

United States Senate

WASHINGTON, DC 20510

April 9, 2009

The Honorable B.J. Penn
Secretary of the Navy
1000 Navy Pentagon
Washington, D.C. 20350-1000

Kimberly Kler, Environmental Planner
Naval Facilities Engineering Command Northwest
1101 Tautog Circle, Suite 203
Silverdale, WA 98315-1101

Dear Secretary Penn and Ms. Kler:

We are writing today to provide our comments on the proposed expansion of the Northwest Training Range Complex ("NWTRC"). First and most importantly, we would like to express our strong support for the Navy's ongoing efforts to strengthen and sustain military readiness. Your efforts to provide personnel with access to realistic training environments are critical to helping maintain our national security. Additionally, we sincerely appreciate the additional time the Navy provided to allow Oregonians to comment on this important and sensitive issue. As the Navy moves forward in the NWTRC decision-making process, however, we cannot overstate the importance of proceeding in a manner that fully considers the environmental and economic needs of our constituents and coastal communities in addition to the military needs of our country.

Based on a number of comments we have received from a variety of interested stakeholders and constituents, we are concerned that many of the Navy's training proposals, including underwater minefield testing, explosive ordinance use, expanded land and air-based exercises, and widespread sonar training in particular, pose substantial environmental and economic risks. For example, you are no doubt aware that there are significant and seemingly unresolved concerns about the Navy's proposed action and the Draft Environmental Impact Statement. These include concerns that the Navy failed to adequately meet the National Environmental Policy Act requirements that compel the Navy to identify and fully explain the potential impacts - including cumulative impacts, provide an analysis of reasonable alternatives, and specify measures to mitigate potential harms. We would like to take this opportunity to highlight a few of the other outstanding key concerns in an effort to make sure they are given appropriate consideration.

1. Training activities have the potential to cause irreparable harm to the fisheries and the many industries dependent upon them along the Oregon Coast. The 2006 value of Oregon's commercial fishery was placed at \$421 million and an additional \$31.9 million was generated by the recreational fishery in 2005. The training activities have the potential to damage essential fish and hard-bottom habitats, as well as alter patterns of fisheries, potentially severely damaging economic and social outcomes for coastal and coastal-

neighboring Oregon communities. Significantly, there is a great deal of expertise to be found both within the fishing and the academic community on the Oregon Coast. We urge the Navy to work with our Coastal communities in assessing impacts and finding adequate ways to mitigate impacts, including working with communities on the scheduling and locating of activities.

2. The use of sonar has been associated with significant impacts on marine mammals. Off the Oregon Coast, the potentially detrimental effects are even more worrisome given the number of threatened and endangered species at risk. Several of the comments identified concerns with the comprehensiveness and inclusiveness of the scientific data and methodologies employed by the Navy to assess the potential consequences on marine mammals. We urge you to look closely at the comments provided on this matter and work to address these concerns.


3. Potential impacts on endangered leatherback sea turtles, sea birds, and other species have also been identified by both constituents and the Navy in the Draft Environmental Impact Statement. We urge the Navy to fully consider and minimize any impacts and to develop a plan for impact mitigation/minimization.

4. Training activities have the potential to release a variety of hazardous materials into sensitive marine ecosystems. We urge the Navy to determine how best to minimize these impacts, to develop a mitigation plan for doing so, and to review that plan with other relevant authorities.

In order to avoid needlessly risking such adverse consequences, we urge the Navy to reconsider the variety of scientific studies and methodologies used to support its environmental review process, to more fully explain potential environmental and cumulative impacts, to analyze all reasonable alternatives, and to identify measures that may actually mitigate harm.

We thank you in advance for your consideration of these comments. We hope to be able to work with the Navy to ensure that the substantive environmental, economic and social concerns of our constituents are considered as you move forward in designing this project. If you have any questions or comments you may contact Michele Miranda in Senator Wyden's DC office at 202-224-3163 or Jeremiah Baumann in Senator Merkley's DC office at 202-224-3753.

Sincerely,



Ron Wyden
United States Senate



Jeff Merkley
United States Senate