

Comments on Navy NWTRC DEIS from The Whale Museum

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Dear Ms. Kler:

The Board of Directors of The Whale Museum appreciates the opportunity to provide comments on the Navy's Draft Environmental Impact Statement/ Overseas Environmental Impact Statement ("DEIS") for the Northwest Training Range Complex ("NWTRC"). Please include the following comments in the administrative record.

To be successful, conservation and recovery programs for endangered species need strategies that minimize threats or disturbances both in time and in space. This is one of the main reasons why recovery plans for endangered species include areas considered critical habitat. The Navy DEIS only tries to provide these exclusion zones by protecting areas around marine mammals that have been detected. This strategy is heavily reliant on the Navy's ability to reliably detect marine mammals. We feel strongly that the Navy needs to incorporate better techniques to improve their detection rates of marine mammals, extend their exclusion zones around detected marine mammals, and utilize exclusion zones based on specific areas and times in their mitigation strategies.

The sounds (active sonar, explosions, vessel/aircraft noise) that the Navy will be generating with increasing frequency as part of their training activities on the NWTRC will likely have significant impacts on marine mammals and other species within this area. While considerable research has been conducted on the impacts of some of these noise sources, especially active sonar, the Navy's estimates of zones of influence are too small and not conservative enough. Much of the modeling relies on tests conducted on a few species in captivity and probably do not accurately reflect the hearing ability and physiological impact on wild populations of the various species that inhabit the NWTRC. To appropriately mitigate the noise impacts that the Navy wishes to generate in the NWTRC we feel they need to do the following.

- Improve their ability to detect all marine mammals and pay special attention to the endangered Southern Resident orcas. This should involve passive acoustic arrays and high elevation (quiet) aerial over-flights for visual observations. The Navy can and should do better at knowing where marine mammals are within the Navy's training region. It would be preferable that a third party organization conduct this monitoring and that the sightings be reported and made available to the scientific and management communities.
- If marine mammals are sighted or detected within acoustic range, then exercises should be shut down if in progress, and postponed or moved elsewhere if the exercises have not yet started. For example, an appropriate threshold for such a decision is when ever noise levels from naval operations as well as other sources at

the location of Southern Resident orcas are expected to be greater than 130 dB re 1 μ Pa.

- Exercises that generate loud noise (active sonar, explosions) should not be conducted at night because visual detections of Southern Resident orcas or other marine mammals are not usually possible.
- Exercises that generate loud noise (active sonar, explosions) should not be conducted in the inland waters (including the Strait of Juan de Fuca) because these form critical habitat for endangered Southern Resident killer whales and because this area already has so many anthropogenic noise sources. Although current anthropogenic noise sources are not as acute as those due to naval training operations, they do create long term stressors. For example Holt et al. 2009¹ found that Southern Residents are increasing the amplitude of their calls to compensate for increased noise from boats. Further increases of this stress are not acceptable for this endangered species.
- The only reason the outer coast was not included as critical habitat for Southern Residents is that there was not enough information about how regularly they use different areas on the outer coast. The Navy should be supporting efforts to better understand habitat and resource use of all marine mammals in the NWTRC so that they can avoid specific areas or specific areas at certain times of the year that are critical to these species. Special efforts should be made to survey the location and behavior of the Southern Resident orcas when they forage in and transit through the Olympic National Marine Sanctuary and to avoid naval operations that would create stress on the Southern Residents while they are in the Sanctuary.
- Aircraft that are transiting any region containing the Southern Resident orcas should re-route their flight paths to avoid direct overflights by noisy aircraft. Existing noise levels already cause stress in the Southern Residents and additional noise and especially additional startling noise should be avoided.

Sincerely,

Board of Directors
The Whale Museum
Friday Harbor, WA 98250

Val Veirs – President, Phil Green – Vice President
Members: Sam Buck, Julie Corey, Darby Crouss, Fred Felleman, Beth Nicholson,

¹ M. M. Holt et al., “Speaking up: Killer whales (*Orcinus orca*) increase their call amplitude in response to vessel noise,” *The Journal of the Acoustical Society of America* 125 (1).