



Naval Facilities
Engineering Command Northwest
1101 Tautog Circle, Suite 203
Silverdale, WA 98315-1101
Attn: Mrs. Kimberly Kler – NWTRC EIS

April 25, 2012

**Re: NEPA Scoping Comments for Navy Northwest Training and Testing
Environmental Impact Statement/ Overseas Environmental Impact Statement**

Dear Mrs. Kler,

On behalf of the board and staff of Humboldt Baykeeper, the following comments are presented on the Navy's Northwest Training and Testing Environmental Impact Statement/ Overseas Environmental Impact Statement (EIS/OEIS), which includes the northern coast of California from the Mendocino-Humboldt County line to the Oregon border and out to sea 250 miles.

Humboldt Baykeeper works to safeguard our coastal resources for the health, enjoyment, and economic strength of the Humboldt Bay community, and is a member of the California Coastkeeper Alliance and the international Waterkeeper Alliance. We have a longstanding interest in the protection of California's coast and ocean and have played a significant role in California's establishment of Marine Protected Areas through the Marine Life Protection Act. Humboldt Baykeeper attended the public meetings organized by the Navy in Eureka California on December 15, 2010 and March 22, 2012, and we are extremely concerned with the activities proposed by the Navy in the EIS/OEIS.

Humboldt Baykeeper is pleased that low frequency sonar, which is documented to be acutely stressful to cetaceans, is no longer used, but remains concerned about use of mid-frequency sonar systems. The EIS/OEIS states that the sound imaging distance of mid-frequency sonar is 18 kilometers, but does not identify the distance traveled by the sound waves at a level that would be audible to marine life such as whales, dolphins, and porpoises. The EIS/OEIS completely ignores any impacts beyond potential lethal effects to these animals and fails to describe the "changes in behavior" that your team of analysts acknowledge. By not including this information it is not possible to make an informed assessment of the potential negative impacts caused by this project.

Humboldt Baykeeper is very concerned with the proposed method to minimize harm to marine mammals by "looking out" from the deck 1,000 yards to sight marine mammals. This method is insufficient, entirely biased to the observer and subject to the vagaries of weather, and therefore lacks scientific standards. We ask that proper scientific sonar sensing gear is used to listen for

marine mammals to determine their respective distances from the ships. Furthermore, we ask that the sonar be completely turned off, not just “turned down” in the presence of marine mammals.

The migration patterns of marine mammals in the Pacific Ocean and beyond should be considered. The Navy sonar testing should include a provision stating that mid and high-frequency sonar *cannot* be amplified during known migration periods of whales and dolphins, many of which are traveling with their young to feeding grounds in the Arctic. This change will circumvent known impacts including but not limited to deafness, aneurisms, and death of marine mammals relying on their sonar to communicate, hunt, and navigate.

As acknowledged by the EIS/OEIS, there are a number of whale species that inhabit both near-shore and deep-water offshore areas within the Northwest Training Range Complex. While a few of these species have populations that are stable or growing, most are at depleted levels and number in the hundreds or low thousands. Most are at risk of extinction and are protected under the Endangered Species Act. Whales have acutely sensitive hearing that overlaps with the mid-frequency sonar frequencies. Any harm, including changes in behavior or distribution caused by training activities could potentially push some of these species closer to extinction.

Humboldt Baykeeper would like to request that the entire California coast that is covered under the Northwest Training Range Complex be considered as an exclusionary zone. The area of the northern California coast included in the Northwest Training Range Complex has four submarine canyons: Trinity, Eel, Mendocino, and Gorda. Areas of consistent upwelling not dependent on the Pacific decadal oscillation cycle result in extraordinarily high productivity, and these areas should be excluded from proposed activities. Furthermore, proposed Marine Protection Areas which will soon be adopted by the State of California should also be excluded from proposed activities. Cumulative effects of other acoustic impacts both in waters of the U.S. and in other parts of the affected marine mammals’ ranges throughout the globe, should be assessed in conjunction with the project activities. Other acoustic impacts that should be addressed include sonar used in international shipping channels, military exercises by the United States and other nations in international waters, and activities in state waters.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink that reads "Beth Werner". The signature is written in a cursive, flowing style.

Beth Werner, Executive Director