

## Navy Region Northwest

Thank you for providing us the opportunity to review and provide feedback on the draft Marine Spatial Plan for Washington's Pacific Coast. We appreciate the efforts to date on developing this draft plan that will guide evaluations of proposed new ocean uses on Washington's Pacific Coast. Navy comments are attached.

**Navy Region Northwest Comments  
Marine Spatial Planning Marine Spatial Plan (October 2017)**

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|----|-------------------|--|--|
| 1  | MSP/x             | Acknowledgements                       | Please add U.S. Navy as a stakeholder.   |
| 2  | MSP/xiii          | Study Area                             | Consider mentioning the five National Wildlife Refuges and Naval Station Everett Annex Pacific Beach.  |
| 3  | MSP/xiv           | Last bullet                            | Include Navy (2016) in the references section.   |
| 4  | MSP/1-13          | The MSP Study Area                     | When discussing the cities and towns along the southern coast, please add Navy facility Naval Station Everett Annex Pacific Beach to the MSP Study Area.   |
| 5  | MSP/1-19          | Authority and Legal Framework, Para 2. | “Prohibited activities include low-altitude overflights” only applies within 1-nm of the National Wildlife Refuges and within 1-nm of the coastal boundary, not the entire OCNMS.  |
| 6  | MSP/1-20          | Para 2                                 | Please add sentence after “The Sanctuary includes conditions in permits and authorizations to ensure that an approved project has minimal negative impacts to the marine environment” that states: “In accordance with 15 C.F.R. section 922.152(d), the military activities performed by the Department of Defense are exempt from Sanctuary prohibitions. Military activities are carried out in a manner that avoids adverse impacts on Sanctuary resources, to the maximum extent possible”. |
| 7  | MSP/2-32          | Orca section, para 2                   | Please replace this sentence: “The NOAA Northwest Fisheries Science Center, Cascadia Research Collective, and the U.S. Navy use satellite tags on the resident orcas to learn more about their winter migrations and the extent of their range.”<br>With: “Satellite tags and passive acoustic recorders have been utilized to learn more about southern resident killer whale winter migrations and the extent of their range (Hanson et al. 2017).”  |
| 8  | MSP/2-35          | Marshbirds                             | Please remove citation to Navy 2015 and cite original studies on harlequin ducks. Navy, 2015 is not the authority on this subject area.  |
| 9  | MSP/2-35          | Shorebirds                             | Please remove citation to Navy 2015 and cite original studies on shorebird stopover and colony habitat. Navy, 2015 is not the authority on this subject area.  |
| 10 | MSP/2-36          | First full para                        | Please remove citation to Navy 2015 and cite original studies on marbled murrelet reproductive success. Navy has funded marbled murrelet studies through cooperation agreement with WDFW, but those studies have been focused on determining marbled murrelet density, and may not be the correct reference for this statement. Information on density and abundance should cite the original WDFW reports.  |
| 11 | MSP/2-45          | Ocean Noise, para 4, sent 2            | This sentence suggests that Navy is the second primary source of noise in the Study Area waters. The Navy is not aware of data to support this statement. Unless there is citable data available, please remove the words “primarily from shipping as well as Navy training and testing activities” so that the sentence reads: “Study Area waters are impacted by both chronic and accumulated acute anthropogenic noise sources.”  |
| 12 | MSP/2-122         | Table 2.5-2                            | As this plan goes out to the 700-ft. Fathom line well beyond state jurisdictional waters of 0-3 NM, those federal agencies that have jurisdiction beyond 3 NM will need to be noted as Primary Regulatory Agencies... NMFS, USDA.  |
| 13 | MSP/2-139         | Lodging                                | Consider mentioning Seabrook, a vacation home rental development established in 2006.  |

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| 14 | MSP/2-162         | Military Use  | Please add additional information regarding the historic presence of the DoD in the Summary of History and Current Use. Please add: These sites have existed for decades, some dating back to the 1910s. Please also incorporate missing historical data on Military use of the Washington Peninsula for training and active use in defense of the Nation (i.e., Quileute Airfield was once Quillayute State Airport, a public airport located approximately 10 miles (16 km) west of the city of Forks, in Clallam County, Washington, United States. It is owned by the City of Forks. This former Naval Auxiliary Air Station was deeded to the City of Forks by the Washington State Department of Transportation in 1999. Quillayute was a Navy facility, the northern base for blimp patrols running up and down the Washington and Oregon coast during WWII. The Navy has for over 70 years and continues to use the airspace over the Washington Peninsula for training Navy, Air Force, and Coast Guard aircrews. The Navy currently has a facility on the coast of Washington at Naval Station Everett Annex Pacific Beach that provides electronic systems training for aircraft. |
| 15 | MSP/2-162         | Military Use, para 1, last sentence                 | Please add to end of last sentence: "although other military services occasionally use the MSP Study Area."  |
| 16 | MSP/2-164         | Future trends, sent 3-6                             | Please replace with: "At the time of writing, the Navy has proposed to conduct small unit, intermediate and advanced land and cold-water maritime training for Navy special operations personnel. The intent of the proposed training is to teach trainees: 1) the skills needed to avoid detection; and 2) not to leave any trace of their presence during or after training activities. The proposed training locations in the MSP Study Area include the following State Park properties: Westhaven, Westport Light, Twin Harbors, Leadbetter Point, Pacific Pines, and Cape Disappointment.  |
| 17 | MSP/2-190         | Potential Impact on Human Uses<br>Spatial conflicts | Please add section heading for Conflicts with Military Use. This section should discuss effects on Navy training areas, including potential impacts to Navy gunnery training, ship and submarine maneuvers and transit, and aircraft training. Obstruction issues resulting from off shore renewable energy development should be addressed, including potential safety of flight issues due to the height of wind energy turbines and the cumulative effect of pushing commercial surface vessel traffic further off shore. Additionally, review of potential interference with both FAA and Western Air Defense radars is needed.  |
| 18 | MSP/4-10          | Section 4.2   | For the benefit of applicants and future users of this document, consider adding to Section 4.2 a list of federal agencies that may need to be coordinated with, including the U.S. Navy.  |
| 19 | MSP/4-27          | Table 4.4-1   | Navy recommends that military uses be addressed separately in this table.  |
| 20 | MSP/4-31          | 2. Current Uses                                     | This section should include current and future military use within the MSP study area.   |
| 21 | MSP/4-41          | Section 4.8, last sent.                             | Consider also including a table of Federal standards and requirements for activities occurring in the MSP study area, but outside state waters (e.g., beyond 3-nautical miles).  |
| 22 | MSP/C-1           | Contents  | Military use and training should be a subject line and appropriate table developed and added.  |

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Programmatic Environmental Impact Statement (October 2017)**

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| 1 | PEIS/4            | Para 1, bullet 1   | Recommend adding Military Training to read as follows: “Adversely impact existing uses such as <b>military training</b> , fishing, shellfish aquaculture, recreation and navigation, including reducing area or access for these activities. |
| 2 | PEIS/4            | Under “The MSP should provide the following outcomes”  | Recommend adding new bullet:<br>• Mitigate to ensure sustainable existing and future military training uses.   |
| 3 | PEIS/5            | Objectives and limitations   | Recommend adding objective 6. Ensure compatibility with existing and future military training needs.   |
| 4 | PEIS/5            | Overarching objectives   | Recommend first bullet be: “Be consistent with state <u>and federal</u> laws, policies and authorities.  |
| 5 | PEIS/7            | Under “Federal planning and management efforts in the MSP Study Area such as.”   | Recommend adding the following bullet: • Navy Warning Area 237 (W-237) Surface Operating Areas” See NOAA Soundings and Fathom Chart 18003.   |
| 6 | PEIS/7            | Under “Local or regional management plans that are in effect or under development that could influence implementation of the MSP include.” | Recommend adding the following bullet • Military range complex management plans  |
| 7 | PEIS/8            | Under “Environmental Impact Statements (NEPA or SEPA)”   | Recommend including Olympic Coast National Marine Sanctuary EIS of November 1993.  |
| 8 | PEIS/28           | Appendix A. Marine Spatial Plan studies  | Recommend adding 2015 NWTT FEIS.   |