSON
DIRECTOR

STIEVE JOHNSON
DIRECTOR

RAY MONROE
DIRECTOR

"SKIP" BAILEY
DIRECTOR

TOM DONOHUE
DIRECTOR

TERRY APPLEBEE
DIRECTOR

PAUL HANNEMAN
REGISTERED AGENT

JERRY BUXTON
EMERITUS

February 17, 2010

Dr. Arthur Nowell, Dean
College of Ocean and Fishery Sciences
University of Washington

Dear Dr. Nowell:

Thank you for your letter of February 3, 2010.

The proposed cable landing at Pacific City, Oregon, is within our traditional and historic fishery area.

We were under the impression, from previous contacts, that no net loss to our fishery would occur.

The Association does not support a cable landing or associated facilities between 45°21' to 45°02' N that jeopardizes the social, economic, or environmental values of this area.

Sincerely,

Paul Hanneman, co / chair Craig Wenrick, co / chair

C:
Dr. John Delaney
Peter Barletto



College of Ocean and Fishery Sciences
University of Washington

February 3, 2010

Mr. Paul Hanneman
Mr. Craig Wenrick
Co-Chairs
Pacific City Dorymen's Association, Inc.
Post Office Box 728
Pacific City, OR 97135

Dear Messrs. Hanneman and Wenrick,

Thank you for your email of 5 January 2010 and the subsequent letter of 11 January 2010 regarding the Regional Scale Nodes (RSN) component of the National Science Foundations Ocean Observatories Initiative (OOI). The University of Washington as the implementing organization of the RSN component is excited about the prospect of this project for both the general public and the science community.

RSN is certainly interested in a dialogue on our proposed plan for landing scientific undersea cables at the existing Pacific City station. Our program management team has experienced commercial undersea cable experts with a track record of collaboration with the fishermen of the Oregon coast. In fact Michael Kelly, one member of the team, is a past Board member of the Oregon Fishermen's Cable Committee.

Dr. Delaney has previously presented the program overview to the Tillamook County Commissioners and during discussions last week with Paul Levesque from the Commissioners Office agreed to provide an update, which would be telecast on the local cable access channel. As indicated to you in our 7 January 2010 email, we would like to coordinate with you for an initial teleconference to discuss the RSN. Once we have opened this dialogue, we would certainly offer to provide a science and project presentation in Pacific City.

Sincerely,

Dr. Arthur Nowell
Dean
College of Ocean and Fishery Sciences
University of Washington

cc: Dr. John Delaney, RSN Principal Investigator
Peter Barletto, RSN Program Director

From: John Lavrakas [mailto:jlavrakas@oregonarc.com]

Sent: Wednesday, September 15, 2010 7:59 AM

To: NSF NEPA Comments

Subject: Site-Specific Environmental Assessment for the Ocean Observatories Initiative (OOI), Federal Register Doc. 2010-20107

nepacomments@nsf.gov

Public Comment

Site-Specific Environmental Assessment for the Ocean Observatories Initiative (OOI), Federal Register Doc. 2010-20107

The NSF seeks to understand the environmental effects of the Ocean Observatories Initiative. One such effect not being adequately considered is the economic and social impact to the Newport, Oregon region by the deployment of the Endurance Array. It is not possible to invest hundreds of millions of dollars in developing, operating and maintaining an ocean observatory infrastructure off the coast of Newport, Oregon without profoundly affecting this rural region. Consider the following:

1. Newport has 10,000 residents with an economic base tied to commercial fishing, tourism, retirement, and work in the marine sciences.
2. Newport has one elementary school, one middle school, one high school, and a community college.
3. The region has modest hospital facilities for general care and well being, although many people requiring specialty care such as cancer treatment still must travel an hour into the Willamette Valley for treatment.
4. The economy of its county (Lincoln County) is depressed with higher than average unemployment and lower than average wages.
5. Affordable family housing is in limited supply, with the price of many homes on the coast driven up by higher than normal real estate costs.

The development of the OOI will require a workforce for the construction, deployment, operations, and maintenance of the system. Either these personnel will come from the existing labor pool, or personnel will need to be brought into the region. In the first case, specialty training will be required to qualify the individuals to work. In the second case, the region must be able to support the short term and long term influx of workers and families. If both cases apply, then each will have corresponding impacts on the region. These impacts are not known, because they have not yet been investigated.

For this reason, I recommend resources be applied toward understanding the social and economic impact the OOI will have on the region about Newport, Oregon. In particular:

1. Assess the workforce needs, including size, skill sets, experience levels, and duration of employment for each phase of the life cycle.
2. Coordinate with Newport leaders, including the economic development authorities, educational institutions, health and human services to identify actions that can be taken to prepare for the workforce needs that will occur.
3. Identify the capabilities the regions has to support the construction, deployment, and O&M needs.
4. Identify shortfalls or gaps that need to be addressed prior to commencing the buildout in the region.

By these comments, I am not implying that the deployment of the Endurance Array will have a negative effect for Newport. In fact, it should be quite the opposite, bringing jobs and opportunity to many in this region. But I do feel to affect the region responsibly and most advantageously, the factors I have cited should be taken into account.

Please note that these are my personal opinions and do not necessarily reflect those of others in the region.

John Lavrakas
Newport, Oregon

Jean Mc Govern
001 Project Director
National Science Foundation
Division of Ocean Sciences
4201 Wilson Blvd.
Arlington, Virginia 22230

September 21, 2010
P.O. Box 1676
Newport,
Oregon 97365

Comment Number: IPW-7

Dear Ms Mc Govern:

These are my comments on the Draft Site Specific Environmental Assessment Ocean Observatories Initiative of August 2010. They basically repeat my previous comments at your Newport, Oregon meetings.

In general, I support the Ocean Observatories Initiative. The Pacific Ocean, including near shore, is largely a science unknown territory very much in need of a systematic, long term program of readily available, real time ocean water and seabed physical, chemical and biological data. The first two needs seem to be part of this program. I'm not certain about any biological data.

But, even necessary and scientifically rewarding programs may have unintended, adverse consequences. That is what concerns me.

My comments center on possible harm to aquatic life particularly Cetaceans and Pinnipeds from acoustic sensors.

Whales are highly sensitive to low frequency sounds and use sound waves to communicate over long distances. Any low frequency acoustic device that harms whale hearing or interferes with their communication can jeopardize them.

Between late April and late October, in most years, gray whales, female and young ones, feed near shore along the Oregon coast.

I have not been able to contact the Cetacean acoustic expert at the NOAA Marine Fisheries office in the Newport Hatfield Marine Science Center, so, I cannot express more than very general concerns about acoustic effects.

I did contact the Pinniped expert in that office showing him your Initiative Draft document. He believes there will be no specific harm to seal and sea lion acoustic sensitivities.

Regarding electromagnetic energy sensitivities of sharks, rays and skates my marine science reference materials state the following

By means of ampullae of Lorenzini, jelly filled pores in a shark's head, they are sensitive to weak electrical currents of their prey contracting muscles and can detect electric fields as weak as

(OVER)

five billionths of a volt per centimeter. These sensitivities are essential to shark, ray and skate hunting prowess. Any man-caused harm to these sensitivities could jeopardize their lives.

A Redwood, California, marine lab biologist believes that Hammerhead sharks follow minute geomagnetic lines when moving from place-to-place. Other shark species likely use the same means to migrate. Electrical interference could harm shark migratory skills.

I hope that acoustic and electrical potential hazards to marine life from the array of ocean observatory devices have been thoroughly examined by marine and other appropriate scientists in the course of preparing the Environmental Assessment document and that these possibilities have not merely been ignored under findings of "no significant impact".

Public confidence in the scientific expertise and ethical objectivity and adherence to environmental and other law requirements in making this and other project evaluations is not something to be lightly dismissed.

I hope that Ocean Observatories program will in NO way jeopardize marine species survival or their habitat quality.

I'm pleased that the public comment period has been extended to September 30th.

Please keep me informed about future Ocean Observatory activities and studies.

Sincerely,

John M. Sherman

From: Douglas Fricke [mailto:dfricke@techline.com]

Sent: Wednesday, August 18, 2010 2:29 PM

To: McGovern, Jean M.

Cc: Michele Cukver; Dale Beasley; Allan Hollingsworth; Barbara Morris ; Bill Walsh; Bob Alverson; Bob Kehoe; Bob Lake; Brady Engvall; Butch Smith; Chris Doumit; Dick Seldon; Doouglas Fricke; Ed Owens; Hill-Holly H; Hobe Kytr; jaocto@juno.com; Joe and Sue Dazey; Kent and Irene Martin; Larry Giese; Marion Larkin; Mark Cedergreen; Mike Baldwin; Pete Leipzig; Ray Toste; Rob Zuanich; smcmullen@ofcc.com; Steve Westrick; Wayne - office; WFOA- Lewis Hill; WFOA- Peter Flournoy

Subject: RE: OOI Draft Site Specific EA

Hi Jean, I finally have a day off the Ocean to review the "Draft Site Specific EA and Attachment". In couple of evening hours, I only have a chance to skim the document, but I am very disappointed that you are charging ahead with this process before our local fishing representatives will have a chance to give local knowledge into making this a successful scientific process. You have been working with the fishermen off of Oregon since the first of the year where WA fishermen were informed of the project in late May. One dramatic shortcoming that I noticed in the EA is that there is no recognition of the Hook and Line commercial salmon troll fishery that will be affected by the deployment off of Grays Harbor. This leads me to wonder what else has been left out of the EA. Did you receive my Email comments as to suggested revisions that I sent to you and the review process? I noticed that they were not listed in the Attachment with the other comments that you received. Now you have set a Sept 1 date for the next meeting of the Grays Harbor Fishermen which is still during our summer fisheries. We have indicated to you that most of our fishermen will not be winding down the summer fisheries until October. Don't know what else to say – you are not making it very easy for our Grays Harbor commercial community to participate in making the project a success. This is too important to rush and have someone inadvertently damage equipment because they wanted to transit or fish where the equipment is placed. – Doug Fricke



NATIONAL SCIENCE FOUNDATION (NSF)
OCEAN OBSERVATORIES INITIATIVE (OOI)
SITE-SPECIFIC ENVIRONMENTAL ASSESSMENT (SSEA)

Comment Sheet

Location: PT JUDITH RI

Date: 8/30/10

Thank you for providing your comments regarding the proposed installation and operation of the OOI. Public involvement is a fundamental part of the development of the OOI SSEA and NSF wants and appreciates your comments. Please provide comments no later than September 15, 2010 to ensure consideration in the Final SSEA. Comments may be submitted at this meeting, via email at nepacomments@nsf.gov or via U.S. Postal Service to the address below.

MY NAME IS TONY FACIANO, CAPTAIN OF F/V SHELBY ANN. SHE IS A 70 FOOT STEEL DRAGGER. I HAVE BEEN OPERATING IN AREA 537 FOR OVER 25 YEARS. I KNOW THAT BOTTOM VERY WELL. I WOULD LIKE TO SUGGEST PLACING THE MOORINGS ON MANY OF THE LOCAL SHIPWRECKS OR HANGS. I CAN PROVIDE GPS COORDINATES OF MANY POSSIBLE LOCATIONS. I COMMUNICATE WITH ALL OF THE OFFSHORE MOBILE GEAR FISHERMAN AND KNOW CERTAIN AREAS WE AVOID. I'M VERY EXCITED WITH THE PROSPECT OF KNOWING THE BOTTOM TEMPERATURE AND A 3D LAYER OF WATER

Please print - additional space is provided on back

-OVER-

1. Name: ANTHONY FACIANO

2. Address: 10 FOX CT
WAKEFIELD RI 02879

3. Please check here if you would like to be on the mailing list.

4. Please check here if you would like your name/address kept private.

5. Would you like to receive a hard copy or CD of the Final SSEA?

Please give this form to one of the NSF representatives, place in the comment drop box, or mail by September 15 to:

Jean McGovern
OOI Program Director, Division of Ocean Sciences
National Science Foundation
4201 Wilson Blvd, Ste 725, Arlington, VA 22230

(comments continued from front)

COLUMN. I FISH FOR SQUID AND LOOK FOR ~~TEMP~~
TEMP BREAKS ALL THE TIME. IT WOULD SAY A LOT OF
STEAMING TIME. LET ME KNOW IF I CAN HELP
YOU WITH MY LOCAL KNOWLEDGE.

TONY FACIANO (10005262)
401 742 8205



NATIONAL SCIENCE FOUNDATION (NSF)
OCEAN OBSERVATORIES INITIATIVE (OOI)
DRAFT SITE-SPECIFIC ENVIRONMENTAL ASSESSMENT (SSEA)

Public Hearing Comment Sheet

Location: New Bedford

Date: 9-8-10

Thank you for providing your comments on the Draft SSEA for the proposed installation and operation of the OOI. Public involvement is a fundamental part of the development of the OOI SSEA and NSF wants and appreciates your comments. Please provide comments no later than September 15, 2010 to ensure consideration in the Final SSEA. Comments may be submitted at this meeting, via email at nepacomments@nsf.gov, or via U.S. Postal Service to the address below. For more information go to <http://www.oceanobservatories.org>. The Draft SSEA can be downloaded from <http://www.nsf.gov/geo/occe/envcomp/> under "Ocean Observatories Initiative".

Extend the comment period.
Pause this process.
Bring the fishing community in
in a real way.

Please print - additional space is provided on back

1. Name: Peg Parker Executive Director
Commercial Fisheries Research Foundation
2. Address: P.O. Box 278
Saunderstown, RI 02874

- 3. Please check here if you would like to be on the mailing list.
- 4. Please check here if you would like your name/address kept private.
- 5. Would you like to receive a hard copy or CD of the Final SSEA?

Please give this form to one of the NSF representatives, place in the comment drop box, or mail by September 15 to:

Jean McGovern
OOI Program Director, Division of Ocean Sciences
National Science Foundation
4201 Wilson Blvd, Ste 725, Arlington, VA 22230

From: Vincelette, Nick (Whitehouse) [mailto:Nick_Vincelette@whitehouse.senate.gov]
Sent: Thursday, September 09, 2010 8:02 AM
To: NSF NEPA Comments; Spaulding, Rick
Cc: Konschnik, Kate (Whitehouse); Carvalho, George (Whitehouse)
Subject: Local Fishing Organizations

Good Morning Jean and Rick,

Thank you for your time last night at the Ocean Observatories Public Hearing. Per your request, I am sending the contact information for two fishing industry organizations in Rhode Island that you may want to reach out to for any comments to include in the draft SSEA.

They are:

Rich Fuka
President
Rhode Island Fisherman's Alliance
401-742-4486
Captlobster@yahoo.com

And

Tina Jackson
President
American Alliance of Fishermen and their Communities
401-837-6932
liteangel3367@yahoo.com

Thank you again, and I hope this information is helpful in your efforts.

Best,

Nicholas A. Vincelette
Constituent Caseworker
U.S. Senator Sheldon Whitehouse
170 Westminister Street, Suite 1100
Providence, RI 02903

401.453.5294
401.453.5085 (Fax)
Nick_Vincelette@whitehouse.senate.gov
www.whitehouse.senate.gov/

From: Gary Mataronas [mailto:lobster2@cox.net]
Sent: Thursday, September 09, 2010 9:22 AM
To: NSF NEPA Comments
Cc: Bonnie Spinazzola; Bob Buffinton; saklob@aol.com
Subject: Pioneer Array

Dear NSF, OOI

I, and my brother Jim own two offshore lobsterboats and have lobstered in the area since 1974 where the planned Pioneer Array is going to be placed. We fought with the Russian, Polish, Japanese and other foreign draggers over this bottom before the 200 mile limit was put in place. We then had many gear conflicts with domestic draggers trying to hold onto this very productive lobster bottom. About 20 years ago the draggers and lobstermen met at the 1st Coast Guard District in Boston to hammer out a solution to reduce fixed gear versus mobile gear conflicts. We came up with a solution where draggers would fish outside 110 fathoms and lobstermen would stay inside 100 fathoms with a 10 fathom buffer zone in the summer and it would be reversed in the winter.

So as you can see there has been a considerable amount of interaction amongst user groups in this area. The Pioneer Array will only add to the gear conflict problems. My fear is if there are several unintentional conflicts the fishermen will surely be made to leave the area, which will put us out of business. (Lobstermen just can't move to other areas because the entire Continental Shelf has been taken up by other lobstermen and if you move into their areas you run the risk of getting your gear cut up. Lobstermen stake out their bottom and generally don't allow other boats into their area, a practice that is respected by all.)

We certainly feel the most important stakeholders are the fishermen, and we have been left out of the process. We hope this wasn't done on purpose, but it certainly puts us at a disadvantage in a process that seems to be sailing right along.

We think you should be upfront with the fishermen and let them all know about this project and not keep it under a veil of secrecy, which seems to be occurring.

The process should be slowed down and get the fishermen together with NSF,OOI for a round table discussion to go over the locations of the moorings and attached equipment and the what-ifs if there are gear entanglements.

The fishermen cannot lose anymore productive bottom under any circumstances.

Gary Mataronas, President
Mataronas Lobster Co., Inc
F/V Edna May
22 California Road
Little Compton, RI 02837
401-635-2143
lobster2@cox.net

James Mataronas
Sakonnet Lobster Company
F/V Sakonnet Lobster
401-635-4371
saklob@aol.com

From: cbank@umassd.edu [mailto:cbank@umassd.edu]
Sent: Monday, September 13, 2010 11:25 AM
To: NSF NEPA Comments
Subject: Pioneer Array OOI

To Whom it May Concern,

I was at the Ocean Observatories Initiative Public Hearing in New Bedford, MA on Sept. 8, 2010 to learn about the Pioneer Array. It sounds like a great program and a worthwhile endeavor, however I am concerned about the location of the site designated for the Pioneer Array and my first comment is to suggest extending the comment period beyond Sept 15, 2010 and providing outreach to the fishing community. My reasoning for this extension is the group of people most effected by this - fishermen: gillnetters, lobstermen, and draggers are not aware of the project and this is an area that is heavily fished by all of them.

I work at Umass Dartmouth's School for Marine Science and Technology and I've been working with a group of gillnetters who target monkfish and fish throughout the area where you want to put movable gear, from Veatch's Canyon past Block Canyon. The gillnets used for monkfish are bottom sink gillnets, fixed gear with tie downs, so they are not very high in the water column but they are still fixed and soak time can range from 3 to 5 days. If your equipment, gliders and AUVs are constantly moving throughout the water column I can see potential problems of your gear getting hung up in the gillnets causing damage to both pieces of equipment not to mention the loss of the fish catch. All of the fishermen I work with who I've contacted know nothing about this project.

This winter I'll be working with scientists from the Gulf of Maine Research Institute and gillnet fishermen to tag monkfish in the area around Atlantis Canyon. Most of the tagging work with monks we've done so far has been inshore, but we are extending the tagging work and targeting the offshore population which extends into the canyons along the shelf, the same area where you want to put movable gear. Although this is the first year we will be tagging in this area we hope to continue working in this area in the following years.

In conclusion, my two comments are:

- 1) Extend the comment period and make an effort to get the fishing industry involved since they are the ones effected by this project.
- 2) Consider locating the array in an area that is not heavily fished. Talk to fishermen of all different gear types and figure out where those areas are. There are many areas where fishermen can't fish due to regulations, closures, management measures, etc. So there's a good chance you might be able to find an area that still suits your needs and doesn't impact the fishing industry.

Thank you for your attention to this matter,

Crista Bank
Fisheries Research Technician
SMAST - UMass Dartmouth
200 Mill Road
Fairhaven, MA 02719-5252 U.S.A

From: Keith Chasse [mailto:kchasse79@hotmail.com]
Sent: Monday, September 27, 2010 10:54 PM
To: Jennifer Dorton (Contractor)
Subject: placement of research buoys

Knowledge and understanding of the oceans around us is imperative. It gives us clues to climate and biological changes that are taking place right before us. I can understand the need for the data that will be retrieved from the buoys and instrumentation that you are seeking to install, but question your placement.

Commercial fishermen are the only ones that are going to be displaced by your equipment. We work and live in the very place you seek. Lobster gear is set on the exact latitude and longitude of the instruments you want to set on the edge of the continental shelf. A half mile safe zone will be taking hundreds of thousands of dollars directly out of the pockets of the men who fish there. Dragger-men also work the "edge". There is a closed area that had to be developed to keep mobil gear (draggers tow nets) from interfering with fixed gear (lobstermen and gill netters set gear that remain on the bottom). The 150 to 200 fathom range along the edge has restricted times of gear for specific times of year. Lobstermen set their traps between 150 ftm and 200 ftm from thanksgiving to June 15. That means the draggers can tow their nets shoal of 150 ftm or deeper than 200 ftm. The opposite occurs from June 15 through thanksgiving.

Educated and professional fishermen will be able to fish in a close proximity to your equipment with no interference. It is those that don't know it is there or don't care that it is there that are going to be the problem. If your gear is set on the 150 and 200 fathom contours there are fewer chance of incidence occurring. On top of the shelf it will be easier to avoid. The biggest concern is that if one or multiple of you sensors gets entangled with fishing gear that we are going to be shut out of "the box". There are all ready enough boxes that we are shut out of. The ocean as commercial fishermen know it is getting smaller and smaller as the uses for it increase.

The commercial fishing industry has already conceded to many interest groups and are running out of patience. In reality no one owns the ocean, but fishermen work it the most and have the most at stake to lose. The boats that fish the area you are seeking are half to one million dollar operations that provide millions of pounds of seafood to the public creating a multi-billion dollar industry. The majority of the country enjoys the high quality of seafood we deliver, but not many understand the reality of what we do, or where we do it. I understand why you want to know the the science behind the reason we the fishermen work where we work, and the significance of it's geographical location in relation to biological diversity and climatology. With that said please keep in mind that this is not a game. You are jeopardizing incomes for families and the viability of small businesses in a hard economic time.

Please keep me and my fellow fishermen informed as your project progresses.

If you or any of your associates needs an open decked vessel to move equipment or people please keep me in mind. I am a licensed captain with vessel for hire.

Keith Chasse
f/v Capt. Bligh of Abundant Fisheries
816 South rd.
South Kingstown, RI 02879

From: FVCaptainRobert@aol.com [<mailto:FVCaptainRobert@aol.com>]
Sent: Tue 9/28/2010 8:24 AM
To: McGovern, Jean M.
Cc: fvcaptainrobert@aol.com
Subject: Pioneer Array Comment

Eastern New England Scallop Association
3119 Post Road, Wakefield RI 02879

September 16, 2010

Ms. Jean McGovern
OOI Program Director, Div. of Ocean Sciences
National Science Foundation
4201 Wilson Blvd., Ste. 725
Arlington, VA 22230

Dear Ms. McGovern;

I am writing on behalf of the Eastern New England Scallop Association in response to your request for comments on the Site-Specific Environmental Assessment (SSEA) for the National Science Foundation-Funded Ocean Observatories Initiative (OOI).

The fishing industry was taken completely off-guard by this project; and this entire Environmental Assessment has circumvented the procedures set up by the government to fully vet the social and economic issues surrounding large scale projects such as this. As a strong participant in the RI OSAMP process, I find this course of action is both odd and unjust; it is unfathomable to imagine that a mere environmental assessment was approved for a project of this magnitude. There are a multitude of questions and severe environmental and economic impacts that have not yet been considered, nor explored.

Both public notice and stakeholder input, to date, can be considered minimal at best. Had we not "stumbled" upon it and contacted the agency, it is likely that it would have proceeded devoid of any stakeholder input at all, indifferent to the NEPA process. The public hearing was poorly attended due to inadequate public notice. Those who did attend, however, were very articulate in their comments to the project participants; they all commented similarly that the project should be halted until the project participants collaborated with a stakeholder advisory group, who would then, ultimately, require written assurances guaranteeing that the areas encompassing the Pioneer Array would not become exclusive, and that fishing would continue indefinitely (barring fishery regulations), without any sort of interruption. The extension of the comment period and the lack of any communication to the fishing industry by the project participants, since the public hearing, demonstrate how serious those comments were taken by the NSF.

This project encompasses thousands of square nautical miles, expressly in the center of one of the most fertile commercial fishing grounds in the northeast.

Other than lobster fishing, there is groundfishing, red crabbing, gillnetting, and surface and bottom longlining taking place in the specific area on which the NSF is planning to locate their ocean observatory. It is unthinkable that any federal agency should expect to "drop" a project in the middle of the ocean, without thought or consideration of those who will be displaced from the area. This is not a matter the fishing community is taking lightly, and continues to request that meetings between the project participants and a fishery advisory group take place to mitigate this plan, in order for it to be acceptable to both the NSF and the fishing community.

Sincerely,
Michael L. Marchetti
Pres. Eastern New England Scallop Assoc.

Cc: Senator Jack Reed

From: Bob Colbert [mailto:e.eaa3@verizon.net]
Sent: Tuesday, September 28, 2010 3:47 PM
To: McGovern, Jean M.
Cc: 'dennis colbert'
Subject: PIONEER ARRAY comments

Bob and Dennis Colbert
F/V Virginia Marie, Trebloc Seafood, Inc
F/V Miss Julie, Colbert Seafood, Inc
F/v Chelsea Girl, Manomet Seafood, Inc
PO Box 1049
Manomet, Ma 02345
781-831-4004

Ms. Jean McGovern
OOI Program Director, Div. of Ocean Sciences
National Science Foundation
4201 Wilson Blvd., Ste. 725
Arlington, VA 22230

Dear Ms. McGovern;

We are writing to you in response to your request for comments on the Site-Specific Environmental Assessment (SSEA) for the National Science Foundation-Funded Ocean Observatories Initiative (OOI).

We just found out about this through our association (AOLA) and are absolutely stunned by how this process is happening. We absolutely stand behind AOLA's statement: "This course of action is both odd and unjust; it is unfathomable to imagine that a mere environmental assessment was approved for a project of this magnitude. There are a multitude of questions and severe environmental and economic impacts that have not yet been considered, nor explored."

We also agree 100 % with AOLA's following statements: "Both public notice and stakeholder input, to date, can be considered minimal at best. No fishing entities the east coast were made aware of this project. Had we not "stumbled" upon it and contacted the agency, it is likely that it would have proceeded devoid of any stakeholder input at all, indifferent to the NEPA process. The public hearing was poorly attended due to inadequate public notice. Those who did attend, however, were very articulate in their comments to the project participants; they all commented similarly that the project should be halted until the project participants collaborated with a stakeholder advisory group, who would then, ultimately, require written assurances guaranteeing that the areas encompassing the Pioneer Array would not become exclusive, and that fishing would continue indefinitely (barring fishery regulations), without any sort of interruption. The extension of the comment period and the lack of any communication to the fishing industry by the project participants, since the public hearing, demonstrate how serious those comments were taken by the NSF."

We are a family owned and run fishing business out of Sandwich Massachusetts, and cannot believe how this project is being pushed through without adequate time to allow us to attend meetings and respond and participate in a plan that may work for all parties concerned. We fish in this area and this is where we try to make a living and support our families and the families of the crews from each boat. Please allow the fishing community to participate in the process.

Sincerely,
Robert A Colbert Jr

Dennis J Colbert

Cc: Senator Jack Reed
Senator John Kerry
Senator Sheldon Whitehouse
Senator Scott Brown

Cote Fisheries Inc.
PO Box 517
Marshfield, Ma 02050-0517
781 834 8770

Ms. Jean McGovern
OOI Program Director, Div. of Ocean Sciences
National Science Foundation
4201 Wilson BLVD., Ste. 725
Arlington, Va 22230

September 28, 2010

Dear Ms. McGovern;

I am writing you in response to your request for comments on the Site-Specific Environmental Assessment (SSEA) for the National Science Foundation-Funded Ocean Observatories Initiative (OOI), Pioneer Array.

I am a commercial fishermen and boat owner who has fished commercially for 35 years from Hyannis, Massachusetts. I am concerned how this project will displace different user groups and fishermen from the very large and extensive area of the proposed OOI. I know for a fact that the site location will greatly impact lobster, scallop, crab, tilefish, squid, whitting, butterfish, swordfish, tuna, groundfish and charter boat fishermen. There doesn't appear to be any effort to determine what the social and economic impact would be to the different user groups that have accessed the area where you intend to locate the OOI. In the environmental assessment it was determined the project had a finding of no significant impact. Given proper notice, the finding might have been different.

Public notice concerning this project has been minimal with no directed notice to the user groups that will be most affected by the OOI. It is unbelievable that a project of this magnitude, encompassing thousands of miles of very actively used fertile fishing grounds could be taken away without any consideration for those user groups. It is unimaginable.

As a taxpayer and a fisherman, I don't want to believe that congress gave the National Science Foundation 130 million dollars to disregard the different user groups that would be displaced by this project and the effect it would have on our industry. I think that the project should be halted until the project participants can work with the different user groups to work through the issues that have not been brought to discussion.

Sincerely,
Bro Cote
FV William Bowe 679879

Cc: Senator John Kerry
Senator Scott Brown
Congressman Barney Frank

COMMERCIAL FISHERIES
Research Foundation

P.O. Box 278
Saunderstown, RI 02874
Phone: (401) 515-4662
Fax: (401) 515-4663
Website: www.cfrfoundation.org

September 29, 2010

Ms. Jean McGovern
OOI Program Director
Div. of Ocean Sciences
National Science Foundation
4201 Wilson Blvd., Suite 725
Arlington, VA 22230

Re: Comments on OOI Initiative – Southern New England Component [OOI Draft SSEA]

Dear Ms. McGovern:

I am writing on behalf of the Commercial Fisheries Research Foundation (CFRF) to offer comments on the NSF funded Ocean Observatories Initiative (OOI), specifically the proposed Pioneer Array component to be located off the coast of southern New England. Our comments fall under two major categories: 1) process; and 2) research applications.

In terms of process, the CFRF offers the following observations:

1. It appears that until most recently, the process under which this proposed project has been developed and reviewed has not included the southern New England fishing community, including both members of the commercial fishing industry as well as fisheries scientists and managers. The project has proceeded without their input, and there has not been any effort made to collaborate on the design, scientific protocol, and placement of the Pioneer Array system.
2. There is an urgent need to simply pause the process as it is now proceeding and correct this oversight. More specifically, there is an urgent need to develop a sense of openness, inclusion, and trust.
3. There appears to have already been a significant investment of public funds without the involvement of the most important stakeholder group in the area – commercial fishermen. And the project calls for a much more significant investment of public funds to implement the proposed design. To continue to proceed without the involvement of fishing industry leaders, fisheries scientists, and fisheries managers appears to be a direct route to a major user conflict situation, and an unjustified science endeavor, with the project now gathering more opposition than support.

On terms of research applications, the CFRF offers the following observations:

1. There appears to be have been little if any thought given to the potential applications of the information to be gathered beyond lower level trophic modeling. There is a growing need to better understand the flow of energy and productivity through all levels of the food chain, and the impacts of these ever changing dynamics on important commercial fishery resources.
2. The data planned to be collected may begin to lead to a better understanding of ecosystem dynamics at the continental shelf area but will be very limited in its scope and application without being coupled with fisheries data from the same area. Working collaboratively and cooperatively with the fishing community offers a much better chance of producing a complete picture of shelf dynamics, and integrating project results into a real world ocean management system.
3. There is a need to re-direct this project from the "pure science" realm into the applied science realm to justify the amount of public resources being invested. This means developing now, in the beginning, a better understanding of the end uses of the information and its application to real world ocean management tasks. The project as currently portrayed is extremely weak in this area.
4. There is a need for the researchers and funding entity involved to think more comprehensively and to work more closely with other scientists, particularly scientist within NOAA's National Marine Fisheries Service. There is also a need to work with the commercial fishing industry to better connect the project scope of work with the fields of fisheries science and management.
5. The project could provide an opportunity to conduct research through a more wholistic approach, and could ultimately make a meaningful contribution to the understanding of ecosystem dynamics, but not if the fishery resource component is left out.

In conclusion, the CFRF would recommend that the NSF and others involved in this project simply step away from the standard public hearing format they are now employing, and instead develop a meaningful way to establish ongoing communication and working partnerships with leaders in the southern New England fishing community, as well as with scientists and managers working in the realm of fisheries management in the region. To proceed otherwise may simply result in unnecessary user conflicts, and a missed opportunity to truly advance the field of marine research.

Sincerely,



Peg Petruny-Parker
Executive Director

Cc:

- U.S. Senator Jack Reed
- U.S. Senator Sheldon Whitehouse
- U.S. Rep. Patrick Kennedy
- U.S. Rep. James Langevin
- Members of Board of Directors, CFRF
- Nancy Thompson, Director, NMFS NEFSC

From: Grant Moore [mailto:brdbillfish@aol.com]
Sent: Wednesday, September 29, 2010 6:31 PM
To: McGovern, Jean M.
Subject: Pioner array

My name is Grant Moore owner operator of the F/V Direction.
I have fished the continental shelf for over thirty years and this proposal is absolutely insane. The fact that this project has been kept from the largest user group is a travesty. I strongly oppose this project and suggest that you find better ways to spend these types of funds .

Grant Moore
Broadbill Fishing Inc
P.O. Box 3428
Westport, MA 02790

Sent from my iPhone

From: Greg DiDomenico [mailto:gregdi@voicenet.com]
Sent: Thursday, September 30, 2010 4:33 PM
To: NSF NEPA Comments
Cc: 'Hennessey, Brendan'
Subject: Comments on: National Science Foundation-Funded Ocean Observatories Initiative



212 West State Street
Trenton, New Jersey 08608
office (609) 898-1100
gregdi@voicenet.com

Ms. Jean McGovern
OOI Program Director, Div. of Ocean Sciences
National Science Foundation
4201 Wilson Blvd., Ste. 725
Arlington, VA 22230

Dear Ms. McGovern:

Please accept these comments on behalf of the Garden State Seafood Association (GSSA); GSSA is comprised of commercial fishermen, shore-based processors, commercial dock facilities, seafood markets, restaurants, and various industry support businesses from New Jersey. Our members actively participate in the fishery management process and are heavily reliant upon the fisheries that exist in the area where your research will be conducted.

GSSA is responding to your request for comments on the Site-Specific Environmental Assessment (SSEA) for the National Science Foundation-Funded Ocean Observatories Initiative (OOI).

The fishing industry will suffer both social and economic impacts, typically associated with large scale projects that often occur with projects like the OOI. It is hard to imagine that a mere environmental assessment was approved for a project of this magnitude. The immediate spatial conflict, loss of fishing opportunity, dislocation from traditional fishing areas and subsequent loss of income will be significant and irreparable. There are a multitude of questions and severe environmental and economic impacts that have not yet been considered, nor explored.

Due to there being no public notice that I am aware of, the stakeholder input has been nonexistent. With all the means of communication and numerous academic, NGO, state and federal entities and myriad of commercial fishing organizations involved in ocean issues, how is it possible we were all unaware of this? In fact, we had to be told by another group who stumbled upon this project. I know of one public hearing that took place. While it was poorly attended, those that were there all commented similarly that the project should be halted until the project participants collaborated with a stakeholder advisory group.

The lack of any communication to the fishing industry by the people associated with the OOI demonstrate a lack of understanding or regard by the NSF.

This project encompasses thousands of square nautical miles, expressly in the center of one of the most fertile commercial fishing grounds in the northeast. It is unthinkable that any entity should expect to “drop” a project in the middle of the ocean without thought or consideration of those who will be displaced from the area. We will continue to request that meetings between the your staff and a fishery advisory group take place to mitigate this plan.

Sincerely,
Gregory DiDomenico
Executive Director
Garden State Seafood Association

From: Joyce Rowley [mailto:prov52jr@earthlink.net]
Sent: Thursday, September 30, 2010 4:47 PM
To: NSF NEPA Comments
Subject: Draft SSEA for Ocean Observatories Initiative

I am concerned about the potential acoustic impacts from the arrays on marine mammals and sea turtles.

Although the Draft SSEA states that the Pioneer array comment period closed at the end of the Programmatic Environmental Assessment (PEA) review, there were changes to the configuration of the array, as well as to the systems and infrastructure to be used since the PEA was adopted. Three AUVs were added and four gliders dropped. The array was re-configured to an 'L' from an 'H'. Further, neither the PEA nor the Draft SSEA reviewed the impact of the active sonar percussion on marine mammals and sea turtles, including endangered species.

Active Sonar/Acoustics Impacts:

Appendix A, the PEA, states the sensor duty cycle is low, and that there would be a narrow time when fish or marine mammals would be in the beam. However, the Pioneer array will have seven sensor beams, plus six gliders and three AUVs with active sonar circulating in the water column in a highly utilized fish habitat. Further, it will operate 24/7 for five years. My concern is that the unpredictable yet persistent sound pattern will cause avoidance of a prime feeding ground for many marine mammal, sea turtle, and fish species, including endangered species protected under the Endangered Species Act.

Lack of Assessment or Modeling of Acoustic Impacts:

None of the environmental assessments evaluated the effect of percussion (sound pressure level or SPL) on marine mammals, fish, or sea turtles, including endangered species. In the Department of Navy Atlantic Fleet Active Sonar Testing (AFAST) EIS, a basement of 120 dB re 1 μ Pa @1 meter SPL was used for Level B marine mammal harassment risk modeling for mid- and high-frequency ranges (AFAST EIS, December 2008, Section 4.4.5.3.10). The basement was selected based on modeling in Hawai'i, and had been criticized for not being low enough during the modeling review process. AFAST held to the 120 dB. Nonetheless, AFAST acknowledged that harbor porpoises clearly have behavioral responses to mid-frequency sounds at 120 dB re 1 μ Pa @1 meter. This may have a greater impact on the Endurance array, which is in closer to shore than Pioneer.

In fact, for the AFAST EIS, Marine Mammal Protection Act standards were set as follows where TTS is the temporary threshold shift in behavior which would indicate Level B harassment (behavioral disturbance) and PTS is the permanent threshold shift in behavior which would indicate Level A harassment (onset of injury):

Cetaceans: 195 dB re 1 μ Pa²-s received EL for TTS; and 215 dB re 1 μ Pa²-s received EL for PTS.

Pinnipeds: 183 dB re 1 μ Pa²-s received EL for TTS; and 203 dB re 1 μ Pa²-s received EL for PTS.

Where energy flux level through an area (EL) is measured as $SPL + 10\log_{10}(\text{duration})$. (AFAST Final EIS, Section 4.4.5.1, PTS (Level A) and TTS (Level B), p. 4-42). A lower TTS reference of 192 dB re 1 μ Pa²-s received EL was used as a minimum level for small cetaceans (Id., p. 4-44, 4-45).

In particular, the Altimeters emit a 4 second pulse at 170 kHz and 206 dB re 1 μ Pa @1 meter or 212 dB re μ Pa²-s received EL, when the formula is applied to acoustic data in Table 2-7 of the Draft SSEA, and Appendix A, PEA, Table 2-6, p. 46. This exposure level is precariously close to the 215 PTS limit accepted by the NOAA, the Marine Mammal Commission and NMFS for the AFAST EIS. It falls clearly within the TTS/Level B harassment criteria. Similarly, the ADCPs at mid- and high-frequency ranges emitting a 1.5 ms pulse at 220 dB re 1 μ Pa @1 meter, produces an EL of 191.76 dB re μ Pa²-s, which is extremely close to the TTS/Level B harassment criteria.

According to Table 2-7, "the proposed MBES and SBP would transmit a chirp pulse (i.e., a long, linearly swept pulse that changes in frequency linearly over time)." Since I did not have a specific duration for these systems, I

used a standard 1-second duration to calculate the exposure level for these active sonar sources as their frequency ranges are well within that of marine mammals. The SBP at 203 dB re 1 μ Pa @1 meter produces an EL of 203 dB re μ Pa²-s in the low frequency range (2-7 kHz) and is within the TTS/Level B harassment criteria. I'd also note that SURTASS, the Naval system of dragging low frequency active sonar (LFA), is currently being challenged in court for its affect on marine mammals and endangered species.

Unfortunately, I was unable to perform further calculations to take into account multiple events on individuals, as the data provided was insufficient. However, it can be said that exposure to multiple pings would increase the level of harassment even for lower SPLs.

Further, rather than use a threshold level, the AFAST EIS looked at the potential risk and derived a mean of 165 SPL which corresponded to behavioral responses to active sonar. Based on that alone, all of the active sonar sources would cause behavioral reactions among the cetaceans.

Resources Affected

The Pioneer array location is a prime feeding ground for the 40 or so marine mammals, many of whom are already stressed by increasing ambient noise levels in the ocean, excessive fishing, pollution, and dwindling food supplies. This would add a persistent and unpredictable sound and percussion source every day, every week, every month for five years. The moored sensors would travel up and down the water column and the gliders and AUVs would be moving through the area randomly. It is possible that the cumulative noise and SPL would cause enough harassment to cause behavioral responses including avoidance from the feeding grounds. Some of the ELs are strong enough to cause physical injury.

A close analogy would be a scenario where a person walks to get groceries every day. One day, while walking through the neighborhood, someone jumps out from behind a bush and blows an airhorn in the person's ear at close range. The person is startled, but the sound stops and so they continue. It happens again further down the street, so they change to the opposite side of the street. Again, an airhorn goes off near them. They move further away but return to their usual route the next day. Suddenly, a flying creature swoops down and blasts them. The person's ears are bloodied, but they're still alive. They get ill and disoriented. Walking to get food becomes a terrifying act where they are always on edge. This happens over and over, every day and night. Eventually, they move away.

I'm particularly concerned that there will be a deterrent effect on the Atlantic Right Whale which is already at a precarious stock level. NMFS has estimated that at 325 individuals left, the Western Atlantic population of the Right Atlantic Whale is near extinction. Although the frequency is higher than their sensitivity range, they are still at risk for noise percussion and entanglement in the sensor mooring wires.

These impacts may be greater in the Endurance array area, as those areas are closer to landforms and channels. Those geologic formations were deemed a contributing factor in the strandings of 14 beaked whales in the Bahamas in 2001.

While it is very important to obtain the data that the Ocean Observatories Initiative hopes to gain from these systems, a complete evaluation of the impacts of the acoustic noise and percussion on marine mammals, sea turtles, and fish should be performed before placing the arrays for any duration.

Regards,
Joyce Rowley
PO Box 230343
Acushnet, MA 02743



ATLANTIC OFFSHORE LOBSTERMEN'S ASSOCIATION

54 Chatham Drive Bedford, New Hampshire 03110
phone: 603-206-5468 fax: 603-666-5601

September 16, 2010

Ms. Jean McGovern
OOI Program Director, Div. of Ocean Sciences
National Science Foundation
4201 Wilson Blvd., Ste. 725
Arlington, VA 22230

Dear Ms. McGovern;

I am writing on behalf of the Atlantic Offshore Lobstermen's Association in response to your request for comments on the Site-Specific Environmental Assessment (SSEA) for the National Science Foundation-Funded Ocean Observatories Initiative (OOI).

The fishing industry was taken completely off-guard by this project; and this entire Environmental Assessment has been a travesty of the procedures set up by the government to fully vet the social and economic issues surrounding large scale projects such as this. This course of action is both odd and unjust; it is unfathomable to imagine that a mere environmental assessment was approved for a project of this magnitude. There are a multitude of questions and severe environmental and economic impacts that have not yet been considered, nor explored.

Both public notice and stakeholder input, to date, can be considered minimal at best. No fishing entities the east coast were made aware of this project. Had we not "stumbled" upon it and contacted the agency, it is likely that it would have proceeded devoid of any stakeholder input at all, indifferent to the NEPA process. The public hearing was poorly attended due to inadequate public notice. Those who did attend, however, were very articulate in their comments to the project participants; they all commented similarly that the project should be halted until the project participants collaborated with a stakeholder advisory group, who would then, ultimately, require written assurances guaranteeing that the areas encompassing the Pioneer Array would not become exclusive, and that fishing would continue indefinitely (barring fishery regulations), without any sort of interruption. The extension of the comment period and the lack of any communication to the fishing industry by the project participants, since the public hearing, demonstrate how serious those comments were taken by the NSF.

This project encompasses thousands of square nautical miles, expressly in the center of one of the most fertile commercial fishing grounds in the northeast. Other than lobster fishing, there is groundfishing and longlining taking place in the specific area on which the NSF is planning to locate their ocean observatory. It is unthinkable that any federal agency should expect to “drop” a project in the middle of the ocean, without thought or consideration of those who will be displaced from the area. This is not a matter the fishing community is taking lightly, and continues to request that meetings between the project participants and a fishery advisory group take place to mitigate this plan, in order for it to be acceptable to both the NSF and the fishing community.

Sincerely,

Bonnie Spinazzola
Executive Director

Cc: Senator Jack Reed
Senator John Kerry
Senator Sheldon Whitehouse
Senator Scott Brown
Congressman Barney Frank



New England Fishery Management Council

50 WATER STREET | NEWBURYPORT, MASSACHUSETTS 01950 | PHONE 978 465 0492 | FAX 978 465 3116
John Pappalardo, *Chairman* | Paul J. Howard, *Executive Director*

October 7, 2010

Ms. Jean McGovern, OOI Program Director
Division of Ocean Sciences
National Science Foundation
4201 Wilson Boulevard, Ste 725
Arlington, VA 22230

Re: NSF's Ocean Observatories Initiative Pioneer Array – Draft Programmatic Environmental Assessment (DPEA) and Micrositing Process

Dear Ms. McGovern:

The New England Fishery Management Council (NEFMC) offers the following comments on the DPEA for the Ocean Observatories Initiative as well as the ongoing micrositing process. We understand that the formal comment period on the DPEA closed on September 30, but due to a Council meeting last week we were unable to assemble comments in time to meet that deadline. Based on our reading of the DPEA document, as well as our attendance at the siting meeting on October 5, we offer the following for your consideration.

First, we support the general concept of ocean observing arrays, and hope the data gathered from this specific initiative will benefit regional ocean science and management efforts over the long term. However, as you are aware, the same oceanographic features that make the array location ideal for studying transport properties and ecosystem dynamics contribute to the area's importance as habitat for economically-significant finfish and invertebrates, and the fisheries that they support.

As noted in similar correspondence you have received from the state of Rhode Island DEM, various bottom tending fishing gears are deployed in the proposed array location, including fixed gears (longlines, gillnets, traps) and mobile gears (otter trawls). Some of the target species, including deep-sea red crab, monkfish, and whiting, are managed or co-managed by NEFMC, while others are managed by the Mid-Atlantic Fishery Management Council and the Atlantic States Marine Fisheries Commission.


Upon consultation with National Marine Fisheries Service Northeast Regional Office Habitat Conservation Division staff, we concur with the findings in Section 4.2.2.1 of the DPEA that placement of the proposed moorings and sensors will not adversely affect essential fish habitat, as the impacts to the seabed will be both minimal in their spatial scope, and temporary in duration. However, the DPEA does not specify the extent to which commercial fisheries operations would be restricted in the area immediately surrounding the array, and it is unclear to us why socioeconomics (fisheries) were not evaluated as a valued environmental component for the Pioneer Array. We understand that you have received other comments on this issue and are encouraged that you plan to respond with a socioeconomic analysis.

Obviously, the potential for fisheries interactions will be less for the Mid-Atlantic components of the OOI as compared to the Pacific components, as there are no buried submarine cables, but we believe that there could still be significant fisheries impacts depending on the restrictions placed on fishing operations in the vicinity of the moorings. As discussed at the October 5 meeting at URI, impacts on the fishing industry could vary depending on the extent of the buffer zone required around each fixed array, and although 0.5 nm radius buffers were proposed by NSF, the buffer zone required will ultimately be determined by the Coast Guard. We would encourage you to consult with the Coast Guard as you develop an appropriate range of options for your socioeconomic assessment. We would be happy to put you in touch with the Coast Guard personnel that participate in our Council process.

We are pleased to see that NSF's is engaging regional fisheries stakeholders during the micro-siting process, and we strongly encourage you to consider the location and magnitude of fishing operations in and around the array location as you proceed. As the Pioneer Array is intended to be moved every 3-5 years, we hope that efforts to engage regional fisheries interests will be ongoing. We would strongly encourage you to at least consider the scientific feasibility of other similar sites along the Mid-Atlantic shelf/slope break as an array location, given the importance of the currently proposed area to regional fisheries. Short of development of another siting alternative, we encourage you to better justify why the selected location meets the scientific needs of the project as you update the draft PEA.

I understand that you have already been in contact with David Preble, who chairs the Council's Habitat/MPA/Ecosystems Committee. We hope that you will continue to consult with us as you further develop your efforts to work with the fisheries community on siting issues for the Pioneer Array.

Sincerely,



John Pappalardo
Chairman

September 27, 2010

Ms. Jean McGovern
OOI Program Director, Div. of Ocean Sciences
National Science Foundation
4201 Wilson Blvd., Ste. 725
Arlington, VA 22230

Dear Ms. McGovern;

I am writing on behalf of the Atlantic Offshore Lobstermen's Association in response to your request for comments on the Site-Specific Environmental Assessment (SSEA) for the National Science Foundation-Funded Ocean Observatories Initiative (OOI).

It is no wonder that there is so little respect for the governmental and scientific communities when foolishness like this occurs. You jump in out of nowhere with a proposal for a massive project that you propose to drop in the middle of our main fishing grounds without really notifying anyone. Do you really think the ocean is empty of activity and you can just drop that mess in there without bothering anyone? Tunafishing, swordfishing, red crabbing, lobstering, dragging, and sportfishing. There is a lot going on there. You need to give time for comment. You apparently don't care or are a bunch of fools. I have a big book of this project that I just got today. I need time and most people have not even heard of this mess. Extend the comment time. If you want any support whatsoever from the fishing community you need to let everyone know about this. If it is such a great thing you are doing, you need not worry about support. Stop the secrecy and give us some time.

John Peabody
F/V Lady Clare
Wakefield, RI

From: <ooi-inbox@oceanobservatories.org>
Reply-To: <weeziem@comcast.net>
Date: Sun, 10 Oct 2010 08:02:18 -0400
To: Emily Griffin <eGriffin@oceanleadership.org>, <ooi-inbox@oceanobservatories.org>
Conversation: Proposed OOI Project in Southern New England
Subject: Proposed OOI Project in Southern New England

a form has been submitted on October 10, 2010, via:
<http://www.oceanleadership.org/programs-and-partnerships/ocean-observing/ooi/ooi-inbox/> [IP 76.118.14.210]

OOI Inbox

First Name: Jan
Last Name: Margeson
Institution/Organization: Georges Bank Fixed Gear Sector
Title/Position: board member
Emailweeziem@comcast.net
Topic/Subject: Proposed OOI Project in Southern New England Comments

Dear Jean,

I am deeply concerned that after hearing industry issues over the location of this project it is still full speed ahead. I am asking you to go back and open another public comment period to improve communications between user groups and yourselves. As i now see by you draft, that only 1 public meeting on the East Coast was held in New Bedford. Our organization was unaware that there was a proposed plan until after the comment period was over. You have been in the planning stages for years and failed to consult the very fisherman that use this area. It is extremely frustrating to us that you seem to be fast tracking this project with disregard to the consequences fisherman will face. I will ask again to reopen the public comment period and meet again with industry representatives.

Sincerely,
Jan Margeson
Enter the code exactly as displayedvmfz3 powered by cformsII
<<http://www.deliciousdays.com/cforms-plugin>>

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September 24, 2010

Ms. Jean McGovern
OOI Program Director, Div. of Ocean Sciences
National Science Foundation
4201 Wilson Blvd., Ste. 725
Arlington, VA 22230

Dear Ms. McGovern;

I am writing on behalf of the Rhode Island Lobstermen's Association in response to your request for comments on the Site-Specific Environmental Assessment (SSEA) for the National Science Foundation-Funded Ocean Observatories Initiative (OOI).

I am writing to request that there be a meaningful stakeholder process undertaken before any area of the ocean is cited for a project of this magnitude. The area you have identified for this project is extremely important fishing grounds for the RI lobster industry and other sectors as well. This project was only just recently brought to industry attention. The economic and social impacts to the Rhode Island fishing community could be devastating if there is any type of exclusion zones that arise because of this project.

There are many other issues that need to be completely vetted thru a stakeholder process before this project should go forward.

Sincerely,

Lanny Dellinger
President

Cc: Senator Jack Reed
Senator Sheldon Whitehouse
Congressman Patrick Kennedy
Congressman James Langevin

Pioneer array comments

Norbert [norbertstamps@gmail.com]

Sent: Wednesday, September 29, 2010 12:07 PM

To: McGovern, Jean M. [JMCGOVER@nsf.gov]

Dear sirs:

AS per our conversation. I want to make sure it is understood, The proposed area for the Pioneer array, is very heavily fished area. Not only by lobster fisherman, but also bottom fin fishermen. as well as longliners. With My experience of thirty plus years of fishing the area, I can tell you most assuredly that The array and the fisheries will not cohabitate well. I can not see how we would be able to use that fishing ground we have come to depend on with the array in that proposed location. Gliders will not fair well with the constant presence of fishing activities. Entanglement with lobster gear will be often. I can foresee damage to our expensive gear as well as too the array. Will fishermen be held responsible for damage to the array? I can most definitely say we do not have the recourses to pay for damages. Will congress appropriate more funds to make repairs or replace sensors?

With the knowledge that this will occur will it be recommended that the area be closed to fishing all together?. If so one must realize that the fishing effort is in that location because that is were the fish are. Fish do not populate the ocean bottom equally as some my think. Just as there are more people in NY.NY per Square mile that are in a square mile in upstate Ny .We also know that there will be more fish in the area with the array. Fish are attracted to structure. It will change the behavior of many species. I hope that we can work together on finding a less intrusive location for the array. I do realize the magnitude of the project and hope we may be able to find an equitable solution. The fishing industry is struggling in many ways. Please to not burdon us more .

Norbert Stamps Captain I/VS. Debbie Ann Owner I/VS. Timber Vice president AOLA. Past president of RI Lobstermen's asso.

OOI East Coast

Bonnie Brady [greenfluke@optonline.net]

Sent: Thursday, September 30, 2010 9:58 PM

To: NSF NEPA Comments [nepacomments@nsf.gov]

To Whom it May Concern

On behalf of the Long Island Commercial Fishing Association, we request that any further forward movement to the OOI project be stopped until a full review of the OOI project can be undertaken by a consortium of East Coast fishermen of all gear types to determine where this project should be sited in the Atlantic Ocean so as not to affect the traditional commercial and recreational fishing user groups who depend on this area.

As it stands, it appears as if this project will move forward and displace traditional user groups, which is unacceptable. Instead of site, and then spin the naysayers, a full, open and transparent process that incorporates meetings at commercial and recreational fishing ports in each state throughout the area affected is the only fair way to move this project forward.

Commercial fishermen are not against scientific research, and the data that ultimately this project may uncover, but cannot support any scientific research study that further limits and or cuts off access for all user groups to their traditional fishing grounds.

Sincerely,
Bonnie Brady
Executive Director
Long Island Commercial Fishing Association
P.O. Box 191
Montauk, NY 11954

Palombo Fishing, Corp.

P.O. Box 3609, 221 Third St.

Newport, RI 02840

Tel #: (401) 849-4982

Fax #: (401) 847-9966

*f/v Endeavour
f/v Timothy Michael
f/v Freedom*

September 30, 2010

Ms. Jean McGovern
OOI Program Director, Div. of Ocean Sciences
National Science Foundation
4201 Wilson Blvd., Ste. 725
Arlington, VA 22230

Dear Ms. McGovern;

I have been actively engaged in the offshore Lobster fishery for 39 years since 1971. Today I own three boats with offshore lobster licenses. I am writing on behalf of my company, Palombo Fishing, Corp. in response to your request for comments on the Site-Specific Environmental Assessment (SSEA) for the National Science Foundation-Funded Ocean Observatories Initiative (OOI). My and other livelihood depends on fishing in traditional areas.

I personally have spent many years as President of AOLA and on many councils, boards and coalitions trying to bring reasonable and long lasting conservation practices to the Lobster Industry. You might not be aware that I strongly believe that conservation of the lobster resource is imperative, not only for the survival of lobsters, but for the industry's survival, as well. I believe in good science and the need for scientific projects, especially as it relates to creating a long term sustainable lobster fishery.

The fishing industry was taken completely off-guard by this project; and this entire Environmental Assessment has been a travesty of the procedures set up by the government to fully vet the social and economic issues surrounding large scale projects such as this. This course of action is both odd and unjust; it is unfathomable to imagine that a mere environmental assessment was approved for a project of this magnitude. There are a multitude of questions and severe environmental and economic impacts that have not yet been considered, nor explored.

Both public notice and stakeholder input, to date, can be considered minimal at best. No fishing entities the east coast were made aware of this project. Had we not "stumbled" upon it and contacted the agency, it is likely that it would have proceeded devoid of any stakeholder input at all, indifferent to the NEPA process.

SSEA
Page 2
September 29, 2010

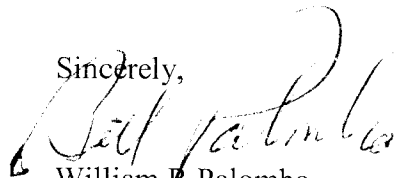
The public hearing was poorly attended due to inadequate public notice. Those who did attend, however, were very articulate in their comments to the project participants; they all commented similarly that the project should be halted until the project participants collaborated with a stakeholder advisory group, who would then, ultimately, require written assurances NSF guaranteeing that the areas encompassing the Pioneer Array would not become exclusive, and that fishing would continue indefinitely (barring fishery regulations), without any sort of interruption.

The extension of the comment period and the lack of any communication to the fishing industry by the project participants, since the public hearing, demonstrate how serious those comments were taken by the NSF.

This project encompasses thousands of square nautical miles, expressly in the center of one of the most fertile commercial fishing grounds in the northeast. Other than lobster fishing, there is ground fishing, red crabbing, gillnetting, and surface and bottom long lining taking place in the specific area on which the NSF is planning to locate their ocean observatory.

It is unthinkable that any federal agency should expect to “drop” a project in the middle of the ocean, without thought or consideration of those who will be displaced from the area. This is not a matter the fishing community is taking lightly, and continues to request that meetings between the project participants and a fishery advisory group take place to mitigate this plan, in order for it to be acceptable to both the NSF and the fishing community.

Sincerely,



William R Palombo
President

Cc: Senator Jack Reed
Senator John Kerry
Senator Sheldon Whitehouse
Senator Scott Brown
Congressman Patrick Kennedy

Pioneer Array

Comment Number: IPE-22

malcolm mcclintock [mjmclintock@optimum.net]

Sent: Thursday, September 30, 2010 5:10 PM

To: NSF NEPA Comments [nepacomments@nsf.gov]

To claim that this project would have "no significant impact" is downright laughable. Luckily many commercial fisherman have government mandated vehicle monitoring systems that will clearly show just how significant these areas are to us. See you in court.

Malcolm J. McClintock F/V Rhonda Denise