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Ms Peggy Willis
Olympic Coast Alliance
2637 W Viewmont Way W
Seattle, Washington 98199

Ms Kimberly Kler
Naval Facilities Engineering Command, Northwest
1101 Tautog Circle, Suite 203
Silverdale, Washington 98315-1101

Re: Northwest Training Range Complex EIS/OEIS

Dear Ms Kler,

The Olympic Coast Alliance (OCA) is a citizens group dedicated to protection of the Olympic Coast National Marine Sanctuary (OCNMS) and to the waters and coastal areas adjacent to the sanctuary, with particular focus on development and uses that negatively impact the coast's marine mammals and complex ecosystems. The purpose of OCA is to assure a healthy coastal ecosystem through public education and outreach, conservation issue advocacy, Olympic Coast National Marine Sanctuary support, stewardship programs, and a strong working relationship with coastal tribes.

OCA is providing written comments on environmental concerns that should be addressed in the Environmental Impact Statement/Overseas Environmental Impact Statement (EIS/OEIS) in response to the US Navy Notice of Intent to Prepare an Environmental Impact Statement/Overseas Environmental Impact Statement for Naval Training Operations in the Northwest Training Range Complex.

Propose Development of New Alternative 3, Reduction of Training Impacts. OCA requests consideration of a third alternative that would reduce baseline training impacts to sensitive marine environments in the Northwest Training Range Complex. The Olympic Coast Alliance (OCA) is concerned about potential environmental impacts from existing Navy use and therefore is not supportive of any potential expansion of Navy training activities from baseline levels.

To help reverse impacts and declining stocks of marine species OCA requests that the Navy EIS/OEIS include a new Alternative 3 that considers environmental improvements to their training; including geographic and seasonal restrictions on sonar use, technological improvements to reduce sonic damage and better monitoring and research. The EIS/OEIS should identify and fully explore an alternative that reduces current training impacts to the OCNMS to determine if Navy training needs can be met without disrupting sensitive marine environments in the Sanctuary.

By the Navy's own admission, LFA Sonar can harm marine mammals. Military active sonar has been responsible for mass strandings of marine mammals globally. Current mitigation efforts have little effect because beaked whales dive so deep that looking for them before testing won't work and listening with passive sonar is ineffective because vocalization is mainly by mating males. Therefore, the EIS/OEIS should include alternative solutions, ways of reducing dependence on this dangerous sonar technology and making technological improvements to reduce sonic impacts. This new alternative, should be included in the EIS/OEIS, in addition to the proposed Alternatives 1, 2 and the No Action Alternative.

Alternatives 1 and 2. OCA does not support Alternatives 1 or 2, which include expansion of use of sonar, other military technology and training activities when there is growing concern expressed by many governmental and scientific bodies such as the Scientific Committee of the International Whaling Commission and the United Nations Law of the Sea forum.

Proposed Areas to be Addressed in EIS/OEIS for all Alternatives, including No Action Alternative. OCA is concerned about several potential threats to marine mammals in the Olympic Coast National Marine Sanctuary and in the rest of the Northwest Training Range Complex which should be addressed in the EIS/OEIS. These include low and mid frequency sonar testing, intertidal disturbance from haul out areas, seafloor disturbance, acoustic effects on marine mammals and seabirds, takings and interference with accustomed tribal rights.

New evidence shows that the rising level of intense underwater sound produced by *military sonar is a threat to many marine species, including whales, dolphins, fish and other marine species.* There are at least 29 species of marine mammals known to use the Sanctuary, including whales, dolphins, porpoise and seals. Salmon, steelhead, halibut, rockfish and cod are also found in the Sanctuary. Many strandings have occurred coincidentally with sonar testing. As one of the loudest human-generated underwater noises, low frequency array sonar (LFA) has the potential to damage marine life. Since low frequency sound travels thousands of miles underwater, the geographic area affected is quite large. In Haro Strait off the Olympic Peninsula, on May 5th, 2003, USS Shoup conducted midrange sonar tests. Orcas were distressed and 11 harbor porpoises washed ashore dead within a few days.

The EIS/OEIS for the proposed Expansion of the Northwest Training Range Complex should fully examine all potential intertidal, seafloor, acoustic, air, land and water quality

impacts to the resources of the OCNMS and other areas within the Northwest Training Range Complex Study Area. The EIS/OEIS should address impacts of each alternative to all marine mammals, fish and seabirds from training activities, including use of low and mid frequency sonar. The EIS/OEIS should address concerns about any takings of marine mammals incidental to conducting operations of Surveillance Towed Array Sensor System (SURTASS) Low Frequency Active (LFA) sonar anywhere in the Northwest Training Range Complex Study Area.

Three Pacific Coast resident pods of Killer whales were added to the federal list of endangered species in November 2005. The EIS/OEIS should address methods of protection, including the issue of sonar protection for several of the endangered orca pods that travel through the Northwest Training Range Complex.

The EIS/OEIS should address impacts of expansion of current training exercises on further depletion of fisheries stocks and potential effects on subsistence and tribal uses. The EIS/OEIS should include a review of impacts on fisheries of intense sources of underwater noise and potential harm to a major world food source. The EIS/OEIS should address protection of several types of northwest salmon that have also been added to the endangered species list.

The EIS/OEIS should address how Tribal access and rights will be protected in all alternatives, including the no action alternative. These Tribal activities do not threaten existing stocks. The EIS/OEIS should outline how Makah, Quileute, Quinault and other Native American Tribes will be consulted on potential impacts to their fishing and other accustomed tribal rights. The EIS/OEIS should develop a process for consulting with the Makah, Quileute, Quinault and other first Nations on all aspects of the Northwest Training Range Complex extension that will affect tribal fishing and ceremonial harvesting. The Navy should look for options that do not include access to Makah, Quileute, Quinault and other First Nation beaches so as to avoid interference with tribal activities.

The Navy EIS/OEIS should address and reject training in areas and during times when marine mammals are likely to be present. Alternatives should consider no sonar testing in or near whale feeding grounds, calving areas or migratory paths. The EIS/OEIS should consider precautions during testing or training with mid-frequency sonar, including, putting rich marine mammal habitat such as the sanctuary off limits; avoiding migration routes and feeding or breeding areas when marine mammals are present; testing and training with sonar primarily in areas with few marine mammals; listening with passive sonar to ensure marine mammals are not in the testing area before switching on active sonar; increasing the volume of active sonar gradually to give nearby marine mammals a chance to flee; and curtailing active sonar drills when marine mammals are detected.

OCA requests that the EIS/OEIS maintain the restriction on mid and LFA Sonar. Mid and low frequency sonar are not Compatible Uses for the Sanctuary and such testing should not be conducted within acoustic impact range of the Sanctuary.

The EIS/OEIS should include methods for further research to assure that naval sonar activities do not disrupt the ecosystem of the sanctuary and other areas within the Northwest Training Range Complex. The EIS/OEIS should include a review of the potential for acoustic devices transmissions to cause damage, disturbance or harassment to marine mammals, rockfish, migratory fish species and/or crab and the need to consider other alternatives for proposed extension of activities.

OCA has adopted a definition and approach for determination of compatible uses for Washington Northwest Outer and Inner Coast from Point Wilson to Copalis Beach. The OCA definition of compatible use is, "Those uses which maintain the natural biological communities in the national marine sanctuary, and protect, and where appropriate, restore and enhance natural habitats, populations and ecological processes."(NMSA Title III, sec 301 (b) (3)). The EIS/OEIS should address the extent to which each of the alternatives is consistent with this definition.

OCA has adopted criteria for use in ranking and evaluating types of impacts from activities which include impacts to biological and physical habitat, species including shellfish and crabs, fin fish, sharks, marine mammals and seabirds and juvenile life stages), spawning, ecological processes, restoration and enhancement and treaty-secured rights. OCA is concerned that there would be impacts from proposed training activities related to these criteria and proposes the EIS/OEIS to include these or similar criteria in reviewing impacts of each alternative. OCA is also concerned that OCNMS prohibited activities be considered and that relevant criteria from DNR, Ecology, Department of Fish and Wildlife, US Fish and Wildlife Service, National Marine Fisheries Service and EPA be considered in the EIS/OEIS.

OCA opposes expansion of baseline training activities within the Northwest Training Range Complex because these activities are not compatible with protection of the resources and marine environment. OCA requests the EIS/OEIS consider a new alternative that would reduce the harmful impacts of current training activities on those sensitive marine environments.

Sincerely,



Peggy Willis, Boardmember, on behalf of
OLYMPIC COAST ALLIANCE

cc: Governor Christine Gregoire
Carol Bernthal, Superintendent, Olympic Coast National Marine Sanctuary