



**UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration**

National Marine Fisheries Service

P.O. Box 21668

Juneau, Alaska 99802-1668

March 18, 2003

MEMORANDUM FOR: Steven Kokkinakis
NOAA Office of Strategic Planning

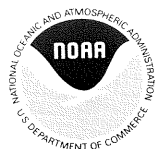
FROM: *For* James W. Balsiger *Donald J. Berg*
Administrator, Alaska Region

SUBJECT: NOAA Fisheries Comments on Ground-Based
Midcourse Defense (GMD) Extended Test Range
(ETR) Draft Environmental Impact Statement
(DEIS)

The Alaska Region of NOAA Fisheries has reviewed the Ground-Based Midcourse Defense (GMD) Extended Test Range (ETR) Draft Environmental Impact Statement (DEIS) dated January 2003. Please refer any questions to Mr. Brad Smith or Lieutenant Mark Boland in our Anchorage office at (907) 271-5006. Attached are the comments and transmittal letter to Colonel Steve Davis, Director, Site Activation Worldwide Ground-Based Midcourse Defense.

The proposed action is the construction and operation of additional launch and test facilities in the Pacific Region in order to conduct more realistic interceptor flight tests in support of GMD development. Under the No Action Alternative, the GMD Extended Test Range would not be established and the Sea Based Test X-Band Radar (SBX) would not be developed. However, GMD testing would continue at the existing launch areas, including the Kodiak Launch Complex (KLC) as it does now. Three alternatives propose new Ground-Based Interceptor (GBI) missile launch site construction with new and existing test components at KLC or Vandenberg Air Force Base (AFB), California or both, and development of the SBX Radar with possible home ports in Valdez or Adak, Alaska.

Attachments (2)



Colonel Steve Davis
Department of Defense Missile Defense Agency
Ground-Based Midcourse Defense Joint Program Office
P.O. Box 1500
Huntsville, AL 35807-3801

Dear Colonel Davis:

The National Oceanic and Atmospheric Administration (NOAA) has reviewed the Ground-Based Midcourse Defense (GMD) Extended Test Range (ETR) Draft Environmental Impact Statement (DEIS) dated January 2003. Please refer any questions to Mr. Brad Smith or LT Mark Boland in our NOAA Fisheries Anchorage office at (907) 271-5006.

Sincerely,

James P. Burgess
NOAA NEPA Coordinator

NOAA Fisheries Alaska Region Comments on Ground-Based
Midcourse Defense (GMD) Extended Test Range (ETR) Draft
Environmental Impact Statement (DEIS)

General Comments

The DEIS includes alternatives that would launch up to five (5) missiles annually from the existing Kodiak Launch Complex (KLC), and would construct new facilities at or near KLC such as launch pads, silos, and barge docks. Several authorizing entities exist for the KLC, including the Federal Aviation Administration, the Alaska Aerospace Development Corporation (AADC), and the various launch entities, which are often Federal agencies (e.g. the US Air Force, Department of the Army, Missile Defense Agency). This DEIS should contain a discussion of the activities and responsibilities of these parties concerning the KLC and the environmental impacts of the facility and launches. For instance, efforts to monitor certain environmental and physical conditions are ongoing near Narrow Cape, as well as operational conditions agreed to by the vendor, AADC. This DEIS should clarify what environmental monitoring is to be done during these additional launches, what the objectives are, who is funding it or responsible for it, what existing agreements or operational constraints require, and which, if any, are inconsistent with the proposed project. For instance, the Ugak Island Steller sea lion haulout was monitored during earlier launches to understand the effect of launches on the behavior of these endangered species. No conclusive results were obtained and, while launch noise may not be injurious to these animals, periodic monitoring is appropriate and necessary. We recommend the DEIS indicate that this monitoring would occur for the first two launches that coincide with periods when the Ugak Island haulout is occupied.

Additionally, we recommend continuing a water quality monitoring program in the streams and lakes around the KLC launch facility. Sampling should include testing for the potentially hazardous materials emitted from the missiles plus standard water chemistry parameters (e.g., pH, dissolved oxygen, temperature, and conductivity). This sampling program should also include a non-impacted control site outside the area of influence of missile emissions.

Specific Comments

The DEIS references Best Management Practices (BMP) and Standard Operating Procedures (SOP) but does not include a description of these. We recommend you include a section describing the BMPs and SOPs.

The proposed configuration of the EKV presently uses liquid propellants that would be very hazardous to local fish and wildlife if lost due to vehicle failure in the early phase of a launch. Please explain why solid propellants cannot be used here.

The Narrow Cape area is a prominent point of land and a popular viewing area for wildlife, especially gray whales during spring migrations. The DEIS notes that access will be restricted during certain activities associated with this project. However, Table ES-2 does not include the Resource Category "Recreation" or "Wildlife Viewing." The DEIS should include an expanded assessment of impacts to this use.

ES1.4 Proposed Action. Please explain the need for construction of launch silos at the KLF, and why existing launch complex configuration is not suitable for launching of either the target or interceptor vehicles. The DEIS should also present more detail on the design of any barge or dock facilities to be constructed on Kodiak Island.

Please explain whether the flight corridor depicted in Figure 4.1.7-2 or Figure 4.1.7-3 is correct; or are multiple corridors proposed?