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March 18, 2015

Mr. Eric Rickerson, State Supervisor  
U.S. Fish and Wildlife Service  
Washington Fish and Wildlife Office  
510 Desmond Drive SE #102  
Lacey, WA 98503

**Reference:** U.S. Pacific Fleet Northwest Training Range Complex (NWTRC) in the Northern Pacific Coastal Waters off Washington, Oregon and California and activities in Puget Sound and Airspace over the State of Washington

Dear Mr. Rickerson:

We are writing to you today to raise concerns with the U.S. Navy's plans for an Electronic Warfare Range on the Olympic Peninsula. The U.S. Navy claims that the U.S. Fish and Wildlife Service's 2010 Biological Opinion for the U.S. Pacific Fleet Northwest Training Range Complex (NWTRC) in the Northern Pacific Coastal Waters is sufficient for evaluating impacts from the Electronic Warfare Range all the way to the year 2020. However, the Biological Opinion did not adequately cover areas that the Navy is now expanding into, specifically the Olympic National Forest and Olympic National Park. As a result of that, and the related public outcry, we understand that the U.S. Fish and Wildlife Service and the Navy are revisiting the Biological Opinion and have reopened formal consultation with an emphasis on evaluating potential effects to marbled murrelets, northern spotted owls, and other listed species. Additionally, the distinct population segment (DPS) of the Fisher, a small mammal that has been recently reintroduced to Olympic Peninsula forests and Park, is also a candidate species for listing. Since this Biological Opinion evaluates impacts all the way to 2020, impacts to this species may also need examining.

We support and appreciate the efforts your office is making to fully evaluate possible impacts to these listed species. There must be new data or studies on these species that would either validate or refute the Navy's conclusion of no significant impacts. While we doubt that the best available science will validate the Navy's view that no significant impacts will occur with the level of intrusion being planned and the tenuous status of these species, we are very glad your office is taking the time to thoroughly review the Navy's proposal.

To contribute to that effort, we note the following quoted sections, which appear in the Biological Opinion on, specifically, the effects to the Marbled Murrelet (beginning on page 48) which your office transmitted by letter to the U.S. Navy on August 12, 2010.

Referencing the survival rate of the species:

“As a result, the FWS believes increasing murrelet breeding success is one of the highest conservation needs of the species.” [page 48]

“The life history characteristics of the murrelet make the species’ capability to recover from mortality or reduced fitness (i.e., population-level resilience) extremely low. The low observed reproductive rate causes the murrelet population to be highly sensitive to mortality and fitness - reducing stressors, particularly when they occur at a frequency that exceeds the species’ loss replacement rate. Despite the relatively long life span of murrelets and a reasonably high adult survival rate, the annual replacement rate needed for long-term population maintenance and stability is currently well below the annual rate of loss in each Conservation Zone. [page 57]

“In general, we expect the murrelets with temporary effects to effectively regain their hearing sensitivity within 12 to 24 hours following exposure, although minor cell damage to inner ear structures may persist for longer periods.” [page 104]

Based on the Navy’s own statements on the Environmental Assessment, 2,900 training flights will be conducted on a daily basis for 260 days per year, with trios of Growler jets flying up to 16 hours per day at an altitude level anywhere from 3,000 to 10,000 feet. The Marbled Murrelet would be unable to regain their hearing sensitivity in the time frame cited above.

To date, a limited number of studies suggest that birds are sensitive to noise because it disrupts their vocal communication. Anthropogenic noise is dominated by low-frequency energy that diminishes in strength toward higher frequencies. Given the spectral profile of noise, birds with low-frequency vocalizations may have a greater difficulty communicating than species that communicate at higher frequencies.

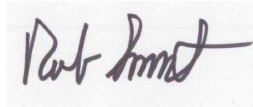
All of these stressors, including the noise levels generated by the Growler jets to be present during daily flights exercises, and the tower interceptions directed west toward incoming murrelets in flight, will no doubt affect the rapidly declining threatened Marbled Murrelet population, as well as having a major impact on the other listed species.

Thank you again for taking the time to review the Navy’s proposal. We encourage you to carefully examine all the existing information, and if that information is found lacking, to initiate a new study. It is also our sincere hope that this step will allow the public a full opportunity to understand and participate in the proposed action and we can begin to properly understand the breadth of impacts to wildlife, habitats and humans.

Respectfully,



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