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UNITED STATES DEPARTMENT OF COMMERCE  
National Oceanic and Atmospheric Administration  
NATIONAL OCEAN SERVICE  
OFFICE OF OCEAN AND COASTAL RESOURCE MANAGEMENT  
Olympic Coast National Marine Sanctuary  
115 East Railroad Avenue, Suite 301  
Port Angeles, WA 98362-2925

September 27, 2007

Naval Facilities Command Center NW  
1101 Tautog Circle, Suite 203  
Silverdale, WA 98315-110  
Att: Kimberly Kler

Dear Ms. Kler:

On behalf of the Olympic Coast National Marine Sanctuary Advisory Council (Council), I am forwarding to you the Council's comments on the scope of issues to be considered by the Navy in preparing an environmental impact statement (EIS) for the U.S. Navy Northwest Training Complex Environmental Impact Statement/Overseas Environmental Impact Statement (the Proposal). By the Council's legislative requirements and the requirements of its Charter, the Council directs recommendations on issues affecting the Sanctuary by other federal agencies to the Sanctuary Superintendent.

In September of 2002, the Council voted to create a non voting membership for the U.S. Navy on the Council. In doing this, the Council acknowledged the importance of Navy activities and interest in Sanctuary waters. The Navy gave the Council a briefing on the Proposal at the September 2007 meeting of the Council. As was proper, the Navy did not participate in the development and adoption of these comments.

In forwarding these comments, I want to state that the views represented in the Council's letter represent the Council views only and do not necessarily represent the views of the Olympic Coast National Marine Sanctuary or the National Marine Sanctuary Program of the National Oceanic and Atmospheric Administration. If you have any questions, please contact me and, if necessary, I will connect you with the appropriate Council member. Also, please address any responses directly to the Council.

Sincerely,

A handwritten signature in cursive script that reads "Carol Bernthal".

Carol Bernthal  
Superintendent, Olympic Coast National Marine Sanctuary

Attachments



# SANCTUARY ADVISORY COUNCIL



**Dr. Terrie Klinger, Chair**  
**Bob Bohlman, Vice-Chair**  
**Teresa Scott, Secretary**

## *Representation*

*Citizen-At-Large*  
*Conservation*  
*Tourism/Economic Development*  
*Commercial Fishing*  
*Marine Business*  
*Education*  
*Research*  
*Hoh Tribe*  
*Makah Tribe*  
*Quileute Tribe*  
*Quinault Indian Nation*  
*Clallam County*  
*Jefferson County*  
*Grays Harbor County*  
*Washington State:*  
*Dept. of Ecology*  
*Dept. of Fish and Wildlife*  
*Dept. of Natural Resources*  
*Olympic National Park*  
*U.S. Fish and Wildlife Service*  
*NOAA Fisheries*  
*U.S. Coast Guard*  
*U.S. Navy*  
*Northwest Straits Commission*

September 27, 2007

Carol Bernthal, Superintendent  
Olympic Coast National Marine Sanctuary  
115 East Railroad Ave.  
Port Angeles, WA 98362

Dear Ms. Bernthal

On behalf of the Olympic Coast National Marine Sanctuary Advisory Committee I am forwarding to you scoping comments on the U.S. Navy Northwest Training Complex Environmental Impact Statement/Overseas Environmental Impact Statement that were adopted by the Olympic Coast National Marine Sanctuary Advisory Council (OCNMSAC) at our September 21, 2007 meeting. Also on behalf of the OCNMSAC, I am requesting that you forward these comments to the U.S. Navy.

With regard to public scoping for the Northwest Training Range Complex EIS, the Sanctuary Council adopted the following resolution with no objections and one abstention at its regular meeting of September 21, 2007:

*Artwork: David Sones*

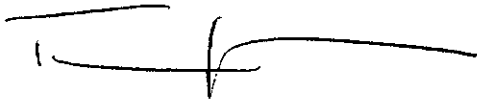
“The Sanctuary Council respectfully requests that the Navy perform a broader analysis of alternatives within the geographic area of the Olympic Coast National Marine Sanctuary. Specifically, we request that the Navy consider alternatives that would 1) maintain activity and equipment levels within the Sanctuary as specified in the Environmental Impact Statement pertaining to Sanctuary designation in 1994; and 2) maintain activity and equipment levels equivalent to those that existed in 2004.

**OLYMPIC COAST NATIONAL MARINE SANCTUARY**  
115 East Railroad Ave., Suite 301 Port Angeles, WA 98362  
360/457-6622 · 360/457-8496 fax  
<http://ocnms.nos.noaa.gov/>

The Sanctuary Council further requests that the Navy address the 13 concerns that the Advisory Council submitted in response to public scoping for the Keyport Range expansion as articulated in a letter dated December 2, 2003 (enclosed). The same concerns apply to scoping for the Northwest Training Range Complex.”

The OCNMSAC is an advisory body only. The opinions and findings of this publication do not necessarily reflect the position of the National Marine Sanctuary Program and the National Oceanic and Atmospheric Administration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Terrie Klinger', with a horizontal line extending to the right.

Terrie Klinger, Chair

Attachment

OLYMPIC COAST  
NATIONAL  
MARINE  
SANCTUARY  
ADVISORY  
COUNCIL



Alan Brooks, Chair  
Cat Hoffman, Vice-Chair  
Marcy Golde, Secretary

December 2, 2003

*Representation*

*Citizen-At-Large*  
*Environmental/Conservation*  
*Business/Tourism*  
*Commercial Fishing*  
*Maritime Industry*  
*Education*  
*Research*  
*Hoh Tribe*  
*Makah Tribe*  
*Quileute Tribe*  
*Quinault Indian Nation*  
*Local Government*  
*Washington State:*  
*Dept. of Ecology*  
*Dept. of Fish and Wildlife*  
*Dept. of Natural Resources*  
*Olympic National Park*  
*U.S. Fish and Wildlife Service*  
*U.S. Coast Guard*  
*U.S. Navy*

Carol Bernthal, Superintendent  
Olympic Coast National Marine Sanctuary  
115 East Railroad Avenue, Suite 301  
Port Angeles, WA 98368

Dear Ms. Bernthal:

The Olympic Coast National Marine Sanctuary Advisory Council (the Council) wishes to forward to you our comments of the scope of issues that the U.S. Navy should consider in developing an Environmental Impact Statement (EIS) for the Pacific Northwest Range Extension Proposal (the Proposal). The Council has previously received a briefing from Navy personnel on aspects of the Proposal. While the Council understands that the Proposal also impacts other areas of the Northwest Range Complex, per its Charter it is confining its comments to those aspects of the Proposal that potentially impact Sanctuary Resources.

The Council lauds the Navy for making a decision at the outset to go through a full NEPA process and produce an EIS for the Proposal. The Council also notes, however, that information on the exact nature of the activities that the Navy envisions conducting in or adjacent to Sanctuary waters is very vague at this point. As such, it makes it very difficult to anticipate with any degree of certainty the magnitude and scope of impacts from the Proposal. *Therefore the Council urges that the Navy make every effort possible to more fully define its activities at the earliest possible date.*

*Artwork:*  
*David*  
*Sones*

Olympic Coast National Marine Sanctuary  
115 East Railroad Ave. Suite 301 • Port Angeles, WA 98362 • 360/457-6622  
•email: olympiccoast@noaa.gov

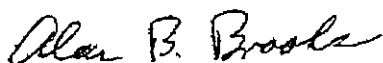
Based on our current understanding of the proposal, there are a number of proposed activities potentially adversely affecting Sanctuary resources. Since the proposal calls for an expansion of the types of activities that normally would occur within current Quinault Underwater Tracking Range to the entire W237A operating area, the activities may affect a much wider range of environments than is presently the case. Equally as important, the addition of a surf zone landing area brings an entire new environment into the Underwater Tracking Range that is neither in the present test range or the operating area. Because of these aspects of the proposal, the Council feels that the scope of issues undertaken for analysis and impact assessment in the EIS should, *at a minimum*, include the following:

- 1) Any seafloor disturbance related to the temporary or permanent placement of cables, listening devices, targets, anchors, or Unmanned Underwater Vehicle (UUV) movements along the seafloor;
- 2) Damage to intertidal, island or upland resources in the proposed surf landing zone on the Quinault Nation's Reservation or, if alternate sites are considered within the Sanctuary boundaries, then consideration of the impacts to Sanctuary resources and damage to intertidal or upland areas of islands caused by wakes of vessels Navy vessels operating in the area.
- 3) The potential for acoustic devices transmissions to cause damage, disturbance or harassment to marine mammals, rockfish, migratory fish species, and/or crab;
- 4) Noise disturbance by aircraft or surface vessels of nesting or migratory water fowl, shorebirds or other marine avian species within the Sanctuary area;
- 5) Damage to historical resources or other cultural resources within the Sanctuary
- 6) Limitation of other recreational uses of the Sanctuary by sport fishermen, kayakers and boaters, and hikers and campers;
- 7) Interference with tribal and non tribal commercial fishing operations within Sanctuary waters;
- 8) Interference with activities by tribal members engaged in ceremonial harvesting of resources;
- 9) Any activities associated with testing that might lead to either intentional or accidental discharges of pollutants within Sanctuary waters and the capacity to clean up and/or restore damaged resources.
- 10) Impacts caused by the loss of any of the UUV or the range support equipment where recovery is infeasible or would cause more damage than leaving it alone;
- 11) Potential for Navy activities to interfere with research being conducted within the Sanctuary within the W237A operating area, either on a temporary basis or long-term denial of access to or restriction of data acquisition to certain areas; and,

- 12) The need to consider other alternatives for the proposed extension of activities in operating area W237A rather than just an action/no action alternative, including the need to look at other areas outside the Sanctuary as potential sites for conducting the proposed range operations. This should entail looking at sites that may be geographically distant, such as other areas along the west coast, east coast, or gulf coasts.
- 13) Impacts on commercial shipping due to increased presence of Naval surface vessels as well as submarines.

We request that you will forward these comments on to the appropriate office within the Navy as noted in the Federal Register notice. The Council will continue to monitor this proposal and comment as appropriate in the future.

Sincerely,



Al Brooks, Chair