



22 January 2015

Naval Facilities Engineering Command, Northwest
Attention: Ms. Kimberly Kler – NWTT EIS/OEIS Project Manager
1101 Tautog Circle, Suite 203
Silverdale, WA 98315-1101

On behalf of Sierra Club North Olympic Group and its nine hundred members we are writing to submit comments on the Supplement (December 2014) to the Navy's Draft Environmental Impact Statement/ Overseas Environmental Impact Statement (DEIS), dated January 2014, for its continued training and testing activities in the Pacific Northwest (NWTT). Please include these comments in the administrative record.

The Navy's activities in the Northwest Training and Testing (NWTT) Study Area poses significant risks to whales, fish, and other wildlife that depend on a peaceful environment for breeding, feeding, navigating, and avoiding predators—in short, for their survival. The increased sonar activity outlined in the Supplement — the Tracking Exercise Maritime Patrol (TRACKEX), and the previously unreported Maritime Security Operations effects, and the cumulative impacts of stressors and greenhouse gases will have increased significant negative impacts on the marine environment.

All of the Sierra Club's previous outlined concerns regarding the NWTT plans proposed in the EIS/OEIS are only intensified by the increased negative effect of the larger percentages of additional activity (TRACKEX) and previously unexamined environmental effects (MSO, GHG) outlined in the Supplement. The long-term, cumulative impacts of all of these activities on marine wildlife have only been cursorily assessed in this Supplement.

KEY CONCERNS PREVIOUSLY COMMENTED ON

We wish to take this opportunity to reiterate key concerns previously submitted on this proposal in April 2014 and note that this Supplement worsens the picture regarding all of them:

- The thousands of injuries and deaths (takes) to and of marine mammals, sea turtles, fish and birds is further increased.
- The lack of sensitivity to the Southern Resident Killer Whale's dwindling population and its need for a protected home in accord with its endangered status remains a critical concern. Training should be excluded from their critical habitat. Proximity to Naval bases for the

convenience of sailors and their families, or interesting underwater topography taken as a rationale for continuing southern Puget Sound exercises does not warrant even one “take” of this species.

- The lack of consideration of exclusion zones, geographic alternatives to the southern Puget Sound and seasonal restrictions are still glaring omissions. All of the Alternatives propose year-round, unrestricted use without regard to seasonal variations in marine mammal and fish abundance. This is true despite the well- documented seasonal migrations of numerous endangered species and the identification of biologically important areas.
- Our concern regarding the apparent lack of any plans for the Navy to use the Cetacean Density and Distribution Mapping Working Group’s data (CetMap) for marine mammal populations in the Pacific Northwest to mitigate harm and protect habitat remains.
- The Navy’s failure to develop meaningful alternatives and strategies to MITIGATE this increased harm is unacceptable—particularly because the Navy’s plan fails to adopt common-sense measures that would dramatically reduce these injuries and deaths without compromising national security. Most importantly, the Navy should put critical marine habitats off-limits to sonar and explosives testing and schedule training to avoid times of the year when sensitive species are present in places like the Olympic Coast National Marine Sanctuary, something it is not willing to do despite the scientific community’s view that these would be the most effective means of reducing harm.

A noticeable lack of increased mitigation plans in accord with the increased damage that is likely from additional sonar activity is unacceptable. Nowhere is it outlined whether visual patrols will increase as a result of this new activity, nor does the Supplement address real concerns over whether or not visual patrol is adequate at times of night or rough seas. No acoustic monitoring, or avoidance strategies are included. This is a serious omission to a document that intended to address the inadequate science and mitigation plans of the original draft. Mitigation must be addressed more fully.

NEW CONCERNS

The opportunity to comment on this Supplement at this time allows the North Olympic Group Sierra Club to add very important criticisms of this proposal.

- Earlier comments submitted by our group and others called for an examination of cumulative impacts of sonar testing, stressors, and climate change concerns. This Supplement has merely mentioned these concerns and then claims them to be non-significant. As these questions are paramount and important to the future of the region these proclamations of non-significance are unsupported and are dismissive.
- It has become evident that the Navy has embarked on a strategy of handling public comment that appears out of sync with federal NEPA requirements. Four clearly-linked documents have been spread out in their introduction to the public over the last year and a half. This has had the effect of separating ground-based, air-based and sea-based naval activities as if they were not

linked. This misleads the public into considering smaller spheres of influence of Navy actions in myriad localities. This strategy, or decision, to break up an obviously unified plan may in fact be in violation of federal law.

The four proposals were:

- An initial call for Scoping Comments to evaluate the potential environmental effects associated with ongoing and planned EA-18G Growler airfield operations at NAS Whidbey Island's Ault Field and Outlying Landing Field (OLF) (December 2013).
- The Northwest Training and Testing EIS/OEIS (January 2014): covering the sea-based training and testing plans stretching from Alaska to California that features a proposed increase of the use of sonar and explosives in offshore areas and the Sound.
- The Pacific Northwest Electronic Warfare Range Environmental Assessment (August 2014) and the National Forest Service Special Use Permit proposal.
- The most recent Scoping period revision of the future U.S. Navy Environmental Impact Statement for the EA-18G Growler Airfield Operations at Naval Air Station (NAS) Whidbey Island November 2014. This significant upward revision of numbers of Growlers proposed was the most recent opportunity to comment.

Importantly, as regards the current NWTT Supplement, the Navy's engagement in the process of informing the public has been extremely flawed and piecemeal. The Navy has not been forthright nor clear about its overall aims and has been lax in its exploration of alternatives and available scientific resources. There is an obligation to present this fragmented series of proposals as it clearly has been planned — as one massive Navy plan for a large region of the Pacific Northwest and the Puget Sound. It has enormous consequences for all that live here.

Our waters are already showing evidence of harm from climate change, habitat degradation, and ocean acidification and the Navy's current plans will result in further deterioration of this precious resource that contributes to the economic vitality and beauty of our Pacific Northwest. Our airways, waterways, parks and wilderness areas, homes and the entire region depend on all of us, including the Navy, to protect the region from further damage.

Respectively submitted,

Monica Fletcher

Chair

North Olympic Group,

Washington State Chapter, Sierra Club