YOUR Help Is Needed!

Unique and in danger - the Olympic Coast National Marine Sanctuary

The ocean we see when we go to the Park's ocean strip or climb an Olympic mountain needs our help. It's the ocean where the Olympic Park's Marbled Murrelets go for fish. It's the ocean where salmon, halibut, cod and other fish feed in its rich upwellings. It's where sea turtles and 29 species of marine mammals, some endangered or threatened, spend part of their lives. Its waves wash the coastal wildlife refuges created by Theodore Roosevelt in 1907. Olympic Park Associates (OPA) asks for your help to protect it.

OPA contends that the National Oceanic Atmospheric Administration (NOAA), the administrative guardian of the Sanctuary, has failed to live up to its responsibility.

The mission of the Olympic Coast National Marine Sanctuary is "To protect the Olympic Coast's natural and cultural resources through responsible stewardship, to conduct and apply research to preserve the area's ecological integrity and maritime heritage, and to promote understanding through public outreach and education."

Five years ago, NOAA issued an Incidental Take Authorization permit to the Navy for their training activities in the Sanctuary. The permit allows incidental taking (killing) of marine mammals that would happen during Navy training activities in the Sanctuary. OPA discovered the 2015 permit by accident on the Internet, six months after it was issued.

In April 2020, OPA discovered that the National Environmental Protection Act (NEPA) process is already underway for a re-issue of this permit. The comment period proclaimed has already passed, without notification to OPA and the public. The Navy Environmental Impact Statement (EIS), on which this permit is based, has not been finalized. OPA contends NOAA has not followed correct NEPA process. It should have notified all who commented on the Navy EIS. Additionally, ads requesting comments should have been put prominently in Peninsula and other newspapers. OPA is not aware of any notification having been given. NOAA did not do it the first time—they have not done it again.

The training activities listed in the Navy's permit application are for much more than using sonobuoys to detect submarines, as the Navy did during the Cold War. Now they include explosive detonations, sonar activity, small- and medium-caliber gunnery exercises, firing from aircraft at targets, firing from ships at targets, large-caliber gunnery exercises, missile exercises, and torpedo (explosive) testing.
OPA argues that NOAA needs to back up in its process for this permit. To impress NOAA, we need emails and letters to go to NOAA. To be sure NOAA hears us, **emails are also needed** to go to your U.S. Senators and congressional Representatives. Ask them to communicate with NOAA regarding your concerns about the permit and the process NOAA is using.

OPA fails to see how these activities would not be disruptive to the mission of the Sanctuary. OPA feels this disruption would also result in damage to the Olympic National Park's ecosystem.

OPA contends understanding nature and its processes are vital to human well-being. As a protector of the Park for more than 70 years, OPA also helped to create the Olympic Coast National Marine Sanctuary (OCNMS) as a natural companion to the Park and its ecosystems. The interaction of land and sea is vital to the earth's fruitful roles in human existence.

The Navy attempts to claim reduced environmental damage with the promise of mitigation. Ecosystem health cannot be mitigated. Ecosystems are like organisms: when organs are reduced or removed from an organism, the organism cannot function as it once did. The only useful mitigation is not to use the Sanctuary for military training. Cannot the Navy find another area out of the other 99.5% of American shoreline to conduct these exercises?

To preserve sanctuaries, like wilderness, is to preserve libraries and laboratories for natural species and processes. By preserving some ecosystems and using them in ways that keep them whole, we gain multiple benefits. We save hundreds of species and their habitats. By studying these places, we learn how they work. They remain as sources of food and medicines for current and future diseases. Also, like trees on land, algae in the ocean absorb carbon dioxide and provide much of the earth's oxygen. A healthy ocean is necessary for our successful living on Earth.

**Navy training is needed BUT NOT in the Sanctuary or over Olympic National Park. Please tell NOAA and Congress now how you feel.**

Following is what lives in this Sanctuary and is endangered by these activities. Twenty-nine species of marine mammals reside in or migrate through the Sanctuary and are endangered by these activities.

**First are the regulars:**
- Sea Otter *Enhydra lutris*
- California sea lion *Zalophus californianus*
- Northern sea lion *Eumetopias jubatus*
- Northern fur seal *Callorhinus ursinus*
- Pacific harbor seal *Phoca vitulina*
- Northern elephant seal *Mirounga angustirostris*
- California gray whale *Eschrichtius robustus* **Endangered**
Minke whale  Balaenoptera acutorostrata  
Humpback whale  Megaptera novaeangliae **Threatened**  
Risso's dolphin  Grampus griseus  
Killer whale  Orcinus orca  **Endangered**  
Northern right whale dolphin  Lissodelphis borealis  
Pacific white-sided dolphin  Lagenorhynchus obliquidens  
Dall's porpoise  Phocoenoides dalli  

These mammals are more rare:  
Northern right whale  Eubalaena glacialis  
Fin whale  Balaenoptera physalus **Endangered**  
Sei Whale  Balaenoptera borealis **Endangered**  
Blue whale  Balaenoptera musculus **Endangered**  
Sperm whale  Physeter macrocephalus **Endangered**  
Pygmy sperm whale  Kogia breviceps  
Stejneger's beaked whale  Mesoplodon stejnegeri  
Hubb's beaked whale  Mesoplodon carlhubbsi  
Cuvier's beaked whale  Ziphius cavirostris  
Baird's beaked whale  Beradius bairdii  
Short-finned pilot whale  Globicephala macrorhynchus  
False killer whale  Pseudorca crassidens  
Common dolphin  Delphinus delphis  
Striped dolphin  Stenella coeruleoalba  
Harbor porpoise  Pocoena phocoena  

These are not all that could be harmed by the Navy's activities. Here are quotes about the value of the Sanctuary from NOAA's own websites:

"The diverse and abundant fish fauna in Olympic Coast National Marine Sanctuary are significant commercial and recreational resources. Although Olympic Coast National Marine Sanctuary does not host breeding colonies or high numbers of sea turtles, they tend to roam widely...."

"Seabirds and marine mammals are among the most charismatic and iconic animals that attract sanctuary visitors and supporters - the spouts and flukes of gray whales in migration, the colorful feathers and bills on tufted puffins in breeding plumage. For marine wildlife, the Olympic Coast is a complex and thriving region with highly productive waters that supports and attracts this nationally significant wildlife breeding and foraging area. For scientists, marine wildlife are megafauna (or large animals) that can serve as indicators of ecosystem health and productivity." There is more info at https://olympiccoast.noaa.gov/  

The Marbled Murrelet, Western Snowy Plover, and Short-tailed Albatross are birds that are threatened or endangered and have been found in the Sanctuary."
In the 1,800-page EIS, the Navy quotes studies on noise and its effect on marine mammals. It further heightens OPA’s concern.

"Noise is of particular concern to marine mammals because many species use sound as a primary sense for navigating, finding prey, avoiding predators, and communicating with other individuals. Noise may cause marine mammals to leave a habitat, impair their ability to communicate, or cause physiological stress (Cholewiak et al., 2018; Courbis & Timmel, 2008; Erbe, 2002; Erbe et al., 2016; Hildebrand, 2009; Holt et al., 2017; Putland et al., 2018; Rolland et al., 2012; Southall et al., 2018; Tyack et al., 2011; Tyne et al., 2017; Williams et al., 2014b). Noise can cause behavioral disturbances, mask other sounds including their own vocalizations, may result in injury, and in some cases may result in behaviors that ultimately lead to death (Erbe et al., 2014; Erbe et al., 2016; National Research Council, 2003, 2005; Nowacek et al., 2007; Southall et al., 2009; Tsujii et al., 2018; Tyack, 2009; Würsig & Richardson, 2009)." [p. 3.4-21 V-1 Northwest Training and Testing Draft Supplemental EIS/OEIS March 2019]

SAMPLE EMAILS

Feel free to use the sample parts with which you agree. Add your own ideas and sentiments. Most of all, please email and help save the Olympic Coast National Marine Sanctuary from Navy training destruction.

<njacob@NOAA.gov>
Dear Dr. Neil Jacobs,
Under Secretary of Commerce for Oceans and Atmosphere
National Oceanic and Atmospheric Administration
1401 Constitution Avenue NW, Room 5128
Washington, DC 20230

I (We) have learned that NOAA is in the process of reissuing a seven-year Incidental Take Authorization permit to the Navy, allowing its training activities in the Olympic Coast National Marine Sanctuary starting Nov. 2020. Agreeing to these activities for an additional seven years would be extremely damaging to this valuable Sanctuary. I (We) have several objections to this permit.

I (We) argue the Sanctuary would continue to be unacceptably damaged by the Navy's training activities. The activities would harm marine mammals, seabirds, fishery habitat, and other marine assets in the Sanctuary, many of whom are threatened or endangered. If this were not true, the permit would not be needed. The activities cited by the Navy would cause long-term damage to the Sanctuary ecosystem which NOAA is supposed to protect as its administrator.

There are many miles of American coastal shoreline available that is not within an area set aside for environmental protection. National defense is important to our future well-being. A healthy environment is also important to us and the generations to follow. These areas provide sources of current and future food and medicines because their
ecosystems have been kept intact. That is as important as protection from an enemy country. Our future will depend on our knowledge and protection of the environment. Our country can do both.

I (We) also object to the lack of transparency in the process NOAA has taken in this and the prior permit. NOAA failed to notify the public and other governmental agencies regarding the permit process. On the current NOAA website, NOAA claims the comment period has already closed. This lack of transparency has not allowed for NEPA-mandated public comment. I (We) are very disappointed that NOAA, an organization I (We) respect, has not provided for public comment in this matter.

Therefore, I (we) ask that NOAA reopen the comment period after proper notification to the public and to all who made comments on the May 29, 2019, Navy EIS. The Navy should be able to provide those names and addresses. The comment period should be, at least, 60 days.

Please include me (us) on your list for notification for public comment.

Sincerely,

Your Name
Address

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Dear Senator Murray,
Dear Senator Cantwell,
Dear Senator _________, (not Washington state resident)
Dear Representative _________ ,

(See Members of Congress links on olympicparkassociates.org to find)

I (We) have learned that NOAA is in the process of reissuing a seven-year Incidental Take Authorization permit to the Navy, allowing its training activities in the Olympic Coast National Marine Sanctuary starting Nov 2020. Agreeing to these activities for an additional seven years would be extremely damaging to this valuable Sanctuary. I (We) have several objections to this permit.

I (We) contend the Navy's training activities in the Sanctuary would cause extreme damage to the Sanctuary's environment. The permit would allow the following: Explosive detonations, sonar activity, small- and medium-caliber gunnery exercises, firing from aircraft at targets, firing from ships at targets, large-caliber gunnery exercises, missile exercises, and torpedo (explosive) testing.

These activities would cause extreme noise, add unnatural chemicals to the ocean and seashores, cause physical damage to wildlife (some threatened and endangered), and litter the area with training debris. This would harm marine
mammals, seabirds, fishery habitat, and other marine assets in the Sanctuary and the areas around it. If this were not true, the permit would not be needed. The concern is it would cause long-term damage to the Sanctuary ecosystem NOAA is supposed to protect.

The Navy admits in its EIS that "Noise is of particular concern to marine mammals because many species use sound as a primary sense for navigating, finding prey, avoiding predators, and communicating with other individuals. Noise may cause marine mammals to leave a habitat, impair their ability to communicate, or cause physiological stress" Also, "Noise can cause behavioral disturbances, mask other sounds including their own vocalizations, may result in injury, and in some cases may result in behaviors that ultimately lead to death."

There are many miles of American coastal shoreline available that is not within an area set aside for environmental protection. The Olympic Coast National Marine Sanctuary is particularly important because of its immediate proximity to Olympic National Park. Both were created to protect part of the natural assets and beauty of the Olympic Peninsula.

National defense is important to our future well-being. A healthy environment is also important to us and the generations to follow. It will provide current and future food and medicines that are as important as protection from an enemy country. Our future will also depend on our knowledge and protection of the environment.

I (We) also object to the lack of transparency in the process NOAA has taken for this and the prior permit. NOAA has failed to notify the public and other governmental agencies regarding the permit process. On the NOAA website, NOAA claims the comment period has already closed. This lack of transparency has not allowed for NEPA-mandated public comment. Therefore, I (we) ask that NOAA reopen the comment period after proper notification to the public and to all who made comments on the May 29, 2019, Navy EIS.

I (we) ask you to ask NOAA to reopen the comment period for this permit for 60 days, at least, following the proper notification to the public.

Sincerely,
Your Name
Your Address
(Your name and address are needed so they know you can vote for them. They can ignore you otherwise.)