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

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U.S. Coast Guard U.S. Navy

Northwest Straits Commission

Artwork: David Sones

January 30, 2009

Carol Bernthal, Superintendent Olympic Coast National Marine Sanctuary 115 E. Railroad Ave., Suite 301 Port Angeles, WA 98362

Dear Superintendent Bernthal:

The Olympic Coast National Marine Sanctuary Advisory Council (council) approved this letter at its January 29, 2009 meeting recommending that you forward to the U.S. Navy the following comments on the U.S. Navy Northwest Training Range Complex Draft EIS/OEIS (DEIS).

- 1. In prior scoping comments (see attachment), the council recommended that the Navy consider alternatives that would maintain the levels of activity and equipment within the sanctuary boundaries as they existed in 1994 and 2004. The DEIS does not consider this recommendation. Rather, both Alternatives 1 and 2 in the DEIS treat sanctuary waters no differently than the rest of the Northwest Training Range Complex, except for the location of the underwater minefield.
- 2. The council recommends that the Navy adopt the No Action alternative in the DEIS. Both Alternatives 1 and 2 anticipate an increased level of ship and aircraft activities over the W237 military warning area. This would result in increased risks of wildlife disturbance, marine debris, and hazardous materials contamination, causing environmental impacts on sanctuary resources. Because

OLYMPIC COAST NATIONAL MARINE SANCTUARY

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the DEIS does not quantify the increase of military activities in the sanctuary, it is difficult to quantitatively assess the increased environmental risks. Therefore, based on a precautionary approach, the council prefers the No Action alternative.

3. The council supports the Navy's decision to prevent underwater minefield installation from taking place in the sanctuary, as proposed in the DEIS.

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

Sincerely,

Terrie Klinger, Chair

Attachment:

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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. Navv

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:

"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.

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Artwork: David Sones

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,

Terrie Klinger, Chair

Attachment