



Keeping Northwest California wild since 1977

Naval Facilities Command Northwest
Attention: NWTT Supplement EIS/OEIS Project Manager
3730 N. Charles Porter Ave
Building 385, Admin. Room 216
Oak Harbor, WA 98278-5000

June 10, 2019

Dear Project Manager,

On behalf of the Environmental Protection Information Center (EPIC), we are submitting this comment letter in solidarity with the ten Tribes that comprise the Inter-Tribal Sinkyone Wilderness Council that have expressed their concerns over the Draft Supplemental EIS/OEIS (SEIS) for the Navy Northwest Training and Testing (NWTT) activities.

The cumulative effects of this project, combined with the impacts of the Navy's historic and ongoing operations, will significantly harm the environment and endangered species. The activities currently being proposed would result in significant harm to whales, dolphins, fish and countless other marine animal species including many species, such as Humpback and Sperm Whales, that are listed as threatened or endangered under the Endangered Species Act.

Testing and training activities including the use of explosives, weapons firing, sonar and other acoustic devices would result in risks that would disrupt basic behaviors of marine mammals, including activities necessary for survival such as migration, surfacing, navigating, hearing, nursing, breeding and feeding. For these reasons, the proposed activities would result in violations of the Endangered Species Act by placing threatened and endangered species in jeopardy. These operations will inflict significant harm the environment and sensitive species and is not in the best interest of the global commons, which is in direct violation of Executive Order 12114;

Activities like dumping debris on the seafloor, spreading toxic chemicals, detonating explosives, and blasting high intensity mid-frequency sonar will significantly degrade habitat areas, including many sensitive habitat areas that serve for countless species, and that are critical to the health and survival of dozens of marine mammal populations. This is regardless if the area

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has had previous impacts to it, as maintained in the SEIS, as repeating those impacts will only increase the pressures on the habitat and species that rely on it.

The Navy fails to account for the decades of operations that have negatively affected our oceans, marine mammals, and other species that depend on clean safe waters to survive. The Navy also fails to account for the impact these operations have on the cultural and spiritual ways of the coastal tribes that are inextricably linked to the ocean, the marine species that inhabit it, and the coastline. As well, there lacks any incorporation or input of the Traditional Ecological Knowledge (TEK) from the coastal tribes, who have stated their opposition to the project due to continued concerns over spiritual, cultural, and environmental impacts.

In conclusion, the SEIS and mitigation measures are severely inadequate and the proposed actions would result in violations of several regulations that are in place to protect the environment and species from these types of harmful activities. All of the actions in the NWTR duplicate operations in other ranges and are therefore unnecessary for “training” purposes. The risk is too large; please rescind the proposed training and testing activities and explore other alternatives to train military personnel that do not put hundreds of thousands of species at risk in the global commons and does not impede the rights of the coastal tribes that have occupied these spaces for millennia.

Sincerely,

A handwritten signature in blue ink that reads "Tom".

Thomas Wheeler
Executive Director

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