22 October 2010

Naval Facilities Engineering Command, Northwest
Attn: Ms. Kimberly Kler - NWTRC EIS
1101 Tautog Circle, Suite 203
Silverdale, WA 98315-1101


Dear Ms. Kler:

Friends of the Earth (FoE) submits the following comments on the United States Navy Northwest Training Range Complex Final Environmental Impact Statement/Overseas Environmental Impact Statement (NWTRC FEIS). FoE is a national environmental organization that leads campaigns to protect the environment and champion a healthy and just world. Our campaigns work to achieve justice and protect the health of the planet. Since 1969, we have worked to protect the rights of all people to live in a safe and healthy environment. FoE has maintained a presence in the Pacific Northwest for over 30 years.

This letter builds on the September 28, 2007 scoping comments and March 10, 2009 comments on the United States Navy Northwest Training Range Complex Draft Environmental Impact Statement/Overseas Environmental Impact Statement we signed onto as part of a broad coalition of environmental groups. Our coalition is concerned about the adequacy of the Navy’s environmental mitigations associated with their range expansion in the Pacific Northwest, especially the use of active sonar. In addition, we are also signatory to an October 7, 2010 letter to Dr. Jane Lubchenco, Administrator of the National Oceanic and Atmospheric Administration (NOAA), concerning the conditions that NOAA may stipulate on the Navy’s Marine Mammal Protection Act take permit for this range.

Since that time we have become aware of the fact that the U.S. Navy has agreed to not conduct active sonar activities in all East and Gulf coast National Marine Sanctuaries. See 74 Fed. Reg. 4844, at 4851 (Jan. 27, 2009).

We hereby request that the Navy grant the Olympic Coast National Marine Sanctuary (NMS) protections consistent with those of the East and Gulf coast sanctuaries and halt its use of active sonar in Olympic Coast NMS waters. The Olympic Coast NMS represents less than 3% of the area the Navy proposes to use for military training along the entire Washington, Oregon and Northern California coasts. Also, we ask that the Navy clarify publicly what type of “navigational” sonar use is allowed in Puget Sound, given scientific concerns over the reflections and channeling of sound that occur in the narrow channels and brackish waters of the estuary. While we appreciate the added consideration the Navy has given for its use of sonar in Puget
Sound, due to its classification as the critical habitat of the endangered Southern resident killer whale community, it is also important to note that these whales spend considerable time along the Washington coast and will be afforded important additional protections by the exclusion of sonar use in the Olympic Coast NMS.

Such an accommodation would recognize the national significance the U.S. Congress and the American public have afforded the only federal marine protected area on the west coast north of California while at the same time providing ample room for the U.S. Navy to maintain its military readiness. We are not suggesting that the Navy does not have a legitimate need to train in the use of active sonar. However, as has been recognized on the East and Gulf coasts, there is no reason to conduct such exercises in a National Marine Sanctuary.

Thank you for your consideration of our comments.

Sincerely,

Marcie Keever
Oceans & Vessels Campaign Director
Friends of the Earth

Fred Felleman
Northwest Consultant
Friends of the Earth

Cc:
U.S. Senator Patty Murray
U.S. Senator Maria Cantwell
U.S. Congressman Norm Dicks
U.S. Congressman Rick Larsen
U.S. Congressman Jay Inslee
Gary Locke, Secretary of Commerce
Dr. Jane Lubchenco, Administrator, NOAA
Monica Medina, Principal Deputy Undersecretary for Oceans, NOAA
Dan Basta, Director, NOAA Office of National Marine Sanctuaries
Carol Bernthal, Superintendent, Olympic Coast NMS