



**Advisory Council on Historic Preservation  
Electronic Section 106 Documentation Submittal System (e106) Form  
MS Word format**

**Send to: *e106@achp.gov***

**Please review the instructions at [www.achp.gov/e106-email-form](http://www.achp.gov/e106-email-form) prior to completing this form. Questions about whether to use the e106 form should be directed to the assigned ACHP staff member in the Office of Federal Agency Programs.**

**I. Basic information**

**1. Purpose of notification.** Indicate whether this documentation is to:

- ☐ Notify the ACHP of a finding that an undertaking may adversely affect historic properties
- ☒ Invite the ACHP to participate in a Section 106 consultation
- ☐ Propose to develop a project Programmatic Agreement (project PA) for complex or multiple undertakings in accordance with 36 C.F.R. 800.14(b)(3)
- ☐ Supply additional documentation for a case already entered into the ACHP record system
- ☐ File an executed MOA or PA with the ACHP in accordance with 800.6(b)(iv) (where the ACHP did not participate in consultation)
- ☒ Other, please describe: In accordance with the provisions of 36 CFR § 800.4(d)(1)(ii) the Navy requests the ACHP to review the Navy's finding that the subject undertaking will result in No Historic Properties Affected.

**2. ACHP Project Number** (If the ACHP was previously notified of the undertaking and an ACHP Project Number has been provided, enter project number here and skip to Item 7 below): Not applicable.

**3. Name of federal agency** (If multiple agencies, list them all and indicate whether one is the lead agency): Department of the Navy

**4. Name of undertaking/project** (Include project/permit/application number if applicable): Northwest Training and Testing. Abbreviated as "NWTT."

**5. Location of undertaking** (Indicate city(s), county(s), state(s), land ownership, and whether it would occur on or affect historic properties located on tribal lands): The undertaking includes areas of Puget Sound and the Strait of Juan de Fuca, areas off the coast of Washington State, and designated airspace over the Olympic Peninsula. The undertaking also includes an area in Alaska; however, the Navy notified the Alaska State Historic Preservation Officer (AK SHPO) the proposed activities and Area of Potential Effect (APE) in Alaska are unchanged from the undertaking as consulted in 2015. AK SHPO agreed with the Navy's finding that the undertaking at that time would result in No Adverse Effect. AK SHPO acknowledged the undertaking did not require re-initiation of Section 106 consultation on February 26, 2019 (File No. 3130-1R / 2018-00375). No tribal lands are involved.

\* See Enclosure 1 for copies of correspondence with the Alaska and Washington SHPOs, Tribes, and interested parties.

ADVISORY COUNCIL ON HISTORIC PRESERVATION

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- 6. Name and title of federal agency official and contact person for this undertaking**, including email address and phone number: Mr. David Grant, Archaeologist, Naval Facilities Engineering Command Northwest, 1101 Tautog Circle, Silverdale, WA 98315 (360) 396-0919 or dave.m.grant@navy.mil.

## **II. Information on the Undertaking\***

- 7. Describe the undertaking and nature of federal involvement** (if multiple federal agencies are involved, specify involvement of each): The proposed undertaking comprises training and testing activities in the Pacific Northwest that support the Navy's mission to maintain, train, and equip combat-ready naval forces. The undertaking is the continuation of longstanding military readiness activities within designated range complexes and operating areas in the offshore and inland waters of Washington State. As shown in Enclosure 2, the training and testing activities associated with this undertaking generally fall into the following five primary mission areas: air warfare, anti-submarine warfare, electronic warfare, mine warfare, and surface warfare. The frequency and types of activities included in the proposed undertaking account for fluctuations in training and testing to meet evolving or emergent military readiness requirements resulting from new missions and systems. Furthermore, Enclosure 2 identified four types of activities with the potential to affect historic properties in specific areas that are discussed further below.

\* See Enclosure 2 for a table listing the activities that occur within Washington State waters or between state waters and territorial waters 12 nautical miles from its shore.

**8. Describe the Area of Potential Effects (APE):**

The Navy consulted with the WA SHPO to define the APE in accordance with 36 C.F.R. § 800.4(a)(1). In determining the APE, the Navy considered the scale and nature of the undertaking, as well as all proposed activities and the geographic areas within which these activities may directly or indirectly cause alterations to historic properties, including physical damage from anchors, disturbance from the placement and use of seafloor devices, shockwaves and vibration from explosives, auditory effects from aircraft, and settling of military expended materials (MEM), among others. With regard to aircraft noise, the highest modeled noise exposure for NWTT activities would be less than 37 decibels (dB) Day-Night Average Sound Level (DNL), with no potential to affect historic properties (for additional information see the Navy letter dated September 13, 2019, which is included in Enclosure 1). As a result of this analysis, the Navy defined the APE as specific geographic areas associated with four types of activities with the potential to affect historic properties. The resulting APE includes areas within existing range complexes and operating areas offshore and in inland waters of Washington where historic properties could be affected by these activities. Enclosure 2 details those activities occurring in each area. Enclosure 3 depicts the APE for the Offshore Area and Inland Waters, respectively:

- Areas involving the use of explosives in the Quinault Range Site (QRS) and use of Explosive Ordnance Disposal (EOD) ranges at Crescent Harbor and Hood Canal.
- Areas involving deployment of vessel anchors with sufficient weight and function to dig into the seafloor in four established precision ship-anchoring areas (one southwest of the Navy 3 Operating Area (OPAREA), one west and one east of Naval Magazine Indian Island, and one west of Naval Station Everett) and at the established barge mooring in Carr Inlet.
- Areas involving the use of seafloor devices, such as the small tracked or wheeled unmanned underwater vehicles, and placement/removal of inert mine shapes and inertial anchors near ports used in civilian port defense training, Dabob Bay Range Complex, Keyport Range Site; Carr Inlet, the Crescent Harbor and Hood Canal EOD Ranges; and pierside at Navy installations.

- Areas involving the settling of MEM, such as flares, fine guidance wires, sonobuoys and their parts, parachutes/decelerators, small buoyancy weights, blank ammunition brass, ammunition belt links, and pyrotechnic parts and fragments in the QRS, Dabob Bay Range Complex, the Keyport Range Site, Carr Inlet, Navy 3 and 7 OPAREAs, the Crescent Harbor and Hood Canal EOD Ranges, and pierside at Navy installations.

\* See Enclosure 3 for a depiction of APE in the Offshore Area and Inland Waters, respectively.

## 9. Describe steps taken to identify historic properties:

The Navy took into account past planning, research, and studies, the magnitude and nature of the undertaking, the degree of Federal involvement, the nature and extent of the potential effects, and the likely nature and location of historic properties within the APE, consistent with 36 C.F.R. § 800.4(b)(1).

The Navy reviewed information from multiple sources, including the following:

- Previous planning for the ranges and associated areas within the current NWTT APE and consultations for prior NWTT undertakings.
- The National Register of Historic Places (NRHP).
- The Washington State Department of Archaeology and Historic Preservation Washington Information System for Architectural and Archaeological Records Data (WISAARD).
- The National Oceanic and Atmospheric Administration (NOAA) Automated Wreck and Obstruction Information System.
- The Bureau of Ocean Energy Management (BOEM) online index of shipwrecks by state.
- Navy shipwreck and submerged aircraft documentation.
- Agencies, organizations, and individuals who expressed interest in participation in the Section 106 process.
- Publicly available sources about Tribal territories and resources, including Tribal websites, as well as information provided in consultation by the consulting Tribes regarding properties of traditional religious and cultural significance within the APE.

Through these efforts, the Navy identified three types of historic properties potentially present within the APE:

- Pre-Contact archaeological sites: pre-Contact inundated sites and features.
- Historic Sunken Craft Sites: shipwrecks and submerged aircraft wreck sites.
- Traditional Cultural Properties (TCPs): historic properties associated with the cultural practices or beliefs of a living community that are rooted in that community's history and are important in maintaining the continuing cultural identity of the community.

To identify pre-Contact archaeological sites within the APE, the Navy reviewed the databases previously listed, as well as the following additional literature:

- *The Inventory and Analysis of Coastal and Submerged Archaeological Site Occurrence on the Pacific Outer Continental Shelf* commissioned by BOEM. This study used physiographic and archaeological research to predict the distribution of marine prehistoric sites on the Pacific Outer Continental Shelf (California, Oregon and Washington) beyond state waters (greater than 3 nm). It provides predictive models to delineate paleoshorelines and paleolandscapes and make predictions about potential site locations based on assumptions about resource distributions and human behavior in certain paleolandscapes. The study predicted that the areas with the highest potential for pre-Contact sites would be found within alluvial drainages that contain attractive resources and relatively high rates of sedimentary deposition that should serve to better preserve pre-Contact sites than in the interfluvial areas (ICF International, Davis Geoarchaeological

Research, and Southeastern Archaeological Research 2013).

- *The Influence of Coastal Geomorphic Processes on Terrestrial Archaeological Site Distributions: A Puget Sound Example.* The Navy was unable to locate any investigations into inundated paleo-landforms likely to contain pre-Contact sites in the inland waters of Washington State. However, studies have been conducted to the north in British Columbia. This study focused on the inland waters but considered archaeological site distributions using publically available data and categorized the entire Washington coastline into three geomorphic types: depositional, erosional, and stable. This analysis revealed that the distribution of nearshore pre-Contact archaeological sites is disproportionately distributed along depositional and stable landforms. (Elder et al., 2019, *Journal of Northwest Anthropology*, Vol. 53, No. 2). The Elder et al. study denotes the rarity of these types of environments for the entire Washington coastline, particularly along the Pacific Coast.

The BOEM predictive modeling study and the Elder et al. research indicate that pre-Contact submerged sites are unlikely to exist within the APE. Additionally, review of existing databases demonstrates that permanently submerged pre-Contact sites are not well represented in the Washington State archaeological record and those that are, such as reef net anchor concentrations, are located well north of the APE. As such, no pre-Contact sites were identified within the APE.

To identify historic sunken craft sites within the APE, the Navy reviewed available wreck and obstruction databases, including the NOAA Automated Wreck and Obstruction Information System, the BOEM online index of shipwrecks by state, and Navy shipwreck and submerged aircraft documentation. This research identified 370 possible historic sunken craft sites within the APE.

To identify historic properties to which they ascribe traditional religious and cultural significance, and consistent with 36 C.F.R. § 800.4(a)(4), the Navy requested input from 26 federally recognized Tribes with cultural ties to the APE. The Navy recognizes that Tribes possess special expertise in identifying and assessing the eligibility of properties of traditional religious and cultural significance to their communities and acknowledges the potential sensitivity of specific information regarding the location, nature, and activities associated with such sites. Information received from several Tribes identified broad views about traditional activities associated with the Pacific Coast region, and the Salish Sea (including Hood Canal), including their cultural affinity with marine life and associated habitats, the interrelationship of natural and cultural resources, protected treaty rights, and broad environmental considerations. The Navy respects the views of all the Tribes and understands that resources such as clean air and water, plants and animals, and intangible cultural values, relationships, and lifeways can be closely related to historic properties.

In continuing consultation, the Navy requested additional information to assess the potential presence of historic properties within the APE. To date, the Navy has received insufficient information to identify traditional cultural properties (TCPs) in the APE.

Additionally, certain resources identified as potential historic properties are incompatible with the National Register criteria. For example, the Navy is unable to treat *Sk'aliCh'elh* (Southern Resident Killer Whale) as a historic property, as living animals are not a potential property type. However, the Navy is responsive to the Tribes' concerns regarding the Southern Resident Killer Whale through compliance with other environmental laws that require the Navy to carefully address potential impacts to marine mammals and other species and their habitats, including the Endangered Species Act and Marine Mammal Protection Act. A detailed explanation of how the Navy addressed their concerns is included in Enclosure 1, Tab G, Finding of Effects Letter.

While the Navy recognizes and respects the Tribes' views, we find that an adequate assessment of National Register eligibility of the Salish Sea, the northern Hood Canal, and the Pacific Coast region would require study and consultation that significantly exceeds the reasonable and good faith identification efforts commensurate with the magnitude and nature of the proposed undertaking. Furthermore, we believe questions related to the traditional religious or cultural significance of these resources must be addressed in partnership with affiliated Tribes, accountable Federal and State agencies, and other interested parties, as appropriate, and we look forward to working together on them.

Lastly, to assess the potential that TCPs important to non-tribal communities are present in the APE, the Navy sought information through public outreach within the NEPA and NHPA processes. Public meetings in an open house format were held in Everett, Silverdale, and Port Angeles, WA, and a poster/information station dedicated to the Section 106 consultation was included. No non-tribal TCPs were identified.

**10. Describe the historic property (or properties) and any National Historic Landmarks within the APE (or attach documentation or provide specific link to this information):**

- No pre-Contact archaeological sites were identified in the APE.
- 370 possible historic sunken craft sites were identified in the APE (see Enclosure 4). The Navy assumes all wrecks and obstructions located within the APE are historic properties.
- No TCPs were identified for this consultation.

\*See Enclosure 4 for tables of possible historic sunken craft sites and resources identified by Tribes in the APE.

**11. Describe the undertaking's effects on historic properties:**

In analyzing potential effects, the Navy assessed four types of activities included in the proposed undertaking.

Explosives: Shockwaves (pressure) and oscillating bubble pulses resulting from underwater explosions may create structural instability and possible collapse of architectural elements of historic craft. The amount of damage would depend on factors such as the size of the charge, the distance from the submerged resource, the water depth, and the topography of the ocean floor. The proposed undertaking includes the use of charges that are approx. 60 pounds or less as well as small charges of 2.5 pounds or less. Explosive detonations of 60 pounds or less are restricted to the QRS. There are no recorded sunken craft in the QRS, and the detonations occur in the water column and will not disturb any historic properties resting on the seafloor or buried below the seafloor. Additionally, the Navy's standard procedures prohibit the use of explosives within 350 yards of any shipwrecks and aircraft wrecks. The use of small explosive charges (2.5 pounds or less) occurs within two inland water ranges, the Crescent Harbor and Hood Canal EOD Ranges, where small explosive ordnance are placed on the seafloor for mine countermeasure and neutralization. These two inland water ranges are long-used locations subject to repeated inspections associated with rigorous environmental monitoring. There are no known shipwrecks or submerged aircraft wrecks at these locations. Furthermore, Navy standard procedures and safety requirements, including visual site survey and hand placement of charges by Navy divers, stipulate that obstructions, including submerged historic craft, are to be avoided. Based on this analysis, the Navy finds that use of explosives would not affect historic properties within the APE.

Anchoring: Deployment of heavy anchors (up to 9,000 pounds) is limited to four established precision anchoring locations. Due to prior seafloor disturbance from historic use as Navy and

commercial anchorages, there is no potential to affect submerged historic properties. Regarding deployment of anchors for temporary barge mooring in Carr Inlet, standard procedures and safety protocols require avoidance of all obstructions, including potential historic properties. As such, precision anchoring and barge mooring will affect no historic properties in the APE.

*Seafloor Devices:* The Navy places targets, mines, and similar devices on the seafloor and operates unmanned underwater vehicles within the Offshore Area, Dabob Bay Range Complex, Keyport Range Site, Carr Inlet, Crescent Harbor EOD Range, Navy 3 and 7 OPAREAs, and pierside at Navy installations. Because this area is so large, and because the Navy avoids known obstructions when using such devices, it is unlikely these materials would come into contact with a submerged historic property. Furthermore, these underwater vehicles and mine shapes are of insufficient weight and design function to penetrate the seafloor. If they should settle on or in the vicinity of an historic property, the seafloor devices would not alter the characteristics or integrity of the submerged resource. Thus, the use of seafloor devices will not affect historic properties resting on or below the seafloor within the APE.

*MEM:* Military expended materials result from training and testing activities within the majority of the Offshore APE and Inland waters APE as shown in Enclosure 3. Expended materials such as chaff, flares, casings, non-explosive practice munitions, ballast weights, sonobuoys, parachutes, and guidance wire could settle on the ocean floor on or near submerged prehistoric sites or sunken historic resources. The settling of MEM does not have the potential to affect historic properties, as even the heaviest MEM, such as a sonobuoy housing, would be too light to cause physical damage. Most of the anticipated expended material would be small objects and fragments that would slowly drift to the seafloor after striking the ocean surface. Furthermore, the settling of MEM on the seafloor would be diffuse and transitory, as MEM is likely to be transported by currents and other turbulence. Therefore, the settling of MEM would not alter the characteristics or integrity of submerged resources and will not affect historic properties within the APE.

\* See Enclosure 2 for a table describing the full scope of activities that occur within Washington State waters or between State waters and territorial waters 12 nautical miles from its shore.

- 12. Explain how this undertaking would adversely affect historic properties** (include information on any conditions or future actions known to date to avoid, minimize, or mitigate adverse effects): No historic properties are affected. Pursuant to 36 C.F.R. § 800.4(b)(1), the Navy took into account past planning, research, and studies, the magnitude and nature of the undertaking and the degree of Federal involvement, the nature and extent of potential effects on historic properties, and the likely nature and location of historic properties within the APE. As a result of our research and analysis, and in consideration of information received during consultation, the Navy finds the proposed NWTT undertaking will affect no historic properties, consistent with 36 C.F.R. § 800.4(d)(1).

**13. Provide copies or summaries of the views provided to date by any consulting parties, Indian tribes or Native Hawai'ian organizations, or the public, including any correspondence from the SHPO and/or THPO.**

<b>Consulting Party</b>	<b>Notes</b>
Cowlitz Indian Tribe	The Tribe received all key Section 106 correspondence. Requested clarifying information about undertaking on 17 July 2018. No specific comments or concerns conveyed but requested continued receipt of key Section 106 correspondence.
Hoh Indian Tribe	The Tribe received all key Section 106 correspondence. Requested the Navy consider the Tribe's worldview, values, and belief system particularly as they apply to the lands, waters, and resources of their traditional area. (See discussion below.)
Jamestown S'Klallam Tribe	The Tribe received all key Section 106 correspondence, including solicitation of knowledge and concerns regarding properties of traditional religious and cultural importance. The Tribe requested to be a consulting party on 26 Feb 2018. No specific comments or concerns conveyed.
Lower Elwha Klallam Tribe	The Tribe received all key Section 106 correspondence, including solicitation of knowledge and concerns regarding properties of traditional religious and cultural importance. The Tribe requested to be a consulting party on 7 July 2018. No specific comments or concerns conveyed.
Lummi Tribe of the Lummi Reservation	The Tribe received all key Section 106 correspondence. The Tribe made seven requests, including that Navy treat Southern Resident Killer Whales and the Salish Sea as traditional historic landmarks or districts and that Navy conduct a thorough Section 106 process. (See discussion below.)
Makah Indian Tribe of the Makah Reservation	The Tribe received all key Section 106 correspondence. The Tribe requested to be a consulting party on 25 June 2018. The Tribe expressed concerns about impacts to trust resources, vessel traffic, sonar, and explosives (particularly due to potential impacts on marine mammals including Southern Resident Killer Whales), climate change, spill response, and incorporating Traditional Tribal Knowledge in this and future Navy planning processes. (See discussion below.)
Muckleshoot Indian Tribe of the Muckleshoot Reservation	The Tribe received all key Section 106 correspondence. The Tribe requested clarifying information about the undertaking on 25 July 2018. No specific comments or concerns conveyed.
Nisqually Indian Tribe of the Nisqually Reservation	The Tribe received all key Section 106 correspondence. On 24 August 2018 the Tribe notified Navy staff would defer on proposed APE determination, requested continued receipt of key Section 106 correspondence. No specific comments or concerns conveyed.
Nooksack Indian Tribe of Washington	The Tribe received all key Section 106 correspondence. The Tribe expressed concerns about low-level military aircraft. The Tribe received an open invitation from NASWI Commanding Officer to consult on other aircraft issues [not associated with this undertaking].
Port Gamble S'Klallam Tribe	The Tribe received all key Section 106 correspondence. The Tribe expressed concerns about direct, indirect, and cumulative effects on tribal natural/cultural resources, and access to fisheries, treaty rights, and fiduciary responsibilities. (See discussion below.)

Puyallup Tribe of the Puyallup Reservation	The Tribe received all key Section 106 correspondence. The Tribe requested clarifying information about undertaking on 17 July 2018. No specific comments or concerns conveyed.
Quileute Tribe of the Quileute Reservation	The Tribe received all key Section 106 correspondence. The Tribe requested clarifying information about undertaking on 17 August 2018. No specific cultural resources concerns, but conveyed primary concerns with respect to natural resources.
Quinalt Indian Nation	The Tribe received all key Section 106 correspondence. The Tribe expressed concerns about use explosives in anti-mine warfare training in Quinalt Range Site and effects on tribal resources and fisheries. (See discussion below.)
Samish Indian Nation	The Tribe received all key Section 106 correspondence. The Tribe requested clarifying information about undertaking and on 25 July 2018 conveyed specific interest in activities around Oak Harbor and north.
Sauk-Suiattle Indian Tribe	The Tribe and Navy met on 15 May 2018 and discussed the Section 106 and NEPA processes and the proposed action/undertaking. The Tribe received all key Section 106 correspondence, including solicitation of knowledge and concerns regarding properties of traditional religious and cultural importance.
Shoalwater Bay Tribe of the Shoalwater Bay Reservation	The Tribe received all key Section 106 correspondence. No specific comments or concerns conveyed.
Skokomish Indian Tribe	The Tribe received all key Section 106 correspondence. The Tribe received Navy brief about undertaking in meeting on 5 March 2018. No specific comments or concerns conveyed.
Snoqualmie Indian Tribe	The Tribe received all key Section 106 correspondence. The Tribe requested to be a consulting party on 11 June 2018. No specific comments or concerns conveyed.
Squaxin Island Tribe of the Squaxin Island Reservation	The Tribe received all key Section 106 correspondence. The Tribe expressed concerns about sonar, population level effects beyond species level, adequate consideration of natural resources as cultural resources to tribe, de-conflicting activities from movement and migrations to minimize fish and wildlife impacts. The Tribe requested to the Navy consider an anchoring buffer zone around shipwrecks in Carr Inlet, last used in 2009. (See discussion below.)
Stillaguamish Tribe of Indians of Washington	The Tribe received all key Section 106 correspondence. The Tribe requested to be a consulting tribe on 19 June 2018. The Tribe subsequently requested clarifying information and continued receipt of key correspondence. No specific comments or concerns conveyed.
Suquamish Indian Tribe of the Port Madison Reservation	The Tribe received all key Section 106 correspondence. The Tribe requested Navy limit time period to better consider cumulative effects on the environment, concerns about unrecovered training and testing materials in the inland waters of the Salish Sea, concerns about Southern Resident Killer Whales, and to consider virtual training alternatives to real-world training. (See discussion below.)
Swinomish Indians of the Swinomish Reservation of Washington	The Tribe received all key Section 106 correspondence, including solicitation of knowledge and concerns regarding properties of traditional religious and cultural importance. No specific comments or concerns conveyed.



Tulalip Tribes of Washington	The Tribe received all key Section 106 correspondence, including solicitation of knowledge and concerns regarding properties of traditional religious and cultural importance. No specific comments or concerns conveyed.
Upper Skagit Indian Tribe	The Tribe received all key Section 106 correspondence, including solicitation of knowledge and concerns regarding properties of traditional religious and cultural importance. No specific comments or concerns conveyed.
Yakama Nation; Confederated Tribes and Bands of the	The Tribe received all key Section 106 correspondence, including solicitation of knowledge and concerns regarding properties of traditional religious and cultural importance. No specific comments or concerns conveyed.
Ebey's Landing National Historic Reserve	The organization received all key Section 106 correspondence.
National Park Service	Agency received all key Section 106 correspondence.
National Parks Conservation Association	NPCA requested to be an interested party on 28 Feb 2018. Generally opposed to aircraft overflights over the Olympic Peninsula. Received all key Section 106 correspondence.
Olympic Forest Coalition	OFC requested to be an interested party on 27 Feb 2018. Generally opposed to aircraft overflights over the Olympic Peninsula. Received all key Section 106 correspondence.
West Coast Action Alliance	WCAA requested to be an interested party on 5 Mar 2018. Generally opposed to the undertaking, with an emphasis on aircraft noise. Received all key Section 106 correspondence.
Skagit Audubon Society	SAC requested to be an interested party on 6 Mar 2018. Generally concerned with aircraft noise and opposed to aircraft overflights over the Olympic Peninsula. Received all key Section 106 correspondence.
Individual – Dr. Beverly Goldie	Requested to be an interested party on 28 Feb 2018. Generally opposed to the undertaking. Received all key Section 106 correspondence.
Individual – Ms. Rhea Miller	Requested to be an interested party on 1 Mar 2018. Concerned with historic preservation. Received all key Section 106 correspondence.

Continued consultations with the following Tribes produced additional information and requests, as outlined below:

Hoh Tribe: In response to the published NEPA Notice of Intent, the Navy received a letter from the Hoh Tribe on September 20, 2017. The Hoh Tribe communicated to the Navy that the Tribe considers natural resources to be cultural resources. They requested that the Navy consider the Tribe's worldview, values, and belief system particularly as they apply to the lands, waters, and resources of their traditional area within the Pacific Coast region. The Tribe also requested that the Navy commission a traditional cultural landscape (TCL) study of this area to understand impacts to the Tribe, including environmental justice concerns. In accordance with 36 C.F.R. § 800.4(a)(4), the Navy requested information from the Tribe to assist in identifying a historic property, such as the proposed TCL, and offered to meet with the Hoh Tribe. To date, the Navy has not received additional comments or information regarding properties of traditional religious and cultural significance to the Hoh Tribe. Due to the current pandemic, the Navy offered an opportunity for phone meetings or exchange information over e-mail.

Lummi Nation: On October 29, 2019, during a government-to-government meeting, the Lummi Nation requested that the Navy take several actions relative to their concerns:

- (1) Treat *Sk'aliCh'elh* (Southern Resident Killer Whale) (*que'ihol'mechen* “our relatives under the water”) as a traditional cultural district eligible for the NRHP, noting that it is eligible for the Lummi Cultural Register;
- (2) Treat *Xw'ullemmy* (the Salish Sea) as a traditional cultural district eligible for the National Register, noting that it is eligible for the Lummi Cultural Register;
- (3) Conduct a rigorous and vigorous Section 106 process regarding *Sk'aliCh'elh* and *Xw'ullemmy* based on the principle of meaningful consultation: full, prior and informed consent, consistent with the Associated Tribes of Northwest Indians Resolution on the Salish Sea
- (4) Fulfill the Navy's obligation as a Trustee to uphold Treaty Rights as the supreme law of the land.
- (5) Conduct an impact assessment on salmon, *qwe'lhol'mechen*, and Treaty rights based on Lummi values (see Netse Mot Proclamation).
- (6) Be part of a cumulative impact assessment (see Schelangen and the Salish Sea Campaign paper).
- (7) Arrange a meeting between Lummi and CINCPAC as part of a process that involves Lummi's full, prior and informed consent.

The Navy requested additional information and clarification from the Lummi Nation to assist in evaluating the proposed traditional cultural districts, but to date has not received additional comments or information. Due to the current pandemic, the Navy offered an opportunity for phone meetings or exchange information over e-mail.

The Makah Indian Tribe of the Makah Reservation: During the NEPA public comment period, the Navy received dated June 12, 2019, the Tribe requested that the Navy:

- (1) Meet with the Tribe in government-to-government consultation and conduct more meaningful consultation with the Makah Tribe prior to finalizing the Supplemental EIS/Overseas EIS.
- (2) Further review the impacts of Navy activities on the Makah Tribe's trust resources and the environments on which they depend and clarify the times of year in which the proposed activities will occur.
- (3) Remove sonar and explosive testing in the spring in the Cape Flattery Offshore area to protect Southern Resident killer whales.
- (4) Include sonar as a prohibited activity within the 50-nautical mile mitigation area as sonar negatively impacts marine mammals, a trust resource of the Makah Tribe.
- (5) Improve oil spill response and other potential hazardous materials commensurate to the increase in testing or movement of naval vessels.
- (6) Conduct rigorous testing and monitoring of new technologies to avoid impacts to fish, marine mammals, wildlife, and Makah's treaty protected trust resource; keep the Tribe updated on the results of the monitoring efforts to ensure the protection of their trust resources.
- (7) Expand the use of data and information to include tribal and traditional knowledge.
- (8) Incorporate changing ocean conditions, treaty-reserved rights, coastal communities, and existing industries (i.e., commercial, subsistence, and recreational fishing as well as tourism) as well as thorough consideration of alternatives in the Cumulative Impacts section of the Supplemental EIS/Overseas EIS.
- (9) Conduct water quality testing to determine the impact of the activities, especially explosives and explosives byproducts, in the face of changing ocean conditions.

Due to the current pandemic, the Navy offered an opportunity for phone meetings or exchange information over e-mail.

The Port Gamble S'Klallam Tribe: In reviewing past planning documents, the Navy noted that during the 2014 NWTT consultation, the Port Gamble S'Klallam Tribe had notified the Navy of their view that the northern Hood Canal represents a network of marine resource locations and other sites that comprise a traditional cultural landscape (TCL). For the current undertaking, consistent with 36 C.F.R. § 800.4(a)(4),

the Navy requested information regarding the Tribe's knowledge to assist with the identification of properties of traditional religious and cultural significance within the APE. To date, the Navy has not received additional comments or information regarding properties of traditional religious and cultural significance to the Port Gamble S'Klallam.

During the NEPA public comment period, the Navy received a letter dated June 14, 2019 from the Port Gamble S'Klallam Tribe requesting that the Navy consider the cumulative impacts of vessel traffic, waves, wakes, the cumulative destruction of habitat, stresses on aquatic species, risk of spills and releases, and other impacts from vessel activities on the Tribe's fisheries.

The Quinault Indian Nation: During the NEPA public comment period in a letter dated June 18, 2019, the Quinault Indian Nation requested that the Navy engage in meaningful and timely government-to-government consultation regarding the Supplemental EIS/Overseas EIS. The Navy met with the Quinault Indian Nation on November 20, 2019. No specific Section 106 comments or concerns conveyed.

Squaxin Island Tribe: The Tribe initially supported WA SHPO's disagreement with the APE as proposed. Later, the Tribe requested the Navy consider establishing buffer zones around shipwrecks in Carr Inlet to avoid damage from the anchoring of barges used for testing various platforms. During the NEPA public comment period, the Navy received a letter dated June 12, 2019. The Tribe requested that the Navy:

- (1) Expand the prohibited activities within the 50-nautical mile mitigation area to include use of sonar.
- (2) Expand the Navy's Monitoring Program to include the effects of training and testing beyond potential harm to species population levels because this standard does not fully incorporate the concept that impacts to Tribal cultural resources may not be manifested in physical impacts on marine species. In addition, impacts upon already depressed populations may not adequately address the concomitant impacts on Tribal rights and resources.
- (3) Clarify the times of year in which proposed activities will occur.

The Navy acknowledged the Tribe's support of the WA SHPO's position on the APE and confirmed that established anchoring standard operating procedures address the Tribe's concern about the avoidance of shipwrecks and obstructions. Furthermore, the Navy confirmed Carr Inlet had not been used for the type of testing requiring the anchoring of a testing barge since 2009. Navy responded to the Tribe's concerns regarding the marine species through compliance with other environmental laws that require the Navy to carefully address potential impacts to marine mammals and other species and their habitats, including the Endangered Species Act and Marine Mammal Protection Act.

The Suquamish Tribe: In a letter dated June 10, 2019, the Suquamish Tribe requested that the Navy:

- (1) Provide a specific defined time period to fully evaluate training-specific and cumulative impacts of the proposed activities.
- (2) Include detailed Standard Operating Procedures protocols to recover and account for all training and testing materials placed into the inland waters of the Salish Sea, including Dabob Bay.
- (3) That impacts of activities on Southern Resident killer whale are re-evaluated with a detailed analysis of training-specific and cumulative impacts to Southern Resident killer whales.
- (4) That the Supplemental Environmental Impact Statement (EIS)/Overseas EIS consider virtual training and testing activities within alternatives to avoid or minimize impacts to habitat, biota, and Treaty-reserved fishing activities affected from training activities.

WA SHPO: The WA SHPO expressed concerns with the effects of noise levels and the frequency of elevated sound levels and requested that the APE include all historic districts and cultural landscapes in the Puget Sound Basin, Salish Sea, and Strait of Juan de Fuca that could be affected by jet and ocean training noise. With regard to the finding of effect, WA SHPO noted that there are no professionally

authored cultural resources reports, nor are there any completed site forms in their records database (i.e., WISAARD) for this undertaking. They expressed concern that fieldwork testing and analysis of assumptions had not been completed. Lastly, they expressed that, given the scale of the undertaking and the Navy's acknowledgment of the traditional cultural values associated with the Salish Sea, a more robust effort to carry out the requested traditional cultural place studies and landscape-scale analysis is warranted in order to arrive at a correct determination of effect. WA SHPO does not agree with Navy's finding of effect.

\* See Enclosure 1 for copies of correspondence with the Alaska and Washington SHPOs, Tribes, and interested parties.

### III. Additional Information

**14. Please indicate the status of any consultation that has occurred to date, including whether there are any unresolved concerns or issues the ACHP should know about in deciding whether to participate in consultation.** Providing a list of consulting parties, including email addresses and phone numbers if known, can facilitate the ACHP's review response.

The Navy invited WA SHPO, 26 federally recognized Tribes, and five interested parties to consult on the proposed undertaking (for a complete list of Tribes and consulting parties, please see Enclosure 1). The Navy provided all consulting parties with documentation of the APE and requested information to assist with the identification of historic properties within the APE. After carefully reviewing all available information and the magnitude and nature of the proposed undertaking, the Navy concluded that the undertaking will have no effect upon historic properties, consistent with 36 CFR § 800.4(d)(1). Consulting parties were provided documentation of this finding on July 14, 2020. WA SHPO disagrees with Navy's finding of effect.

As noted above, multiple Tribes expressed views related to the cultural significance of marine resources. The Hoh Tribe, Lummi Nation, and Port Gamble S' Klallam Tribe provided preliminary views regarding resources of traditional religious and cultural significance within the APE, including *Sk'aliCh'elh* (Southern Resident Killer Whale), *Xw'ullemy* (Salish Sea), the northern portion of the Hood Canal, and the Pacific Coast region. The Navy is unable to directly address *Sk'aliCh'elh* (Southern Resident Killer Whale) as an historic property, because living animals are not a property type eligible for the National Register. With regard to the potential eligibility of the Salish Sea, the northern Hood Canal, and the Pacific Coast region, the Navy requested additional information to assist in the identification of these properties, acknowledging the sensitivity of specific information regarding the location, nature, and activities associated with such sites. The Navy has been unable to obtain the information needed to identify one or more TCPs of traditional religious and cultural significance within the APE.

The Navy also considered the nature and extent of the potential effects of the undertaking and the likely nature and location of historic properties within the APE, including potential TCPs, as well as the types of activities proposed and the measures and standard operating procedures developed to minimize impacts from the proposed action to marine resources. These include measures to: (1) avoid or reduce potential effects on biological resources located on the seafloor; (2) minimize adverse effects on marine mammal species or stocks and their habitat to the greatest extent practicable; and (3) ensure that the proposed action does not jeopardize the continued existence of endangered or threatened species, or result in destruction or damage to critical habitat (see Chapter 5 and Appendix K of the Supplemental EIS/OEIS for further detail). Following this analysis, the Navy determined that evaluation of the proposed properties would require study and consultation that significantly exceeds the reasonable and good faith identification efforts commensurate with the magnitude and nature of

the proposed undertaking. With respect for the Tribes' views, the Navy recognizes that Federal statutory and regulatory processes may not respond fully to Tribal concerns. We acknowledge that these laws, including NHPA, may constrain the consideration of the complex, interconnected relationships of traditional resources and represent a continuing challenge to agencies and Tribes. However, the Navy remains committed to good faith consultation, and we strive to balance mission requirements with environmental stewardship responsibilities for both natural and cultural resources.

The WA SHPO notified the Navy that they disagreed with the Navy's determination of No Historic Properties Affected. WA SHPO noted that no professionally authored cultural resources reports or WISAARD site forms were prepared for this undertaking, no field work was completed to test and analyze assumptions built into the Navy's analysis, and no traditional cultural place studies and landscape scale analysis requested by the Tribes were completed. WA SHPO recommended that, given the scale of the undertaking and the acknowledgment of the traditional cultural values associated with the Salish Sea, a more robust effort to carry out the requested professional studies is necessary and that additional professional work is needed to arrive at a correct determination of effect. Additionally, they advised that continued consultations are necessary both to resolve the information needs and also to create and implement a collaborative monitoring program to assure effects are carefully monitored and mitigation efforts can be successfully implemented.

The Navy's efforts to identify historic properties within the APE have been commensurate with the magnitude and nature of the proposed undertaking, the nature and extent of the potential effects, and the likely nature and location of historic properties within the APE. The Navy recognizes that large scale, potential historic properties of significance to Tribes such as *Xw'ullem* (the Salish Sea) must be addressed in partnership with the affiliated Tribes, accountable Federal and State agencies, and other interested parties, as appropriate, and would require study and consultation that significantly exceeds the reasonable and good faith identification efforts commensurate with the magnitude and nature of the proposed undertaking. As a result of our research and analysis, and in consideration of information received during consultation, the Navy finds the proposed NWTT undertaking will have no effect upon historic properties, consistent with 36 C.F.R. § 800.4(d)(1).

In accordance with the provisions of 36 CFR § 800.4(d)(ii) the Navy requests a review of its finding that the subject undertaking will result in No Historic Properties Affected.

\* See Enclosure 1 for copies of correspondence with the Alaska and Washington SHPOs, tribes, and interested parties and Enclosure 5 for the NWTT Section 106 mailing list and contact information

**15. Does your agency have a website or website link where the interested public can find out about this project and/or provide comments?** Please see <http://www.nwtteis.com>

**16. Is this undertaking considered a "major" or "covered" project listed on the Federal Infrastructure Projects Permitting Dashboard?** If so, please provide the link: No.

**The following are attached to this form** (check all that apply):

- ☒ Section 106 consultation correspondence
- ☒ Maps, photographs, drawings, and/or plans
- ☐ Additional historic property information
- ☒ Consulting party list with known contact information
- ☐ Other: Click here to enter text.

## Enclosure 1

Tab A. Alaska Correspondence

Tab B. Washington – Government-to-Government Invitation

Tab C. Washington – Initiation Letters and Responses

Tab D. Washington – 106 Outreach

Tab E. Washington – Area of Potential Effect Letter and Correspondence with WA SHPO

Tab F. Washington – Historic Properties Identification Letters and Responses

Tab G. Washington – Finding of Effect Letters and Responses

Tab H. Washington – Table of Summarized Comments Received from Tribes and Interested Parties on the Draft Supplemental Environmental Impact Statement (EIS)/Overseas EIS

## Enclosure 1. Tab A.

### Alaska Correspondence

On March 9, 2018, the Navy notified the Alaska State Historic Preservation Officer and Alaska Tribes that the undertaking and Are of Potential Effect in Alaska had not changed since 2015. The Alaska SHPO agreed it did not require re-initiation of Section 106 consultation on February 26, 2019 (File No. 3130-1R / 2018-00375). Letters were sent to the following:

#### TRIBES

Ketchikan Indian Community  
Metlakatla Indian Community, Annette Island Reserve  
Organized Village of Saxman  
Central Council of the Tlingit and Haida Indian Tribes

The Ketchikan Indian Community requested a tour of the SEAFAC on March 7, 2018 and the Council was able to receive a tour of the facility on March 27, 2019. The Ketchikan Indian Community has not expressed any further interest in undertaking. No other responses were received or concerns raised from the Alaska Tribes.



DEPARTMENT OF THE NAVY  
NAVAL BASE KITSAP  
120 SOUTH DEWEY ST  
BREMERTON, WA 98314-5020

5090  
Ser PRB4/00487  
9 Mar 18

Ms. Judith E. Bittner  
Chief, Office of History and Archaeology, and State Historic  
Preservation Officer (SHPO)  
550 West 7th Ave., Suite 1310  
Anchorage, Alaska 99501-3565

SUBJECT: CONTINUATION OF NORTHWEST TRAINING AND TESTING (NWTT)  
NATIONAL HISTORIC PRESERVATION ACT SECTION 106  
CONSULTATION

Dear Ms. Bittner:

The purpose of this letter is to provide you with information concerning the status of the Navy's continuation of military training and testing activities that were previously the subject of consultation with your office (File number 3130-IR Navy). Although some levels of activities have increased or decreased, the types of activities have not changed. Therefore, the potential for the activities to affect historic properties has not changed nor has the area of potential effect (APE). The Navy is continuing public outreach with local communities and government-to-government consultation with five affected tribes. The Navy will take into consideration new information about historic properties if received, however, at this time none of the criteria for re-initiation of consultation as set forth in 36 Code of Federal Regulations (C.F.R.) §800 are triggered.

The undertaking will continue to occur in established maritime operating areas and warning areas in the eastern North Pacific Ocean, including the Southeast Alaska Acoustic Measurement Facility in Western Behm Canal (Enclosure 1). The Navy determined the nature of the testing activities had low potential to affect any unidentified properties, let alone affect character defining features that would qualify submerged structures or objects for listing in the National Register of Historic Places or result in potential loss of information from inundated archaeological deposits. Accordingly, the Navy determined the proposed undertaking would result in No Adverse Effect on Historic Properties in a letter dated June 23, 2015



SUBJECT: CONTINUATION OF NORTHWEST TRAINING AND TESTING (NWT) (NWTT)  
NATIONAL HISTORIC PRESERVATION ACT SECTION 106  
CONSULTATION

(received by your office on June 30, 2015). Your office concurred with this determination on July 20, 2015.

Because the Navy's training and testing activities and the APE remain the same, the Navy's previous determination of No Adverse Effect on Historic Properties remains unchanged. None of the circumstances articulated at 36 C.F.R. § 800.8(c)(5) are present. Therefore, the Navy is not requesting to reinitiate consultation at this time.

If you need additional information or have questions, please feel free to contact Mr. David Grant, who can be reached at (360) 396-0919 or via email at dave.m.grant@navy.mil.

Sincerely,



E. A. Schrader  
Captain, U.S. Navy  
Commanding Officer

**From:** [Grant, Dave M CIV NAVFAC NW, EV9](#)  
**To:** [Queen, Jacqueline M CIV NAVFAC NW, PRW4](#); [Mosher, John G CIV COMPACFLT, N465JM](#); [Thedwall, Craig S CDR NLSC, RLSC NW, SJA](#); [Thompson, Sean M. CDR COMPACFLT N465](#); [Kler, Kimberly H CIV NAVFAC NW, EV21](#); [Abramson, Kerry L CAPT COMPACFLT N46](#)  
**Subject:** FW: Northwest Training and Testing  
**Date:** Wednesday, February 27, 2019 8:28:30 AM

---

Per action item from T21 Feb NWT Tribal/Cultural Working Group meeting.

-----Original Message-----

From: Meitl, Sarah J (DNR) <sarah.meitl@alaska.gov>  
Sent: Tuesday, February 26, 2019 5:09 PM  
To: Grant, Dave M CIV NAVFAC NW, EV9 <dave.m.grant@navy.mil>  
Subject: [Non-DoD Source] Northwest Training and Testing

File No. 3130-1R / 2018-00375

Hi Dave,

Thank you for contacting our office. As we discussed over the phone, the Alaska State Historic Preservation Office received correspondence from the Navy concerning the continuation of Northwest Training and Testing in March of 2018. Our office reviewed the project and agreed that it did not require re-initiation of Section 106 consultation. We logged the project in our database and listed our action as "No Response Necessary" on April 26, 2018. Please contact me if you have any questions or if our office can be of further assistance.

Best,

Sarah Meitl

Review and Compliance Coordinator

Alaska State Historic Preservation Office / Office of History and Archaeology

550 West 7th Avenue, Suite 1310

Anchorage, AK 99501-3510

sarah.meitl@alaska.gov <<mailto:sarah.meitl@alaska.gov>>

907-269-8720



DEPARTMENT OF THE NAVY  
NAVAL BASE KITSAP  
120 SOUTH DEWEY ST  
BREMERTON, WA 98314-5020

5090  
Ser PRB4/00483  
9 Mar 18

The Honorable Gianna Willard-Flannery, President  
Ketchikan Indian Community  
2960 Tongass Highway  
Ketchikan, AK 99901

SUBJECT: CONTINUATION OF NORTHWEST TRAINING AND TESTING (NWT)  
NATIONAL HISTORIC PRESERVATION ACT SECTION 106  
CONSULTATION

Dear President Willard-Flannery:

The purpose of this letter is to provide you with information concerning the status of the Navy's continuation of military training and testing as it relates to Section 106 of the National Historic Preservation Act (NHPA). The continuing activities that make up the Section 106 undertaking were the subject of consultation with your tribe in 2014 and 2015.

The undertaking will include training and testing activities that continue to occur in established maritime operating areas and warning areas in the eastern North Pacific Ocean, including the Southeast Alaska Acoustic Measurement Facility in Western Behm Canal (Enclosure 1). Training activities may include operating vehicles, aircraft, submarines, and ships; conducting weapons training; detecting and locating submarines; finding and removing in-water practice mines and other explosive ordnance disposal. Testing activities may include basic and applied scientific research and technology development, as well as testing, evaluation, and maintenance of missiles, torpedoes, radar, active and passive sonar systems, vessels, submarines, and aircraft.

The Navy determined the nature of the training and testing activities had low potential to affect any unidentified historic properties, or affect character defining features that would qualify submerged structures or objects for listing in the National Register of Historic Places, or result in potential loss of information from inundated archaeological deposits.

Accordingly, the Navy determined the proposed undertaking would result in No Adverse Effect on Historic Properties in a

SUBJECT: CONTINUATION OF NORTHWEST TRAINING AND TESTING (NWTT)  
NATIONAL HISTORIC PRESERVATION ACT SECTION 106  
CONSULTATION

letter dated June 23, 2015. The Alaska State Historic Preservation Officer concurred with this determination on July 20, 2015.

Your leadership was notified of the Navy's intent to prepare a supplemental environmental assessment via a letter in August 2017. Although some levels of activities have increased or decreased, the types of activities have not changed. Therefore, the potential for the activities to affect historic properties has not changed nor has the area of potential effect (APE).

The Navy invited you to initiate government-to-government consultation for NWTT. The Navy will take into consideration new information about historic properties of cultural or religious importance to your tribe if received from you.

If you need additional information or have questions, please feel free to contact Mr. David Grant, who can be reached at (360) 396-0919 or via email at dave.m.grant@navy.mil.

Sincerely,



E. A. Schrader  
Captain, U.S. Navy  
Commanding Officer





DEPARTMENT OF THE NAVY  
NAVAL BASE KITSAP  
120 SOUTH DEWEY ST  
BREMERTON, WA 98314-5020

5090  
Ser PRB4/00484  
9 Mar 18

The Honorable Karl S. Cook, Mayor/Tribal Chairman  
Metlakatla Indian Community, Annette Island Reserve  
PO Box 8  
Metlakatla, AK 99926-0008

SUBJECT: CONTINUATION OF NORTHWEST TRAINING AND TESTING (NWTT)  
NATIONAL HISTORIC PRESERVATION ACT SECTION 106  
CONSULTATION

Dear Chairman Cook:

The purpose of this letter is to provide you with information concerning the status of the Navy's continuation of military training and testing as it relates to Section 106 of the National Historic Preservation Act (NHPA). The continuing activities that make up the Section 106 undertaking were the subject of consultation with your tribe in 2014 and 2015.

The undertaking will include training and testing activities that continue to occur in established maritime operating areas and warning areas in the eastern North Pacific Ocean, including the Southeast Alaska Acoustic Measurement Facility in Western Behm Canal (Enclosure 1). Training activities may include operating vehicles, aircraft, submarines, and ships; conducting weapons training; detecting and locating submarines; finding and removing in-water practice mines and other explosive ordnance disposal. Testing activities may include basic and applied scientific research and technology development, as well as testing, evaluation, and maintenance of missiles, torpedoes, radar, active and passive sonar systems, vessels, submarines, and aircraft.

The Navy determined the nature of the training and testing activities had low potential to affect any unidentified historic properties, or affect character defining features that would qualify submerged structures or objects for listing in the National Register of Historic Places, or result in potential loss of information from inundated archaeological deposits.

Accordingly, the Navy determined the proposed undertaking would result in No Adverse Effect on Historic Properties in a

SUBJECT: CONTINUATION OF NORTHWEST TRAINING AND TESTING (NWTT)  
NATIONAL HISTORIC PRESERVATION ACT SECTION 106  
CONSULTATION

letter dated June 23, 2015. The Alaska State Historic Preservation Officer concurred with this determination on July 20, 2015.

Your leadership was notified of the Navy's intent to prepare a supplemental environmental assessment via a letter in August 2017. Although some levels of activities have increased or decreased, the types of activities have not changed. Therefore, the potential for the activities to affect historic properties has not changed nor has the area of potential effect (APE).

The Navy invited you to initiate government-to-government consultation for NWTT. The Navy will take into consideration new information about historic properties of cultural or religious importance to your tribe if received from you.

If you need additional information or have questions, please feel free to contact Mr. David Grant, who can be reached at (360) 396-0919 or via email at dave.m.grant@navy.mil.

Sincerely,



E. A. Schrader  
Captain, U.S. Navy  
Commanding Officer



DEPARTMENT OF THE NAVY  
NAVAL BASE KITSAP  
120 SOUTH DEWEY ST  
BREMERTON, WA 98314-5020

5090  
Ser PRB4/ 00485  
9 Mar 18

The Honorable Lee Wallace, President  
Organized Village of Saxman  
RR 2, Box 2-Saxman  
Ketchikan, AK 99901-9802

SUBJECT: CONTINUATION OF NORTHWEST TRAINING AND TESTING (NWT)  
NATIONAL HISTORIC PRESERVATION ACT SECTION 106  
CONSULTATION

Dear President Wallace:

The purpose of this letter is to provide you with information concerning the status of the Navy's continuation of military training and testing as it relates to Section 106 of the National Historic Preservation Act (NHPA). The continuing activities that make up the Section 106 undertaking were the subject of consultation with your tribe in 2014 and 2015.

The undertaking will include training and testing activities that continue to occur in established maritime operating areas and warning areas in the eastern North Pacific Ocean, including the Southeast Alaska Acoustic Measurement Facility in Western Behm Canal (Enclosure 1). Training activities may include operating vehicles, aircraft, submarines, and ships; conducting weapons training; detecting and locating submarines; finding and removing in-water practice mines and other explosive ordnance disposal. Testing activities may include basic and applied scientific research and technology development, as well as testing, evaluation, and maintenance of missiles, torpedoes, radar, active and passive sonar systems, vessels, submarines, and aircraft.

The Navy determined the nature of the training and testing activities had low potential to affect any unidentified historic properties, or affect character defining features that would qualify submerged structures or objects for listing in the National Register of Historic Places, or result in potential loss of information from inundated archaeological deposits.

Accordingly, the Navy determined the proposed undertaking would result in No Adverse Effect on Historic Properties in a



SUBJECT: CONTINUATION OF NORTHWEST TRAINING AND TESTING (NWTT)  
NATIONAL HISTORIC PRESERVATION ACT SECTION 106  
CONSULTATION

letter dated June 23, 2015. The Alaska State Historic Preservation Officer concurred with this determination on July 20, 2015.

Your leadership was notified of the Navy's intent to prepare a supplemental environmental assessment via a letter in August 2017. Although some levels of activities have increased or decreased, the types of activities have not changed. Therefore, the potential for the activities to affect historic properties has not changed nor has the area of potential effect (APE).

The Navy invited you to initiate government-to-government consultation for NWTT. The Navy will take into consideration new information about historic properties of cultural or religious importance to your tribe if received from you.

If you need additional information or have questions, please feel free to contact Mr. David Grant, who can be reached at (360) 396-0919 or via email at dave.m.grant@navy.mil.

Sincerely,



E. A. Schrader  
Captain, U.S. Navy  
Commanding Officer





DEPARTMENT OF THE NAVY  
NAVAL BASE KITSAP  
120 SOUTH DEWEY ST  
BREMERTON, WA 98314-5020

5090  
Ser PRB4/00486  
9 Mar 18

The Honorable Richard J Peterson, President  
Central Council of the Tlingit and Haida Indian Tribes  
320 W Willoughby Avenue  
Suite 300  
Juneau, AK 99801

SUBJECT: CONTINUATION OF NORTHWEST TRAINING AND TESTING (NWTT)  
NATIONAL HISTORIC PRESERVATION ACT SECTION 106  
CONSULTATION

Dear President Peterson:

The purpose of this letter is to provide you with information concerning the status of the Navy's continuation of military training and testing as it relates to Section 106 of the National Historic Preservation Act (NHPA). The continuing activities that make up the Section 106 undertaking were the subject of consultation with your tribe in 2014 and 2015.

The undertaking will include training and testing activities that continue to occur in established maritime operating areas and warning areas in the eastern North Pacific Ocean, including the Southeast Alaska Acoustic Measurement Facility in Western Behm Canal (Enclosure 1). Training activities may include operating vehicles, aircraft, submarines, and ships; conducting weapons training; detecting and locating submarines; finding and removing in-water practice mines and other explosive ordnance disposal. Testing activities may include basic and applied scientific research and technology development, as well as testing, evaluation, and maintenance of missiles, torpedoes, radar, active and passive sonar systems, vessels, submarines, and aircraft.

The Navy determined the nature of the training and testing activities had low potential to affect any unidentified historic properties, or affect character defining features that would qualify submerged structures or objects for listing in the National Register of Historic Places, or result in potential loss of information from inundated archaeological deposits.

SUBJECT: CONTINUATION OF NORTHWEST TRAINING AND TESTING (NWT)T)  
NATIONAL HISTORIC PRESERVATION ACT SECTION 106  
CONSULTATION

Accordingly, the Navy determined the proposed undertaking would result in No Adverse Effect on Historic Properties in a letter dated June 23, 2015. The Alaska State Historic Preservation Officer concurred with this determination on July 20, 2015.

Your leadership was notified of the Navy's intent to prepare a supplemental environmental assessment via a letter in August 2017. Although some levels of activities have increased or decreased, the types of activities have not changed. Therefore, the potential for the activities to affect historic properties has not changed nor has the area of potential effect (APE).

The Navy invited you to initiate government-to-government consultation for NWT)T. The Navy will take into consideration new information about historic properties of cultural or religious importance to your tribe if received from you.

If you need additional information or have questions, please feel free to contact Mr. David Grant, who can be reached at (360) 396-0919 or via email at dave.m.grant@navy.mil.

Sincerely,



E. A. Schrader  
Captain, U.S. Navy  
Commanding Officer

# Enclosure 1. Tab B.

## Washington – Government-to-Government Invitation

On February 6 and 7, 2018, pursuant to the Navy's policy for American Indian/Alaska Native tribal Government-to-Government consultation, the Navy offered to brief Tribal leadership or staff on the training and testing activities and invited Government-to-Government consultation. Some Tribes were continuing discussions since the previous training and testing consultation effort, and received letters requesting continued consultation (i.e., the Hoh Tribe, Jamestown S'Klallam Tribe, Lower Elwha Klallam Tribe, Port Gamble S'Klallam Tribe, Quinault Indian Nation, Suquamish Indian Tribe of the Port Madison Reservation, and Upper Skagit Indian Tribe). This enclosure provides one example letter sent to the Tribes for initial invitation and one for continuing consultation. Upon request, the Navy can provide copies of all letters.

In the following weeks, the Navy received confirmations of involvement via e-mail, during phone discussions and a letter. The letter is included here. Response dates and concerns are summarized within a table in the e106 form.

### TRIBES

Confederated Tribes and Bands of the Yakama Nation  
Confederated Tribes of the Chehalis Reservation  
Cowlitz Indian Tribe  
Hoh Indian Tribe  
Jamestown S'Klallam Tribe  
Lower Elwha Klallam Tribe  
Lummi Tribe of the Lummi Reservation  
Makah Indian Tribe of the Makah Reservation  
Muckleshoot Indian Tribe of the Muckleshoot Reservation  
Nisqually Indian Tribe of the Nisqually Reservation  
Nooksack Indian Tribe of Washington  
Port Gamble S'Klallam Tribe  
Puyallup Tribe of the Puyallup Reservation  
Quileute Tribe of the Quileute Reservation  
Quinault Indian Nation  
Samish Indian Nation  
Sauk-Suiattle Indian Tribe  
Shoalwater Bay Tribe of the Shoalwater Bay Reservation  
Skokomish Indian Tribe  
Snoqualmie Indian Tribe  
Squaxin Island Tribe of the Squaxin Island Reservation  
Stillaguamish Tribe of Indians of Washington  
Suquamish Indian Tribe of the Port Madison Reservation  
Swinomish Indians of the Swinomish Reservation of Washington  
Tulalip Tribes of Washington  
Upper Skagit Indian Tribe



DEPARTMENT OF THE NAVY  
NAVAL BASE KITSAP  
120 SOUTH DEWEY ST  
BREMERTON, WA 98314-5020

5090  
Ser PRB4/ 00288  
6 Feb 18

The Honorable Leonard Forsman, Chairman  
Suquamish Indian Tribe of the Port Madison Reservation  
PO Box 498  
Suquamish, WA 98392

Dear Chairman Forsman:

SUBJECT: INVITATION TO INITIATE GOVERNMENT-TO-GOVERNMENT  
CONSULTATION FOR U.S. NAVY NORTHWEST TRAINING AND TESTING  
ACTIVITIES

In continuation of the Department of the Navy's government-to-government tribal consultation responsibilities, I would like to inform you that the Navy is preparing a Supplement to the 2015 Environmental Impact Statement/Overseas Environmental Impact Statement (EIS/OEIS) that analyzed the Navy's training and testing activities in the Northwest. Please find attached the Notice of Intent to study the environmental effects of this proposed action, as published in the Federal Register on August 22, 2017 (Enclosure 1). Additional information is available on the project website at <http://nwtteis.com/>. Also attached, please find the letter I sent to you in August, discussing the Notice of Intent to develop the Supplemental EIS/OEIS in August 2017 (Enclosure 2).

Although the Supplement to the EIS/OEIS is in the preliminary stages of development, I would like to invite you to review the information provided below and on the project website and evaluate whether you believe there may be a potential for this action to significantly affect tribal treaty rights, resources, or lands. This invitation is made pursuant to Navy policies for government-to-government consultation with American Indian and Alaska Native Tribes.

The purpose of the proposed training activities is to ensure that the Navy accomplishes its mission to maintain, train, and equip combat-ready naval forces capable of winning wars, deterring aggression, and maintaining freedom of the seas. The Supplemental EIS/OEIS will assess the potential environmental effects associated with ongoing and future at-sea military readiness activities conducted within the Study Area beyond 2020. The Study Area remains unchanged since the 2015 Final EIS/OEIS. As part of this process, the Navy will seek the issuance of federal regulatory permits and authorizations under the Marine Mammal Protection Act and Endangered Species Act.

The Navy and the U.S. Coast Guard conduct military readiness training and testing activities in waters and associated airspace of

SUBJECT: INVITATION TO INITIATE GOVERNMENT-TO-GOVERNMENT  
CONSULTATION FOR U.S. NAVY NORTHWEST TRAINING AND TESTING  
ACTIVITIES

the Pacific Northwest. These designated areas include areas within the Strait of Juan de Fuca and Puget Sound and at Navy pierside locations (as contained within Enclosure 3). These areas have historically been used by the Navy for training and testing, with some activities dating back to 1914.

Training activities may include operating vehicles, aircraft, submarines, and ships; conducting weapons training; detecting and locating submarines and finding and removing in-water practice mines. Testing activities may include basic and applied scientific research and technology development, as well as testing, evaluation, and maintenance of missiles, torpedoes, radar, active and passive sonar systems, vessels, submarines, and aircraft.

Pursuant to Navy policies for American Indian/Alaska Native tribal government-to-government consultation, I would like to offer the opportunity to have the Navy brief you or your staff on the testing and training activities. If you believe there would be a potential to significantly affect tribal treaty rights or resources resulting from the implementation of the proposed action and would like to initiate Government-to-Government consultation, the Navy will continue consultation with you beyond the initial briefing.

If you have questions or concerns, or require further information please contact me directly at (360) 627-4000 or Edward.schrader@navy.mil, or contact my Tribal Liaison, Katherine Pollock by telephone at (360) 315-1162 or katherine.pollock@navy.mil.

Sincerely,



E. A. Schrader  
Captain, U.S. Navy  
Commanding Officer

Enclosures: 1. Notice of Intent  
2. Notice of Intent Letter  
3. Northwest Training and Testing Supplemental  
Environmental Impact Statement/Overseas Environmental  
Impact Statement Project Information Booklet

Any associated form(s) for this collection may be located within this same electronic docket and downloaded for review/testing. Follow the instructions at <http://www.regulations.gov> for submitting comments. Please submit comments on any given form identified by docket number, form number, and title.

**FOR FURTHER INFORMATION CONTACT:** To request more information on this proposed information collection or to obtain a copy of the proposal and associated collection instruments, please write to the DSS Office of Information Management, Russell Knox Building, 27130 Telegraph Rd., Quantico, VA 22134 or email [dss.niss@mail.mil](mailto:dss.niss@mail.mil).

**SUPPLEMENTARY INFORMATION:**

**Title:** Associated Form; and OMB Number: National Industrial Security System (NISS); OMB Control Number 0704-XXXX.

**Needs and Uses:** The information collection requirement is necessary for DSS to oversee the National Industrial Security Program (NISP) pursuant to Executive Order 12829. The National Industrial Security System (NISS) will become the repository of records related to the maintenance of information pertaining to contractor facility security clearances (FCL) and contractor capabilities to protect classified information in its possession.

**Affected Public:** Cleared contractor companies participating in the NISP.

**Annual Burden Hours:** 11,671.

**Number of Respondents:** 11,671.

**Responses per Respondent:** 1.

**Annual Responses:** 11,671.

**Average Burden per Response:** 60 minutes.

**Frequency:** On occasion.

Respondents are security professionals who provide information to DSS in order to process facility security clearances (FCL), report changes of the facility that may affect the FCL, and managing incident response. In addition to this standard processing, NISS will enable security staff to communicate with their DSS representative pursuant to requirement DoD 5220.22-M, National Industrial Security Program Operating Manual. The NISS will be an integrated automated solution that will facilitate efficient execution of the Agency's core mission. NISS will allow users to manage large amounts of information through increased automated workflows to ensure accuracy, create linkages in data, and close the gap of missing data elements.

Dated: August 16, 2017.

Aaron Siegel,  
Alternate OSD Federal Register Liaison  
Officer, Department of Defense.  
[FR Doc. 2017-17686 Filed 8-21-17; 8:45 am]  
BILLING CODE 5001-06-P

**DEPARTMENT OF DEFENSE**

**Department of the Navy**

**Notice of Intent To Prepare a Supplemental Environmental Impact Statement/Overseas Environmental Impact Statement for Northwest Training and Testing**

**AGENCY:** Department of the Navy, DoD.  
**ACTION:** Notice.

**SUMMARY:** Pursuant to the National Environmental Policy Act (NEPA) of 1969 and regulations implemented by the Council on Environmental Quality, the Department of the Navy (DoN) announces its intent to prepare a supplement to the 2015 Final Northwest Training and Testing (NWT) Environmental Impact Statement/Overseas Environmental Impact Statement (EIS/OEIS).

**DATES:** Public comments will be accepted during the 30-day scoping period from August 22, 2017 to September 21, 2017. Public scoping meetings will not be held. However, public meetings are planned to occur following the release of the Draft Supplemental EIS/OEIS in early 2019.

**ADDRESSES:** The DoN invites scoping comments on the NWT Supplemental EIS/OEIS from all interested parties. Substantive comments may be provided by mail to the address below and through the project Web site at <http://nwtleis.com/>. Comments must be postmarked or received online by September 21, 2017 for consideration during the development of the Draft Supplemental EIS/OEIS.

**FOR FURTHER INFORMATION CONTACT:** John Mosher, (360) 257-3234, [john.g.mosher@navy.mil](mailto:john.g.mosher@navy.mil). Naval Facilities Engineering Command Northwest, Attention: NWT Supplemental EIS/OEIS Project Manager, 3730 North Charles Porter Avenue, Building 385, Oak Harbor, Washington 98278-3500.

**SUPPLEMENTARY INFORMATION:** The DoN will assess the potential environmental effects associated with ongoing and future at-sea military readiness activities conducted within the NWT EIS/OEIS Study Area (hereafter known as the "Study Area") beyond 2020. Military readiness activities include training and research, development, testing, and

evaluation (hereafter known as "testing"). The Supplemental EIS/OEIS will include an analysis of training and testing activities using new information available after the release of the 2015 Final EIS/OEIS. New information includes an updated acoustic effects model, updated marine mammal density data, and evolving and emergent best available science. Proposed activities are generally consistent with those analyzed in the 2015 Final EIS/OEIS and are representative of training and testing activities the DoN has been conducting in the Study Area for decades.

The Study Area remains unchanged since the 2015 Final EIS/OEIS. The Study Area is comprised of established maritime operating areas and warning areas in the northeastern Pacific Ocean, including areas within the Strait of Juan de Fuca, Puget Sound, and the Western Behm Canal in southeastern Alaska. The Study Area includes air and water space within and outside Washington state waters, air and water space outside state waters of Oregon and Northern California, and DoN pierside locations where sound navigation and ranging (sonar) maintenance and testing occur. In the supplement to the 2015 Final EIS/OEIS, the DoN will only analyze those training and testing activities conducted at sea within the Study Area.

As part of this process, the DoN will seek the issuance of federal regulatory permits and authorizations under the Marine Mammal Protection Act and Endangered Species Act to support ongoing and future at-sea military readiness activities within the Study Area beyond 2020.

Pursuant to 40 CFR 1501.6, the DoN will invite the National Marine Fisheries Service and the U.S. Coast Guard to be cooperating agencies in preparation of the Supplemental EIS/OEIS.

The DoN's lead action proponent is Commander, U.S. Pacific Fleet. Additional action proponents include Naval Sea Systems Command and Naval Air Systems Command.

The DoN's Proposed Action is to conduct at-sea training and testing activities within the Study Area. Activities include the use of active sonar and explosives while employing marine species protective mitigation measures. The Proposed Action does not alter the DoN's original purpose and need as discussed in the 2015 Final EIS/OEIS.

The purpose of the Proposed Action is to maintain a ready force, which is needed to ensure the DoN can accomplish its mission to maintain, train, and equip combat-ready naval

forces capable of winning wars, deterring aggression, and maintaining freedom of the seas, consistent with Congressional direction in section 5062 of Title 10 of the U.S. Code. A Supplemental EIS/OEIS is considered the appropriate document, as there is recent scientific information including revised acoustic criteria to consider, in furtherance of NEPA, relevant to the environmental effects of the DoN's Proposed Action. The analysis will support Marine Mammal Protection Act authorization requests.

Proposed training and testing activities are generally consistent with those analyzed in the 2015 Final EIS/OEIS. In the Supplemental EIS/OEIS, the DoN will analyze the proposed changes to the tempo and types of training and testing activities, accounting for the introduction of new technologies, the evolving nature of international events, advances in warfighting doctrine and procedures, and changes in the organization of vessels, aircraft, weapons systems, and DoN personnel. In the NWTT Supplemental EIS/OEIS, the DoN will reflect the compilation of training and testing activities required to fulfill the DoN's military readiness requirements beyond 2020, and therefore includes the analysis of newly proposed activities and changes to previously analyzed activities.

In the Supplemental EIS/OEIS, the DoN will evaluate the potential environmental effects of a no action alternative and action alternatives. Resources to be evaluated include, but are not limited to, marine mammals, sea turtles, essential fish habitat, threatened and endangered species, and American Indian and Alaska Native Traditional Resources.

The scoping process is used to identify public concerns and local issues to be considered during the development of the Draft Supplemental EIS/OEIS. Federal agencies, state agencies, local agencies, the public, and interested persons are encouraged to provide substantive comments to the DoN on environmental resources and issue areas of concern the commenter believes the DoN should consider.

Comments must be postmarked or received online by September 21, 2017 for consideration during the development of the Draft Supplemental EIS/OEIS. Comments can be mailed to: Naval Facilities Engineering Command Northwest, Attention: NWTT Supplemental EIS/OEIS Project Manager, 3730 North Charles Porter Avenue, Building 385, Oak Harbor, Washington 98278-3500. Comments can be submitted online via the project Web

site at <http://www.nwtteis.com/>. Also at this Web site, those interested in receiving electronic project updates can subscribe to receive notifications via email for key milestones throughout the environmental planning process.

Dated: August 16, 2017.

A.M. Nichols,  
Lieutenant Commander, Judge Advocate  
General's Corps, U.S. Navy, Federal Register  
Liaison Officer.

[FR Doc. 2017-17618 Filed 8-21-17; 8:45 am]

BILLING CODE 3810-FF-P

## DEPARTMENT OF EDUCATION

### Free Application for Federal Student Aid (FAFSA®) Information To Be Verified for the 2018-2019 Award Year

#### Correction

In notice document 2017-09167, appearing on pages 21204 through 21208, in the issue of Friday, May 5, 2017, make the following corrections:

1. On page 21207, in the second column, on the second line, the entry that reads "I certify that I \_\_\_\_", should read:

"I certify that I \_\_\_\_ am".

2. On the same page, in the same column, on the nineteenth line, the entry that reads "I certify that I \_\_\_\_", should read:

"I certify that I \_\_\_\_ am".

[FR Doc. C1-2017-09167 Filed 8-21-17; 8:45 am]

BILLING CODE 1301-00-D

## DEPARTMENT OF ENERGY

### Office of Energy Efficiency and Renewable Energy

[EERE-2017-BT-CRT-0054]

#### Proposed Agency Information Collection Extension

**AGENCY:** Office of Energy Efficiency and Renewable Energy, U.S. Department of Energy.

**ACTION:** Information collection extension, with changes; notice and request for comment.

**SUMMARY:** The U.S. Department of Energy (DOE) intends to extend with changes for three years with the Office of Management and Budget (OMB), the Certification Reports, Compliance Statements, Application for a Test Procedure Waiver, and Recordkeeping for Consumer Products and Commercial/Industrial Equipment subject to Energy or Water Conservation Standards Package under OMB No.

1910-1400. Comments are invited on: (a) Whether the proposed collection of information is necessary for the proper performance of the functions of the agency; including whether the information shall have practical utility; (b) the accuracy of the agency's estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions used; (c) ways to enhance the quality, utility, and clarity of the information to be collected; and (d) ways to minimize the burden of the collection of information on respondents, including through the use of automated collection techniques or other forms of information technology.

**DATES:** Written comments and information are requested and will be accepted on or before October 23, 2017.

**ADDRESSES:** Interested persons are encouraged to submit comments using the Federal eRulemaking Portal at <http://www.regulations.gov>. Follow the instructions for submitting comments. Alternatively, interested persons may submit comments, identified by docket number EERE-2017-BT-CRT-0054, by any of the following methods:

1. **Federal eRulemaking Portal:** <http://www.regulations.gov>. Follow the instructions for submitting comments.

2. **Email:** to [InfoCollection2017CRT0054@ee.doe.gov](mailto:InfoCollection2017CRT0054@ee.doe.gov). Include docket number EERE-2017-BT-CRT-0054 in the subject line of the message.

3. **Postal Mail:** Appliance and Equipment Standards Program, U.S. Department of Energy, Building Technologies Office, Mailstop EE-5B, 1000 Independence Avenue SW., Washington, DC 20585-0121. Telephone: (202) 287-1445. If possible, please submit all items on a compact disc ("CD"), in which case it is not necessary to include printed copies.

4. **Hand Delivery/Courier:** Appliance and Equipment Standards Program, U.S. Department of Energy, Building Technologies Office, 950 L'Enfant Plaza SW., Suite 600, Washington, DC 20024. Telephone: (202) 287-1445. If possible, please submit all items on a CD, in which case it is not necessary to include printed copies.

No telefacsimilies (faxes) will be accepted.

**Docket:** The docket for this activity, which includes **Federal Register** notices, comments, and other supporting documents/materials, is available for review at <http://www.regulations.gov>. All documents in the docket are listed in the <http://www.regulations.gov> index. However, some documents listed in the index,





**DEPARTMENT OF THE NAVY**  
NAVAL BASE KITSAP  
120 SOUTH DEWEY STREET  
BREMERTON, WA 98314-5020

5090  
Ser PRB4/00967  
11 Aug 17

The Honorable Leonard Forsman, Chairman  
Suquamish Indian Tribe of the Port Madison Reservation  
PO Box 498  
Suquamish, WA 98392

Dear Chairman Forsman:

**SUBJECT: NOTICE OF INTENT TO PREPARE A SUPPLEMENTAL ENVIRONMENTAL  
IMPACT STATEMENT/OVERSEAS ENVIRONMENTAL IMPACT  
STATEMENT FOR NORTHWEST TRAINING AND TESTING**

In recognition of our government-to-government responsibilities, I am writing to inform you that the Department of the Navy (Navy) is preparing a supplement to the 2015 Northwest Training and Testing (NWTT) Final Environmental Impact Statement/Overseas Environmental Impact Statement (EIS/OEIS) to assess the potential environmental impacts associated with ongoing and future at-sea military readiness activities conducted within the NWTT EIS/OEIS Study Area (hereafter referred to as the "Study Area"). Military readiness activities include training and research, development, testing, and evaluation (referred to as "training and testing"). The Navy is requesting your comments on the scope of the analysis, including potential environmental issues, cultural resources, tribal treaty issues, and viable alternatives to be considered during the development of the Draft Supplemental EIS/OEIS.

The Navy previously completed an EIS/OEIS in 2015, for which a Record of Decision was signed in October 2016, for at-sea training and testing activities occurring within the Study Area. The supplement to the 2015 Final EIS/OEIS is being prepared to support ongoing and future activities conducted at sea within the Study Area beyond 2020. Proposed training and testing activities are generally consistent with those analyzed in the 2015 Final EIS/OEIS and are representative of activities the Navy has been conducting in the Study Area for decades.

The Supplemental EIS/OEIS will include an analysis of training and testing activities using new information available after the release of the 2015 Final EIS/OEIS. New information includes an updated acoustic effects model, updated marine mammal density data, and evolving and emergent best available science. As part of this process, the Navy will seek the issuance of federal regulatory permits and authorizations under the Marine Mammal Protection Act and the Endangered Species Act to support ongoing and future at-sea military readiness activities within the Study Area beyond 2020. The Navy will also complete Section 106 of the National Historic Preservation Act analysis and consultations with the Washington State Historic Preservation Officer and Tribal Historic Preservation Officers. Additionally, the Navy will invite tribes to continue government-to-government consultation regarding tribal treaty rights.

The Study Area remains unchanged since the 2015 Final EIS/OEIS (Enclosure 1). The Study Area is comprised of established maritime operating areas and warning areas in the



**SUBJECT: NOTICE OF INTENT TO PREPARE A SUPPLEMENTAL ENVIRONMENTAL  
IMPACT STATEMENT/OVERSEAS ENVIRONMENTAL IMPACT  
STATEMENT FOR NORTHWEST TRAINING AND TESTING**

northeastern Pacific Ocean, including areas within the Strait of Juan de Fuca, Puget Sound, and the Western Behm Canal in southeastern Alaska. The Study Area includes air and water space within and outside Washington state waters, air and water space outside state waters of Oregon and Northern California, and Navy pierside locations where sonar maintenance and testing occur. In the supplement to the 2015 Final EIS/OEIS, the Navy will only analyze those training and testing activities conducted at sea within the Study Area.

The Proposed Action is to conduct at-sea training and testing activities within the Study Area. Activities include the use of active sonar and explosives while employing marine species protective mitigation measures. The purpose of the Proposed Action is to maintain a ready force, which is needed to ensure the Navy can accomplish its mission to maintain, train, and equip combat-ready naval forces capable of winning wars, deterring aggression, and maintaining freedom of the seas, consistent with Congressional direction in section 5062 of Title 10 of the U.S. Code. To achieve and maintain military readiness, the Navy proposes to:

- Conduct at-sea training and testing activities at levels required to support military readiness requirements beyond 2020; and
- Accommodate evolving mission requirements, including those resulting from the development, testing, and introduction of new vessels, aircraft, and weapons systems into the fleet.

Public comments will be accepted during the 30-day scoping period beginning August 22, 2017 through September 21, 2017. Comments must be postmarked or received online by **September 21, 2017** for consideration in the development of the Draft Supplemental EIS/OEIS. Comments may be submitted online at [www.NWTTEIS.com](http://www.NWTTEIS.com), or by mail to:

Naval Facilities Engineering Command Northwest  
Attention: NWTT Supplemental EIS/OEIS Project Manager  
3730 North Charles Porter Ave., Building 385  
Oak Harbor, WA 98278-3500

If you would like additional information, or to receive a project briefing, please contact Mr. John Mosher at (360) 257-3234 or [john.g.mosher@navy.mil](mailto:john.g.mosher@navy.mil). Please help the Navy inform the community about the intent to prepare a Supplemental EIS/OEIS for at-sea training and testing in the Pacific Northwest by sharing this information with your staff and interested individuals.

Sincerely,

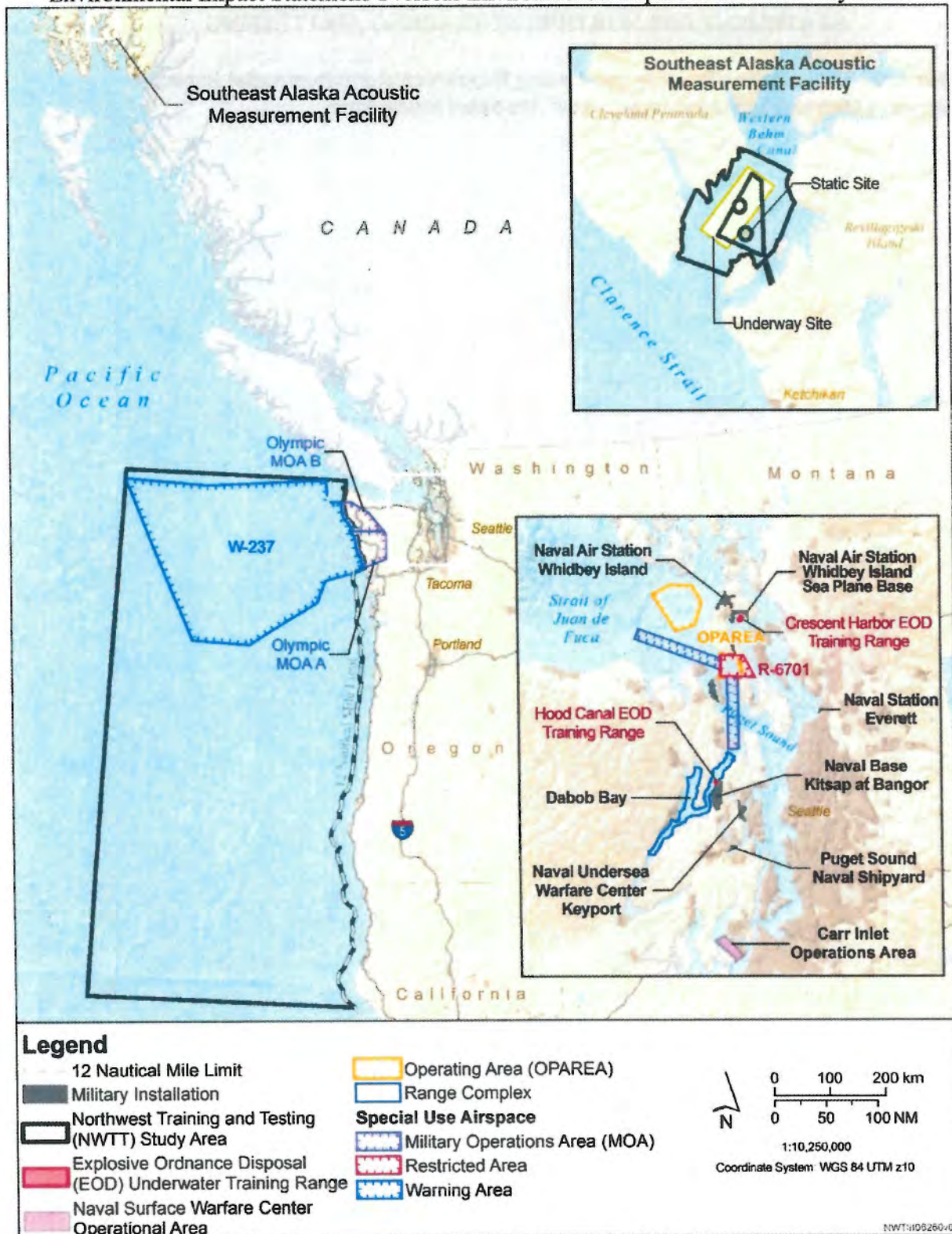


E. A. SCHRADER  
Captain, U. S. Navy  
Commanding Officer

**SUBJECT: NOTICE OF INTENT TO PREPARE A SUPPLEMENTAL ENVIRONMENTAL  
IMPACT STATEMENT/OVERSEAS ENVIRONMENTAL IMPACT  
STATEMENT FOR NORTHWEST TRAINING AND TESTING**

**Enclosure: 1. Northwest Training and Testing Supplemental Environmental Impact  
Statement/Overseas Environmental Impact Statement Study Area.**

Northwest Training and Testing Supplemental  
Environmental Impact Statement/Overseas Environmental Impact Statement Study Area







DEPARTMENT OF THE NAVY

NAVAL AIR STATION WHIDBEY ISLAND  
3730 NORTH CHARLES PORTER AVENUE  
OAK HARBOR, WASHINGTON 98278-5000

5090  
Ser N44/0503  
February 7, 2018

The Honorable Arnold Cooper  
Squaxin Island Tribe of the Squaxin Island Reservation  
10 SE Squaxin Lane  
Shelton, WA 98584

Dear Chairman Cooper:

SUBJECT: INVITATION TO INITIATE GOVERNMENT-TO-GOVERNMENT  
CONSULTATION FOR U.S. NAVY NORTHWEST TRAINING AND TESTING  
ACTIVITIES

In recognition of the Department of the Navy's government-to-government responsibilities, I would like to inform you that the Navy is preparing a Supplement to the 2015 Environmental Impact Statement/Overseas Environmental Impact Statement (EIS/OEIS) that analyzed the Navy's training and testing activities in the Northwest. Please find attached the Notice of Intent to study the environmental effects of this proposed action, as published in the Federal Register on August 22, 2017 (Enclosure 1). Additional information is available on the project website at <http://nwtteis.com/>. Also attached, please find the letter we sent to you in August, discussing the Notice of Intent to develop the Supplemental EIS/OEIS in August 2017 (Enclosure 2).

Although the Supplement to the EIS/OEIS is in the preliminary stages of development, I would like to invite you to review the information provided below and on the project website and evaluate whether you believe there may be a potential for this action to significantly affect tribal treaty harvest rights, resources, or lands. This invitation is made pursuant to Federal Indian Policy and the Navy's policy for Government-to-Government consultation with American Indian and Alaska Native Tribes.

The purpose of the proposed training activities is to ensure that the Navy accomplishes its mission to maintain, train, and equip combat-ready naval forces capable of winning wars, deterring aggression, and maintaining freedom of the seas. The Supplemental EIS/OEIS will assess the potential environmental effects associated with ongoing and future at-sea military readiness activities conducted within the Study Area beyond 2020. The Study Area remains unchanged since the 2015 Final EIS/OEIS. As part of this process, the Navy will seek the issuance of federal regulatory permits and authorizations under the Marine Mammal Protection Act and Endangered Species Act.

The Navy conducts military readiness training and testing activities in waters and associated airspace of the Pacific Northwest. These designated areas include portions of the Pacific Ocean off the coast of Washington, Oregon, and California, in areas within the Strait of Juan de Fuca and Puget Sound, and at Navy pierside locations (as contained within Enclosure 3). These areas have historically been used by the Navy for training and testing, with some activities dating back to 1914.


5090  
Ser N44/0503  
February 7, 2018

Training activities may include operating vehicles, aircraft, submarines, and ships; conducting weapons training; detecting and locating submarines and finding and removing in-water practice mines. Testing activities may include basic and applied scientific research and technology development, as well as testing, evaluation, and maintenance of missiles, torpedoes, radar, active and passive sonar systems, vessels, submarines, and aircraft.

Pursuant to the Navy's policy for American Indian/Alaska Native tribal Government-to-Government consultation, I would like to offer the opportunity to have the Navy brief you or your staff on the testing and training activities. If you believe there would be a potential to significantly affect tribal treaty rights or resources resulting from the implementation of the proposed action and would like to initiate Government-to-Government consultation, the Navy will continue consultation with your tribe beyond the initial briefing.

If you have questions or concerns, or require further information please contact me directly at (360) 257-2037 or [geoffrey.moore@navy.mil](mailto:geoffrey.moore@navy.mil), or the Project Manager, John Mosher at (360) 257-3234 or [john.g.mosher@navy.mil](mailto:john.g.mosher@navy.mil).

Sincerely,



G. C. MOORE  
Captain, U.S. Navy  
Commanding Officer

Enclosures: 

1. Notice of Intent
2. Notice of Intent Letter
3. Northwest Training and Testing Supplemental Environmental Impact Statement/Overseas Environmental Impact Statement Project Information Booklet.

## Enclosure 1. Tab C.

### Washington – Initiation Letter and Responses

The Initiation Letter was sent to the WA SHPO, Tribes, potential interested parties, and the ACHP on February 16, 2018. This enclosure provides one example letter sent to the Tribes and one example letter sent to the interested parties. Upon request, the Navy can provide copies of all letters.

In the following weeks, the Navy received confirmations of involvement via e-mail, during phone discussions and a letter. The letter is included here. Response dates and concerns are summarized within a table in the e106 form.

#### TRIBES

Confederated Tribes and Bands of the Yakama Nation  
Confederated Tribes of the Chehalis Reservation  
Cowlitz Indian Tribe  
Hoh Indian Tribe  
Jamestown S'Klallam Tribe  
Lower Elwha Klallam Tribe  
Lummi Tribe of the Lummi Reservation  
Makah Indian Tribe of the Makah Reservation  
Muckleshoot Indian Tribe of the Muckleshoot Reservation  
Nisqually Indian Tribe of the Nisqually Reservation  
Nooksack Indian Tribe of Washington  
Port Gamble S'Klallam Tribe  
Puyallup Tribe of the Puyallup Reservation  
Quileute Tribe of the Quileute Reservation  
Quinault Indian Nation  
Samish Indian Nation  
Sauk-Suiattle Indian Tribe  
Shoalwater Bay Tribe of the Shoalwater Bay Reservation  
Skokomish Indian Tribe  
Snoqualmie Indian Tribe  
Squaxin Island Tribe of the Squaxin Island Reservation  
Stillaguamish Tribe of Indians of Washington  
Suquamish Indian Tribe of the Port Madison Reservation  
Swinomish Indians of the Swinomish Reservation of Washington  
Tulalip Tribes of Washington  
Upper Skagit Indian Tribe

#### POTENTIAL INTERESTED PARTIES – ORGANIZATIONS and AGENCIES

Reserve Manager, Ebey's Landing National Historic Reserve  
Northwest Regional Director, National Parks Conservation Association  
Regional Director, Pacific West Region, US Department of the Interior, National Park Service  
President, Olympic Forest Coalition  
Co-Founder, West Coast Action Alliance





DEPARTMENT OF THE NAVY

NAVAL AIR STATION WHIDBEY ISLAND  
3730 NORTH CHARLES PORTER AVENUE  
OAK HARBOR, WASHINGTON 98278-5000

5090

Ser N465/0595

February 16, 2018

Allyson Brooks, Ph.D.  
State Historic Preservation Officer  
Washington Department of Archaeology & Historic Preservation  
P.O. Box 48343  
Olympia, WA 98504-8343

Dear Dr. Brooks:

SUBJECT: INITIATION OF CONSULTATION UNDER SECTION 106 OF THE  
NATIONAL HISTORIC PRESERVATION ACT FOR NORTHWEST  
TRAINING AND TESTING ACTIVITIES

In accordance with Section 106 of the National Historic Preservation Act (NHPA), the Navy would like to initiate consultation on proposed training and testing activities to occur in Washington State beginning in 2020. The purpose of the proposed undertaking is to maintain, train, and equip combat-ready naval forces. The Navy is currently preparing a Supplement to the 2015 Northwest Training and Testing (NWTT) Environmental Impact Statement (EIS)/Overseas EIS (OEIS) with the same Study Area, including areas of Puget Sound and the Strait of Juan de Fuca, areas off the coast of Washington State, and designated airspace over the Olympic Peninsula. The Navy requests to enter into consultation in defining the appropriate Area of Potential Effects (APE).

In order to meet its obligations under Section 106 and its implementing regulations, the Navy will use the NWTT Supplemental EIS/OEIS public involvement processes (e.g., public scoping and public review) to partially fulfill its public notification and consultation requirements, as well as a separate Section 106 process involving interested and potential consulting parties.

Should you have any questions or require additional information, my point of contact for this proposed undertaking is Mr. David Grant, Archaeologist, Naval Facilities Engineering Command Northwest, (360) 396-0919 or [dave.m.grant@navy.mil](mailto:dave.m.grant@navy.mil).

Sincerely,

G. C. MOORE  
Captain, U.S. Navy  
Commanding Officer



DEPARTMENT OF THE NAVY  
NAVAL AIR STATION WHIDBEY ISLAND  
3730 NORTH CHARLES PORTER AVENUE  
OAK HARBOR, WASHINGTON 98278-5000

5090  
Ser N465/0596  
February 16, 2018

Reid Nelson, Director  
Advisory Council on Historic Preservation  
401 F Street NW, Suite 308  
Washington, DC 20001-2637

Dear Mr. Nelson:

SUBJECT: DETERMINATION OF INTEREST IN CONSULTATION UNDER SECTION  
106 OF THE NATIONAL HISTORIC PRESERVATION ACT FOR  
NORTHWEST TRAINING AND TESTING ACTIVITIES

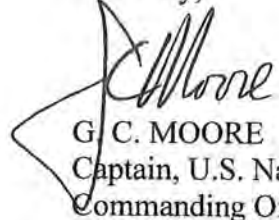
In accordance with Section 106 of the National Historic Preservation Act (NHPA), the Navy is initiating consultation on proposed training and testing activities beginning in 2020. The purpose of this letter is to determine if the Advisory Council on Historic Preservation (ACHP) has an interest in participating in the consultation.

The purpose of the proposed undertaking is to maintain, train, and equip combat-ready naval forces. The Navy is currently preparing a Supplement to the 2015 Northwest Training and Testing (NWTT) Environmental Impact Statement (EIS)/Overseas EIS (OEIS) with the same Study Area, comprising areas off the Washington State coast, within Puget Sound and the Strait of Juan de Fuca, in designated airspace over the Olympic Peninsula, and in the Western Behm Canal in southeastern Alaska.

In order to meet its obligations under Section 106 and implementing regulations, the Navy will use the NWTT Supplemental EIS/OEIS public involvement processes (e.g., public scoping and public review) to partially fulfill its public notification and consultation requirements, as well as a separate Section 106 process involving interested and potential consulting parties.

I look forward to hearing from you as to whether ACHP wishes to participate in Section 106 consultation for this proposed undertaking. Should you have any questions or require additional information, my point of contact is Mr. David Grant, Archaeologist, Naval Facilities Engineering Command Northwest, (360) 396-0919 or [dave.m.grant@navy.mil](mailto:dave.m.grant@navy.mil).

Sincerely,

  
G. C. MOORE  
Captain, U.S. Navy  
Commanding Officer





DEPARTMENT OF THE NAVY

NAVAL AIR STATION WHIDBEY ISLAND  
3730 NORTH CHARLES PORTER AVENUE  
OAK HARBOR, WASHINGTON 98278-5000

5090  
Ser N465/0604  
February 16, 2018

Mr. Gerald Lewis  
Cultural Committee Chairman  
Confederated Tribes and Bands of the Yakama Nation  
PO Box 151  
Toppenish, WA 98948

Dear Mr. Lewis:

SUBJECT: DETERMINATION OF INTEREST IN CONSULTATION UNDER SECTION 106 OF  
THE NATIONAL HISTORIC PRESERVATION ACT FOR NORTHWEST TRAINING  
AND TESTING ACTIVITIES

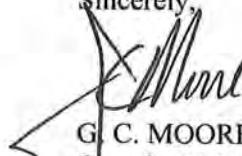
In accordance with Section 106 of the National Historic Preservation Act (NHPA), the Navy would like to initiate consultation on proposed training and testing activities to occur in Washington State beginning in 2020. The purpose of the proposed undertaking is to maintain, train, and equip combat-ready naval forces. The Navy is currently preparing a Supplement to the 2015 Northwest Training and Testing (NWTT) Environmental Impact Statement (EIS)/Overseas EIS (OEIS) with the same Study Area, including areas of Puget Sound and the Strait of Juan de Fuca, areas off the coast of Washington State, and designated airspace over the Olympic Peninsula. Your leadership was notified of the Supplement via a letter in August 2017.

In order to meet its obligations under Section 106 and its implementing regulations, the Navy will use the NWTT Supplemental EIS/OEIS public involvement processes (e.g., public scoping and public review) to partially fulfill its public notification and consultation requirements, as well as a separate Section 106 process involving interested and potential consulting parties.

The proposed training and testing activities have the potential to affect historic properties of religious and cultural significance to your tribe, therefore the purpose of this letter is to request whether you wish to participate in this consultation.

If your tribe is interested in consulting on this proposed undertaking, I look forward to engaging with you to fulfill our Section 106 responsibilities. Should you have any questions or require additional information, my point of contact is Mr. David Grant, Archaeologist, Naval Facilities Engineering Command Northwest, (360) 396-0919 or [dave.m.grant@navy.mil](mailto:dave.m.grant@navy.mil).

Sincerely,



G. C. MOORE  
Captain, U.S. Navy  
Commanding Officer

copy to:  
Mr. Johnson Meninick, Cultural Resource Program Manager



DEPARTMENT OF THE NAVY

NAVAL AIR STATION WHIDBEY ISLAND  
3730 NORTH CHARLES PORTER AVENUE  
OAK HARBOR, WASHINGTON 98278-5000

5090  
Ser N465/0601  
February 16, 2018

Reserve Manager  
Ebey's Landing National Historic Reserve  
PO Box 774  
Coupeville, WA 98239

Dear Sir or Madam:

SUBJECT: DETERMINATION OF INTEREST IN SECTION 106 OF THE NATIONAL HISTORIC PRESERVATION ACT FOR NORTHWEST TRAINING AND TESTING ACTIVITIES

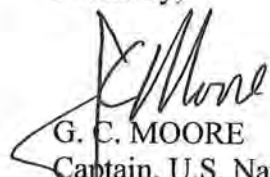
In accordance with Section 106 of the National Historic Preservation Act (NHPA), this letter is being sent to determine if your organization is interested in participating in the consultation process mandated by the NHPA.

The purpose of the proposed undertaking is to maintain, train, and equip combat-ready naval forces. The Navy is currently preparing a Supplement to the 2015 Northwest Training and Testing (NWTT) Environmental Impact Statement (EIS)/Overseas EIS (OEIS) with the same Study Area, comprising areas off the Washington State coast, within Puget Sound and the Strait of Juan de Fuca, in designated airspace over the Olympic Peninsula, and in the Western Behm Canal in southeastern Alaska.

In order to meet its obligations under Section 106, the Navy will use the NWTT Supplemental EIS/OEIS public involvement processes (e.g. public scoping and public review) to partially fulfill its public notification and consultation requirements, as well as a separate Section 106 process involving interested and potential consulting parties.

If you wish to become an interested party, please contact Mr. David Grant, Archaeologist, Naval Facilities Engineering Command Northwest, at (360) 396-0919 or by email: [dave.m.grant@navy.mil](mailto:dave.m.grant@navy.mil). For additional information please see the project website at [NWTTEIS.com](http://NWTTEIS.com).

Sincerely,

  
G. C. MOORE  
Captain, U.S. Navy  
Commanding Officer



Allyson Brooks Ph.D., Director  
State Historic Preservation Officer

February 28, 2018

Captain G.C. Moore  
Naval Air Station Whidbey Island  
3730 North Charles Porter Avenue  
Oak Harbor, Washington 98278-5000

Re: Northwest Training & Testing Activities  
Log No.: 2018-02-01511-USN

Dear Captain Moore:

Thank you for contacting our department. We have reviewed the materials you provided for the proposed Northwest Training & Testing Activities that will occur in Washington State beginning in 2020

Thank you for this advance information. We look forward to further consultations on the definition of the Area of Potential Effect (APE) and the proposed identification efforts to assure that cultural resources and historic properties are appropriately identified and potential effects are identified.

We would appreciate receiving any correspondence or comments from concerned tribes or other parties that you receive as you consult under the requirements of 36CFR800.4(a)(4).

These comments are based on the information available at the time of this review and on the behalf of the State Historic Preservation Officer in conformance with Section 106 of the National Historic Preservation Act and its implementing regulations 36CFR800. Should additional information become available, our assessment may be revised. Thank you for the opportunity to comment and a copy of these comments should be included in subsequent environmental documents.

Sincerely,

Robert G. Whitlam, Ph.D.  
State Archaeologist  
(360) 890-2615  
email: [rob.whitlam@dahp.wa.gov](mailto:rob.whitlam@dahp.wa.gov)







# MAKAH CULTURAL AND RESEARCH CENTER

P.O. Box 160 • Neah Bay, WA 98357 • (360) 645-2711 • FAX (360) 645-2656 • [MakahMuseum@centurytel.net](mailto:MakahMuseum@centurytel.net)

June 25<sup>th</sup>, 2018

G. C. Moore  
Captain, U.S. Navy  
Department of the Navy  
Naval Air Station Whidbey Island  
3730 North Charles Porter Ave.  
Oak Harbor, WA 98278-5000

Dear Captain Moore,

We have reviewed the invitation to consult under Section 106 National Historic Preservation Act for the Northwest Training and Testing Activities proposed by the Department of the Navy and are interested in engaging in consultation with your agency. We look forward to better understanding your planned activities within traditional Makah territory.

Please contact me or Rebekah Monette, THPO Program Manager at 360 645 2711 or [mrcrcjanine@centurytel.net](mailto:mrcrcjanine@centurytel.net) and [makahthpo@centurytel.net](mailto:makahthpo@centurytel.net) to schedule meetings.

Sincerely,

Janine Ledford  
Makah Tribal Historic Preservation Officer

Copy to:

David Grant, Archaeologist, Naval Facilities Engineering Command Northwest  
Nate Tyler, Chairman, Makah Tribal Council

## Enclosure 1. Tab D.

### Washington – 106 Outreach

As part of the NEPA process, a 75-day Public comment period held 22 Mar – 12 Jun 2019. Public meetings in open house format were held between 24 Apr and 8 May in Everett, Silverdale, and Port Angeles, WA. To fulfill requirements under Section 106, a handout was available on the Section 106 process and a poster/station dedicated to the consultation effort.

# NORTHWEST TRAINING AND TESTING

## National Historic Preservation Act and Section 106

### What is Section 106?

Section 106 of the National Historic Preservation Act (NHPA) of 1966 requires the Navy to consider the effects of a federal action on historic properties. Historic properties include prehistoric or historic districts, sites, buildings, structures, or objects included or eligible for listing in the National Register of Historic Places. Compliance with the National Environmental Policy Act (NEPA) requires the Navy to demonstrate that the project is also in compliance with Section 106 of the NHPA. Therefore, the NEPA and Section 106 processes run concurrently.

Consultation is a critical component of the Section 106 review. Consultation does not mandate a specific outcome. Instead, it is the process of seeking, discussing, and considering the views of consulting parties to assist in the identification of historic properties in the project area and potential effects to those historic properties.

### How can the public participate in the Section 106 process?

You are invited to comment on information, concerns, or issues about historic properties in the project area or that may be affected by the Proposed Action. Your input will assist the Navy in considering the potential effects of the Proposed Action on historic properties in accordance with Section 106 of the NHPA.

### How to become a consulting party

Other individuals and organizations with a demonstrated interest in the project may participate in the Section 106 review as consulting parties due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties. Under these circumstances, you or your organization may write to the Navy asking to become a consulting party.

To request consulting party status, explain in a letter to the Navy why you believe your participation would be important to successful resolution of the Section 106 process.

Because the Advisory Council on Historic Preservation (ACHP) and the State Historic Preservation Officer (SHPO) will assist the Navy in deciding who will participate in the consultation, please provide the ACHP and SHPO with a copy of your letter. Make sure to emphasize your relationship with the project and demonstration of how your connection will inform the Navy's decision making.

Consulting party status allows you to share your views, receive and review pertinent information, offer ideas, and consider possible solutions together with the Navy and other consulting parties.

### For more information

Submit consulting party request letters to: David Grant, NAVFAC NW EV-9, Building 1101 Tautog Circle, Silverdale, WA 98315-1101 or attach to an e-mail and send to [dave.m.grant@navy.mil](mailto:dave.m.grant@navy.mil). For additional questions regarding the information on this page or the NWTT Section 106 process call David at 360-396-0919.

# Enclosure 1. Tab E.

## Washington – Area of Potential Effects Letter and Correspondence with WA SHPO

The Proposed Area of Potential Effects Letter was sent to the WA SHPO copy to Tribes, interested parties, and the ACHP on May 20, 2019. The electronic submittal to the WA SHPO was delayed until June 4, 2019. After the Initiation Letter was sent on February 16, 2018, three additional interested parties were added to the distribution list: the Skagit Audubon Society and two individuals (Dr. Beverly Goldie and Ms. Rhea Miller) notified the Navy they wished to be interested parties.

On June 17, 2019, the WA SHPO disagreed with the APE on account that it did not sufficiently consider auditory effects. On September 13, 2019, the Navy replied via letter and provided clarification on the APE boundaries and noise analysis, affirming that there are no potential effects caused by the noise associated with this undertaking.

### TRIBES

Confederated Tribes and Bands of the Yakama Nation  
Confederated Tribes of the Chehalis Reservation  
Cowlitz Indian Tribe  
Hoh Indian Tribe  
Jamestown S'Klallam Tribe  
Lower Elwha Klallam Tribe  
Lummi Tribe of the Lummi Reservation  
Makah Indian Tribe of the Makah Reservation  
Muckleshoot Indian Tribe of the Muckleshoot Reservation  
Nisqually Indian Tribe of the Nisqually Reservation  
Nooksack Indian Tribe of Washington  
Port Gamble S'Klallam Tribe  
Puyallup Tribe of the Puyallup Reservation  
Quileute Tribe of the Quileute Reservation  
Quinault Indian Nation  
Samish Indian Nation  
Sauk-Suiattle Indian Tribe  
Shoalwater Bay Tribe of the Shoalwater Bay Reservation  
Skokomish Indian Tribe  
Snoqualmie Indian Tribe  
Squaxin Island Tribe of the Squaxin Island Reservation  
Stillaguamish Tribe of Indians of Washington  
Suquamish Indian Tribe of the Port Madison Reservation  
Swinomish Indians of the Swinomish Reservation of Washington  
Tulalip Tribes of Washington  
Upper Skagit Indian Tribe

### INTERESTED PARTIES – AGENCIES

Reserve Manager, Ebey's Landing National Historic Reserve  
Northwest Regional Director, National Parks Conservation Association  
Regional Director, Pacific West Region, US Department of the Interior, National Park Service  
President, Olympic Forest Coalition  
Co-Founder, West Coast Action Alliance  
Skagit Audubon Society

**INTERESTED PARTIES – INDIVIDUALS**

(Sent a copy of the letter both individuals via e-mail on June 5, 2019)

Dr. Beverly Goldie

Ms. Rhea Miller





DEPARTMENT OF THE NAVY

NAVAL AIR STATION WHIDBEY ISLAND  
3730 NORTH CHARLES PORTER AVENUE  
OAK HARBOR, WASHINGTON 98278-5000

5090

Ser N44/1026

20 May 19

Allyson Brooks, PhD  
State Historic Preservation Officer  
Washington Department of Archaeology and Historic Preservation  
1110 South Capital Way, Suite 30  
P.O. Box 48343  
Olympia, WA 98504-8343

Dear Dr. Brooks:

SUBJECT: LOG NO. 2018-02-01511-USN: CONTINUING SECTION 106  
CONSULTATION ON THE PROPOSED AREA OF POTENTIAL EFFECTS  
FOR NORTHWEST TRAINING AND TESTING ACTIVITIES

In accordance with Section 106 of the National Historic Preservation Act (NHPA), the Navy has determined the proposed Area of Potential Effects (APE) for Northwest Training and Testing (NWTT) activities specific to the State of Washington. The undertaking is scheduled to begin in 2020 and the majority of activities would be the same as or similar to the previous NWTT undertaking. The proposed undertaking entails over 50 activities, more than 30 of which occur within Washington or between state waters and territorial waters 12 nautical miles from its shore, and approximately 20 activities having potential to directly or indirectly affect historic properties (Enclosure 1). Section 106 consultations for earlier phases of NWTT based the APE on the National Environmental Policy Act (NEPA) 'Study Area', which included Puget Sound, the Strait of Juan de Fuca, offshore ranges, and coastal areas and designated airspaces. However, for this consultation, the Navy will more appropriately define the APE in accordance with the applicability, directives, and definitions provided by 36 CFR 800.

Based on the scale and nature of the proposed NWTT undertaking, the Navy has determined that there is no potential to directly or indirectly affect the qualifying characteristics or use of historic properties associated with the established air space. The Navy maintains that Day Night Average Sound Levels (DNLs) exceeding 65 decibels (dB) remain the most reliable, tested, and defensible basis for assessing audible effects. The most current noise analysis does not identify any areas in the NWTT study area exceeding 37 dB DNL. Additionally, continuing aircraft flights within the altitude restrictions of established air space will not introduce new atmospheric or visual elements that may indirectly affect historic properties.

Accordingly, the proposed NWTT APE (Enclosures 2 and 3) comprises areas where historic properties could be directly affected by incidental disturbance and compression of littoral and seafloor sediments via tracked or wheeled vehicles, anchors, other seafloor devices, or explosions; destruction or damage to shipwrecks, submerged aircraft, or other historic or pre-contact structures standing proud of the seafloor from anchors or other seafloor devices; disturbance of pre-contact inundated archaeological deposits from anchors, other seafloor

devices, or explosions; or any other activities with potential to affect historic properties themselves. The APE also includes areas where indirect effects may change a submerged historic property's character or use by deposition of military expended materials like sonobuoys and other single-use items.

To identify properties with possible religious or cultural significance to affected tribes, the Navy has initiated consultation with 26 federally recognized Washington tribes with traditional ties to the proposed APE. In addition, the following parties have expressed interest in participating in the Section 106 process:

- National Park Service
- Ebey's Landing National Historic Reserve
- National Parks Conservation Association
- Olympic Forest Coalition
- West Coast Action Alliance
- Skagit Audubon Society
- Individual Members of the Public

Should you have any questions or require additional information, my point of contact for this proposed undertaking is Mr. David Grant, Archaeologist, Naval Facilities Engineering Command Northwest, (360) 396-0919 or dave.m.grant@navy.mil.

Sincerely,



M. L. ARNY  
Captain, U.S. Navy  
Commanding Officer

Enclosures: 1. Spreadsheet of activities within 12 nautical miles with a potential to affect  
2. Proposed Offshore Area APE  
3. Proposed Inland Waters APE

Copy to: 1. National Park Service  
2. Ebey's Landing National Historic Reserve  
3. National Parks Conservation Association  
4. Olympic Forest Coalition  
5. West Coast Action Alliance  
6. Skagit Audubon Society  
7. Dr. Beverly Goldie  
8. Ms. Rhea Miller

9. Confederated Tribes and Bands of the Yakama Nation
10. Confederated Tribes of the Chehalis Reservation
11. Cowlitz Indian Tribe
12. Hoh Indian Tribe
13. Jamestown S'Klallam Tribe
14. Lower Elwha Klallam Tribe
15. Lummi Tribe of the Lummi Reservation
16. Makah Indian Tribe of the Makah Reservation
17. Muckleshoot Indian Tribe of the Muckleshoot Reservation
18. Nisqually Indian Tribe of the Nisqually Reservation
19. Nooksack Indian Tribe of Washington
20. Port Gamble S'Klallam Tribe
21. Puyallup Tribe of the Puyallup Reservation
22. Quileute Tribe of the Quileute Reservation
23. Quinault Indian Nation
24. Samish Indian Nation
25. Sauk-Suiattle Indian Tribe
26. Shoalwater Bay Tribe of the Shoalwater Bay Reservation
27. Skokomish Indian Tribe
28. Snoqualmie Indian Tribe
29. Squaxin Island Tribe of the Squaxin Island Reservation
30. Stillaguamish Tribe of Indians of Washington
31. Suquamish Indian Tribe of the Port Madison Reservation
32. Swinomish Indians of the Swinomish Reservation of Washington
33. Tulalip Tribes of Washington
34. Upper Skagit Indian Tribe
35. Advisory Council on Historic Preservation

Enclosure 1. Activities occurring within 12nm of Washington shore.<sup>1</sup>

Activity	Description (extracted from Appendix A Draft v2)	Location	Potential Effect to Historic Properties
<b>Air Combat Maneuver</b>	Basic flight maneuvers in which fixed-wing aircrew engage in offensive and defensive maneuvering against each other.	<b>Offshore Area</b> W-237 Olympic MOA	<b>Direct:</b> none  <b>Indirect:</b> none
<b>Electronic Warfare Training</b>	Aircraft and ship crews control the electromagnetic spectrum used by enemy systems to degrade or deny the enemy's ability to take defensive actions. Electronic Warfare Operations can be active or passive, offensive or defensive.	<b>Offshore Area</b> W-237 Olympic MOA	<b>Direct:</b> none  <b>Indirect:</b> none
<b>Civilian Port Defense— Homeland Security Anti-Terrorism/Force Protection Exercises</b>	Naval forces conduct mine warfare training in conjunction with Department of Homeland Security units. Helicopters, surface ships, and undersea (divers, marine mammals, and unmanned vehicles) mine countermeasures will be used. Non-permanent mine shapes will be laid in various places on the bottom and will be retrieved.	<b>Inland Waters</b> Naval Magazine Indian Island (NAVMAG); Naval Station Everett (NSE) NBK Bangor Bremerton Manchester Port Angeles Port of Seattle	<b>Direct:</b> incidental disturbance of sediments by anchors for mine shapes  <b>Indirect:</b> none
<b>Mine Neutralization – Explosive Ordnance Disposal</b>	Navy divers disable threat mines with explosive charges to create a safe channel for friendly vessels to transit. Personnel detect, identify, evaluate, and neutralize mines in the water with an explosive device and may involve detonation.	<b>Inland Waters</b> Crescent Harbor EOD Training Range (CH EOD TR) Hood Canal EOD Training Range (HC EOD TR)	<b>Direct:</b> damage to submerged historic properties from explosive shock wave  <b>Indirect:</b> none
<b>Intelligence, Surveillance, Reconnaissance</b>	Maritime Patrol Aircraft and unmanned aerial systems operators use all available sensors to collect data on threat vessels. Passive sonobuoys are used to collect and analyze acoustic data, and photographic equipment is used to document the vessel with visual information.	<b>Offshore Area</b>  <b>Inland Waters</b> Restricted Area (RA) 6701 NAVY 7 OPAREA	<b>Direct:</b> none  <b>Indirect:</b> introduction of incompatible visual elements from deposition of military expended materials (MEM) such as sonobuoys, parachutes/decelerators, wires
<b>Maritime Security Operations</b>	Maritime security operations are predominantly maritime security escort events, including the Transit Protection Program (TPP) and training of other escort units.	<b>Inland Waters</b> Bremerton Hood Canal Dabob Bay	<b>Direct:</b> none  <b>Indirect:</b> introduction of incompatible visual elements from deposition of military expended materials (MEM) such as blank

<sup>1</sup> The following activities occur beyond 12 nautical miles from shore or only in Alaska (SEAFAC) and therefore not addressed further: **Gunnery Exercise Surface-to-Air; Missile Exercise Air-to-Air; Missile Exercise Surface-to-Air; Anti-Submarine Warfare Torpedo Exercise—Submarine; Anti-Submarine Warfare Tracking Exercise – Helicopter; Anti-Submarine Warfare Tracking Exercise—Maritime Patrol Aircraft; Anti-Submarine Warfare Tracking Exercise—Ship; Anti-Submarine Warfare Tracking Exercise—Submarine; Bombing Exercise Air-to-Surface; Gunnery Exercise Surface-to-Surface – Ship; Missile Exercise Air-to-Surface; Torpedo (explosive) Testing; Kinetic Energy Weapon Testing; Vessel Signature Evaluation; Hydrodynamic and Maneuverability Testing; Anti-Submarine Warfare Tracking Test—Maritime Patrol Aircraft**

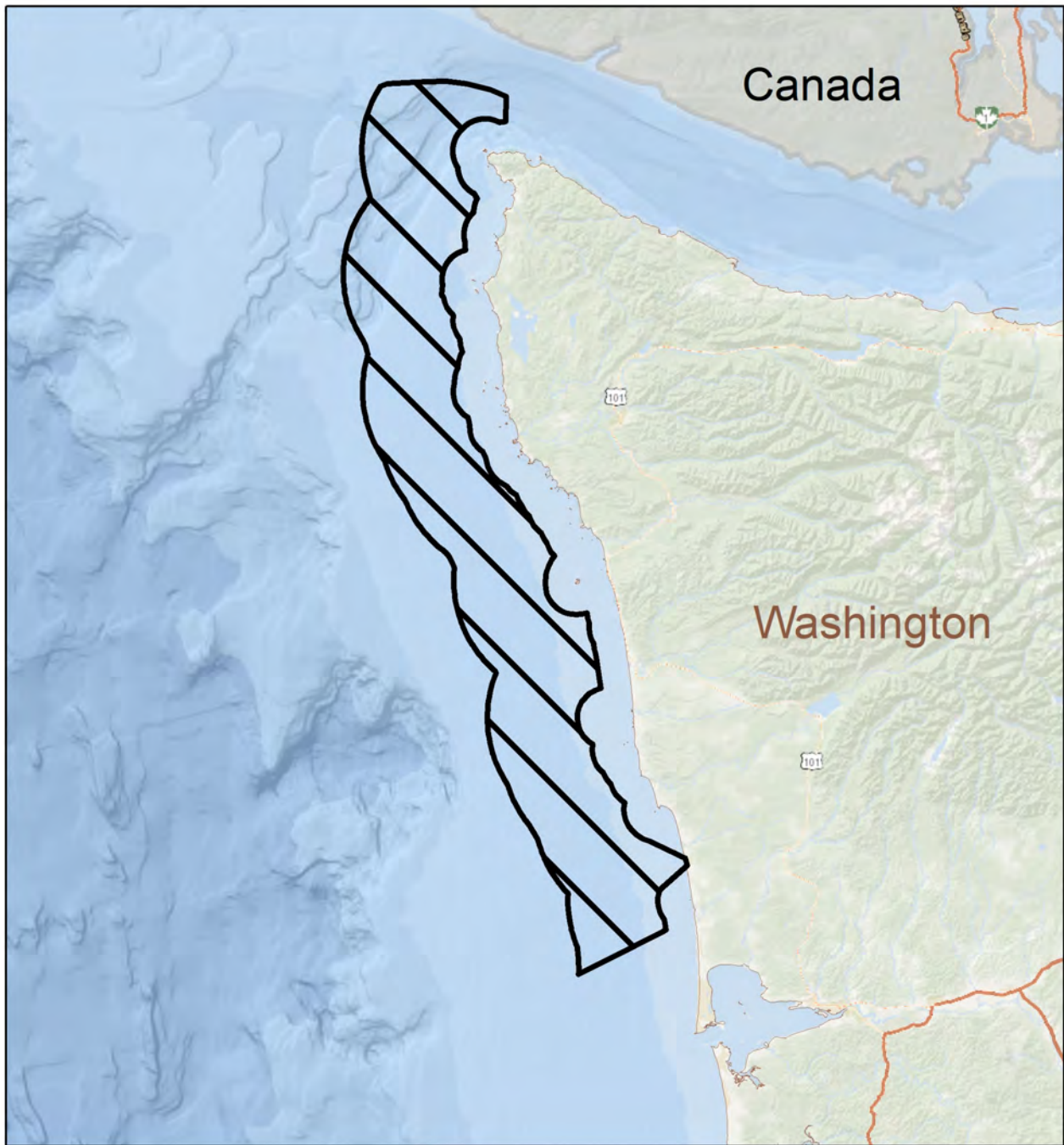
	All shell casings associated with use of blank ammunition shall be captured, to the greatest extent feasible, using either cofferdams around guns, capture bins, or capture on the deck of vessels.	TPS Route (169) NSE Puget Sound Strait of Juan de Fuca	ammunition brass, disintegrating ammunition belt links, and pyrotechnic parts and fragments
<b>Personnel Insertion/Extraction Training—Non-Submersible</b>	Military personnel train for clandestine insertion and extraction into target areas using rotary wing aircraft, fixed-wing aircraft (insertion only), or small boats.	<b>Inland Waters</b> CH EOD TR NAVY 7 OPAREA	<b>Direct:</b> none  <b>Indirect:</b> none
<b>Precision Anchoring</b>	Surface ship crews release and retrieve anchors in designated locations.	<b>Inland Waters</b> Designated areas near NAVMAG NSE, NAVY 3 OPAREA, Eastern Bank Area	<b>Direct:</b> damage to submerged historic properties from anchors contacting and penetrating seafloor  <b>Indirect:</b> none
<b>Search and Rescue</b>	Helicopter crews rescue military personnel at sea. Helicopters fly below 3,000 ft. and locate personnel to be rescued, hover, recover the survivor, and then depart.	<b>Inland Waters</b> CH EOD TR RA 6701	<b>Direct:</b> none  <b>Indirect:</b> none
<b>Small Boat Attack Exercise</b>	Small boat crews engage pier side surface targets with small-caliber weapons. Only blank rounds are fired. Duration of firing will be approximately 2 hours with a total of 1,000 rounds fired the first day, and a duration of 1.5 hours with a total of 1,000 rounds fired the second day.	<b>Inland Waters</b> NSE NBK Bangor Bremerton	<b>Direct:</b> none  <b>Indirect:</b> introduction of incompatible visual elements from deposition of military expended materials (MEM) such as ammunition brass and disintegrating ammunition belt links
<b>Submarine Sonar Maintenance</b>	Submarines conduct maintenance to their sonar systems in shallow water near their homeport; however, sonar maintenance could occur at sea as the system's performance may warrant.	<b>Offshore Area</b> Offshore Area <b>Inland Waters</b> NBK Bremerton NBK Bangor	<b>Direct:</b> none  <b>Indirect:</b> none
<b>Surface Ship Sonar Maintenance</b>	Surface ships perform periodic maintenance to the sonar and other systems while in port or at sea. Surface ships operate active sonar systems for maintenance while in shallow water near their homeport; however, sonar maintenance could occur anywhere.	<b>Offshore Area</b> Offshore Area  <b>Inland Waters</b> NSE Bremerton	<b>Direct:</b> none  <b>Indirect:</b> none
<b>Unmanned Underwater Vehicle Training</b>	Training with unmanned platforms on which various payloads are attached and used for different purposes. Training can range from basic remote control and autonomous navigation tests to deployment and activation of onboard systems that may include hydrodynamic instruments, launchers, and recovery capabilities.	<b>Offshore Area</b> Quinault Range Site <b>Inland Waters</b> CH EOD TR, Dabob Bay Range Complex (DBRC), NBK Bangor, Bremerton, Keyport Range, Manchester, NAVY 3 OPAREA, NAVY 7 OPAREA	<b>Direct:</b> incidental disturbance of sediments by anchors for instruments  <b>Indirect:</b> none

<b>Anti-Submarine Warfare Testing</b>	Ships conduct operations using airborne and surface assets. Active and passive acoustic systems are used to detect and track submarine targets, culminating in the deployment of lightweight torpedoes.	<b>Offshore Area</b> Offshore Area	<b>Direct:</b> none  <b>Indirect:</b> introduction of incompatible visual elements from deposition of military expended materials (MEM) such as torpedo accessories, decelerator/parachute, sonobuoys, and wires.
<b>At-Sea Sonar Testing</b>	At-sea sonar testing verifies the vessel meets design acoustic specifications, defines the underwater characteristics, determines effects of systems and equipment on ship's acoustic characteristics, and provides for design improvements.	<b>Offshore Area</b> Offshore Area  <b>Inland Waters</b> DBRC	<b>Direct:</b> none  <b>Indirect:</b> introduction of incompatible visual elements from deposition of military expended materials (MEM) such as torpedo accessories, decelerator/parachute, sonobuoys, and wires.
<b>Countermeasure Testing</b>	Countermeasure testing evaluates the deployment, operation, and effectiveness of systems used to defend a vessel from an incoming threat. Countermeasures may be mechanical, chemical, or electronic devices that are released from a vessel to obscure its location or provide a false target. Countermeasures may also be systems operated from within the vessel to detect, localize, track, and respond to incoming threats. Most components are used off shore and are consumed, dissipate, or recovered.	<b>Offshore Area</b> Quinault Range Site  <b>Inland Waters</b> DBRC Keyport Range	<b>Direct:</b> none  <b>Indirect:</b> introduction of incompatible visual elements from deposition of military expended materials (MEM) such as torpedo accessories, mobile subsurface target, and guidance wire.
<b>Pierside Sonar Testing</b>	Ships and submarines will activate mid- and high-frequency tactical sonars, underwater communications systems, and navigational devices. Testing may include the firing of inert torpedo shapes.	<b>Inland Waters</b> NBK Bangor Bremerton NSE	<b>Direct:</b> none  <b>Indirect:</b> none
<b>Torpedo (non-explosive) Testing</b>	Aerial, surface, and subsurface assets fire exercise torpedoes against surface or subsurface targets, or programmed with a particular run geometry. Exercise torpedoes are typically recovered by ships and helicopters designed for this task.	<b>Offshore Area</b> Offshore Area <b>Inland Waters</b> DBRC	<b>Direct:</b> incidental disturbance of sediments from anchors for stationary surface targets  <b>Indirect:</b> introduction of incompatible visual elements from deposition of military expended materials (MEM) such as small decelerator/parachutes, acoustic countermeasures, buoy (non-explosive), torpedo accessories, mobile sub-surface target, sonobuoy, sonobuoy wires, guidance wire
<b>Mine Countermeasure and Neutralization Testing</b>	These systems may be deployed with a variety of ships, aircraft, submarines, or UAVs. Mines are neutralized by cutting mooring cables of buoyant mines, producing acoustic energy that fires acoustic-influence mines; or by employing radar or laser fields, detonate mines using remotely-operated vehicles, and use explosive charges to destroy threat mines.	<b>Offshore Area</b> Offshore Area (no explosives in OCNMS) <b>Inland Waters</b> Bremerton Carr Inlet CH EOD TR DBRC HC EOD TR	<b>Direct:</b> explosive shock wave and incidental disturbance of sediments from anchors for mine shapes  <b>Indirect:</b> introduction of incompatible visual elements from deposition of military expended materials (MEM) such as fiber optic wires and cables



		NSE Keyport Range NAVMAG NAVY 3 OPAREA	
<b>Mine Detection and Classification Testing</b>	Systems may use acoustic, electro-optic, or laser sensors, and may be deployed from aircraft, surface or subsurface vessels, or unmanned platforms.	<b>Offshore Area</b> Quinault Range Site <b>Inland Waters</b> DBRC Keyport Range	<b>Direct:</b> incidental disturbance of sediments from anchors from mine shapes (in place up to 12 months)  <b>Indirect:</b> none
<b>Unmanned Aerial System Testing</b>	UASs are remotely piloted or self-piloted (i.e., preprogrammed flight pattern) aircraft that include fixed-wing, rotary-wing, and other vertical takeoff vehicles. They can carry cameras, sensors, communications equipment, or other payloads.	<b>Offshore Area</b> Quinault Range Site <b>Inland Waters</b> DBRC Keyport Range RA 6701	<b>Direct:</b> none  <b>Indirect:</b> none
<b>Unmanned Surface Vehicle System Testing</b>	Unmanned surface vehicles (USV) can include remotely operated craft and test vehicles. During testing, they can operate autonomously, semi-autonomously, or non-autonomously.	<b>Offshore Area</b> Quinault Range Site <b>Inland Waters</b> DBRC Keyport Range	<b>Direct:</b> incidental disturbance of sediments from anchors for stationary surface targets  <b>Indirect:</b> none
<b>Unmanned Underwater Vehicle Testing</b>	UUVs may be developed to carry out warfare missions (e.g., mine detection) or scientific missions (e.g., bottom mapping), while others are developed to support other testing objectives (e.g., performing as a target for anti-submarine warfare).	<b>Offshore Area</b> Quinault Range Site <b>Inland Waters</b> Carr Inlet DBRC Keyport Range	<b>Direct:</b> incidental disturbance of sediments from anchors for stationary surface and sub-surface targets  <b>Indirect:</b> introduction of incompatible visual elements from deposition of military expended materials (MEM) such as torpedo accessories, mobile sub-surface target, decelerator/parachutes, wires, and cables
<b>Propulsion Testing</b>	Propulsion testing is one part of the total sea trial activity. The ship is tested for maneuverability, including full power and endurance runs.	<b>Offshore Area</b> Offshore Area beyond 3 nm	<b>Direct:</b> none  <b>Indirect:</b> none
<b>Undersea Warfare Testing</b>	Undersea warfare testing includes demonstrating the ability of the ship to search, detect, and track a target and conduct attacks with exercise torpedoes. Subsurface moving targets, rocket and air-dropped weapons, sonobuoys, towed arrays, and sub-surface torpedo-like devices may be used.	<b>Offshore Area</b> Offshore Area	<b>Direct:</b> none  <b>Indirect:</b> introduction of incompatible visual elements from deposition of military expended materials (MEM) such as decelerator/parachutes, acoustic countermeasures, expendable bathythermograph and wire, torpedo accessories, mobile subsurface target, sonobuoy and wires, and other cables and wires
<b>Vessel Signature Evaluation</b>	Signature testing is passive monitoring of surface ships and submarines to assess the vessel's vulnerability to various types of detection systems.	<b>Inland Waters</b> DBRC	<b>Direct:</b> none  <b>Indirect:</b> none
<b>Acoustic and Oceanographic Research</b>	Active acoustic transmissions used for tests of acoustic sources, validation of ocean acoustic models, tests of signal processing algorithms, and	<b>Offshore Area</b> Quinault Range Site <b>Inland Waters</b> DBRC	<b>Direct:</b> incidental disturbance of sediments from anchors for instruments  <b>Indirect:</b> none

	characterization of acoustic interactions with the ocean bottom, fish and ocean surface.	Keyport Range	
<b>Acoustic Component Testing</b>	Pier side testing includes evaluation and troubleshooting of acoustic components. ROVs may be used to deploy sensors below the water line.	<b>Inland Waters</b> NBK Bangor Bremerton NSE NAVMAG	<b>Direct:</b> none  <b>Indirect:</b> none
<b>Cold Water Support</b>	Training for divers in a cold water diver training environment, and other training supporting range/test facility operations and maintenance. Includes hand-held acoustic systems, underwater communication devices, in-water devices for transporting divers or cargo, and various dive targets such as mine-like shapes.	<b>Inland Waters</b> Carr Inlet DBRC Keyport Range	<b>Direct:</b> incidental disturbance of sediments from mine shape anchors  <b>Indirect:</b> none
<b>Non-Acoustic Component Testing</b>	Radio communication with submarines using tethered, untethered, or towed buoyant in-water devices to raise an antenna to the surface to broadcast the signal. Test may involve radar, environmental sensors, magnetic, passive acoustic, or optical instrumentation to measure, record, and analyze effectiveness, dependability, operational parameters, and durability.	<b>Offshore Area</b> Offshore Area <b>Inland Waters</b> DBRC Keyport Range Keyport Pier NBK Bangor Zelatched	<b>Direct:</b> instruments placed on bottom  <b>Indirect:</b> none
<b>Post Refit Sea Trial</b>	Testing activities following maintenance or repairs to evaluate submarine propulsion, sonar systems, and other mechanical tests.	<b>Inland Waters</b> DBRC	<b>Direct:</b> none  <b>Indirect:</b> none
<b>Radar and other System Testing</b>	At-sea testing may include use of military or commercial radar, communication systems, simulators, or high-energy lasers. Testing of air and surface targets may include UAVs or small craft (e.g., floating cardboard tri-walls, towed, anchored, or self-propelled vessels).	<b>Offshore Area</b> Offshore Area	<b>Direct:</b> none  <b>Indirect:</b> introduction of incompatible visual elements from deposition of MEM such as expendable drone, target fragments
<b>Semi-Stationary Equipment Testing</b>	Semi-stationary equipment calibration and testing is performed from a fixed site, suspended over the side of a boat, moored to the bottom, suspended in the water column, or on the surface; all devices and their anchors are recovered.	<b>Inland Waters</b> DBRC Keyport Range	<b>Direct:</b> incidental disturbance of sediments from placement/removal of seafloor devices such as anchors  <b>Indirect:</b> none
<b>Simulant Testing</b>	The capabilities of defense systems to detect and protect in the event of chemical and biological attacks are tested via deployment of harmless compounds as substitutes for warfare agents.	<b>Offshore Area</b> Offshore Area beyond 3 nm	<b>Direct:</b> none  <b>Indirect:</b> none
<b>ISR/EW Triton Testing</b>	Testing will evaluate the sensors and communication systems on board the MQ-4C Triton unmanned aerial system at a high altitude (50,000 feet above sea level).	<b>Offshore Area</b> Offshore Area	<b>Direct:</b> none  <b>Indirect:</b> none



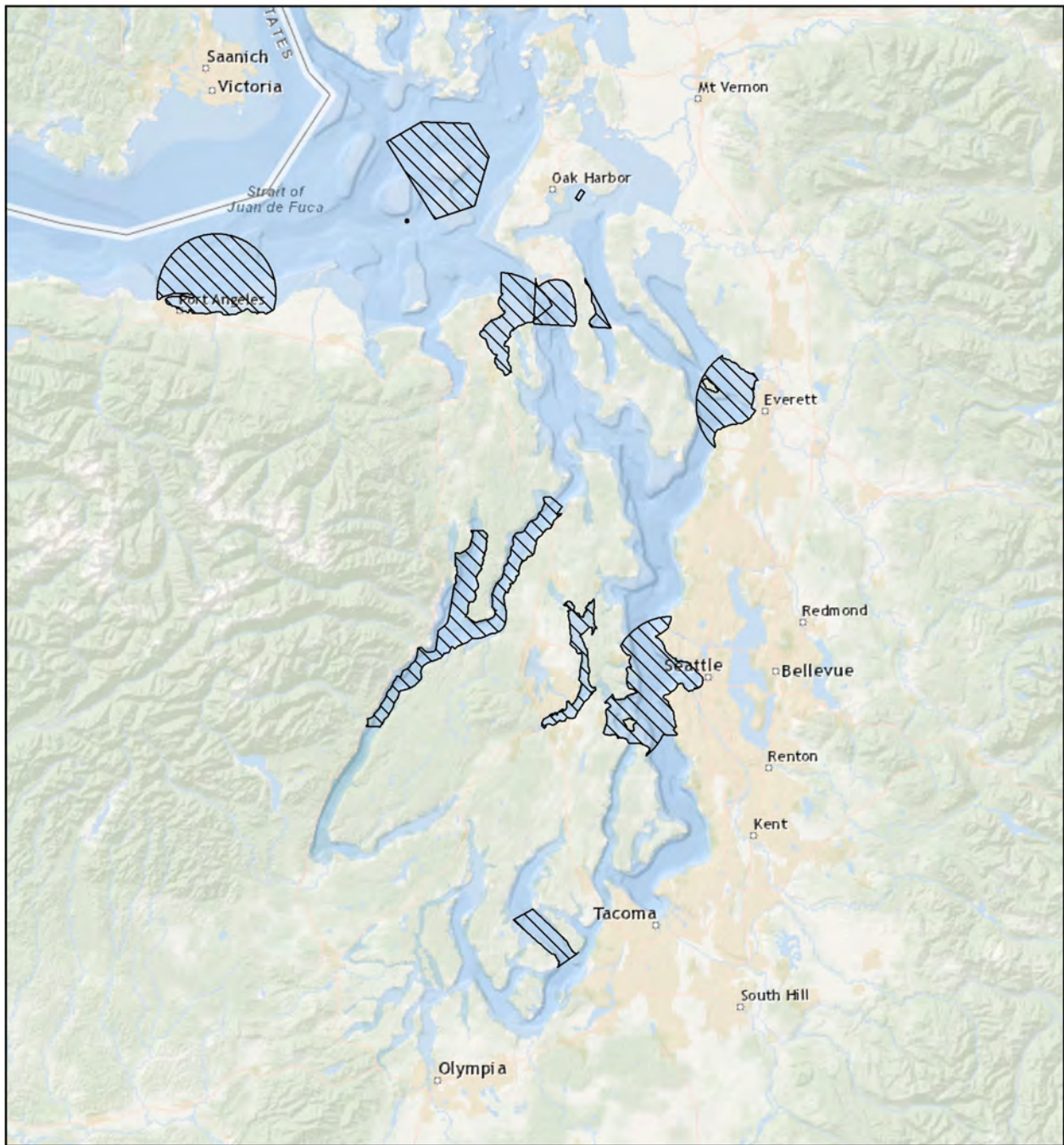
Proposed Area of Potential Effect




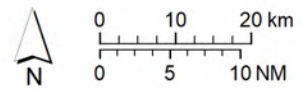
0 4.5 9 18 km  
0 3.75 7.5 15 NM

Projection: WGS84, UTM 10N





 Proposed Area of Potential Effect



Coordinate System: WGS 84 UTM z10



Allyson Brooks Ph.D., Director  
State Historic Preservation Officer

June 17, 2019

Mr. M. L. Arny  
Captain, U.S. Navy  
Commanding Officer  
Naval Air Station Whidbey Island  
3730 North Charles Porter Avenue  
Oak Harbor, WA 98278-5000

In future correspondence please refer to:  
Project Tracking Code: 2018-02-01511  
Re: NW Training & Testing Activities (NWTT)

Dear Captain Arny:

Thank you for contacting the Washington State Department of Archaeology and Historic Preservation (DAHP). The above referenced project has been reviewed on behalf of the State Historic Preservation Officer (SHPO) under provisions of Section 106 of the National Historic Preservation Act of 1966 (as amended) and 36 CFR Part 800. Our review is based upon documentation contained in your communication.

We understand, based on your letter, that you are the appropriate federal person to receive our comments as per 36 CFR 800. We do not agree with the Area of Potential Effect (APE) that you have proposed, as it does not include all areas that will be affected by direct effects such as noise. The DC circuit court just issued an opinion on Dominion Virginia Power Towers that concluded indirect effects, such as visual or noise, can be considered direct impacts to historic properties. This needs to be considered in your Section 106 consultation, including the definition of the APE.

Our concerns center on the undertaking's proposed effects to cultural and historic resources from Whidbey Island to the training area. We are specifically concerned with the impact of noise levels and the frequency of elevated sound levels. We would expect that the APE to include all historic districts and cultural landscapes in the Puget Sound Basin, Salish Sea, and Strait of Juan de Fuca that will be affected by jet and ocean training noise.

During the consultation on the additional Growlers, we were adamant that the 65 DBL was not a meaningful measure of actual sound levels when determining the boundaries for the APE. The decibel level chosen was an average, as opposed to a direct impact, which was above 100 DBL. We are maintaining that concern during the consultation process for NWTT. As such, we are requesting that proposed APE maps of the region include the flight patterns and transit routes that will be used by the planes to reach the training and testing areas. Please provide DAHP and the other consulting parties with these maps, so that we can properly consult on the APE.

These comments are based on the information available at the time of this review and on behalf of the State Historic Preservation Officer (SHPO) in conformance with Section 106 of the National Historic Preservation Act and its implementing regulations 36 CFR 800. Also, we appreciate receiving copies of any correspondence or comments from concerned tribes and other parties that you receive as you consult under the requirements of 36 CFR 800.4(a)(4). Should additional information become available, our assessment may be revised.



Thank you for the opportunity to review and comment. Please ensure that the DAHP Project Number (a.k.a. Project Tracking Code) is shared with any hired cultural resource consultants and is attached to any communications or submitted reports. If you have any questions, please feel free to contact me.

Sincerely,



Allyson Brooks Ph.D., Director  
State Historic Preservation Officer

Kate Valdez (Confederated Tribes and Bands of the Yakama Nation)  
Dan Penn (Confederated Tribes of the Chehalis Reservation)  
Nathan Reynolds (Cowlitz Indian Tribe)  
Alexis Barry (Hoh Indian Tribe)  
David Brownell (Jamestown S'Klallam Tribe)  
Bill White (Lower Elwha Klallam Tribe)  
Lena Tso (Lummi Nation)  
Janine Ledford (Makah Tribe)  
Laura Murphy (Muckleshoot Indian Tribe)  
Annette Bullchild (Nisqually Indian Tribe)  
Trevor Delgado (Nooksack Tribe)  
Stormy Purser (Port Gamble S'Klallam Tribe)  
Brandon Reynon (Puyallup Tribe)  
Rio Jaime (Quileute Tribe of the Quileute Reservation)  
Justine James (Quinault Nation)  
Jackie Ferry (Samish Indian Nation)  
The Honorable Kevin Joseph (Sauk-Suiattle Tribe)  
Earl Davis (Shoalwater Bay Tribe)  
Kris Miller (Skokomish Tribe)  
Steven Mullen-Moses (Snoqualmie Indian Tribe)  
Rhonda Foster (Squaxin Island Tribe)  
Kerry Lyste (Stillaguamish Tribe of Indians of Washington)  
Dennis Lewarch (Suquamish Indian Tribe of the Port Madison Reservation)  
Josephine Jefferson (Swinomish Indian Tribal Community)  
Richard Young (Tulalip Tribes)  
Scott Schuyler (Upper Skagit Indian Tribe)  
Roy Zipp (National Park Service)  
Kristen Griffin (Ebey's Landing National Historic Reserve)  
Rob Smith (National Parks Conservation Association)  
Patricia Jones (Olympic Forest Coalition)  
Karen Sullivan (West Coast Action Alliance c/o Olympic Forest Coalition)  
Reid Nelson (Advisory Council on Historic Preservation)  
Timothy Manss (Skagit Audubon Society)  
Rhea Miller  
Beverly Goldie







DEPARTMENT OF THE NAVY

NAVAL AIR STATION WHIDBEY ISLAND  
3730 NORTH CHARLES PORTER AVENUE  
OAK HARBOR, WASHINGTON 98278-5000

5090

Ser N44/ 1765

13 Sep 19

Allyson Brooks, PhD  
State Historic Preservation Officer  
Washington Department of Archaeology and Historic Preservation  
1110 South Capital Way, Suite 30  
P.O. Box 48343  
Olympia, WA 98504-8343

Dear Dr. Brooks:

SUBJECT: PROJECT TRACKING CODE 2018-02-01511: SECTION 106  
CONSULTATION ON THE AREA OF POTENTIAL EFFECT FOR  
NORTHWEST TRAINING AND TESTING ACTIVITIES

Thank you for your letter dated June 17, 2019 concerning the Navy's proposed area of potential effects (APE) for the proposed Northwest Training and Testing Activities. This letter is intended to respond to your comments and clarify the basis of our assessment of the APE in continuation of this consultation.

The Navy agrees that adverse effects may include audible effects resulting from intermittent aircraft or surface activities. During our consultations last year for EA-18G Growler Airfield Operations at Naval Air Station (NAS) Whidbey Island Complex, the Navy and the Washington Department of Archaeology and Historic Preservation agreed that additional Growler noise from certain operations would indirectly adversely affect the character-defining qualities of the historic landscape in several specific locations.

The Navy finds that the undertaking currently under consultation differs from the undertaking analyzed in the above-referenced consultation, because neither aircraft nor surface activities on state waters have the potential to result in auditory, visual, or atmospheric effects with the potential to affect historic properties. In determining the proposed APE, the Navy considered all effects to cultural and historic resources, including potential auditory effects, based on sound modeling to identify the 65 dB Day-Night Average Sound Level (DNL) threshold for potential effects.

The Environmental Protection Agency, the Federal Aviation Administration (FAA), the Federal Interagency Committee on Noise, and the American National Standards Institute recommend and recognize the reliance on averages reflected in the DNL measurement as a valid methodology for consideration of noise. As a recognized standard, the use of DNL, rather than single noise events, continues to be applied nationwide for all manner of effects from noise, including effects on historic properties. The D.C. Circuit Court, which you mentioned in your

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letter, as well as several other Circuit Courts, have upheld agency use of DNL as an appropriate standard.

DNL is commonly used to assess noise exposures near airfields and under special use airspaces like the military operations area (MOA) over the west side of the Olympic Peninsula. This approach is particularly appropriate for large areas such as the MOA where noise levels vary widely in intensity, occurrence, and location. Noise modeling results show that the area below the Olympic MOA would experience a cumulative noise exposure of less than 37 dB DNL for all activities proposed in the undertaking. This is well below the longstanding and federally established threshold for significance of 65 dB DNL.

As the nation's airspace regulator, the FAA established the Olympic MOA in 1977. For the efficient management of regional airspace, the FAA and the Navy jointly established standard flight plans with preplanned routes for military aircraft to transit to and from NAS Whidbey Island and the Olympic MOA. To reach the Olympic MOAs, aircraft must fly west-southwest from NAS Whidbey Island over the Strait of Juan de Fuca normally at or above 15,000 feet above mean sea level (MSL) and return normally at or above 12,000 feet MSL. These higher altitudes translate to lower cumulative noise levels on the ground. The highest noise exposure for the preplanned transit routes is 36 dB DNL. Based on the accepted threshold of 65 dB DNL, this cumulative noise level falls well below the level that would have the potential to affect historic properties along the transit routes.

In closing, after carefully considering your comments and all aspects of potential effects, the Navy's assessment is that the proposed APE accurately characterizes the full area potentially subject to adverse effects to historic properties, both direct and indirect.

Should you have any questions or require additional information, my point of contact for this proposed undertaking is Mr. David Grant, Archaeologist, Naval Facilities Engineering Command Northwest, (360) 396-0919 or [dave.m.grant@navy.mil](mailto:dave.m.grant@navy.mil).

Sincerely,



M. L. ARNY  
Captain, U.S. Navy  
Commanding Officer

Copy to:

1. Gerald Lewis (Confederated Tribes and Bands of the Yakama Nation)
2. Kate Valdez (Confederated Tribes and Bands of the Yakama Nation)
3. Johnson Meninick (Confederated Tribes and Bands of the Yakama Nation)
4. Dan Penn (Confederated Tribes of the Chehalis Reservation)
5. Nathan Reynolds (Cowlitz Indian Tribe)
6. Wendy Largent (Hoh Indian Tribe)
7. Alexis Barry (Hoh Indian Tribe)

8. David Brownell (Jamestown S'Klallam Tribe)
9. Bill White (Lower Elwha Klallam Tribe)
10. Lena Tso (Lummi Nation)
11. Janine Ledford (Makah Tribe)
12. Laura Murphy (Muckleshoot Indian Tribe)
13. Jacqueline (Jackie) Wall (Nisqually Indian Tribe)
14. Annette Bullchild (Nisqually Indian Tribe)
15. Trevor Delgado (Nooksack Tribe)
16. Stormy Purser (Port Gamble S'Klallam Tribe)
17. Brandon Reynon (Puyallup Tribe)
18. Rio Jaime (Quileute Tribe of the Quileute Reservation)
19. The Honorable Fawn Sharp (Quinalt Nation)
20. Justine James (Quinalt Nation)
21. Jackie Ferry (Samish Indian Nation)
22. The Honorable Kevin Joseph (Sauk-Suiattle Tribe)
23. Benjamin Joseph (Sauk-Suiattle Tribe)
24. Earl Davis (Shoalwater Bay Tribe)
25. Kris Miller (Skokomish Tribe)
26. Steven Mullen-Moses (Snoqualmie Indian Tribe)
27. Rhonda Foster (Squaxin Island Tribe)
28. Kerry Lyste (Stillaguamish Tribe of Indians of Washington)
29. Dennis Lewarch (Suquamish Indian Tribe of the Port Madison Reservation)
30. Josephine Jefferson (Swinomish Indian Tribal Community)
31. Richard Young (Tulalip Tribes)
32. Scott Schuyler (Upper Skagit Indian Tribe)
33. Kristen Griffin (Ebey's Landing National Historic Reserve)
34. Rob Smith (National Parks Conservation Association)
35. Roy Zipp (National Park Service)
36. Patricia Jones (Olympic Forest Coalition)
37. Karen Sullivan (West Coast Action Alliance c/o Olympic Forest Coalition)
38. Reid Nelson (Advisory Council on Historic Preservation)
39. Timothy Manss (Skagit Audubon Society)
40. Ms. Rhea Miller
41. Dr. Beverly Goldie

# Enclosure 1. Tab F.

## Washington – Historic Properties Identification Letters and Responses

A Historic Properties Identification Status was sent to WA SHPO, interested parties, and the ACHP on November 27, 2019. The Tribes received a version soliciting knowledge and concerns about properties of traditional religious and cultural importance to the Tribes within the APE. This enclosure provides one example letter sent to the Tribes and one example letter sent to the interested parties. Upon request, the Navy can provide copies of all letters. Both the ACHP and the WA SHPO responded in December 2019.

### TRIBES

Confederated Tribes and Bands of the Yakama Nation  
Confederated Tribes of the Chehalis Reservation  
Cowlitz Indian Tribe  
Hoh Indian Tribe  
Jamestown S'Klallam Tribe  
Lower Elwha Klallam Tribe  
Lummi Tribe of the Lummi Reservation  
Makah Indian Tribe of the Makah Reservation  
Muckleshoot Indian Tribe of the Muckleshoot Reservation  
Nisqually Indian Tribe of the Nisqually Reservation  
Nooksack Indian Tribe of Washington  
Port Gamble S'Klallam Tribe  
Puyallup Tribe of the Puyallup Reservation  
Quileute Tribe of the Quileute Reservation  
Quinault Indian Nation  
Samish Indian Nation  
Sauk-Suiattle Indian Tribe  
Shoalwater Bay Tribe of the Shoalwater Bay Reservation  
Skokomish Indian Tribe  
Snoqualmie Indian Tribe  
Squaxin Island Tribe of the Squaxin Island Reservation  
Stillaguamish Tribe of Indians of Washington  
Suquamish Indian Tribe of the Port Madison Reservation  
Swinomish Indians of the Swinomish Reservation of Washington  
Tulalip Tribes of Washington  
Upper Skagit Indian Tribe

### INTERESTED PARTIES – ORGANIZATIONS and AGENCIES

Reserve Manager, Ebey's Landing National Historic Reserve  
Northwest Regional Director, National Parks Conservation Association  
Regional Director, Pacific West Region, US Department of the Interior, National Park Service  
President, Olympic Forest Coalition  
Co-Founder, West Coast Action Alliance  
Skagit Audubon Society

### INTERESTED PARTIES – INDIVIDUALS

(Sent a copy of the letter both individuals via e-mail on December 11, 2019)  
Dr. Beverly Goldie  
Ms. Rhea Miller





DEPARTMENT OF THE NAVY

NAVAL AIR STATION WHIDBEY ISLAND  
3730 NORTH CHARLES PORTER AVENUE  
OAK HARBOR, WASHINGTON 98278-5000

5090  
Ser N00/2419  
27 Nov 2019

Allyson Brooks, Ph.D.  
State Historic Preservation Officer  
Washington Department of Archaeology & Historic Preservation  
P.O. Box 48343 Olympia, WA 98504-8343

SUBJECT: CONTINUING SECTION 106 CONSULTATION ON THE  
IDENTIFICATION EFFORT FOR THE PROPOSED NORTHWEST  
TRAINING AND TESTING (LOG. NO. 2018-02-015511-USN)

Dear Dr. Brooks:

Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA), as amended, and its implementing regulations in 36 Code of Federal Regulations (CFR) Section 800, the Navy is continuing consultation for the proposed Northwest Training and Testing (NWTT) activities specific to Washington State. The Navy thanks you for your comments on our identification methodology and appreciates your continued participation in the Section 106 consultation. The Navy will carefully take your comments and recommendations into consideration. This letter is to provide you an update on our effort to identify historic properties within the area of potential effect (APE). The Navy welcomes your comments or any additional information about historic properties in the area.

The proposed undertaking entails over 50 activities, more than 30 of which occur within Washington or within the territorial seas of the United States which extend to 12 nautical miles from its shore, and approximately 20 activities having potential to affect historic properties (Enclosure 1). The Navy is currently in the process of gathering information on historic properties in the APE (Enclosures 2 and 3). To date, we have compiled data from the Washington State Department of Archaeology and Historic Preservation Washington Information System for Architectural and Archaeological Records Data; the National Register of Historic Places (NRHP); the National Oceanic and Atmospheric Administration Automated Wreck and Obstruction Information System; the Bureau of Ocean Energy Management online index of shipwrecks by state; Navy shipwreck and submerged aircraft documentation; and sources used in previous planning phases of NWTT. The summary table in Enclosure 4 includes data gathered from these sources of existing information. The summary table considers NRHP listed, eligible, and unevaluated properties in and at the margins of the APE.

Finally, per 36 CFR 800.4(a)(4) the Navy is consulting with Indian Tribes to identify properties of religious and cultural significance with the APE. Washington Tribes have identified traditional cultural resources important to them that reflect core values founded in generational connections to and interactions with the environment. These may overlap or




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otherwise intersect with one, several, or all of the locations forming the NWTT APE. Some examples to date include opportunities to propagate their living cultures, lifeways, and spiritual wellbeing; tangible entities such as clean water and animals; and large physical areas and bodies of water considered by the tribes to be traditional cultural/maritime landscapes, National Historic Landmarks, and/or World Heritage Sites.

The Navy looks forward to continued consultations with you. If during the identification and evaluation of historic properties the Navy determines it necessary to expand the APE or revise our inventory plan, we will consult with your office and our other consulting parties. If you require additional information, please contact Mr. David Grant, NAVFAC NW Archaeologist at (360) 396-0919 or [dave.m.grant@navy.mil](mailto:dave.m.grant@navy.mil).

Sincerely,

  
M. L. ARMY  
Captain, U.S. Navy  
Commanding Officer

- Enclosures:
1. Spreadsheet of activities within 12 nautical miles with a potential to affect
  2. Offshore APE
  3. Inland Waters APE
  4. Table of properties and potential properties in the APE

Copy to:  
ACHP

Enclosure 1. Activities occurring within 12nm of Washington shore.<sup>1</sup>

Activity	Description (extracted from Appendix A Draft v2)	Location	Potential Effect to Historic Properties
<b>Air Combat Maneuver</b>	Basic flight maneuvers in which fixed-wing aircrew engage in offensive and defensive maneuvering against each other.	<b>Offshore Area</b> W-237 Olympic MOA	none
<b>Electronic Warfare Training</b>	Aircraft and ship crews control the electromagnetic spectrum used by enemy systems to degrade or deny the enemy's ability to take defensive actions. Electronic Warfare Operations can be active or passive, offensive or defensive.	<b>Offshore Area</b> W-237 Olympic MOA	none
<b>Civilian Port Defense—Homeland Security Anti-Terrorism/Force Protection Exercises</b>	Naval forces conduct mine warfare training in conjunction with Department of Homeland Security units. Helicopters, surface ships, and undersea (divers, marine mammals, and unmanned vehicles) mine countermeasures will be used. Non-permanent mine shapes will be laid in various places on the bottom and will be retrieved.	<b>Inland Waters</b> Naval Magazine Indian Island (NAVMAG); Naval Station Everett (NSE) NBK Bangor Bremerton Manchester Port Angeles Port of Seattle	potential incidental disturbance of sediments by anchors for mine shapes
<b>Mine Neutralization – Explosive Ordnance Disposal</b>	Navy divers disable threat mines with explosive charges to create a safe channel for friendly vessels to transit. Personnel detect, identify, evaluate, and neutralize mines in the water with an explosive device and may involve detonation.	<b>Inland Waters</b> Crescent Harbor EOD Training Range (CH EOD TR) Hood Canal EOD Training Range (HC EOD TR)	potential damage to submerged historic properties from explosive shock wave
<b>Intelligence, Surveillance, Reconnaissance</b>	Maritime Patrol Aircraft and unmanned aerial systems operators use all available sensors to collect data on threat vessels. Passive sonobuoys are used to collect and analyze acoustic data, and photographic equipment is used to document the vessel with visual information.	<b>Offshore Area</b>  <b>Inland Waters</b> Restricted Area (RA) 6701 NAVY 7 OPAREA	potential introduction of incompatible visual elements from deposition of military expended materials (MEM) such as sonobuoys, parachutes/decelerators, wires
<b>Maritime Security Operations</b>	Maritime security operations are predominantly maritime security escort events, including the Transit Protection Program (TPP) and training of other escort units.	<b>Inland Waters</b> Bremerton Hood Canal Dabob Bay	potential introduction of incompatible visual elements from deposition of military expended materials (MEM) such as blank ammunition brass, disintegrating ammunition belt links, and pyrotechnic parts and fragments

<sup>1</sup> The following activities occur beyond 12 nautical miles from shore or only in Alaska (SEAFAC) and therefore not addressed further: **Gunnery Exercise Surface-to-Air; Missile Exercise Air-to-Air; Missile Exercise Surface-to-Air; Anti-Submarine Warfare Torpedo Exercise—Submarine; Anti-Submarine Warfare Tracking Exercise – Helicopter; Anti-Submarine Warfare Tracking Exercise—Maritime Patrol Aircraft; Anti-Submarine Warfare Tracking Exercise—Ship; Anti-Submarine Warfare Tracking Exercise—Submarine; Bombing Exercise Air-to-Surface; Gunnery Exercise Surface-to-Surface – Ship; Missile Exercise Air-to-Surface; Torpedo (explosive) Testing; Kinetic Energy Weapon Testing; Vessel Signature Evaluation; Hydrodynamic and Maneuverability Testing; Anti-Submarine Warfare Tracking Test—Maritime Patrol Aircraft**

	All shell casings associated with use of blank ammunition shall be captured, to the greatest extent feasible, using either cofferdams around guns, capture bins, or capture on the deck of vessels.	TPS Route (169) NSE Puget Sound Strait of Juan de Fuca	
<b>Personnel Insertion/Extraction Training—Non-Submersible</b>	Military personnel train for clandestine insertion and extraction into target areas using rotary wing aircraft, fixed-wing aircraft (insertion only), or small boats.	<b>Inland Waters</b> CH EOD TR NAVY 7 OPAREA	none
<b>Precision Anchoring</b>	Surface ship crews release and retrieve anchors in designated locations.	<b>Inland Waters</b> Designated areas near NAVMAG NSE, NAVY 3 OPAREA, Eastern Bank Area	potential damage to submerged historic properties from anchors contacting and penetrating seafloor
<b>Search and Rescue</b>	Helicopter crews rescue military personnel at sea. Helicopters fly below 3,000 ft. and locate personnel to be rescued, hover, recover the survivor, and then depart.	<b>Inland Waters</b> CH EOD TR RA 6701	none
<b>Small Boat Attack Exercise</b>	Small boat crews engage pier side surface targets with small-caliber weapons. Only blank rounds are fired. Duration of firing will be approximately 2 hours with a total of 1,000 rounds fired the first day, and a duration of 1.5 hours with a total of 1,000 rounds fired the second day.	<b>Inland Waters</b> NSE NBK Bangor Bremerton	potential introduction of incompatible visual elements from deposition of military expended materials (MEM) such as ammunition brass and disintegrating ammunition belt links
<b>Submarine Sonar Maintenance</b>	Submarines conduct maintenance to their sonar systems in shallow water near their homeport; however, sonar maintenance could occur at sea as the system's performance may warrant.	<b>Offshore Area</b> Offshore Area <b>Inland Waters</b> NBK Bremerton NBK Bangor	none
<b>Surface Ship Sonar Maintenance</b>	Surface ships perform periodic maintenance to the sonar and other systems while in port or at sea. Surface ships operate active sonar systems for maintenance while in shallow water near their homeport; however, sonar maintenance could occur anywhere.	<b>Offshore Area</b> Offshore Area  <b>Inland Waters</b> NSE Bremerton	none
<b>Unmanned Underwater Vehicle Training</b>	Training with unmanned platforms on which various payloads are attached and used for different purposes. Training can range from basic remote control and autonomous navigation tests to deployment and activation of onboard systems that may include hydrodynamic instruments, launchers, and recovery capabilities.	<b>Offshore Area</b> Quinault Range Site <b>Inland Waters</b> CH EOD TR, Dabob Bay Range Complex (DBRC), NBK Bangor, Bremerton, Keyport Range, Manchester, NAVY 3 OPAREA, NAVY 7 OPAREA	potential incidental disturbance of sediments by anchors for instruments

<b>Anti-Submarine Warfare Testing</b>	Ships conduct operations using airborne and surface assets. Active and passive acoustic systems are used to detect and track submarine targets, culminating in the deployment of lightweight torpedoes.	<b>Offshore Area</b> Offshore Area	potential introduction of incompatible visual elements from deposition of military expended materials (MEM) such as torpedo accessories, decelerator/parachute, sonobuoys, and wires.
<b>At-Sea Sonar Testing</b>	At-sea sonar testing verifies the vessel meets design acoustic specifications, defines the underwater characteristics, determines effects of systems and equipment on ship's acoustic characteristics, and provides for design improvements.	<b>Offshore Area</b> Offshore Area  <b>Inland Waters</b> DBRC	potential introduction of incompatible visual elements from deposition of military expended materials (MEM) such as torpedo accessories, decelerator/parachute, sonobuoys, and wires.
<b>Countermeasure Testing</b>	Countermeasure testing evaluates the deployment, operation, and effectiveness of systems used to defend a vessel from an incoming threat. Countermeasures may be mechanical, chemical, or electronic devices that are released from a vessel to obscure its location or provide a false target. Countermeasures may also be systems operated from within the vessel to detect, localize, track, and respond to incoming threats. Most components are used off shore and are consumed, dissipate, or recovered.	<b>Offshore Area</b> Quinault Range Site  <b>Inland Waters</b> DBRC Keyport Range	potential introduction of incompatible visual elements from deposition of military expended materials (MEM) such as torpedo accessories, mobile subsurface target, and guidance wire.
<b>Pierside Sonar Testing</b>	Ships and submarines will activate mid- and high-frequency tactical sonars, underwater communications systems, and navigational devices. Testing may include the firing of inert torpedo shapes.	<b>Inland Waters</b> NBK Bangor Bremerton NSE	none
<b>Torpedo (non-explosive) Testing</b>	Aerial, surface, and subsurface assets fire exercise torpedoes against surface or subsurface targets, or programmed with a particular run geometry. Exercise torpedoes are typically recovered by ships and helicopters designed for this task.	<b>Offshore Area</b> Offshore Area <b>Inland Waters</b> DBRC	potential incidental disturbance of sediments from anchors for stationary surface targets  potential introduction of incompatible visual elements from deposition of military expended materials (MEM) such as small decelerator/parachutes, acoustic countermeasures, buoy (non-explosive), torpedo accessories, mobile sub-surface target, sonobuoy, sonobuoy wires, guidance wire
<b>Mine Countermeasure and Neutralization Testing</b>	These systems may be deployed with a variety of ships, aircraft, submarines, or UAVs. Mines are neutralized by cutting mooring cables of buoyant mines, producing acoustic energy that fires acoustic-influence mines; or by employing radar or laser fields, detonate mines using remotely-operated vehicles, and use explosive charges to destroy threat mines.	<b>Offshore Area</b> Offshore Area (no explosives in OCNMS) <b>Inland Waters</b> Bremerton Carr Inlet CH EOD TR DBRC HC EOD TR NSE Keyport Range	potential explosive shock wave and incidental disturbance of sediments from anchors for mine shapes  potential introduction of incompatible visual elements from deposition of military expended materials (MEM) such as fiber optic wires and cables

		NAVMAG NAVY 3 OPAREA	
<b>Mine Detection and Classification Testing</b>	Systems may use acoustic, electro-optic, or laser sensors, and may be deployed from aircraft, surface or subsurface vessels, or unmanned platforms.	<b>Offshore Area</b> Quinault Range Site <b>Inland Waters</b> DBRC Keyport Range	potential incidental disturbance of sediments from anchors from mine shapes (in place up to 12 months)
<b>Unmanned Aerial System Testing</b>	UASs are remotely piloted or self-piloted (i.e., preprogrammed flight pattern) aircraft that include fixed-wing, rotary-wing, and other vertical takeoff vehicles. They can carry cameras, sensors, communications equipment, or other payloads.	<b>Offshore Area</b> Quinault Range Site <b>Inland Waters</b> DBRC Keyport Range RA 6701	none
<b>Unmanned Surface Vehicle System Testing</b>	Unmanned surface vehicles (USV) can include remotely operated craft and test vehicles. During testing, they can operate autonomously, semi-autonomously, or non-autonomously.	<b>Offshore Area</b> Quinault Range Site <b>Inland Waters</b> DBRC Keyport Range	potential incidental disturbance of sediments from anchors for stationary surface targets
<b>Unmanned Underwater Vehicle Testing</b>	UUVs may be developed to carry out warfare missions (e.g., mine detection) or scientific missions (e.g., bottom mapping), while others are developed to support other testing objectives (e.g., performing as a target for anti-submarine warfare).	<b>Offshore Area</b> Quinault Range Site <b>Inland Waters</b> Carr Inlet DBRC Keyport Range	potential incidental disturbance of sediments from anchors for stationary surface and sub-surface targets  potential introduction of incompatible visual elements from deposition of military expended materials (MEM) such as torpedo accessories, mobile sub-surface target, decelerator/parachutes, wires, and cables
<b>Propulsion Testing</b>	Propulsion testing is one part of the total sea trial activity. The ship is tested for maneuverability, including full power and endurance runs.	<b>Offshore Area</b> Offshore Area beyond 3 nm	none
<b>Undersea Warfare Testing</b>	Undersea warfare testing includes demonstrating the ability of the ship to search, detect, and track a target and conduct attacks with exercise torpedoes. Subsurface moving targets, rocket and air-dropped weapons, sonobuoys, towed arrays, and sub-surface torpedo-like devices may be used.	<b>Offshore Area</b> Offshore Area	potential introduction of incompatible visual elements from deposition of military expended materials (MEM) such as decelerator/parachutes, acoustic countermeasures, expendable bathythermograph and wire, torpedo accessories, mobile subsurface target, sonobuoy and wires, and other cables and wires
<b>Vessel Signature Evaluation</b>	Signature testing is passive monitoring of surface ships and submarines to assess the vessel's vulnerability to various types of detection systems.	<b>Inland Waters</b> DBRC	none
<b>Acoustic and Oceanographic Research</b>	Active acoustic transmissions used for tests of acoustic sources, validation of ocean acoustic models, tests of signal processing algorithms, and characterization of acoustic interactions with the ocean bottom, fish and ocean surface.	<b>Offshore Area</b> Quinault Range Site <b>Inland Waters</b> DBRC Keyport Range	potential incidental disturbance of sediments from anchors for instruments
<b>Acoustic Component Testing</b>	Pier side testing includes evaluation and troubleshooting of acoustic components. ROVs may be used to deploy sensors below the water line.	<b>Inland Waters</b> NBK Bangor Bremerton NSE	none



		NAVMAG	
<b>Cold Water Support</b>	Training for divers in a cold water diver training environment, and other training supporting range/test facility operations and maintenance. Includes hand-held acoustic systems, underwater communication devices, in-water devices for transporting divers or cargo, and various dive targets such as mine-like shapes.	<b>Inland Waters</b> Carr Inlet DBRC Keyport Range	potential incidental disturbance of sediments from mine shape anchors
<b>Non-Acoustic Component Testing</b>	Radio communication with submarines using tethered, untethered, or towed buoyant in-water devices to raise an antenna to the surface to broadcast the signal. Test may involve radar, environmental sensors, magnetic, passive acoustic, or optical instrumentation to measure, record, and analyze effectiveness, dependability, operational parameters, and durability.	<b>Offshore Area</b> Offshore Area <b>Inland Waters</b> DBRC Keyport Range Keyport Pier NBK Bangor Zelatched	potential disturbance from instruments placed on bottom
<b>Post Refit Sea Trial</b>	Testing activities following maintenance or repairs to evaluate submarine propulsion, sonar systems, and other mechanical tests.	<b>Inland Waters</b> DBRC	none
<b>Radar and other System Testing</b>	At-sea testing may include use of military or commercial radar, communication systems, simulators, or high-energy lasers. Testing of air and surface targets may include UAVs or small craft (e.g., floating cardboard tri-walls, towed, anchored, or self-propelled vessels).	<b>Offshore Area</b> Offshore Area	potential introduction of incompatible visual elements from deposition of MEM such as expendable drone, target fragments
<b>Semi-Stationary Equipment Testing</b>	Semi-stationary equipment calibration and testing is performed from a fixed site, suspended over the side of a boat, moored to the bottom, suspended in the water column, or on the surface; all devices and their anchors are recovered.	<b>Inland Waters</b> DBRC Keyport Range	potential incidental disturbance of sediments from placement/removal of seafloor devices such as anchors
<b>Simulant Testing</b>	The capabilities of defense systems to detect and protect in the event of chemical and biological attacks are tested via deployment of harmless compounds as substitutes for warfare agents.	<b>Offshore Area</b> Offshore Area beyond 3 nm	none
<b>ISR/EW Triton Testing</b>	Testing will evaluate the sensors and communication systems on board the MQ-4C Triton unmanned aerial system at a high altitude (50,000 feet above sea level).	<b>Offshore Area</b> Offshore Area	none

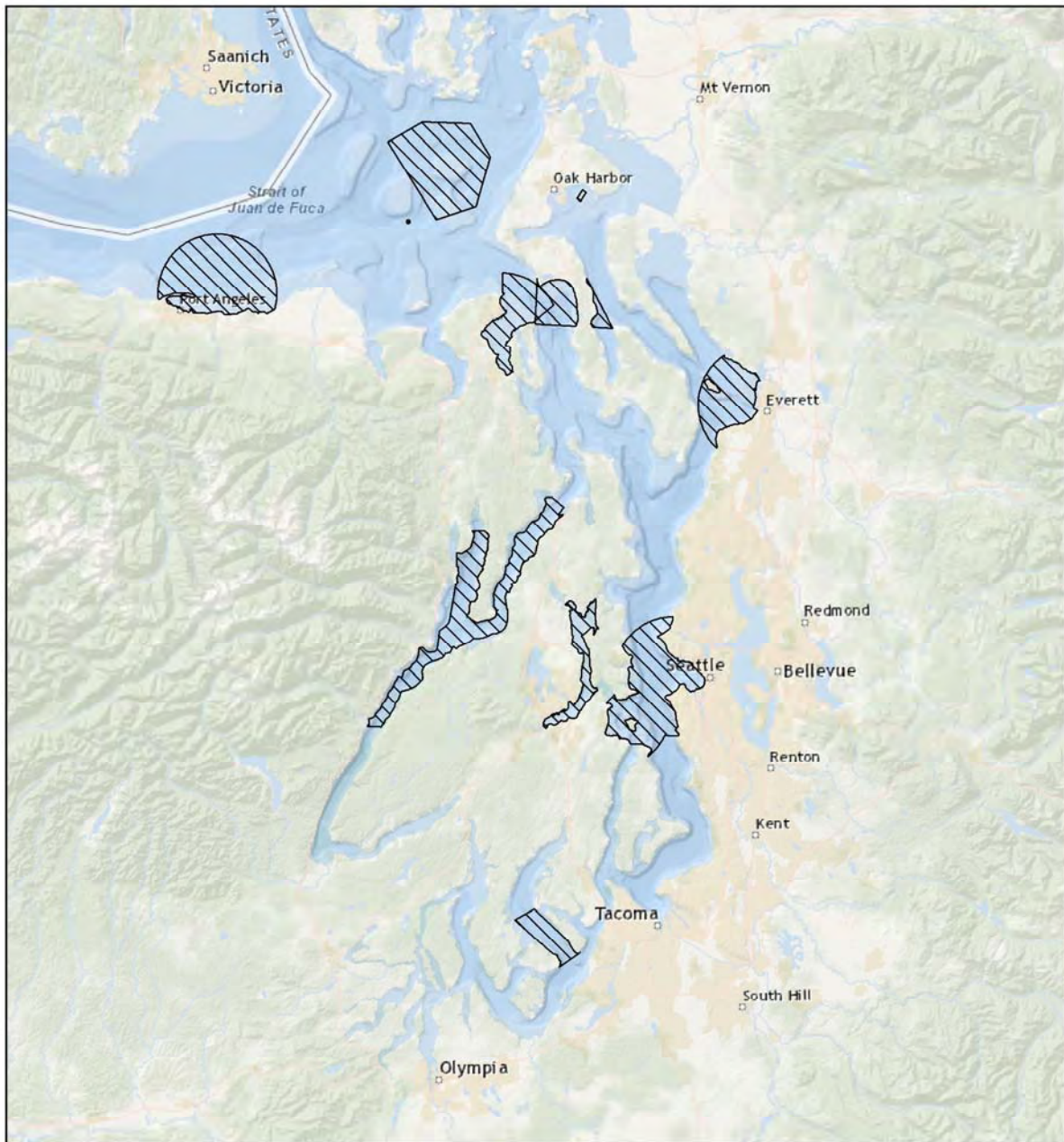


Proposed Area of Potential Effect

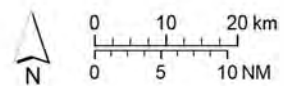


0 4.5 9 18 km  
0 3.75 7.5 15 NM

Projection: WGS84, UTM 10N



 Proposed Area of Potential Effect



Coordinate System: WGS 84 UTM z10



Offshore/ Inshore	Location	Data Fields in WISAARD		
		Maritime Resource Name	Early Year Date	Late Year Date
Offshore	Offshore Area	Aloma	0	1924
Offshore	Offshore Area	Anna Porter	1909	1919
Offshore	Offshore Area	Karl Marx	1914	1925
Offshore	Offshore Area	H & S No. 15	1913	1931
Offshore	Offshore Area	Milky Way	1978	2005
Offshore	Offshore Area	Chetzemoka	1927	1977
Offshore	Offshore Area	Nika	1919	1923
Offshore	Offshore Area	Blanco	1925	1936
Offshore	Offshore Area	Catherine M.	1902	1924
Offshore	Offshore Area	Moonbeam	0	2009
Offshore	Offshore Area	Rose	1907	1951
Offshore	Offshore Area	Pacific	1850	1875
Offshore	Offshore Area	Swiftsure Bank	1909	1961
Offshore	Offshore Area	Pacific Leader	0	1986
Offshore	Offshore Area	Bugara, USS	1944	1971
Offshore	Offshore Area	*Niha (confirm, possibly same as Nika )		
Offshore	Offshore Area	*4 Wrecks Submerged Dangerous		
Offshore	Offshore Area	*2 UNKNOWNs		
Offshore	Offshore Area	**FM-2 Wildcat BuNo 16521	1943	1944
Offshore	Offshore Area	**FM-2 Wildcat BuNo 16590	1943	1944
Offshore	Offshore Area	**FM-2 Wildcat BuNo 55493	1943	1945
Inshore	Port Angeles	Martha Foss	1886	1946
Inshore	Port Angeles	Prosper	0	1993
Inshore	Port Angeles	*Wrecks - Submerged, Dangerous		
Inshore	Port Angeles	* 4 Obstructions		
Inshore	Port Angeles	* 16 Unknowns		
Inshore	^Anchoring Area	No findings from any source		
Inshore	Navy 3 OPAREA	**USS Crow (Amc-20)	1940	1943
Inshore	Navy 3 OPAREA	**NE-1 Grasshopper BuNo 26258	1942	1943
Inshore	Navy 3 OPAREA	**F6F-3 Hellcat BuNo 40177	1943	1943
Inshore	Navy 3 OPAREA	**F6F- Hellcat BuNo 42703	1942	1944
Inshore	Navy 3 OPAREA	*7 obstructions or wrecks		
Inshore	Port Townsend	Orca	0	1999
Inshore	Port Townsend	Alaska Reefer	1944	1961
Inshore	Port Townsend	Governor	1907	1921
Inshore	Port Townsend	*Comet		
Inshore	Port Townsend	* 3 Wrecks - Submerged, Dangerous	0	0
Inshore	Port Townsend	*Wrecks - Visible	0	0
Inshore	Port Townsend	UNKNOWN WRECK	0	0
Inshore	Port Townsend	UNKNOWN WRECK	0	0
Inshore	Port Townsend	UNKNOWN WRECK	0	0
Inshore	Port Townsend	* 41 Obstructions or Wrecks		
Inshore	Port Townsend	*23 Unknowns		
Inshore	Port Townsend	* 2 Soundings		

Offshore/ Inshore	Location	Data Fields in WISAARD		
		Maritime Resource Name	Early Year Date	Late Year Date
Inshore	Navy 7 OPAREA	**PV-1 Ventura BuNo 33414	1942	1945
Inshore	Navy 7 OPAREA	*8 Obstructions or Wrecks	0	0
Inshore	Navy 7 OPAREA	* 13 Unknowns		
Inshore	Everett	Al-Ind-Esk-A-Sea	1945	1982
Inshore	Everett	UNKNOWN WRECK	0	0
Inshore	Everett	UNKNOWN WRECK	0	0
Inshore	Everett	UNKNOWN WRECK	0	0
Inshore	Everett	UNKNOWN WRECK	0	0
Inshore	Everett	*2 Wrecks - Submerged, Nondangerous		
Inshore	Everett	* 1 Obstruction		
Inshore	Everett	*9 Unknowns		
Inshore	Everett	* 1 Sounding		
Inshore	Dabob Bay Range	*Frances W.		
Inshore	Dabob Bay Range	*1 Obstruction		
Inshore	Dabob Bay Range	*35 Unknowns		
Inshore	Bremerton/NUWC	UNKNOWN WRECK	0	0
Inshore	Bremerton/NUWC	UNKNOWN WRECK	0	0
Inshore	Bremerton/NUWC	UNKNOWN WRECK	0	0
Inshore	Bremerton/NUWC	*6 Wrecks - Submerged, Dangerous		
Inshore	Bremerton/NUWC	*25 Obstructions		
Inshore	Bremerton/NUWC	*22 Unknowns		
Inshore	Seattle/Elliot Bay	Boss	0	0
Inshore	Seattle/Elliot Bay	A.J. Fuller	1889	1918
Inshore	Seattle/Elliot Bay	Shilshole Barge	0	0
Inshore	Seattle/Elliot Bay	Shilshole Barge	0	0
Inshore	Seattle/Elliot Bay	Omar	1918	1995
Inshore	Seattle/Elliot Bay	UNKNOWN WRECK	0	0
Inshore	Seattle/Elliot Bay	UNKNOWN WRECK	0	0
Inshore	Seattle/Elliot Bay	UNKNOWN WRECK	0	0
Inshore	Seattle/Elliot Bay	UNKNOWN WRECK	0	0
Inshore	Seattle/Elliot Bay	UNKNOWN WRECK	0	0
Inshore	Seattle/Elliot Bay	UNKNOWN WRECK	0	0
Inshore	Seattle/Elliot Bay	*2 Wrecks		
Inshore	Seattle/Elliot Bay	*6 Wrecks - Submerged, Dangerous		
Inshore	Seattle/Elliot Bay	*6 Wrecks - Submerged, Nondangerous		
Inshore	Seattle/Elliot Bay	*29 Obstructions		
Inshore	Seattle/Elliot Bay	*43 Unknowns		
Inshore	Seattle/Elliot Bay	* 1 Sounding		
Inshore	Carr Inlet OPAREA	UNKNOWN WRECK	0	0
Inshore	Carr Inlet OPAREA	UNKNOWN WRECK	0	0
Inshore	Carr Inlet OPAREA	* 6 Unknowns		



Washington Tribes have provided important information and cultural perspectives regarding a variety of resources that have religious and cultural importance. These may overlap or otherwise intersect with one, several, or all of the locations forming the NWTT APE. The Navy received this information in letters, through comments received in response to prior and current NEPA documents, and during recent meetings. In addition to soliciting information through the Section 106 process, the Navy expects to receive additional information from ongoing and pending government-to-government consultations and will work with advisory and consulting parties to address challenges inherent to full consideration of these resources within the regulatory framework of NEPA, NHPA, and other applicable mandates, authorities, instructions, and guidance.

Navy removed 30 WISAARD property listings from in or near the APE boundaries for the following reasons: the listing is or was on land (e.g., lighthouses), it is land such as a topographic feature or landform (e.g., Admiralty Head), or it is not a place but a historic occurrence (e.g., Wilkes enter Port Discovery), it was at the margin of the APE but effects from the undertaking were unlikely (e.g., docks, shipyards, port facilities), or it is a movable NRHP eligible or listed vessel (e.g., USS *Turner Joy*, the schooners *Adventuress* and *Martha* in Port Townsend, and the tug *Arthur Foss*).

Four 'soundings' listed in NOAA AWOIS were not included

This table may include redundant listings of unknowns, unknown wrecks, and/or obstructions

\* source: NOAA Automated Wreck and Obstruction Information System (AWOIS)

\*\* source: Grant et. al., 1993, U.S. Navy Shipwrecks and Submerged Naval in Washington

^There are four anchoring areas, one stands alone and is its own location (see above), two are within the Port Townsend location, and one is in Everett location.



DEPARTMENT OF THE NAVY

NAVAL AIR STATION WHIDBEY ISLAND  
3730 NORTH CHARLES PORTER AVENUE  
OAK HARBOR, WASHINGTON 98278-5000

5090  
Ser N44/2382  
27 Nov 19

Mr. Timothy Manss  
Skagit Audubon Society  
PO Box 1101  
Mount Vernon, WA 98273

Dear Mr. Manss:

SUBJECT: CONTINUING SECTION 106 CONSULTATION ON THE IDENTIFICATION  
EFFORT FOR THE PROPOSED NORTHWEST TRAINING AND TESTING  
LOG NO. 2018-02-015511-USN

Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA), as amended, and its implementing regulations in 36 Code of Federal Regulations (CFR) Section 800, the Navy is continuing consultation for the proposed Northwest Training and Testing (NWTT) activities specific to Washington State. The Navy thanks you for your comments on our identification methodology and appreciates your continued participation in the Section 106 consultation. The Navy will carefully take your comments and recommendations into consideration. This letter is to provide you an update on our effort to identify historic properties within the area of potential effect (APE). The Navy welcomes your comments or any additional information about historic properties in the area.

The proposed undertaking entails over 50 activities, more than 30 of which occur within Washington or within the territorial seas of the United States which extend 12 nautical miles from its shore, and approximately 20 activities having potential to affect historic properties (enclosure 1). The Navy is currently in the process of gathering information on historic properties in the APE (enclosures 2 and 3). To date, we have compiled data from the Washington State Department of Archaeology and Historic Preservation Washington Information System for Architectural and Archaeological Records Data; the National Register of Historic Places (NRHP); the National Oceanic and Atmospheric Administration Automated Wreck and Obstruction Information System; the Bureau of Ocean Energy Management online index of shipwrecks by state; Navy shipwreck and submerged aircraft documentation; and sources used in previous planning phases of NWTT. The summary table in enclosure 4 includes data gathered from these sources of existing information. The summary tables considers NRHP listed, eligible, and unevaluated properties in and at the margins of the APE.

Finally, per 36 CFR 800.4(a)(4), the Navy is consulting with Indian Tribes to identify properties of religious and cultural significance with the APE. Washington Tribes have identified traditional cultural resources important to them that reflect core values founded in generational connections to and interactions with the environment. These may overlap or otherwise intersect with one, several, or all of the locations forming the NWTT APE. Some examples to date include

5090  
Ser N44/2382  
27 Nov 19

opportunities to propagate their living cultures, lifeways, and spiritual wellbeing; tangible entities such as clean water and animals; and large physical areas and bodies of water considered by the tribes to be traditional cultural/maritime landscapes, National Historic Landmarks, and/or World Heritage Sites.

The Navy looks forward to continued consultations with you. If during the identification and evaluation of historic properties the Navy determines it necessary to expand the APE or revise our inventory plan, we will consult with your office and our other consulting parties. If you require additional information, please contact Mr. David Grant, NAVFAC NW Archaeologist at (360) 396-0919 or [dave.m.grant@navy.mil](mailto:dave.m.grant@navy.mil).

Sincerely,



M. L. ARNY  
Captain, U.S. Navy  
Commanding Officer

- Enclosures:
1. Spreadsheet of activities within 12 nautical miles with a potential to affect
  2. Offshore APE
  3. Inland Waters APE
  4. Table of properties and potential properties in the APE





DEPARTMENT OF THE NAVY

NAVAL AIR STATION WHIDBEY ISLAND  
3730 NORTH CHARLES PORTER AVENUE  
OAK HARBOR, WASHINGTON 98278-5000

5090  
Ser N00/2383  
27 Nov 19

Mr. Gerald Lewis  
Confederate Tribes and Bands  
Of the Yakama Nation  
PO Box 151  
Toppenish, WA 98948

SUBJECT: CONTINUING SECTION 106 CONSULTATION ON THE  
IDENTIFICATION EFFORT FOR THE PROPOSED NORTHWEST  
TRAINING AND TESTING LOG NO. 2018-02-015511-USN

Dear Mr. Gerald Lewis:

Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA), as amended, and its implementing regulations in 36 Code of Federal Regulations Section 800, the Navy is continuing consultation for the proposed Northwest Training and Testing (NWTT) activities specific to Washington State. This letter is to provide you an update on our effort to identify historic properties within the Area of Potential Effect (APE). The Navy welcomes your comments or any additional information about historic properties in the area.

The proposed undertaking entails over 50 activities, more than 30 of which occur within Washington or within the territorial seas of the United States, which extend 12 nautical miles from the shore, and approximately 20 activities having potential to affect historic properties (Enclosure 1). The Navy is currently in the process of gathering information on historic properties in the APE (enclosures 2 and 3). To date, we have compiled data from the Washington State Department of Archaeology and Historic Preservation Washington Information System for Architectural and Archaeological Records Data; the National Register of Historic Places (NRHP); the National Oceanic and Atmospheric Administration Automated Wreck and Obstruction Information System; the Bureau of Ocean Energy Management online index of shipwrecks by state; Navy shipwreck and submerged aircraft documentation; and sources used in previous planning phases of NWTT. The summary table in enclosure 4 includes data gathered from these sources of existing information. The summary table considers NRHP listed, eligible, and unevaluated properties in and at the margins of the APE.

The Navy understands that the project area and its surrounding location may have cultural importance and significance to your tribe. Section 106 of the NHPA requires federal agencies to seek information from tribes likely to have knowledge of, or concerns with, historic resources within the project's APE. We are specifically seeking your comments on our proposed APE and any knowledge or concerns about properties that may have religious or cultural significance and may be eligible for listing in the NRHP, including Traditional Cultural Properties.

We appreciate any assistance you could provide us in our efforts to comply with Section 106 of the NHPA. Please be assured that the Navy will treat any information you share with us with the degree of confidentiality that is required in Section 800.11(c) of the NHPA, or with any other special restrictions you may require. Washington Tribes have identified traditional cultural resources reflecting core values founded in generational connections to and interactions with the environment. These may overlap or otherwise intersect with one, several, or all of the locations forming the NWTT APE. Some examples to date include opportunities and resources vital to culture, lifeways, and spiritual wellbeing; tangible entities such as clean water and animals; and large physical areas and bodies of water considered by the tribes to be traditional cultural/maritime landscapes, National Historic Landmarks, and/or World Heritage Sites.

The Navy looks forward to continued consultations with you. If during the identification and evaluation of historic properties the Navy determines it necessary to expand the APE or revise our inventory plan, we will consult with the State Historic Preservation Officer and our other consulting parties. If you require additional information, please contact Mr. David Grant, NAVFAC NW Archaeologist at (360) 396-0919 or dave.m.grant@navy.mil.

Sincerely,



M. L. ARNY  
Captain, U.S. Navy  
Commanding Officer

- Enclosures:
1. Spreadsheet of activities within 12 nautical miles with a potential to affect
  2. Offshore APE
  3. Inland Waters APE
  4. Table of properties and potential properties in the APE





DEPARTMENT OF THE NAVY

NAVAL AIR STATION WHIDBEY ISLAND  
3730 NORTH CHARLES PORTER AVENUE  
OAK HARBOR, WASHINGTON 98278-5000

5090  
Ser N00/2375  
27 Nov 19

Mr. Reid Nelson  
Advisory Council on Historic Preservation  
401 F. Street NW, Suite 308  
Washington, D. C. 200001-2637

SUBJECT: CONTINUING SECTION 106 CONSULTATION ON THE  
IDENTIFICATION EFFORT FOR THE PROPOSED NORTHWEST  
TRAINING AND TESTING (LOG. NO. 2018-02-015511-USN)

Dear Mr. Nelson:

Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA), as amended, and its implementing regulations in 36 Code of Federal Regulations (CFR) Section 800, the Navy is continuing consultation for the proposed Northwest Training and Testing (NWT) activities specific to Washington State. This letter is to provide you an update on our effort to identify historic properties within the area of potential effect (APE). The Navy welcomes your comments or any additional information about historic properties in the area.

The proposed undertaking entails over 50 activities, more than 30 of which occur within Washington or within the territorial seas of the United States which extend to 12 nautical miles from its shore, and approximately 20 activities having potential to affect historic properties (Enclosure 1). The Navy is currently in the process of gathering information on historic properties in the APE (Enclosures 2 and 3). To date, we have compiled data from the Washington State Department of Archaeology and Historic Preservation Washington Information System for Architectural and Archaeological Records Data; the National Register of Historic Places (NRHP); the National Oceanic and Atmospheric Administration Automated Wreck and Obstruction Information System; the Bureau of Ocean Energy Management online index of shipwrecks by state; Navy shipwreck and submerged aircraft documentation; and sources used in previous planning phases of NWT. The summary table in Enclosure 4 includes data gathered from these sources of existing information. The summary table considers NRHP listed, eligible, and unevaluated properties in and at the margins of the APE.

Finally, per 36 CFR 800.4(a)(4) the Navy is consulting with Indian Tribes to identify properties of religious and cultural significance within the APE. To date, Washington Tribes have identified traditional cultural resources important to them that reflect core values founded in generational connections to and interactions with the environment.

The Navy looks forward to continued consultations with you. If during the identification and evaluation of historic properties the Navy determines it necessary to expand the APE or revise our inventory plan, we will consult with the State Historic Preservation Officer and our other consulting parties. If you require additional information, please contact Mr. David Grant, NAVFAC NW Archaeologist at (360) 396-0919 or [dave.m.grant@navy.mil](mailto:dave.m.grant@navy.mil).

Sincerely,



M. L. ARNY  
Captain, U.S. Navy  
Commanding Officer

Enclosures: 1. Spreadsheet of activities within 12 nautical miles with a potential to affect  
2. Offshore APE  
3. Inland Waters APE  
4. Table of properties and potential properties in the APE



*Preserving America's Heritage*

December 17, 2019

Captain Matthew Army  
Commanding Officer  
Naval Air Station Whidbey Island  
3730 North Charles Porter Avenue  
Oak Harbor, WA 98278-5000

Ref: *Supplement to the Northwest Training and Testing (AK-WA)*  
*ACHPConnect Log Number: 012892*

Dear CAPT Army:

On December 11, 2019, the Advisory Council on Historic Preservation (ACHP) received your supporting documentation regarding the ongoing Section 106 consultation regarding the referenced undertaking. Based upon the information you provided, we have concluded that our participation at this time, pursuant to Section 800.2(b)(1), of our regulations, "Protection of Historic Properties" (36 CFR Part 800) implementing Section 106 of the National Historic Preservation Act, may be premature.

The Department of the Navy (Navy) should continue consultation with the Washington and Alaska State Historic Preservation Officers, Indian tribes and other consulting parties, as appropriate, to identify and evaluate historic properties and to assess any potential adverse effects on those historic properties. If you determine, through consultation, that the undertaking will adversely affect historic properties and that a Section 106 agreement document (Agreement) is necessary, the Navy must notify the ACHP of the finding of adverse effect and provide the documentation detailed at 36 CFR § 800.11(e). In the event that this undertaking is covered under the terms of an existing Agreement, you should follow the process set forth in the applicable Agreement.

If you have any questions or require our further assistance at this time, please contact Ms. Katharine R. Kerr at (202) 517-0216 or by e-mail at [kkerr@achp.gov](mailto:kkerr@achp.gov) and reference the ACHPConnect Log Number above.

Sincerely,

Artisha Thompson  
Historic Preservation Technician  
Office of Federal Agency Programs

ADVISORY COUNCIL ON HISTORIC PRESERVATION

401 F Street NW, Suite 308 • Washington, DC 20001-2637  
Phone: 202-517-0200 • Fax: 202-517-6381 • [achp@achp.gov](mailto:achp@achp.gov) • [www.achp.gov](http://www.achp.gov)



Allyson Brooks Ph.D., Director  
State Historic Preservation Officer

December 24, 2019

Captain M. L. Army  
Commanding Officer  
U.S. Navy  
Naval Air Station Whidbey Island  
3730 North Charles Porter Avenue  
Oak Harbor, WA 98278-5000

In future correspondence please refer to:  
Project Tracking Code: 2018-02-01511  
Re: NW Training & Testing Activities (NWTT)

Dear Captain Army:

Thank you for your letter of November 27, 2019 to the Washington State Historic Preservation Officer (SHPO) in follow-up to our letter to you of June 17, 2019. Your correspondence has been reviewed on behalf of the SHPO under provisions of Section 106 of the National Historic Preservation Act of 1966 (as amended) and 36 CFR Part 800. Our review is based upon documentation contained in your communication.

In response, we appreciate the update on your work to identify historic properties within the Navy's proposed area of potential effect (APE) for the Northwest Training & Testing Activities (NWTT). We also appreciate your consultation with interested/affected Tribes to identify properties of religious and cultural significance in the APE.

However, our review of the maps enclosed with your letter of the proposed APE indicates that our previous comment/recommendation has not been addressed. As cited from our June 27<sup>th</sup> letter:

*We are specifically concerned with the impact of noise levels and the frequency of elevated sound levels. We would expect that the APE to include all historic districts and cultural landscapes in the Puget Sound Basin, Salish Sea, and Strait of Juan de Fuca that will be affected by jet and ocean training noise...As such, we are requesting that proposed APE maps of the region include the flight patterns and transit routes that will be used by the planes to reach the training and testing areas. Please provide DAHP and the other consulting parties with these maps, so that we can properly consult on the APE.*

Based upon our review of your November 27<sup>th</sup> letter and the enclosures, we reiterate our concerns and request for the Navy to include in the APE the flight corridors between air bases and the delineated training and testing areas. These comments are based on the information available at the time of this review and in conformance with Section 106 of the National Historic Preservation Act and its implementing regulations 36 CFR 800. Also, we appreciate receiving copies of any correspondence or comments from concerned tribes and other parties that you receive as you consult under the requirements of 36 CFR 800.4(a)(4). Should additional information become available, our assessment may be revised.

Thank you for the opportunity to review and comment. Please ensure that the DAHP Project Number (2018-02-01511) is shared with any hired cultural resource consultants and is attached to any communications or submitted reports. If you have any questions, please feel free to contact me.



Captain M.L. Army  
December 24, 2019  
Page Two

Sincerely,



Greg Griffith  
Deputy State Historic Preservation Officer

Copy: Gerald Lewis (Confederated Tribes and Bands of the Yakama Nation)  
Dan Penn, THPO (Confederated Tribes of the Chehalis Reservation)  
Nathan Reynolds (Cowlitz Indian Tribe)  
Bob Smith (Hoh Indian Tribe)  
David Brownell (Jamestown S'Klallam Tribe)  
Bill White (Lower Elwha Klallam Tribe)  
Lena Tso (Lummi Tribe of the Lummi Reservation)  
Janine Ledford (Makah Indian Tribe of the Makah Reservation)  
Laura Murphy (Muckleshoot Indian Tribe of the Muckleshoot Reservation)  
Jacqueline Wallace (Nisqually Indian Tribe of the Nisqually Reservation)  
George Swanaset, Jr. (Nooksack Indian Tribe of Washington)  
Stormy Purser (Port Gamble S'Klallam Tribe)  
Brandon Reynon (Puyallup Tribe of the Puyallup Reservation)  
Rio Jaime (Quileute Tribe of the Quileute Reservation)  
The Honorable Fawn Sharp (Quinalt Indian Nation)  
Jackie Ferry (Samish Indian Nation)  
Benjamin Joseph (Sauk-Suiattle Indian Tribe)  
Earl Davis (Shoalwater Bay Tribe of the Shoalwater Bay Reservation)  
Kris Miller (Skokomish Indian Tribe)  
Steven Mullen-Moses (Snoqualmie Indian Tribe)  
Rhonda Foster, THPO (Squaxin Island Tribe of the Squaxin Island Reservation)  
Kerry Lyste (Stillaguamish Tribe of Indians of Washington)  
Dennis Lewarch (Suquamish Indian Tribe of the Port Madison Reservation)  
Josephine Jefferson (Swinomish Indians of the Swinomish Reservation of Washington)  
Richard Young (Tulalip Tribes of Washington)  
Scott Schuyler (Upper Skagit Indian Tribe)  
Roy Zipp (National Park Service)  
Kristen Griffin (Ebey's Landing National Historic Reserve)  
Rob Smith (National Parks Conservation Association)  
Patricia Jones (Olympic Forest Coalition)  
Karen Sullivan (West Coast Action Alliance c/o Olympic Forest Coalition)  
Reid Nelson (Advisory Council on Historic Preservation)  
Timothy Manss (Skagit Audubon Society)  
Rhea Miller  
Beverly Goldie





# Enclosure 1. Tab G.

## Washington – Finding of Effect Letters and Responses

The Finding of Effect Letter was sent to the WA SHPO copy to Tribes, interested parties, and the ACHP on July 13, 2020. The WA SHPO responded on July 22, 2020.

### TRIBES

Confederated Tribes and Bands of the Yakama Nation  
Confederated Tribes of the Chehalis Reservation  
Cowlitz Indian Tribe  
Hoh Indian Tribe  
Jamestown S'Klallam Tribe  
Lower Elwha Klallam Tribe  
Lummi Tribe of the Lummi Reservation  
Makah Indian Tribe of the Makah Reservation  
Muckleshoot Indian Tribe of the Muckleshoot Reservation  
Nisqually Indian Tribe of the Nisqually Reservation  
Nooksack Indian Tribe of Washington  
Port Gamble S'Klallam Tribe  
Puyallup Tribe of the Puyallup Reservation  
Quileute Tribe of the Quileute Reservation  
Quinault Indian Nation  
Samish Indian Nation  
Sauk-Suiattle Indian Tribe  
Shoalwater Bay Tribe of the Shoalwater Bay Reservation  
Skokomish Indian Tribe  
Snoqualmie Indian Tribe  
Squaxin Island Tribe of the Squaxin Island Reservation  
Stillaguamish Tribe of Indians of Washington  
Suquamish Indian Tribe of the Port Madison Reservation  
Swinomish Indians of the Swinomish Reservation of Washington  
Tulalip Tribes of Washington  
Upper Skagit Indian Tribe

### INTERESTED PARTIES – ORGANIZATIONS and AGENCIES

Reserve Manager, Ebey's Landing National Historic Reserve  
Northwest Regional Director, National Parks Conservation Association  
Regional Director, Pacific West Region, US Department of the Interior, National Park Service  
President, Olympic Forest Coalition  
Co-Founder, West Coast Action Alliance  
Skagit Audubon Society

### INTERESTED PARTIES – INDIVIDUALS

Dr. Beverly Goldie (Sent a copy of the letter via e-mail on July 13, 2020)  
Ms. Rhea Miller



DEPARTMENT OF THE NAVY

NAVAL AIR STATION WHIDBEY ISLAND  
3730 NORTH CHARLES PORTER AVENUE  
OAK HARBOR, WASHINGTON 98278-5000

5090  
Ser N00/0981  
10 Jul 20

Allyson Brooks, Ph.D.  
State Historic Preservation Officer  
Washington Department of Archaeology  
& Historic Preservation  
P.O. Box 48343 Olympia, WA 98504-8343

SUBJ: FINDING OF NO HISTORIC PROPERTIES AFFECTED FOR THE PROPOSED  
NORTHWEST TRAINING AND TESTING (LOG. NO. 2018-02-01511-USN)

Dear Dr. Brooks:

The United States Navy (Navy) is continuing consultation on the above-subject undertaking, initiated in February 2018, pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA). The Navy seeks your agreement on our finding of No Historic Properties Affected for the proposed Northwest Training and Testing (NWTT) activities occurring in Washington State.

**Proposed Undertaking**

As documented in our February 16, 2018 letter, the proposed undertaking is to conduct training and testing activities in the Pacific Northwest that support the Navy's mission to maintain, train, and equip combat-ready naval forces. The undertaking would continue longstanding military readiness activities within designated range complexes and operating areas in the offshore and inland waters of Washington State (Enclosure 1). Activities associated with this undertaking generally fall into the following five primary mission areas: air warfare, anti-submarine warfare, electronic warfare, mine warfare, and surface warfare. The frequency and types of activities included in the proposed undertaking account for fluctuations in training and testing to meet evolving or emergent military readiness requirements resulting from new missions and systems. Enclosure 2 provides a table describing the full scope of activities that occur within Washington state waters or between state waters and territorial waters 12 nautical miles from its shore.

**Area of Potential Effects**

In careful consideration of the proposed undertaking, the Navy consulted with your office, Tribes, and additional consulting parties to define the area of potential effects (APE) in accordance with 36 C.F.R. § 800.4(a)(1). In determining the APE, the Navy considered all proposed activities and their potential effects, including physical damage from anchors, disturbance from the placement and use of seafloor devices, shockwaves and vibration from explosives, auditory effects from aircraft, and settling of military expended materials (MEM), among others. With regard to aircraft noise, the highest modeled noise exposure for NWTT activities, based on the most current noise analysis, would be less than 37 decibels (dB) Day-Night Average Sound Level (DNL) (see Navy letter dated September 13, 2019 for additional information). In consideration of comments received, and the scale and nature of the proposed undertaking, the Navy identified four types of activities with the potential to affect historic properties as part of the APE definition process:

- Use of explosives in the Quinault Range Site (QRS) and use of Explosive Ordnance Disposal (EOD) ranges at Crescent Harbor and Hood Canal.
- Employment of vessel anchors with sufficient weight and function to dig into the seafloor in four established precision ship-anchoring areas (one southwest of the Navy 3 Operating Area (OPAREA), one west and one east of Naval Magazine Indian Island, and one west of Naval Station Everett) and at the established barge mooring in Carr Inlet.
- Use of seafloor devices, such as the small tracked or wheeled unmanned underwater vehicles, and placement/removal of inert mine shapes and inertial anchors near ports used in the QRS, Dabob Bay Range Complex, Keyport Range Site, Carr Inlet, the Crescent Harbor and Hood Canal EOD Ranges, and pierside at Navy installations.
- Settling of military expended materials (MEM), such as flares, fine guidance wires, sonobuoys and their parts, parachutes/decelerators, small buoyancy weights, blank ammunition brass, ammunition belt links, and pyrotechnic parts and fragments in the QRS, Dabob Bay Range Complex, the Keyport Range Site, Carr Inlet, Navy 3 and 7 OPAREAs, the Crescent Harbor and Hood Canal EOD Ranges, and pierside at Navy installations.

The resulting APE includes areas within existing range complexes and operating areas offshore and in inland waters of Washington where historic properties could be affected by these activities. The APE, as described in our May 20, 2019 letter, is depicted in Enclosures 3 and 4.

#### **Historic Properties Identified in the APE**

In accordance with 36 C.F.R. § 800.4(b)(1), the Navy's efforts to identify historic properties took into account past planning, research, and studies, the magnitude and nature of the undertaking, the degree of Federal involvement, the nature and extent of the potential effects, and the likely nature and location of historic properties within the APE. The Navy obtained information from a variety of sources, including the following:

1. Properties identified during previous planning for the ranges and associated areas within the current NWTT APE and consultations for prior NWTT undertakings
2. The National Register of Historic Places (NRHP)
3. The Washington State Department of Archaeology and Historic Preservation Washington Information System for Architectural and Archaeological Records Data
4. The National Oceanic and Atmospheric Administration (NOAA) Automated Wreck and Obstruction Information System
5. The Bureau of Ocean Energy Management (BOEM) online index of shipwrecks by state
6. Navy shipwreck and submerged aircraft documentation
7. Agencies, organizations, and individuals who expressed interest in participation in the Section 106 process

8. Publically available sources about Tribal territories and resources, including Tribal websites, and information solicited directly from the 26 consulting Tribes to identify properties of traditional religious and cultural significance within the APE

The Navy provided a synthesis of its research efforts to your office on November 27, 2019 and included a "Table of Properties and Potential Properties in the APE". Through these efforts, the Navy identified three types of historic properties known or anticipated to be present within the APE:

- Pre-Contact archaeological sites: Pre-Contact inundated sites and features.
- Historic Sunken Craft Sites: shipwrecks and submerged aircraft wreck sites.
- Traditional Cultural Properties (TCPs): historic properties associated with the cultural practices or beliefs of a living community that are rooted in that community's history and are important in maintaining the continuing cultural identity of the community.

#### Pre-Contact Archaeological Sites

The Navy's review found no previously documented pre-Contact inundated isolates, features, or sites within the APE. To identify pre-Contact archaeological sites within the APE, the Navy reviewed the databases previously listed as well as additional literature: (1) *The Inventory and Analysis of Coastal and Submerged Archaeological Site Occurrence on the Pacific Outer Continental Shelf* commissioned by BOEM, which found that early coastal migration sites that were on land during lower sea levels but are now submerged might survive on the Outer Continental Shelf (ICF International, Davis Geoarchaeological Research, and Southeastern Archaeological Research 2013); and (2) *The Influence of Coastal Geomorphic Processes on Terrestrial Archaeological Site Distributions: A Puget Sound Example*, which demonstrated terrestrial coastal sites are more likely to survive in environments subject to stable or depositional geomorphic processes (Elder et al., 2019, *Journal of Northwest Anthropology*, Vol. 53, No. 2). This latter study pointed out the rarity of these types of environments for the entire Washington coastline, particularly along the Pacific Coast. Stable or depositional geomorphic processes also would have been necessary for the preservation of now-inundated sites. Since the APE does not include tidelands, the Navy limited its review to permanently submerged pre-Contact sites. These types of sites are not well represented in the Washington State archaeological record and those that are, such as reef net anchor concentrations, are located well north of the APE.

#### Historic Sunken Craft Sites

The Navy reviewed available wreck and obstruction data, including the NOAA Automated Wreck and Obstruction Information System, the BOEM online index of shipwrecks by state, and Navy shipwreck and submerged aircraft documentation. This research identified 370 potential historic sunken craft sites within the APE; these comprise 211 unknown anomalies, 122 obstructions, 30 known shipwrecks, and 7 sunken aircraft (Enclosure 5, Table 1). There is insufficient information available to make definitive statements as to the nature and character of any particular wreck or obstruction. Accordingly, and in an abundance of caution, the Navy assumes all wrecks and obstructions located within the APE are historic properties.

#### Traditional Cultural Properties

The Navy recognizes the importance of identifying properties of traditional, religious and cultural significance to living communities, the Navy requested input from both tribal and non-tribal communities regarding properties to which they ascribe traditional, religious, or cultural significance within the APE.

Consistent with 36 C.F.R. § 800.4(a)(4), the Navy contacted 26 federally recognized tribes (Enclosure 6) within the State of Washington. Among 23 tribes that responded, 16 requested additional information, and/or shared their general interest and concerns, and two tribes shared specific views (Enclosure 5, Table 2). Discussion follows in the next section on Tribal Consultation.

### Tribal Consultation

The Navy recognizes that tribes possess special expertise in assessing the eligibility of properties of traditional, religious, and cultural significance to their communities. Accordingly, the Navy requested input from federally recognized tribes regarding properties to which they ascribe traditional, religious and cultural significance within the APE. Some tribes chose to submit comments pertaining to cultural resources, historic properties, and/or their expectations for the NEPA and NHPA processes within the NEPA public scoping period, during the draft Supplemental Environmental Impact Statement (EIS)/Overseas EIS review period, and/or during government-to-government (GtG) consultation meetings about the undertaking. In general, the Navy received input from tribes about traditional activities associated with the Pacific Coast and Salish Sea, including the sacred nature of marine life and associated habitats. Below is a brief summary of Section 106 consultations with the Hoh Indian Tribe, Makah Indian Tribe, Port Gamble S'Klallam Tribe, and the Lummi Tribe of the Lummi Reservation (Lummi Nation).

Consultation with the Hoh Tribe began in November 2014 during prior NWT environmental reviews. Through ongoing consultation, the Hoh Tribe noted that the tribe considers natural resources to be cultural resources. They requested that the Navy consider the tribe's worldview, values, and belief system particularly as they apply to the lands, waters, and resources of their traditional area. They also requested that the Navy conduct a traditional cultural landscape (TCL) study to understand impacts to the tribe, including environmental justice concerns, as well as to inform the NEPA and NHPA processes. The Navy has made multiple but has been unsuccessful in efforts to meet with the tribe to learn more.

The Makah Indian Tribe of the Makah Reservation expressed interest in participating in the Section 106 process on June 25, 2018 and requested a GtG meeting in a letter on June 12, 2019. Multiple attempts to schedule meetings have continued. The Navy reached out to the tribe's cultural resources staff on July 3, 2019 to solicit any questions the tribe had about the APE. The Navy also requested information regarding the tribe's knowledge and concerns about properties of traditional religious and cultural significance to them in the APE on November 27, 2019 with a follow up e-mail to the cultural resources staff on January 7, 2020. We have not received any information regarding properties of traditional, religious and cultural significance from the tribe and will continue our GtG relations.

During the 2014 NWT consultation, the Port Gamble S'Klallam Tribe notified the Navy that the northern Hood Canal represents a network of marine resource locations and other site types within the context of a TCL. At the time, there was insufficient information to delineate the portion of the northern Hood Canal wherein the traditional properties and networks were located, and specific historic properties could not be evaluated. During the current consultation, the Navy provided the Port Gamble S'Klallam Tribe with all key Section 106 correspondence, and a staff level discussion regarding NWT occurred at the 20<sup>th</sup> Annual National Tribal Historic Preservation Conference, September 1-14, 2018. The Navy has not received additional comments or information regarding properties of traditional, religious and cultural significance to the Port Gamble S'Klallam.

The Lummi Nation and the Navy met for GtG consultation on October 29, 2019 to discuss the NWT proposed action. During the meeting and in a follow-up e-mail, the Lummi Nation made a series of specific requests pertaining to NHPA: (1) Treat *Sk'aliCh'elh* (Southern Resident Killer Whales) (*que'ihol'mechen* "our relatives under the water") as a traditional cultural district eligible for the NRHP, noting that it is already considered eligible for the Lummi Cultural Register; (2) Treat *Xw'ullem'y* (the



Salish Sea) as a traditional cultural district eligible for the National Register, noting that it is already considered eligible for the Lummi Cultural Register; (3) Conduct a rigorous and vigorous Section 106 process regarding *Sk'aliCh'elh* and *Xw'ullemmy* based on the principle of meaningful consultation: full, prior and informed consent, consistent with the Associated Tribes of Northwest Indians Resolution on the Salish Sea. The Navy provided responses on December 27, 2019 from the Commander, U.S. Pacific Fleet and January 24, 2020 and June 26, 2020 from the Commanding Officer of Naval Air Station Whidbey Island.

With regard to Southern Resident killer whales, the Navy understands that while resources such as (1) clean air and water, (2) plants and animals, (3) and intangible cultural values, relationships, or lifeways can be closely related to historic properties, they are not themselves eligible for listing in the NRHP (36 C.F.R. § 800.16(I)(1)). Since living animals are not a property type eligible for the NRHP, the Navy is unable to evaluate them as historic properties. Other environmental laws, however, require the Navy to carefully address potential impacts to Southern Resident killer whales, including the Endangered Species Act and Marine Mammal Protection Act. Analyses of the potential impacts of the proposed action on these resources are presented in the Supplemental EIS/OEIS. The Navy is committed to balancing its mission requirements with its environmental stewardship responsibilities, and this includes best practices and mitigation of potential impacts to the Southern Resident killer whale.

With regard to the *Xw'ullemmy* (the Salish Sea), the Navy does not have sufficient information at this time to adequately delineate, document, and evaluate the physical resource(s) that would constitute a traditional cultural district. While we recognize and respect the Tribes' views, we find that an adequate assessment of potential eligibility of *Xw'ullemmy* (the Salish Sea) as a historic property would require study and consultation that significantly exceeds the reasonable and good faith identification efforts commensurate with the nature and magnitude of the proposed undertaking. In reaching this determination, the Navy carefully considered the types and locations of testing and training activities, and their overall consistency with longstanding Navy activities. Furthermore, we believe questions related to the traditional cultural significance of the Salish Sea must be addressed in partnership with affiliated Tribes, accountable Federal and State agencies, and other interested parties, as appropriate, and we look forward to working together on them.

As a result of these consultations and careful consideration of information provided, the Navy has awareness that the Hoh Indian Tribe, Lummi Nation, and Port Gamble S'Klallam Tribe all identify resources of traditional, religious, and cultural significance within the APE. Some of those resources, such as the *Sk'aliCh'elh* (Southern Resident Killer Whales), are not a property type eligible for the NRHP, and the Navy is unable to directly address them under the Section 106 consultation process. For the *Xw'ullemmy* (the Salish Sea) and potential TLC in the Hood Canal, we find that an adequate assessment of potential eligibility of either of these resources as historic properties would require study and consultation that significantly exceeds the reasonable and good faith identification efforts commensurate with the nature and magnitude of the proposed undertaking. The Navy recognizes that Federal statutory and regulatory processes may not respond fully to Tribal concerns. We acknowledge that these laws, including NHPA, may constrain the consideration of the complex, interconnected relationships of traditional resources and represent a continuing challenge to agencies and Tribes. The Navy is committed to good faith consultation in the context of GtG relationships, which endure above and beyond consultations limited to a specific law, project, action, or undertaking.

#### Public Outreach

As indicated in the letter of February 16, 2018 initiating consultation, the Navy used the NWTT Supplemental EIS/OEIS public involvement processes (e.g., public scoping and public review), consistent with 36 C.F.R. § 800.8, to partially fulfill its Section 106 public notification and consultation

requirements. Specifically, the Navy had a cultural resources and NHPA Section 106 poster station at three open house public meetings. A subject matter expert meeting Secretary of Interior Qualifications for Archaeology was available to pass out information flyers and answer resource and Section 106 process questions. The three meetings held in Washington were at Everett, Silverdale, and Port Angeles on April 24, 25, and 26, 2019, respectively. Five Non-Governmental Organizations and two citizens expressed interest in the Section 106 process and subsequently received all key correspondence. The public did not identify historic properties during the Section 106 process.

### **Assessment of Effects on Historic Properties**

The Navy identified 370 possible historic properties within the APE, all representing potential historic sunken craft sites. The Navy assumes that all of these properties project above the seafloor and, therefore, may be susceptible to effects from proposed Navy activities. While there are no previously identified submerged pre-Contact archaeological sites or NRHP-evaluated properties of traditional, cultural, or religious significance in the APE, it is the Navy's finding that the undertaking will not affect either category of resource. For a detailed list of activities that have the potential to affect historic properties, please see Enclosure 2.

**Explosives:** Shockwaves (pressure) and oscillating bubble pulses resulting from underwater explosions may disturb the seafloor or create structural instability and possible collapse of architectural features above the seafloor. The amount of damage would depend on factors such as the size of the charge, the distance from the submerged resource, the water depth, and the topography of the ocean floor. Explosive detonations (60 pounds or less) in the QRS occur in the water column and will not disturb the seafloor or any historic properties resting on the seafloor or buried below the seafloor. Navy standard procedures require the use of explosives occur 350 yards at a minimum from shipwrecks and aircraft wrecks. In addition, there are no such recorded sunken craft in the QRS. Therefore, the use of explosives will not affect submerged or sunken historic properties within the QRS. The Navy continues to conduct training activities that use a small amount (2.5 pounds or less) of explosive ordnance placed on the seafloor at the Crescent Harbor and Hood Canal EOD Ranges for mine countermeasure and neutralization – explosive ordnance disposal. These two inland water ranges are long-used locations subject to repeated inspections associated with rigorous environmental monitoring. Navy standard procedures and safety requirements, including visual site survey and hand placement of charges by Navy divers to avoid submerged resources. No shipwrecks or submerged aircraft wrecks exist at these locations. Based on this analysis, the Navy finds that use of explosives would not affect historic properties within the APE, if any existed.

**Anchoring:** Deployment of heavy anchors (up to 9,000 pounds) is limited to four established precision anchoring locations. Due to prior seafloor disturbance from historic use as Navy and commercial anchorages, there is no potential to affect submerged historic properties. Regarding deployment of anchors for temporary barge mooring in Carr Inlet, standard procedures and safety protocols require avoidance of all obstructions, including potential historic properties. As such, precision anchoring and barge mooring will affect no historic properties in the APE.

**Seafloor Devices:** The Navy places targets, mines, and similar devices on the seafloor and operates unmanned underwater vehicles within the Offshore Area, Dabob Bay Range Complex, Keyport Range Site, Carr Inlet, Crescent Harbor EOD Range, Navy 3 and 7 OPAREAs, and pierside at Navy installations. Because this area is so large, and because the Navy avoids known obstructions when using such devices, it is unlikely these materials would come into contact with a submerged historic property. Furthermore, these underwater vehicles and mine shapes are of insufficient weight and design function to penetrate the seafloor. If they should settle on or in the vicinity of an historic property, the seafloor devices would not alter the archaeological or historic characteristics or integrity of the submerged

resource. Thus the use of seafloor devices will not affect historic properties resting on or below the seafloor within the APE.

MEM: Military expended materials result from training and testing activities within the majority of the Offshore APE and Inland waters APE as shown in Enclosures 3 and 4. Expended materials such as chaff, flares, casings, non-explosive practice munitions, ballast weights, sonobuoys, parachutes, and guidance wire could be settle on the ocean floor on or near submerged prehistoric sites or sunken historic resources. The settling of MEM does not have the potential to affect historic properties, as even the heaviest MEM, such as a sonobuoy housing, would be too light to cause physical damage. Most of the anticipated expended material would be small objects and fragments that would slowly drift to the seafloor after striking the ocean surface. Furthermore, the settling of MEM on the seafloor would be diffuse and transitory, as MEM is likely to be transported by currents and other turbulence. Therefore the settling of MEM would not alter the archaeological or historic characteristics or integrity of the submerged resource and will, therefore, not affect historic properties within the APE.

### Finding of Effect


Pursuant to 36 C.F.R. § 800.4(b)(1), the Navy took into account past planning, research, and studies, the magnitude and nature of the undertaking and the degree of Federal involvement, the nature and extent of potential effects on historic properties, and the likely nature and location of historic properties within the APE. As a result of our research and analysis, and in consideration of information received during consultation, the Navy finds the proposed NWTT undertaking affects no historic properties, consistent with 36 C.F.R. § 800.4(d)(1).

In the event of a post-review discovery or unanticipated effects, the Navy will make all appropriate efforts to avoid, minimize, or mitigate adverse effects to historic properties and will implement the provisions of with 36 C.F.R. § 800.13(b).

The Navy respectfully requests your concurrence with on our finding of no historic properties affected. Consistent with 36 C.F.R. § 800.4(d)(1), we will assume your agreement if no objection is received from your office within 30 days of receipt of this letter.

If you require additional information, please contact Mr. David Grant, NAVFAC NW Archaeologist at (360) 396-0919 or dave.m.grant@navy.mil.

Sincerely,

  
M. L. ARNY  
Captain, U.S. Navy  
Commanding Officer

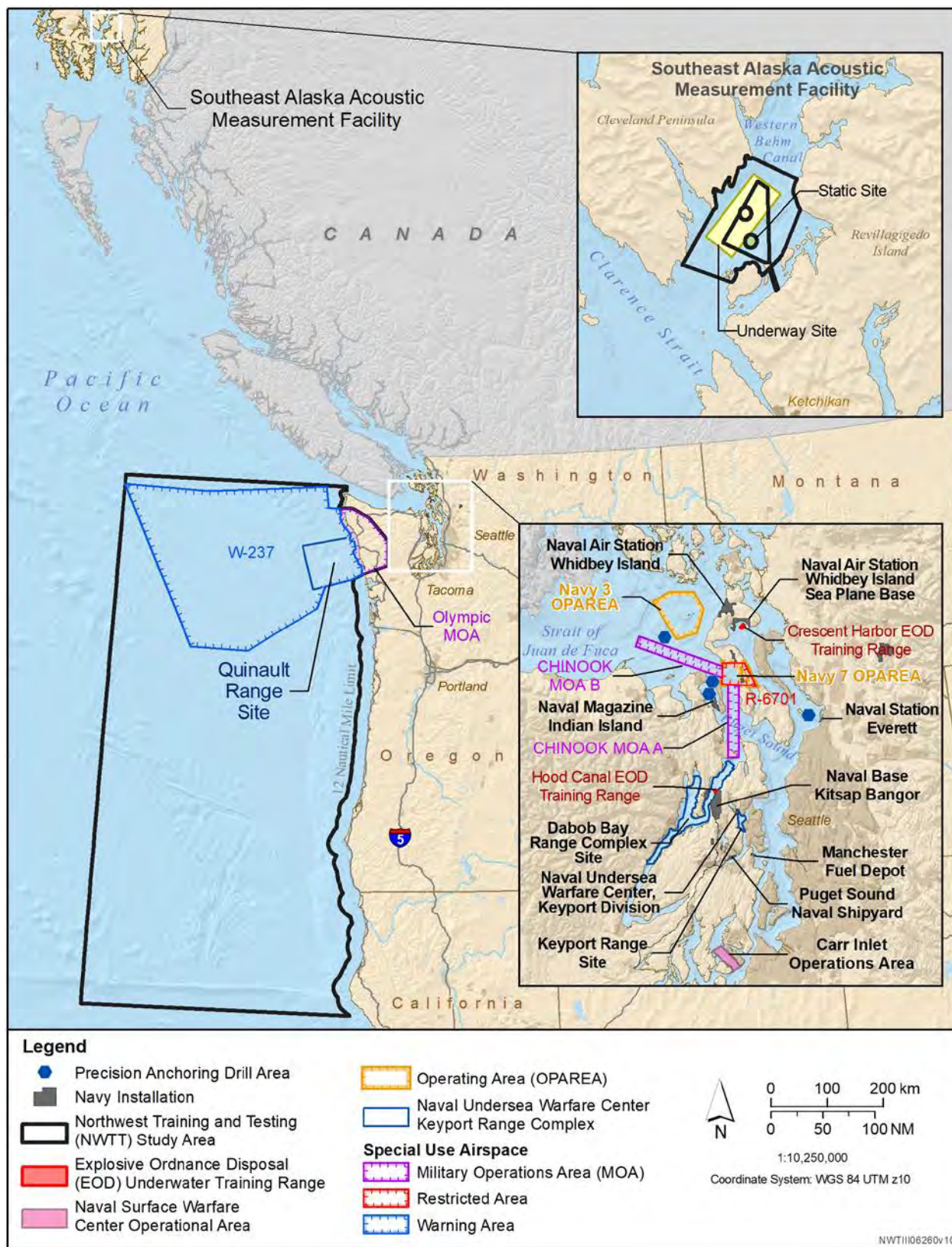
Enclosures:    1.    NWTT Study Area Map  
                  2.    Activities Occurring Within 12 NM of Washington Shore  
                  3.    Offshore Area of Potential Effects  
                  4.    Inland Waters Area of Potential Effects  
                  5.    Finding of Effect Tables 1 and 2  
                  6.    Tribal Consultation Summary

Copy to:

Director, Advisory Council on Historic Preservation  
Cultural Committee Chairwoman, Confederated Tribes and Bands of the Yakama Nation  
Tribal Historic Preservation Officer, Confederated Tribes of the Chehalis Reservation  
Natural Resources Director, Confederated Tribes of the Chehalis Reservation  
Director, Cultural Resources Department, Cowlitz Indian Tribe  
Executive Director, Hoh Indian Tribe  
Cultural Resources Specialist, Jamestown S'Klallam Tribe  
Cultural Resource Archaeologist, Lower Elwha Klallam Tribe  
Tribal Historic Preservation Officer, Lummi Tribe of the Lummi Reservation  
Tribal Historic Preservation Officer, Makah Indian Tribe of the Makah Reservation  
Cultural Resources Specialist, Muckleshoot Indian Tribe of the Muckleshoot Reservation  
Tribal Historic Preservation Officer Cultural Resources, Nisqually Indian Tribe of the Nisqually Reservation  
Tribal Historic Preservation Officer, Nooksack Indian Tribe of Washington  
Tribal Historic Preservation Officer, Port Gamble S'Klallam Tribe  
Tribal Historic Preservation Officer Cultural Resources, Puyallup Tribe of the Puyallup Reservation  
Cultural Resources Specialist, Quileute Tribe of the Quileute Reservation  
The Honorable Fawn Sharp, Quinault Indian Nation  
Tribal Historic Preservation Officer, Samish Indian Nation  
Tribal Historic Preservation Officer, Sauk-Suiattle Indian Tribe  
Cultural Resources Specialist, Shoalwater Bay Tribe of the Shoalwater Bay Reservation  
Tribal Historic Preservation Officer, Skokomish Indian Tribe  
Cultural Resource Director/Tribal Historic Preservation Officer, Snoqualmie Indian Tribe  
Tribal Historic Preservation Officer/Cultural Resource Department Director, Squaxin Island Tribe of the Squaxin Island Reservation  
Tribal Historic Preservation Officer/GIS Database Administrator, Stillaguamish Tribe of Indians of Washington  
Tribal Historic Preservation Officer, Suquamish Indian Tribe of the Port Madison Reservation  
Tribal Historic Preservation Officer, Swinomish Indians of the Swinomish Reservation of Washington  
Cultural Preservation Officer, Tulalip Tribes of Washington  
Cultural Resources Manager, Upper Skagit Indian Tribe  
Reserve Manager, Ebey's Landing National Historic Reserve  
Northwest Regional Director, National Parks Conservation Association  
Regional Director, Pacific West Region, US Department of the Interior, National Park Service  
President, Olympic Forest Coalition  
Co-Founder, West Coast Action Alliance  
Skagit Audubon Society  
Dr. Goldie  
Ms. Miller



Enclosure 1. NWTT Study Area Map.



NWTIII06260v10



Enclosure 2. Activities occurring within 12 nautical miles of Washington’s ocean shore and in state inland waters.<sup>1</sup>

Activity	Description	Location	Type of Action that Could Affect Historic Properties
<b>Air Combat Maneuver</b>	Basic flight maneuvers in which fixed-wing aircrew engage in offensive and defensive maneuvering against each other.	<b>Offshore Area</b> W-237 Olympic MOA	N/A
<b>Electronic Warfare Training</b>	Aircraft and ship crews control the electromagnetic spectrum used by enemy systems to degrade or deny the enemy’s ability to take defensive actions. Electronic Warfare Operations can be active or passive, offensive or defensive.	<b>Offshore Area</b> W-237 Olympic MOA	N/A
<b>Civilian Port Defense— Homeland Security Anti-Terrorism/Force Protection Exercises</b>	Naval forces conduct mine warfare training in conjunction with Department of Homeland Security units. Helicopters, surface ships, and undersea (divers, marine mammals, and unmanned vehicles) mine countermeasures will be used. Non-permanent mine shapes will be laid in various places on the bottom and will be retrieved.	<b>Inland Waters</b> Naval Magazine Indian Island (NAVMAG) Naval Station Everett (NSE) NBK Bangor NBK Bremerton Manchester Port Angeles Port of Seattle	Anchors for mine shapes
<b>Mine Neutralization – Explosive Ordnance Disposal</b>	Navy divers disable threat mines with explosive charges to create a safe channel for friendly vessels to transit. Personnel detect, identify, evaluate, and neutralize mines in the water with an explosive device and may involve detonation.	<b>Inland Waters</b> Crescent Harbor EOD Training Range (CH EOD TR) Hood Canal EOD Training Range (HC EOD TR)	Explosive shock wave
<b>Intelligence, Surveillance, Reconnaissance</b>	Maritime Patrol Aircraft and unmanned aerial systems operators use all available sensors to collect data on threat vessels. Passive sonobuoys are used to collect and analyze acoustic data, and photographic equipment is used to document the vessel with visual information.	<b>Inland Waters</b> Restricted Area (R) 6701 NAVY 7 OPAREA	Introduction of incompatible visual elements from settling of military expended materials (MEM) such as sonobuoys, parachutes/decelerators, wires

<sup>1</sup> The following activities occur beyond 12 nautical miles from Washington’s ocean shore or only in Alaska (SEAFAC) and therefore not addressed further: Gunnery Exercise Surface-to-Air; Missile Exercise Air-to-Air; Missile Exercise Surface-to-Air; Anti-Submarine Warfare Torpedo Exercise—Submarine; Anti-Submarine Warfare Tracking Exercise – Helicopter; Anti-Submarine Warfare Tracking Exercise—Maritime Patrol Aircraft; Anti-Submarine Warfare Tracking Exercise—Ship; Anti-Submarine Warfare Tracking Exercise—Submarine; Bombing Exercise Air-to-Surface; Gunnery Exercise Surface-to-Surface – Ship; Missile Exercise Air-to-Surface; Torpedo (explosive) Testing; Kinetic Energy Weapon Testing; Hydrodynamic and Maneuverability Testing; Anti-Submarine Warfare Tracking Test—Maritime Patrol Aircraft

<b>Activity</b>	<b>Description</b>	<b>Location</b>	<b>Type of Action that Could Affect Historic Properties</b>
<b>Maritime Security Operations</b>	Maritime security operations are predominantly maritime security escort events, including the Transit Protection Program and training of other escort units. All shell casings associated with use of blank ammunition shall be captured, to the greatest extent feasible, using either cofferdams around guns, capture bins, or capture on the deck of vessels.	<b>Inland Waters</b> NBK Bremerton Hood Canal Dabob Bay Range Complex (DBRC) TPS Route (169) NSE Puget Sound Strait of Juan de Fuca	N/A
<b>Personnel Insertion/Extraction Training—Non-Submersible</b>	Military personnel train for clandestine insertion and extraction into target areas using rotary wing aircraft, fixed-wing aircraft (insertion only), or small boats.	<b>Inland Waters</b> CH EOD TR NAVY 7 OPAREA	N/A
<b>Precision Anchoring</b>	Surface ship crews release and retrieve anchors in designated locations.	<b>Inland Waters</b> Designated areas near NAVMAG NSE NAVY 3 OPAREA	Anchors contacting and penetrating seafloor
<b>Search and Rescue</b>	Helicopter crews rescue military personnel at sea. Helicopters fly below 3,000 feet and locate personnel to be rescued, hover, recover the survivor, and then depart.	<b>Inland Waters</b> CH EOD TR R-6701	N/A
<b>Small Boat Attack Exercise</b>	Small boat crews engage pier side surface targets with small-caliber weapons. Only blank rounds are fired. Duration of firing will be approximately 2 hours with a total of 1,000 rounds fired the first day, and a duration of 1.5 hours with a total of 1,000 rounds fired the second day.	<b>Inland Waters</b> NSE NBK Bangor NBK Bremerton	Introduction of incompatible visual elements from settling of MEM such as ammunition brass and disintegrating ammunition belt links
<b>Submarine Sonar Maintenance</b>	Submarines conduct maintenance to their sonar systems in shallow water near their homeport; however, sonar maintenance could occur at sea as the system's performance may warrant.	<b>Offshore Area</b> Offshore Area <b>Inland Waters</b> NBK Bremerton NBK Bangor	N/A

Activity	Description	Location	Type of Action that Could Affect Historic Properties
<b>Surface Ship Sonar Maintenance</b>	Surface ships perform periodic maintenance to the sonar and other systems while in port or at sea. Surface ships operate active sonar systems for maintenance while in shallow water near their homeport; however, sonar maintenance could occur anywhere.	<b>Offshore Area</b> Offshore Area <b>Inland Waters</b> NSE NBK Bremerton	N/A
<b>Unmanned Underwater Vehicle Training</b>	Training with unmanned platforms on which various payloads are attached and used for different purposes. Training can range from basic remote control and autonomous navigation tests to deployment and activation of onboard systems that may include hydrodynamic instruments, launchers, and recovery capabilities.	<b>Offshore Area</b> Quinault Range Site <b>Inland Waters</b> CH EOD TR DBRC NBK Bangor NBK Bremerton Keyport Range Site Manchester NAVY 3 and 7 OPAREAs	Anchors for instruments
<b>Anti-Submarine Warfare Testing</b>	Ships conduct operations using airborne and surface assets. Active and passive acoustic systems are used to detect and track submarine targets, culminating in the deployment of lightweight torpedoes.	<b>Offshore Area</b> Offshore Area	Introduction of incompatible visual elements from settling of MEM such as torpedo accessories, decelerator/parachute, sonobuoys, and wires.
<b>At-Sea Sonar Testing</b>	At-sea sonar testing verifies the vessel meets design acoustic specifications, defines the underwater characteristics, determines effects of systems and equipment on ship's acoustic characteristics, and provides for design improvements.	<b>Offshore Area</b> Offshore Area <b>Inland Waters</b> DBRC	Introduction of incompatible visual elements from settling of MEM such as torpedo accessories, decelerator/parachute, sonobuoys, and wires.
<b>Countermeasure Testing</b>	Countermeasure testing evaluates the deployment, operation, and effectiveness of systems used to defend a vessel from an incoming threat. Countermeasures may be mechanical, chemical, or electronic devices that are released from a vessel to obscure its location or provide a false target. Countermeasures may also be systems operated from within the vessel to detect, localize, track, and respond to incoming threats. Most components are used off shore and are consumed, dissipate, or recovered.	<b>Offshore Area</b> Quinault Range Site <b>Inland Waters</b> DBRC Keyport Range Site	Introduction of incompatible visual elements from settling of MEM such as torpedo accessories, mobile subsurface target, and guidance wire.

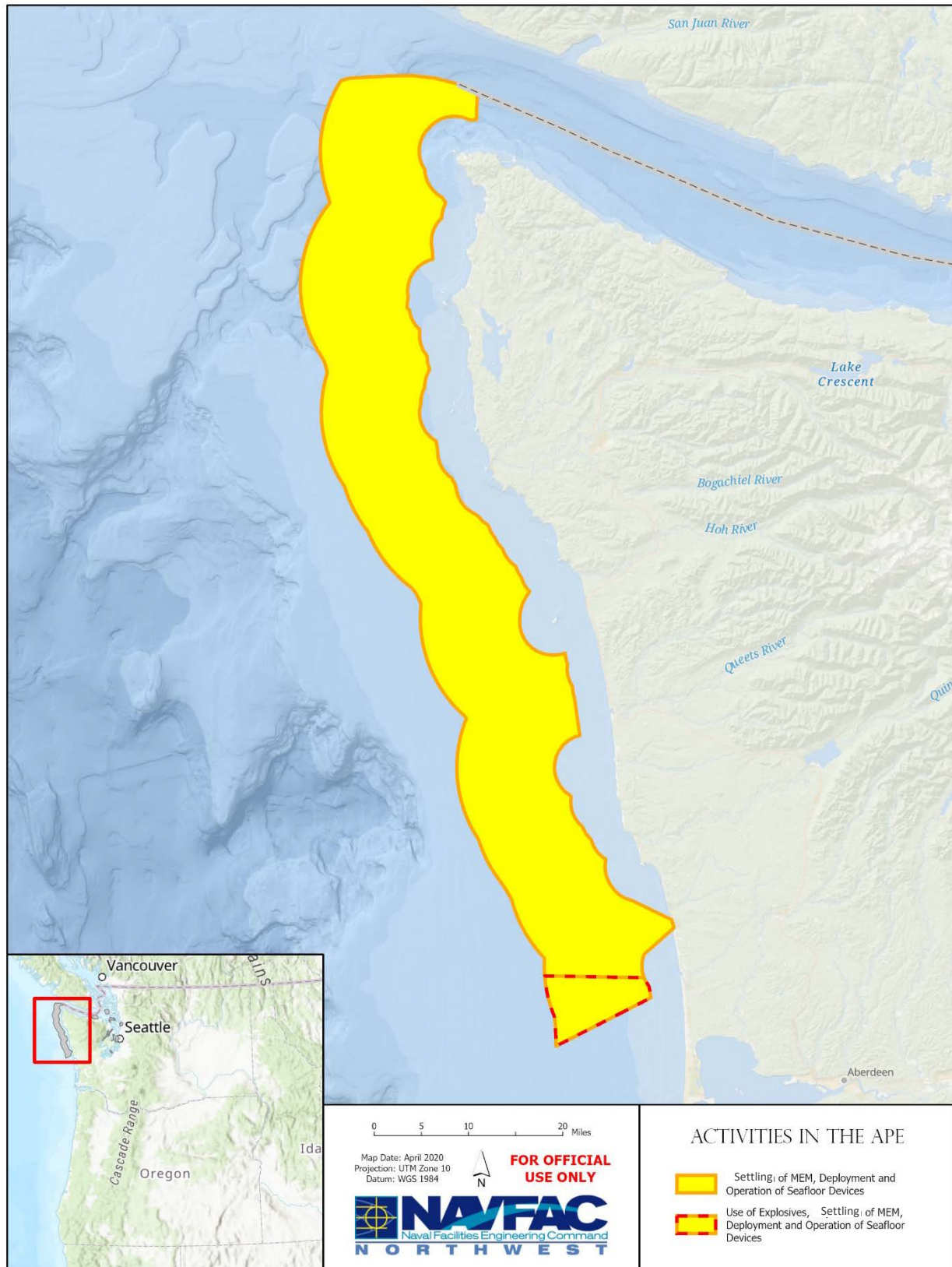
Activity	Description	Location	Type of Action that Could Affect Historic Properties
<b>Pierside Sonar Testing</b>	Ships and submarines will activate mid- and high-frequency tactical sonars, underwater communications systems, and navigational devices. Testing may include the firing of inert torpedo shapes.	<b>Inland Waters</b> NBK Bangor Bremerton NSE	N/A
<b>Torpedo (non-explosive) Testing</b>	Aerial, surface, and subsurface assets fire exercise torpedoes against surface or subsurface targets, or programmed with a particular run geometry. Exercise torpedoes are typically recovered by ships and helicopters designed for this task.	<b>Offshore Area</b> Offshore Area <b>Inland Waters</b> DBRC	Anchors for stationary surface targets  Introduction of incompatible visual elements from settling of MEM such as small decelerator/parachutes, acoustic countermeasures, buoy (non-explosive), torpedo accessories, mobile sub-surface target, sonobuoy, sonobuoy wires, guidance wire.
<b>Mine Countermeasure and Neutralization Testing</b>	These systems may be deployed with a variety of ships, aircraft, submarines, or UAVs. Mines are neutralized by cutting mooring cables of buoyant mines, producing acoustic energy that fires acoustic-influence mines; or by employing radar or laser fields, detonate mines using remotely-operated vehicles, and use explosive charges to destroy threat mines.	<b>Offshore Area</b> Offshore Area (no explosives in OCNMS) <b>Inland Waters</b> NBK Bremerton Carr Inlet CH EOD TR DBRC HC EOD TR NSE Keyport Range Site NAVMAG NAVY 3 OPAREA	Explosive shock wave and anchors for mine shapes  Introduction of incompatible visual elements from settling of MEM such as fiber optic wires and cables
<b>Mine Detection and Classification Testing</b>	Systems may use acoustic, electro-optic, or laser sensors, and may be deployed from aircraft, surface or subsurface vessels, or unmanned platforms.	<b>Offshore Area</b> Quinault Range Site <b>Inland Waters</b> DBRC Keyport Range Site	Anchors from mine shapes (in place up to 12 months)
<b>Unmanned Aerial System Testing</b>	UASs are remotely piloted or self-piloted (i.e., preprogrammed flight pattern) aircraft that include fixed-wing, rotary-wing, and other vertical takeoff vehicles. They can carry cameras, sensors, communications equipment, or other payloads.	<b>Offshore Area</b> Quinault Range Site <b>Inland Waters</b> DBRC Keyport Range Site R-6701	N/A

<b>Activity</b>	<b>Description</b>	<b>Location</b>	<b>Type of Action that Could Affect Historic Properties</b>
<b>Unmanned Surface Vehicle System Testing</b>	Unmanned surface vehicles (USV) can include remotely operated craft and test vehicles. During testing, they can operate autonomously, semi-autonomously, or non-autonomously.	<b>Offshore Area</b> Quinault Range Site <b>Inland Waters</b> DBRC Keyport Range Site	Anchors for stationary surface targets
<b>Unmanned Underwater Vehicle Testing</b>	UUVs may be developed to carry out warfare missions (e.g., mine detection) or scientific missions (e.g., bottom mapping), while others are developed to support other testing objectives (e.g., performing as a target for anti-submarine warfare).	<b>Offshore Area</b> Quinault Range Site <b>Inland Waters</b> Carr Inlet DBRC Keyport Range Site	Anchors for stationary surface and sub-surface targets  Introduction of incompatible visual elements from settling of MEM such as torpedo accessories, mobile sub-surface target, decelerator/parachutes, wires, and cables
<b>Propulsion Testing</b>	Propulsion testing is one part of the total sea trial activity. The ship is tested for maneuverability, including full power and endurance runs.	<b>Offshore Area</b> Offshore Area beyond 10 nm from shore	N/A
<b>Undersea Warfare Testing</b>	Undersea warfare testing includes demonstrating the ability of the ship to search, detect, and track a target and conduct attacks with exercise torpedoes. Subsurface moving targets, rocket and air-dropped weapons, sonobuoys, towed arrays, and sub-surface torpedo-like devices may be used.	<b>Offshore Area</b> Offshore Area	Introduction of incompatible visual elements from settling of MEM such as decelerator/parachutes, acoustic countermeasures, expendable bathythermograph and wire, torpedo accessories, mobile subsurface target, sonobuoy and wires, and other cables and wires
<b>Vessel Signature Evaluation</b>	Signature testing is passive monitoring of surface ships and submarines to assess the vessel's vulnerability to various types of detection systems.	<b>Inland Waters</b> DBRC	N/A
<b>Acoustic and Oceanographic Research</b>	Active acoustic transmissions used for tests of acoustic sources, validation of ocean acoustic models, tests of signal processing algorithms, and characterization of acoustic interactions with the ocean bottom, fish and ocean surface.	<b>Offshore Area</b> Quinault Range Site <b>Inland Waters</b> DBRC Keyport Range Site	Possible incidental disturbance of sediments from anchors for instruments
<b>Acoustic Component Testing</b>	Pier side testing includes evaluation and troubleshooting of acoustic components. ROVs may be used to deploy sensors below the water line.	<b>Inland Waters</b> NBK Bangor Bremerton NSE NAVMAG	N/A

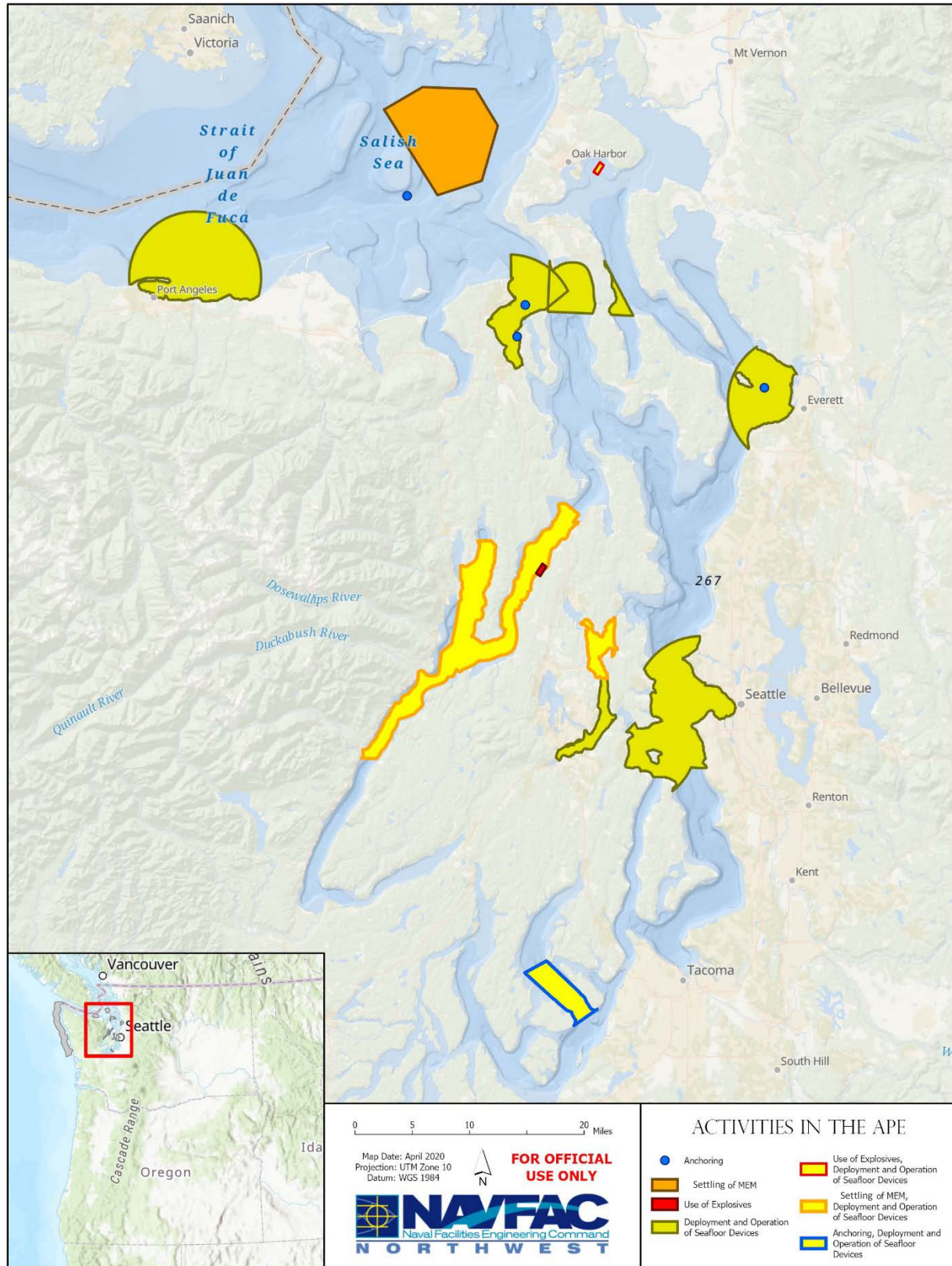


Activity	Description	Location	Type of Action that Could Affect Historic Properties
<b>Cold Water Support</b>	Training for divers in a cold water diver training environment, and other training supporting range/test facility operations and maintenance. Includes hand-held acoustic systems, underwater communication devices, in-water devices for transporting divers or cargo, and various dive targets such as mine-like shapes.	<b>Inland Waters</b> Carr Inlet DBRC Keyport Range Site	Mine shape anchors
<b>Non-Acoustic Component Testing</b>	Radio communication with submarines using tethered, untethered, or towed buoyant in-water devices to raise an antenna to the surface to broadcast the signal. Test may involve radar, environmental sensors, magnetic, passive acoustic, or optical instrumentation to measure, record, and analyze effectiveness, dependability, operational parameters, and durability.	<b>Offshore Area</b> Offshore Area <b>Inland Waters</b> DBRC Keyport Range Site Keyport Pier NBK Bangor Zelatched Point Pier	Instruments placed on bottom  Settling of MEM such as fiber optic cables
<b>Post Refit Sea Trial</b>	Testing activities following maintenance or repairs to evaluate submarine propulsion, sonar systems, and other mechanical tests.	<b>Inland Waters</b> DBRC	N/A
<b>Radar and other System Testing</b>	At-sea testing may include use of military or commercial radar, communication systems, simulators, or high-energy lasers. Testing of air and surface targets may include UAVs or small craft (e.g., floating cardboard tri-walls, towed, anchored, or self-propelled vessels).	<b>Offshore Area</b> Offshore Area	Introduction of incompatible visual elements from settling of MEM such as expendable drone, target fragments
<b>Semi-Stationary Equipment Testing</b>	Semi-stationary equipment calibration and testing is performed from a fixed site, suspended over the side of a boat, moored to the bottom, suspended in the water column, or on the surface; all devices and their anchors are recovered.	<b>Inland Waters</b> DBRC Keyport Range Site	Placement/removal of seafloor devices such as anchors  Introduction of incompatible visual elements from settling of MEM, such as fiber optic cables
<b>Simulant Testing</b>	The capabilities of defense systems to detect and protect in the event of chemical and biological attacks are tested via deployment of harmless compounds as substitutes for warfare agents.	<b>Offshore Area</b> Offshore Area beyond 3 nm	N/A
<b>ISR/EW Triton Testing</b>	Testing will evaluate the sensors and communication systems on board the MQ-4C Triton unmanned aerial system.	<b>Offshore Area</b> Offshore Area	N/A

Enclosure 3. Offshore Area of Potential Effects.



Enclosure 4. Inland Waters Area of Potential Effects.





## Enclosure 5. Finding of Effect

Table 1. Historic Sunken Craft Sites

Offshore/ Inshore	Location	Maritime Resource Name	Early Year Date	Late Year Date	NRHP Eligibility (For Purposes of	Activity Type(s)	Comments	Effect on Historic
Offshore	Offshore Area	Aloma	0	1924	Assumed	MEM	MEM settlement is ephemeral and inconsequential	No Effect
Offshore	Offshore Area	Anna Porter	1909	1919	Assumed	MEM	MEM settlement is ephemeral and inconsequential	No Effect
Offshore	Offshore Area	Karl Marx	1914	1925	Assumed	MEM	MEM settlement is ephemeral and inconsequential	No Effect
Offshore	Offshore Area	H & S No. 15	1913	1931	Assumed	MEM	MEM settlement is ephemeral and inconsequential	No Effect
Offshore	Offshore Area	Milky Way	1978	2005	Assumed	MEM	MEM settlement is ephemeral and inconsequential	No Effect
Offshore	Offshore Area	Chetzemoka	1927	1977	Assumed	MEM	MEM settlement is ephemeral and inconsequential	No Effect
Offshore	Offshore Area	Nika	1919	1923	Assumed	MEM	MEM settlement is ephemeral and inconsequential	No Effect
Offshore	Offshore Area	Blanco	1925	1936	Assumed	MEM	MEM settlement is ephemeral and inconsequential	No Effect
Offshore	Offshore Area	Catherine M.	1902	1924	Assumed	MEM	MEM settlement is ephemeral and inconsequential	No Effect
Offshore	Offshore Area	Moonbeam	0	2009	Assumed	MEM	MEM settlement is ephemeral and inconsequential	No Effect
Offshore	Offshore Area	Rose	1907	1951	Assumed	MEM	MEM settlement is ephemeral and inconsequential	No Effect
Offshore	Offshore Area	Pacific	1850	1875	Assumed	MEM	MEM settlement is ephemeral and inconsequential	No Effect
Offshore	Offshore Area	Swiftsure Bank	1909	1961	Assumed	MEM	MEM settlement is ephemeral and inconsequential	No Effect
Offshore	Offshore Area	Pacific Leader	0	1986	Assumed	MEM	MEM settlement is ephemeral and inconsequential	No Effect
Offshore	Offshore Area	Bugara, USS	1944	1971	Assumed	MEM	MEM settlement is ephemeral and inconsequential	No Effect

## Enclosure 5. Finding of Effect

### Table 1. Historic Sunken Craft Sites

Offshore/ Inshore	Location	Maritime Resource Name	Early Year Date	Late Year Date	NRHP Eligibility (For Purposes of	Activity Type(s)	Comments	Effect on Historic
Offshore	Offshore Area	*Niha (confirm, possibly same as Nika )			Assumed	MEM	MEM settlement is ephemeral and inconsequential	No Effect
Offshore	Offshore Area	*4 Wrecks Submerged Dangerous			Assumed	MEM	MEM settlement is ephemeral and inconsequential	No Effect
Offshore	Offshore Area	*2 UNKNOWNs			Assumed	MEM	MEM settlement is ephemeral and inconsequential	No Effect
Offshore	Offshore Area	**FM-2 Wildcat BuNo 16521	1943	1944	Assumed	MEM	MEM settlement is ephemeral and inconsequential	No Effect
Offshore	Offshore Area	**FM-2 Wildcat BuNo 16590	1943	1944	Assumed	MEM	MEM settlement is ephemeral and inconsequential	No Effect
Offshore	Offshore Area	**FM-2 Wildcat BuNo 55493	1943	1945	Assumed	MEM	MEM settlement is ephemeral and inconsequential	No Effect
Inshore	Port Angeles	Martha Foss	1886	1946	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Port Angeles	Prosper	0	1993	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Port Angeles	*Wrecks - Submerged, Dangerous			Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Port Angeles	*4 Obstructions			Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Port Angeles	*16 Unknowns			Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Navy 3 OPAREA	**USS Crow (Amc-20)	1940	1943	Assumed	MEM	MEM settlement is ephemeral and inconsequential	No Effect
Inshore	Navy 3 OPAREA	**NE-1 Grasshopper BuNo 26258	1942	1943	Assumed	MEM	MEM settlement is ephemeral and inconsequential	No Effect
Inshore	Navy 3 OPAREA	**F6F-3 Hellcat BuNo 40177	1943	1943	Assumed	MEM	MEM settlement is ephemeral and inconsequential	No Effect
Inshore	Navy 3 OPAREA	**F6F-3 Hellcat BuNo 42703	1942	1944	Assumed	MEM	MEM settlement is ephemeral and inconsequential	No Effect



## Enclosure 5. Finding of Effect

### Table 1. Historic Sunken Craft Sites

Offshore/ Inshore	Location	Maritime Resource Name	Early Year Date	Late Year Date	NRHP Eligibility (For Purposes of	Activity Type(s)	Comments	Effect on Historic
Inshore	Navy 3 OPAREA	*7 obstructions or wrecks			Assumed	MEM	MEM settlement is ephemeral and inconsequential	No Effect
Inshore	Port Townsend	Orca	0	1999	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Port Townsend	Alaska Reefer	1944	1961	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Port Townsend	Governor	1907	1921	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Port Townsend	*Comet			Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Port Townsend	*3 Wrecks - Submerged, Dangerous	0	0	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Port Townsend	*Wrecks - Visible	0	0	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Port Townsend	UNKNOWN WRECK	0	0	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Port Townsend	UNKNOWN WRECK	0	0	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Port Townsend	UNKNOWN WRECK	0	0	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Port Townsend	*41 Obstructions or Wrecks			Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Port Townsend	*23 Unknowns			Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Navy 7 OPAREA	**PV-1 Ventura BuNo 33414	1942	1945	Assumed	MEM	MEM Deposition is ephemeral and inconsequential	No Effect
Inshore	Navy 7 OPAREA	*8 Obstructions or Wrecks	0	0	Assumed	MEM	MEM settlement is ephemeral and inconsequential	No Effect

## Enclosure 5. Finding of Effect

### Table 1. Historic Sunken Craft Sites

Offshore/ Inshore	Location	Maritime Resource Name	Early Year Date	Late Year Date	NRHP Eligibility (For Purposes of Undertaking) ^	Activity Type(s)	Comments	Effect on Historic Properties
Inshore	Navy 7 OPAREA	*13 Unknowns			Assumed	MEM	MEM settlement is ephemeral and	No Effect
Inshore	Everett	Al-Ind-Esk-A-Sea	1945	1982	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Everett	UNKNOWN WRECK	0	0	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Everett	UNKNOWN WRECK	0	0	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Everett	UNKNOWN WRECK	0	0	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Everett	UNKNOWN WRECK	0	0	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Everett	*2 Wrecks - Submerged, Nondangerous			Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Everett	*1 Obstruction			Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Everett	*9 Unknowns			Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Dabob Bay Range	*Frances W.			Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Dabob Bay Range	*1 Obstruction			Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Dabob Bay Range	*35 Unknowns			Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Bremerton/NUWC	UNKNOWN WRECK	0	0	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Bremerton/NUWC	UNKNOWN WRECK	0	0	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect

## Enclosure 5. Finding of Effect

### Table 1. Historic Sunken Craft Sites

Offshore/ Inshore	Location	Maritime Resource Name	Early Year Date	Late Year Date	NRHP Eligibility (For Purposes of	Activity Type(s)	Comments	Effect on Historic
Inshore	Bremerton/NUWC	UNKNOWN WRECK	0	0	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Bremerton/NUWC	*6 Wrecks - Submerged, Dangerous			Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Bremerton/NUWC	*25 Obstructions			Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Bremerton/NUWC	*22 Unknowns			Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Seattle/Elliot Bay	Boss	0	0	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Seattle/Elliot Bay	A.J. Fuller	1889	1918	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Seattle/Elliot Bay	Shilshole Barge	0	0	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Seattle/Elliot Bay	Shilshole Barge	0	0	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Seattle/Elliot Bay	Omar	1918	1995	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Seattle/Elliot Bay	UNKNOWN WRECK	0	0	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Seattle/Elliot Bay	UNKNOWN WRECK	0	0	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Seattle/Elliot Bay	UNKNOWN WRECK	0	0	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Seattle/Elliot Bay	UNKNOWN WRECK	0	0	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Seattle/Elliot Bay	UNKNOWN WRECK	0	0	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Seattle/Elliot Bay	UNKNOWN WRECK	0	0	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect

## Enclosure 5. Finding of Effect

Table 1. Historic Sunken Craft Sites

Offshore/ Inshore	Location	Maritime Resource Name	Early Year Date	Late Year Date	NRHP Eligibility (For Purposes of	Activity Type(s)	Comments	Effect on Historic
Inshore	Seattle/Elliot Bay	*2 Wrecks			Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Seattle/Elliot Bay	*6 Wrecks - Submerged, Dangerous			Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Seattle/Elliot Bay	*6 Wrecks - Submerged, Nondangerous			Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Seattle/Elliot Bay	*29 Obstructions			Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Seattle/Elliot Bay	*43 Unknowns			Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Carr Inlet OPAREA	UNKNOWN WRECK	0	0	Assumed	HA	Avoidance During Anchoring of Test Platform Barge	No Effect
Inshore	Carr Inlet OPAREA	UNKNOWN WRECK	0	0	Assumed	HA	Avoidance During Anchoring of Test	No Effect
Inshore	Carr Inlet OPAREA	*6 Unknowns			Assumed	HA	Avoidance During Anchoring of Test	No Effect

^ Assumed eligible: All wreck listings assumed to meet the NRHP eligibility criteria per § 800.4(c)(2); however, as the site is not on Navy controlled property, formal evaluation has not been conducted (16 USC 470h-2(a)(1). However, pursuant to 16 USC 470h-2(C); the Navy recognizes that the preservation of properties not under the jurisdiction or control of the agency, but subject to be potentially affected by agency actions are given full consideration in planning. There is insufficient information about Unknowns and Obstructions to determine eligibility, but this analysis assumes they are potentially eligible properties.

Activities w/ Potential to Affect Resource: Explosions (EXP), Anchoring (HA), Seafloor Devices (including Small Inertial Anchors and UUVs) (SD), Military Expended Materials (MEM)

No Known Historic Properties Subject to Explosions and No Known Historic Properties in five areas subject to Heavy Anchor Deployment

Basis of Finding: Avoidance Through Standard Operating Procedures (SOPs) such as avoidance of known obstructions and sonar and/or diver assisted placement of seafloor devices.

Navy removed 30 Washington Information System for Architectural and Archaeological Records Data (WISAARD) property listings from in or near the APE boundaries for the following reasons: the listing is or was on land (e.g., lighthouses), it is land such as a topographic feature or landform (e.g., Admiralty Head), or it is not a place but a historic occurrence (e.g., Wilkes enter Port Discovery), it was at the margin of the APE but effects from the undertaking will not occur (e.g., docks, shipyards, port facilities), or it is a movable NRHP eligible or listed vessel (e.g., USS <i>Turner Joy</i> , the schooners <i>Adventuress</i> and <i>Martha</i> in Port Townsend, and the tug <i>Arthur Foss</i> ). This table may include redundant listings of unknowns, unknown wrecks, and/or obstructions.
Entry source is WISAARD unless indicated as coming from one of the sources below. Columns C, D, & E are WISAARD data fields.
* Source: NOAA Automated Wreck and Obstruction Information System (AWOIS) (four 'soundings' listed in AWOIS deleted).
** Source: Grant et. al., 1996, U.S. Navy Shipwrecks and Submerged Naval Aircraft in Washington: An Overview



## Enclosure 5. Finding of Effect

### Table 2. Cultural Properties Identified by Tribes

Offshore/ Inshore	Location	Resource Name	Comments
Offshore	Offshore Area	Hoh Tribal Traditional Landscape	Adequate evaluation would exceed the reasonable and good faith identification efforts commensurate with the nature and magnitude of the proposed undertaking
Inshore	All Inshore Areas	Sk'aliCh'elh, (que'ihol'mechen) Southern Resident Killer Whales	Not a Property Type Eligible for the NRHP
Inshore	All Inshore Areas	Xw'ullemy (The Salish Sea)	Adequate evaluation would exceed the reasonable and good faith identification efforts commensurate with the nature and magnitude of the proposed undertaking
Inshore	North Hood Canal	Port Gamble S'Klallam Tribe Maritime Cultural Landscape	Adequate evaluation would exceed the reasonable and good faith identification efforts commensurate with the nature and magnitude of the proposed undertaking
Washington Tribes have provided important information and cultural perspectives regarding a variety of resources that have religious and cultural importance. These may overlap or otherwise intersect with one, several, or all of the locations forming the NWTT APE.			

Enclosure 6. Tribal Consultation Summary

TRIBE	Contact and/or Contact Attempt	(1) Decision to Monitor Process (2) Decision to Monitor Process After Receiving Additional Information (3) Expression of Interest in Participation (4) Knowledge and Concerns Conveyed (5) Active Consultation				
		Section 106 Step When Communication Received From Tribe				
		Prior to 106 Initiation*	Initiation Ltr 2/16/18	Proposed APE Ltr 5/30/19	Clarified APE Ltr 9/13/19	Final APE & HP ID Status Ltr 11/27/19
Confederated Tribes and Bands of the Yakama Nation	7		2			
Confederated Tribes of the Chehalis Reservation	5		2			
Cowlitz Indian Tribe	8		2			
Hoh Indian Tribe	6	3 & 4 9/20/17				5
Jamestown S'Klallam Tribe	4		3			
Lower Elwha Klallam Tribe	6		3			
Lummi Indian Nation	7					3, 4, & 5
Makah Tribe	6	3 6/25/18	3			
Muckleshoot Indian Tribe of the Muckleshoot Reservation	6		2			
Nisqually Indian Tribe of the Nisqually Reservation	7		3			
Nooksack Indian Tribe of Washington	7		3			
Port Gamble S'Klallam Tribe	7		1			
Puyallup Tribe of the Puyallup Reservation	6		3			
Quileute Tribe	7		3			
Quinault Indian Nation	10		3		4	
Samish Indian Nation	7		3	2		
Sauk-Suiattle Indian Tribe	5	3 5/15/18	2			
Shoalwater Bay Tribe of the Shoalwater Bay Reservation	10		2			

TRIBE	Contact and/or Contact Attempt	(1) Decision to Monitor Process (2) Decision to Monitor Process After Receiving Additional Information (3) Expression of Interest in Participation (4) Knowledge and Concerns Conveyed (5) Active Consultation				
	letter, e-mail, call, meeting	Section 106 Step When Communication Received From Tribe				
		Prior to 106 Initiation*	Initiation Ltr 2/16/18	Proposed APE Ltr 5/30/19	Clarified APE Ltr 9/13/19	Final APE & HP ID Status Ltr 11/27/19
Skokomish Indian Tribe	4		1			
Snoqualmie Indian Tribe	6		3			
Squaxin Island Tribe of the Squaxin Island Reservation	9			4	2	
Stillaguamish Tribe of Indians of Washington	7		3		2	
Suquamish Indian Tribe of the Port Madison Reservation	6			3		5
Swinomish Indians of the Swinomish Reservation of Washington	8		1			
Tulalip Tribes of Washington	9		1			
Upper Skagit Indian Tribe	11		3			
*Some Tribes chose to express interest in the Section 106 process and provide information about Properties of Traditional Religious and Cultural Importance to them during the initial NEPA scoping period, during Government-to-Government Meetings, and or via e-mail. All Tribes received key correspondence at every step of 106 process, each letter being followed with e-mails and phone calls to THPOs or designated cultural resources POCs confirming receipt and offering to answer any questions. Some requests for additional information were conveyed by e-mail or phone conversation immediately following receipt of letter or at some point thereafter.						



Allyson Brooks Ph.D., Director  
State Historic Preservation Officer

July 22, 2020

Captain M.L. Army  
Naval Air Station Whidbey Island  
3730 North Charles Porter Avenue  
Oak Harbor, Washington 98278-5000

Re: Northwest Testing & Training Project  
Log No.: 021314-41-USN

Dear Captain Army;

Thank you for contacting our department. We have reviewed the materials you provided for the proposed Northwest Testing & Training Project within Washington.

We do not concur with your Determination of No Historic Properties Affected.

While we appreciate the detailed recitations in your letter, there is, as of this date, no professionally authored cultural resources report with the relevant sub-discipline reports on each of the types of cultural resources in the Area of Potential Effect, nor are there any completed site forms in the Wisaard under this project.

What is particularly important in any report, and especially for one of this type of undertaking, is actual field work testing and analyzing the assumptions built into your analysis.

While we appreciate your recitation of tribal outreach efforts and purported consultations, what is missing is the actual substantive results from your efforts. You note that specific tribes have requested the Navy conduct traditional cultural place studies and landscape scale analysis, but this has not been done.

Given the scale of the undertaking and the acknowledgment of the traditional cultural values associated with the Salish Sea we believe a more robust effort is necessary for the Navy to undertake the requested professional studies.

We believe much additional professional work is needed to arrive at a correct determination of effect that will reflect the true scale of the Navy's impact to significant cultural resources in the Salish Sea.

Given your acknowledged uncertainties on the information and effects we believe continued consultations are necessary both to resolve the information needs and also to create and implement a collaborative monitoring program to assure effects are carefully monitored and mitigation efforts can be successfully implemented.



We look forward to further consultations and the development of a correct determination of effect and an agreed upon monitoring effort during the life of the undertaking.

We appreciate receiving any correspondence or comments from concerned tribes or other parties that you receive as you consult under the requirements of 36CFR800.4(a)(4).

These comments are based on the information available at the time of this review and on the behalf of the State Historic Preservation Officer in conformance with Section 106 of the National Historic Preservation Act and its implementing regulations 36CFR800. Should additional information become available, our assessment may be revised. Thank you for the opportunity to comment and a copy of these comments should be included in subsequent environmental documents.

Sincerely,



Robert G. Whitlam, Ph.D.  
State Archaeologist  
(360) 586-3080  
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Enclosure 1. Tab H.

Washington –Table of Summarized Comments Received  
from Tribes and Interested Parties on the Draft  
Supplemental Environmental Impact Statement (EIS)/  
Overseas EIS

## TRIBES

<b><i>Lummi Indian Business Council (Lummi)</i></b>	
Lummi-01	<p>1. DEIS Statement: Navy actions were not the sources for any of the identified threats in the report by the Southern Resident Orca Task Force (Office of the Washington Governor, 2018) (DEIS page 3.4-46).</p> <p>Lummi Response: The Navy's use of sonar equipment was raised as a concern at the very first SRKW Task Force meeting. As participants in the Washington State Governor's SRKW Task Force, we take exception to the erroneous statement in the DEIS that, "Navy actions were not the sources for any of the identified threats" in the report by the Southern Resident Orca Task Force (Office of the Washington Governor, 2018) (page 3.4-46). In point of fact, concerns about the Navy's use of sonar equipment impacting the Southern Residents was raised in the very first Orca Task Force meeting on May 1, 2018. In addition, the Task Force's final report recommended coordinating with the Navy to "discuss reduction of noise and disturbance affecting Southern Resident areas from military exercises and Navy aircraft." The final report went on to recommend that Governor Inslee: should meet with the U.S. Navy's Commanding Officer for the region that includes Washington state to address the acoustic and physical impacts to Southern Resident orcas from Naval exercises in waters and air of Washington state. The Governor should request the Navy participate on the Vessels working group in Year Two and identify actions to reduce the Navy's impacts to Southern Resident areas.</p>
Lummi-02	<p>2. DEIS Statement: The use of sonar and other transducers during training activities as described under [preferred] Alternative 1 will result in the unintentional taking of killer whales incidental to those activities (page 3.4-190).</p> <p>Lummi Response: This is not the first instance in the DEIS where the Navy adopts a cavalier and seemingly naïve attitude towards the complex behavior of the <i>qwe lhol mechen</i>. It is widely known that harmful harassment to a single area-whether intentional or inadvertent will likely lead to a population-wide effect.</p> <p>The EIS Fact Sheet Booklet states that 99.84% of all estimated takes of marine mammals would be Level B harassment. This would include disrupting and altering natural behavior patterns such as feeding, surfacing, nursing, breeding, sheltering or migration. All of these activities, but in particular feeding, breeding, and nursing, are critical for the distressed SRKW population. Level B harassment that interferes with both feeding and breeding or displaces areas from preferred foraging areas is of significant concern and will further contribute to the Southern Resident orcas' low reproductive success.</p> <p>We are also concerned with new and increased impacts to Southern Resident orcas from mine explosives. It is well known that this can cause injury, disorientation, or death for an orca population. Moreover, the use of mid-frequency sonar can impact orca and other marine mammals within 2,000 square miles, an area well outside the reasonable area that even highly trained marine mammal observers are able to survey.</p>
Lummi-03	<p>3. DEIS Statement: Long-term consequences to marine mammal populations from Vessels, in-water devices, military expended materials, and seafloor devices associated with Navy training and testing activities are not anticipated. The use of in-water electromagnetic devices and high-energy lasers have the potential to result in impacts on marine mammals but would not result in long-term impacts on marine mammal populations.</p> <p>Lummi Response: It is mystifying how the Navy can reach these conclusions on the long term impacts of the proposed activities on the SRKW. The fact that the Navy can come to these conclusions while stating that tests may present risks to individual marine mammals," "can cause injury or result in the death of an animal", or that "the numbers of marine mammals potentially</p>

	<p>impacted by explosives are small as compared to each species' respective abundance, long-term consequences for the species or stocks would not be expected," demonstrates a willful ignorance or a reductionist understanding and modeling of the complexity of orca communication and communality.</p> <p>a. The DEIS wording of "would not result in long-term impacts" and "are not anticipated," are not substantiated by the Navy's own data and are conclusions that cannot be drawn from the information in the DEIS. There are documented cases in this region of U.S. and Canadian naval activities, including active sonar training and explosive testing, have caused—and continue to cause—direct short, near, and long-term harm to <i>qwe lhol mechen</i>.</p> <p>b. Every individual orca in the current SRKW population matters if the population is to avoid extinction. It is well documented that among the orca, with their strong, intergenerational bonds, the loss of one orca will also directly affects the others' chance of survival. Researcher Jeff Foster, for example, demonstrated that when a female resident orca dies, it increases the mortality risk of her male offspring under age 30 by 3.1 times, and the mortality risk of her male offspring over age 30 by 8.3 times.</p> <p>c. An active sonar training exercise conducted by the U.S. Navy in 2003 in the eastern Strait of Juan de Fuca and Haro Strait caused members of the SRKW J-pod to stop foraging. Their behavioral pattern became disoriented and they eventually grouped together in shallow water where they are at increased risk of stranding. (Sonar could clearly be heard above the water in a video recording of the incident.)</p> <p>d. A juvenile Southern Resident female was stranded in 2012 with evidence of trauma consistent with an explosion or high-pressure impact, a week after the Canadian Navy had been conducting sonar exercises in the region. Experts in underwater noise who continue to review her case believe that the most likely cause of death was an underwater military explosion.</p> <p>e. In 2017, explosives detonated by the Canadian Navy near a group of Southern Residents (L pod) caused the whales to group together suddenly and flee the area. These examples show that just one incident of training and testing activities impacting Southern Residents can cause significant harm, death, or displacement from preferred habitat.</p>
Lummi-04	<p>f. The DEIS acknowledges the potential for marine mammals to experience non-auditory injury and mortality as a result of its activities. Nonetheless, the assumptions the Navy has made in modeling these types of harm result in 'take estimates' that both underestimate effects and are inconsistent with the Marine Mammal Protection Act.</p> <p>The DEIS also fails to account for the findings such as those contained in Wieland, M., A. Jones, and S. C. P. Renn. 2010. This study, like a number of others, found that because the SRKW are adjusting their behavior, "we must consider the very real possibility that engine noise is hindering their ability to communicate, and may well impact their efficiency at using acoustics to forage and navigate, as well." The use of mid-frequency sonar has also been linked to separation of killer whale and calf from its group (Olson, JK, J Wood, RW Osborne, L Barrett-Lennard, S Larson. 2018). The SRKW simply cannot afford any further decrease in their already very low recruitment rates, an increase in distress in their foraging opportunities, or disorientation among its members.</p>
Lummi-05	<p>6. DEIS Statement: Foraging during the spring-in Salish Sea by Southern Resident killer whales has declined in recent years as they shift their range and forage for Chinook salmon or other prey species elsewhere in response to reduced prey availability in that historically used inland waters foraging area. (DEIS p. 3.4-26).</p> <p>Lummi Response: In actual fact, Olson et al. (2018) noted that K and L pods have been increasing the duration of their stay in the inland waters by staying in the Salish Sea through the fall and into the early winter. Furthermore, any short-term variations in</p>

	<p>their presence in the Salish Sea should not be a rationale for exercising less caution in the inland waters. It is difficult to predict orca presence on a long-term or even annual basis, and the Navy should not assume that the shift outside of the Salish Sea in the spring and summer is a permanent change.</p> <p>Moreover, the DEIS fails to acknowledge that even spending time elsewhere, Southern Resident orcas are not getting enough food and are showing signs of malnutrition. The DEIS also implies that changes in the Southern Residents' presence in the Salish Sea mean that protections there are less important than they used to be. This is a misleading and dangerous, assumption; one of several that lead us to question to motives and aim of the DEIS. On the contrary, the inland waters remain a critical foraging area for the future of the SRKW. For that reason, tribal, state and federal governments are actively working to restore salmon populations in the inland waters as well as reduce vessel traffic noise.</p> <p>Additionally, the Navy should take into consideration that when the Southern Resident orcas are not in inland waters, they are likely to be in their offshore area, which is subject to additional training and testing activities that do not occur in the Salish Sea (see Southern Resident Killer Whale migration route at right). The Navy should consider additional mitigation and monitoring in the orcas' offshore habitat given the potential increased use of this area and the unique activities—such as active sonar—that take place in this portion of their range.</p>
Lummi-06	<p>7. Additional and Related Lummi Comments</p> <p>a. Unless there is strategic alignment across tribal, state, and federal agencies, the SRKW are likely to go extinct within our lifetimes. The DEIS demonstrates an increase in the threat to the SRKW from ocean noise, direct harm, disorientation and displacement for an already stressed population. The Navy must consider the current crisis facing the endangered Southern Resident orcas and make new adjustments in its testing and training activities.</p>
Lummi-07	<p>b. The EIS should detail the times of year during which the proposed activities will take place. The Southern Resident orcas have exhibited seasonality in their movements, and information from tagging studies, coastal surveys, and passive acoustic monitoring allows some degree of prediction for when and where they may be traveling and foraging. Any overlap in their seasonal movements and the Navy's testing and training activities will increase impacts on these species. Information about timing should be made public in the EIS and the Navy should seek to adjust the timing of their activities to minimize such overlap.</p> <p>c. The intended duration of the EIS is not clear. It is not stated in this EIS whether the proposed activities were analyzed for impacts over a five-year time period or for the extended seven-year time period.</p>
Lummi-08	<p>d. The designation for Southern Resident orca critical habitat is likely to change later this year. The Navy should not make final decisions about training and testing in the potential new critical habitat areas off the coasts of Washington, Oregon and California until this designation has been made. The Navy should wait until NMFS makes its final designation for expanded critical habitat before pursuing activities that would adversely affect the area. Changes in the Navy's mitigation measures are likely to be necessary so that the proposed action does not "result in destruction or adverse modification of critical habitat."</p> <p>e. It is incumbent upon the Navy to be rigorous, transparent, and conservative in assessing potential impacts on these populations. 40 C.F.R. §§ 1502.22, 24 (requiring agencies, inter alia, to obtain information essential to a reasoned choice among alternatives and to ensure the professional integrity of their analyses).</p>

<b><i>Makah Tribe (Makah)</i></b>	
Makah-01	<p>1) Protection of Makah Trust Resources</p> <p>The Makah Tribe would bring to the Navy's attention the need to further review the impacts of the NWTT on the Makah Tribe's trust resources and the environments on which they depend. In order to more accurately evaluate impacts to fish, marine mammals, and other wildlife from the existing, new, and increased training and testing activities, we need the Navy to clarify the times of year in which the proposed activities will occur. These discussions should occur with our policy and technical staff to better assess impacts to tribal trust resources, especially those with seasonal movements and/or who rely on sound to feed, communicate, breed, and navigate (i.e., gray whales, humpback whales, halibut, salmon, rockfish, southern resident killer whales, etc.). The Makah Tribe has significant expertise in fisheries, marine mammals, cultural resource protection, vessel traffic safety, oil spill response, and policy development and are the most appropriate ones to determine potential impacts to the Makah Tribe. The Makah Tribe looks forward to working with the Navy to fully understand the scope and impacts of the proposed activities on our treaty resources.</p>
Makah-02	<p>The Makah Tribal Council has been engaged on the Governor's SRKW Task Force in both the prey and vessels working groups, which provided a recommendation (Recommendation #25) for the Navy to "address the acoustic and physical impacts to Southern Resident orcas from Naval exercises in waters and air of Washington state. "For example, recent acoustic data from NOAA's hydrophone network show high use of the Cape Flattery Offshore area by southern resident killer whales (SRKW) in the spring compared to other areas of the coast. As such, we recommend this area be removed for sonar and explosive testing and training to avoid impacts or incidental take of SRKW, as well as other tribal trust resources. Acoustic, or noise impacts of vessel traffic, have also been demonstrated to negatively impact orca behavior, echolocation, and foraging success. Primary sources of acoustic impacts include sonar, acoustic devices, vessel traffic, and construction. Killer whales use echolocation to locate prey, communicate, and navigate underwater. Underwater anthropogenic noise can impair SRKW ability to successfully engage in these important behaviors and/or cause them to compensate in an energetically expensive manner.</p>
Makah-03	<p>The Makah Tribal Council recommends including sonar as a prohibited activity within 50nm mitigation area as sonar negatively impacts marine mammals, a trust resource of the Makah Tribe.</p>
Makah-04	<p>2) Adequate Spill Response and Clean up Preparedness</p> <p>Any changes in testing or movement of Naval vessels needs to be accompanied by appropriately scaled improvements in oil spill response and other potential hazardous materials. The Makah Tribe is willing to work with the Navy to determine whether or not the Navy is adequately prepared to address a response to hazardous materials in our marine area, considering the recent incident of 4,000 gallons of sewage spilled into Puget Sound in March, 2019. The Makah Tribe has experienced over 1 million gallons of oil spilled in our treaty area since the early 1970s; we have witnessed firsthand the devastating effects of oil spilled by the General Mieggs, the Nesstucca barge and the Tenyo Mam. While we recognize that there has been progress towards reducing the risk of oil spills or spills of other hazardous materials, we remain concerned about risks of catastrophic spills and, in particular, the limited capability to clean up spills, especially in remote areas such as the Washington Coast.</p>
Makah-05	<p>3) Testing and Training new technology and Environmental Research</p> <p>Within the SEIS, the Navy is proposing the use of high-energy lasers, kinetic energy weapons, and biodegradable polymer, the effects of which are unknown. The Makah Tribal Council recommends the Navy conduct rigorous testing and monitoring of these</p>



	<p>new technologies to assess and avoid impacts to fish, marine mammals, wildlife, and Makah's treaty protected trust resources. We would also like to be updated on the results of these monitoring efforts to ensure the protection of our trust resources. Additionally, the Navy Northwest has funded, and will continue to fund, research in this region. The Makah Tribal Council is interested in becoming more involved in the development of the research objectives and the research design for ongoing, planned, and future research off of the Washington coast.</p>
Makah-06	<p>4) Inclusion of Tribal and Traditional Knowledge</p> <p>The Navy should expand their use of data and information to include tribal and traditional knowledge. The Makah Tribe has lived on the Washington coast since time immemorial, as such our knowledge would enhance the SEIS and complement the western science used. The Navy should solicit and include traditional knowledge and assessments from tribes when analyzing the NWTT impacts to tribal cultural, ceremonial, spiritual, and economic marine resources, as determined by each Tribe. The Makah Tribal Council recommends that in order for the SEIS to be complete, tribal traditional knowledge and impacts as determined by the Makah Tribe should be taken into account in a meaningful and respectful manner, while respecting the need for cultural sensitivity and confidentiality.</p>
Makah-07	<p>5) Climate Change Impacts</p> <p>The Makah Tribal Council believes the current SEIS is deeply flawed by under representing the importance of and the impact upon marine areas, habitats, and species as well as how projected climate and ocean changes are and may affect these resources. Our oceans are experiencing multiple environmental stressors, including temperature increases, ocean acidification, hypoxia, and harmful algal blooms. Washington State is projected to be hit especially hard by ocean acidification due to strong natural upwelling processes, resulting in significant impacts to pteropods, juvenile crab, shellfish, finfish, deep-sea corals, etc. A cumulative impacts analysis of NWTT needs to incorporate changing ocean conditions, treaty-reserved rights, coastal communities, and existing industries (i.e., commercial, subsistence, and recreational fishing as well as tourism) as well as thorough consideration of alternatives. The Makah Tribal Council also recommends the Navy conduct water quality testing to determine the impact of the NWTT, especially explosives and explosives byproducts, in the face of changing ocean conditions.</p>
Makah-08	<p>6) Meaningful Consultation</p> <p>The Makah Tribe is a sovereign tribal government with reserved rights under the Treaty of Neah Bay. The Makah Tribal Council believes the Navy has not conducted comprehensive and meaningful consultation with the Makah Tribal Council in the development of the NWTT SEIS. Notification letters and limited discussions are not meaningful consultation. The Navy has outlined that they will work to "to ensure that timely notice and appropriate consultation with tribes occurs prior to taking any actions that may have the potential to significantly affect protected tribal resources, treaty rights, or Indian lands protected by a statute, regulation or executive order. 16</p> <p>"In addition to the National Historic Preservation Act, Section 106, requirements for impacts to cultural resources, the Makah Tribe emphasizes that fish, marine mammals, seabirds, invertebrates, etc. are cultural and trust resources and we should be consulted as a cooperating agency with the Navy and other federal agencies in determining impacts under the Marine Mammal Protection Act, Endangered Species Act, Magnuson-Stevens Act, etc. as we are co-managers of the resources. We request the Navy conduct more meaningful consultation with the Makah Tribe prior to finalizing the SEIS.</p> <p>The Makah Tribal Council is also interested in including the National Oceanic and Atmospheric Administration (NOAA) in our</p>

	<p>consultation request, as NOAA's consultation in reviewing this SEIS did not include consultation with the Makah Tribe on the impacts to treaty resources, including, but not limited to, fisheries, marine mammals, and the habitats they depend on. The Makah Tribal Council understands, given our unique legal, spiritual, and cultural connection to the ocean, there is a disproportionate and unacceptable risk to the Makah Tribe and our treaty protected resources. The Makah Tribal Council requests formal government-to-government consultation with the Navy and NOAA on this draft SEIS. We recommend informal staff meetings occur prior to the formal consultation taking place. The SEIS needs to incorporate more input from the Makah Tribe, a coastal treaty tribe with extensive ocean history, knowledge, and dependence, to aid the Navy in meeting their federal trust responsibility to the Makah Tribe.</p>
<b><i>Port Gamble S'Klallam Tribe (PGST)</i></b>	
PGST-01	<p>The Supplemental DEIS/OEIS proposes to increase the number of pier side sonar testing events at Bangor from 67 events per year to &lt; 174 events per year; the number of unmanned underwater vehicle tests at Dabob Bay from 253 events per year to &lt; 400 events; and the number of NEPM torpedoes tested at Dabob Bay from 41 events per year to 61 events per year, in addition to other increases in the tempo and intensity of training and testing activities throughout the Puget Sound. Every five years, as the Navy increases the existing NWTT exercises and adds new exercises, the environmental impacts to natural and cultural resources will increase. The Tribe is concerned that these NWTT activities will directly, indirectly and cumulatively impact tribal access and treaty resources within its usual and accustomed fishing area. We are concerned that the NWTT program incrementally threatens the Tribe's treaty right leading to damaged marine sediment, declining water and air quality, and degraded marine habitat.</p>
PGST-02	<p>Cumulative effects from increased acoustic sonar and other acoustic devices, underwater explosions, weapons firing, aircraft noise, vessel noise, electromagnetic signals, target strikes, in-water device strikes, expended materials, seafloor devices, cables and wires, release of air pollutants, explosives, metals, chemicals and other materials, physical disturbance, limited accessibility, underwater energy and physical interactions will impact natural and cultural resources and tribal fisheries in the Tribe's usual and accustomed area. The NWTT explosions and byproducts of explosions and combusted propellants, as well as unexploded ordnance, non-combusted propellant, metals, chemicals and other materials will have impacts to water quality. Increased criteria pollutant emissions and hazardous air pollutant emissions from vessels, aircraft and munitions will impact air quality. Acoustic stressors (underwater detonations) and physical disturbance or strikes (interactions with vessels and in-water devices, military expended materials, or seafloor devices) will affect marine habitats.</p> <p>Potential impacts include localized disturbance of the seafloor, cratering of softbottom sediments, and structural damage to hard-bottom habitats. Impacts on marine mammals may include mortality, injury, and disturbance or behavioral modification, caused by underwater explosions or vessel strikes, sonar use, noise and pollution. Cumulative impacts to sea turtles may include mortality, injury, disturbance or behavior modification caused by underwater explosions, vessel strikes, sonar use, noise, pollution and habitat loss.</p> <p>Impacts to birds may include mortality, injury, disturbance or behavioral modification from underwater explosions, air strikes or vessel strikes, noise, pollution, and habitat loss. NWTT activities such as underwater explosions, interactions with vessels and in-water devices, military expended materials or seafloor devices could also affect marine vegetation, including localized disturbance and mortality. Acoustic stressors (tactical acoustic sonar, other acoustic devices, pile driving, underwater explosions,</p>

	weapons firing noise, aircraft noise, vessel noise), electromagnetic stressors, physical disturbance or strikes (vessels and in-water devices, military expended materials, seafloor devices), entanglement (cables and wires, parachutes), and ingestion (military expended materials) may affect marine invertebrates. Underwater explosions or vessel strikes, sonar use, noise and pollution may cause fish mortality, injury, disturbance or behavioral modification.
PGST-03	In addition to the NWTT exercises, the increased vessel traffic associated with these exercises will have a significant cumulative effect. Vessel activity from all projects in aggregate will impact tribal fisheries and access to traditional fishing and harvesting areas throughout Hood Canal. Cumulative vessel traffic limits harvesting and fishing during scheduled fish and shellfish openings, by requiring that fishing boats leave or stay away from particular areas of the Hood Canal to avoid vessel activity. Tribal fishers and harvesters also face the increased threat of lost or damaged gear from increase vessel traffic through fishing and harvesting areas.
PGST-04	Having promised to secure the Tribes their fisheries, the Navy has a fiduciary duty to fulfill that promise and protect the Tribe's treaty rights. Exercising that trust responsibility requires the Navy to analyze and select action alternatives that do not add to the collective impact of the Navy's actions on the Port Gamble S'Klallam Tribe's treaty rights. The Navy should consider the cumulative impacts of vessel traffic, waves, and wakes, the cumulative destruction of habitat, stresses on aquatic species, risks of spills and releases, and other impacts from vessel activities on the Tribe's fisheries. In the aggregate, the Navy's projects and many other activities in the Hood Canal have a significant effect on the timing, location, quality and quantity of harvest for tribal members. The DEIS/OEIS for the proposed NWTT should take account of contributions toward the cumulative effects of activities encroaching on tribal resources and fisheries within the PGST's usual and accustomed areas.
<b><i>Squaxin Island Tribe (Squaxin)</i></b>	
Squaxin-01	While the Marine Species Coastal Mitigation Area provides a measure of protection against harm from Navy training and testing, <b>the Tribe urges the Navy to expand the prohibited activities to include use of sonar</b> , considering the impact such devices have on the health and wellbeing of whales and other marine mammals.
Squaxin-02	The Tribe requests that the Navy's monitoring program be expanded to include effects of training and testing beyond potential harm to species population levels. Population level effects are insufficient to fully consider the potential harm that Navy training and testing may cause, because this standard does not fully incorporate the concept that impacts to Tribal cultural resources may not be manifested in physical impacts on marine species. In addition, impacts upon already depressed populations may not adequately address the concomitant impacts on Tribal rights and resources.
Squaxin-03	To evaluate the impacts to fish and wildlife species from existing, new, and increased training and testing activities more accurately, we request that the Navy clarify the times of year in which proposed activities will occur. This is especially important when assessing impacts to fish and wildlife, which have seasonal movements and behaviors that will greatly determine whether Navy activities significantly affect each species in the proposed areas.
<b><i>Suquamish Tribe (Suquamish)</i></b>	
Suquamish-01	The time period of activities specified in the 2019 DSEIS is "beyond 2020 into the reasonable foreseeable future". A specific time period should be defined to fully evaluate training-specific and cumulative impacts of these proposed activities.
Suquamish-02	<b>Marine Debris</b> The Tribe is concerned of unrecovered training and testing materials associated with these training activities. These materials may

	include, but are not limited to, sonobuoys, remote operated vehicles, torpedoes, targets, and associated lithium batteries. On August 20, 2018, a floating mine was discovered in waters adjacent to the Port Madison Indian Reservation and required the deployment of Navy officials and emergency response personnel. Although the floating mine was determined to be one of two mines left unrecovered from a previous training activity and considered marine debris, it had a direct effect on the Suquamish community. <u>The Tribe requests that the 2019 SEIS include detailed Standard Operating Procedure (SOP) protocols to recover and account for all training and testing materials placed into the inland waters of Salish Sea, including Dabob Bay.</u> The SOP protocols for recovery should not be limited to physical debris such as mines or lithium batteries, but should also provide a detailed account for the recovery of toxic liquids such as unspent torpedo OTTO fuel.
Suquamish-03	<p><b>NWTT Impacts to the Southern Resident Killer Whale</b></p> <p>SRKW depend on sound to navigate, find food, and communicate with each other. Underwater noise from sonar, training technologies implemented during training, and vessels can impair communication, mask echolocation signals, modify behavior, and permanently damage hearing sensitivity among SRKW. These impacts carries both energetic and physiological costs to SRKW; requiring the whales to expend more energy to communicate and locate prey.</p> <p>NMFS prepared a Biological Opinion (Bi Op) in 2015 assessing NWTT impacts on Killer Whales and issued Letters of Authorization for incidental take of three distinct Killer Whale populations, including the SRKW through the year 2020. Since the 2015 Bi Op, NMFS has designated SRKW as a "Species in the Spotlight" and emerging science has further refined the assessment of underwater noise impacts on the declining SRKW population 1 2 3. <u>The Tribe requests that impacts of NWTT activities on SRKW are reevaluated with a detailed analysis of training-specific and cumulative impacts to SRKW.</u></p>
Suquamish-04	<p><b>Alternatives to Real-life Training and Testing</b></p> <p>The Tribe requests that the 2019 SEIS consider virtual training and testing activities within alternatives to avoid or minimize impacts to habitat, biota, and Treaty-reserved fishing activities affected from training activities.</p>

## INTERESTED PARTIES

<b><i>National Parks Conservation Association</i></b>
<p>Olympic National Park is too special to be degraded by thunderous jet noise. I am requesting that the U.S. Navy use its considerable resources to avoid flying over the park and instead train in other designated military areas that do not interfere with Olympic and other national parks. The unique qualities of Olympic have been recognized as a national park, wilderness area, International Biosphere Reserve and World Heritage Site. At the heart of the park is the Hoh Rain Forest, one of the quietest places in the Lower 48. Many of us visit places like this specifically to get away from noise, people, and the more obtrusive trappings of modern civilization.</p> <p>Warplanes are antithetical to the very qualities that draw us to this, one of the most quiet, wild, and protected areas in the country. Please consider a training alternative that would avoid Growler training and noise over and around the Olympic Peninsula.</p>
<b><i>U.S. Department of Interior (DOI)</i></b>
<p>The purpose and need states, “These proposed activities are generally consistent with those analyzed in the 2015 NWTT Final EIS/OEIS, and are representative of activities the military has conducted in the Study Area for decades” (pg 1-1). While this may be true given the Olympic Military Operating Areas (MOAs) were established by the Federal Aviation Administration (FAA) in the late 70s, the difference between past activities and the proposed activities is not minor. The changes include an increase in the number and type (Growlers vs. Prowlers) of aircraft and an increase in training days and times over the Olympic MOA. Additional changes include the connected action of training utilizing emitters in park-adjacent U.S. Forest Service (USFS) areas, specifically concentrating the aircraft and noise disturbance within and immediately adjacent to western portions of Olympic National Park (OLYM), including portions of the western interior, and nearly the entire coastal portion, of the Daniel J. Evans Wilderness (Evans Wilderness). The Department recommends that this increased level of activities should be appropriately reflected in the FEIS.</p>
<p>The Department – through the National Park Service (NPS) commented in phases I and II of this project noting the need to identify affected NPS units on all maps within the SEIS. The majority of the maps do not identify federal or tribal lands. For greater transparency and public understanding, the Department recommends that the maps included in the FEIS should depict the locations of all federal and tribal lands within the training and testing ranges for all three states.</p> <p>More specifically, the maps should, at minimum, identify the location and extent of OLYM. The only map included in the document that shows OLYM (and also shows Ebey’s Landing National Historical Reserve (EBLA)) is on page 3.12-21 (aside from those in Appendix J) in Volume 2 of the SEIS. Subsequently, the only references found for OLYM are within the cultural resources section of the affected environment as well as in Appendix J.</p>
<p>The Department recommends that the FEIS include an analysis that accurately reflects the presence of park visitors throughout the week, especially from May through September.</p>
<p>The FEIS should include an analysis of the effect of the noise on visitors who come to the park specifically to experience the natural environment, including those natural sounds, and without the interruption of anthropogenic factors beyond the presence and subsequent noise of other park visitors.</p>
<p>The SEIS also states, “In a worst case scenario with an individual located at an elevation of 4,000-4,500 ft. and an EA-18G flying directly over that individual at an altitude of 6,000 MSL, the analysis shows that the maximum noise level would be 100.6 dBA, and noise at this level would last for an average of 0.12 second per flight. (pg 3.12-28)” From within the OLYM Headquarters building, located in Port Angeles, with an</p>



open office window near moderate traffic, the high school, and nearby residential areas, Growlers are seen flying over the area and the sound is readily detectible for approximately 3 minutes at minimum. The Growlers can be heard on approach, as they fly over, and long after they're out of sight. So, either the modeling is incorrect or aircraft flies lower than the noted 10,000 ft. MSL (page 3.12-28 of the SEIS states that "multiple aircraft flying above the Olympic Peninsula would generate, on average, low level (37 dBA) noise, because more than 95 percent of overflights would occur above 10,000 ft. Mean Sea Level (MSL), placing the source of the noise, an aircraft, and the receptor, a person on the ground, thousands of feet apart.)."
Additionally, averaging sounds over a 24-hour day-night period to assess cumulative sound levels within national park and wilderness land designations, is counter to what visitors actually experience on-the-ground. As properly noted in Appendix J, nighttime overflights have a greater adverse effect on the natural soundscape and visitor experience. Visitors, researchers, and staff tend to reference overflights by total number witnessed vs. 24-hour averages. Complaints have been shared in regard to low and loud flights occurring along the wilderness coast during the day and high and loud flights occurring over the interior wilderness at night. Researchers have noted that low flying Growlers have impacted their coastal studies due to wildlife being startled and suddenly dispersing.
The FEIS should reflect the importance of aircraft keeping to their designated incoming flight path (depending on the width of that path), to control where aircraft are seen and heard.
"From 2015 through 2017, the average annual number of Navy EA-18G aircraft transits to and from the Olympic MOAs was 2,224. Under Alternative 1 [the preferred alternative], EA-18G transits to and from the Olympic MOAs are proposed to increase by 300 per year. This proposed increase equates to, on average, less than one additional transit per day over a calendar year." We note that the proposal would result in roughly 7 total "events" per day, with much louder aircraft than previously experienced. A visitor who is in the park for 5 days would experience noise from military overflights at least 35 times in one visit.
Page 3-20, Affected Environment and Environmental Consequences - For overall noise from the EA-18G while training within the OMOA, the Appendix J noise analysis shows an increase of 11 dBA for a total of 37 dBA estimated for the preferred Alternative 1. The discussion in Appendix J did not appear to account for a baseline of 26 dBA, then an increase to 37 dBA, and so it is unclear where the initial measurement came from. The FEIS should clarify whether the 26 dBA is intended to measure natural ambient and 37 dBA is the proposed ambient under the preferred alternative. The FEIS should reflect that the increase of 11 dB to any soundscape would reduce the listening area for humans and visitors by 92% which would be a very significant impact on the soundscape and ability for wildlife to function and communicate in their environment.
Appendix J, Page J-26, J.7 Acoustic Monitoring Report. The Department recommends that the FEIS provide the metric(s) for the natural daytime ambient acoustic baseline in the second paragraph (i.e., L50 or Leq).
Appendix J.6.3 provides estimated Lmax durations. As noted in the report, Lmax may only occur for a fraction of a second. So as to provide more context about duration of jet noise, the FEIS should include the percent time above metrics at the threshold levels in Table J-18 per year (Table J-13) for all combined missions, and for the time period when the training exercises are occurring. This information will be more representative of what a national park visitor would actually experience.
The Department recommends that the Navy provide soundscape monitoring assistance to capture real-time baseline sound levels with and without Growler overflights and continue to conduct on-the-ground monitoring for the duration (indefinitely) of all naval training and testing activities within and immediately adjacent to the Olympic MOA, wilderness area outside of the MOA, and especially along the park's very

popular wilderness coast. This would be a measured outcome and would provide transparency to the public regarding commitments made by the Navy with respect to the number, timing, and the extent of overflights in this specific area, as well as whether the aircraft regularly maintained the AGL and MSL levels as identified in the SEIS.

***Olympic Forest Coalition***

Thank you for the opportunity to comment on the NWT Draft Supplemental EIS/OEIS. The Olympic Forest Coalition incorporates submitted comments (OFCO/WCAA Comment on Draft EIS Navy Draft EIS – EA-18G Growlers at Naval Air Station Whidbey Island, February 2017; OFCO/WCAA Comment, Scoping, NWT Draft Supplemental EIS/OEIS, October 2017, among other comments on related activities). The Coalition joins the West Coast Action Alliance, the Olympic Park Associates, and the National Parks Conservation Association in their comments on this draft Supplemental EIS/OEIS.

Our comments include the following areas of concern: a) unjustified reliance on the flawed NWT FEIS (2015); b) the 2019 study on impacts of military flights on the Olympic Peninsula soundscape was not included; c) inadequate analysis of impacts on threatened and endangered species (Marbled Murrelets and Northern Spotted Owl); d) inadequate cumulative impacts analysis; e) Inadequate consideration of reasonable alternatives; and f) inadequate mitigation measures.

Unjustified Reliance on the Flawed NWT FEIS (2015).

The Draft SEIS/OEIS incorporates in part the NWT FEIS published in 2015, unless the literature review undertaken for this Supplemental EIS/OEIS on scientific studies published since 2015 identified new findings. The NWT FEIS was flawed due to incomplete and inadequate information, segmentation of functionally related Navy action into several “actions” limited in scope, inadequate analysis of all impacts (including noise, prey resources, air, water and soil contamination, and climate change), and lack of cumulative impacts analysis of all functionally related Navy actions. The NWT FEIS incorporated the US Fish and Wildlife Service Biological Opinion that was completed on inadequate and incomplete information provided by the Navy to the Service. The biological determination made in the BiOp are flawed. WCAA/OFCO commented on this problem and the Draft Supplemental EIS/OEIS does not address the critique. The Navy should undertake a full and adequate Revised EIS that fully addresses all inadequacies before consideration of expanded training activities is completed.

**2019 Impacts of Military Flights on Olympic Peninsula Soundscape Findings Not Incorporated in Analysis**

The Draft SEIS/OIS does not incorporate a very recent, significant and relevant piece of scientific research directly on point: “Impacts of Military Flights on Olympic Peninsula Soundscapes” (Kuehne, 2019). The research has been presented in regional symposia in beginning stages, and should have been included in the analysis. The two-year study of the impacts on the soundscape by the Navy Boeing EA-18G (“Growler”) aircraft is particularly relevant, and one of a kind. The study was conducted by Lauren Kuehne, MSc Research Scientist at the University of Washington’s College of the Environment, School of Aquatic and Fishery Sciences. Ms. Kuehne carried out one of the only scientific studies of the soundscape on the Olympic Peninsula. Ms. Kuehne “sought to answer two questions: 1) What are the current noise levels and contributions of different aircraft on the Olympic Peninsula soundscape? and 2) How might these levels change with proposed increases in military training and operations?” The study captured sound data from three areas – within the Olympic National Park and adjacent to the Military Operations Area for the Navy training activities that fly out of Naval Air Station Whidbey Island (NASWI). The three study locations on the west side of the Olympic Peninsula were: “Third Beach (elevation 64 m), River Trail (199 m), and Hoh Watershed (28 m)”. The study recorded and distinguished commercial aircraft, military aircraft, and helicopters. The study including capturing data from the Navy Boeing EA-18G “Growler” aircraft in 2017 and 2018, before the proposed increase of 36 added aircraft (2019). With the decision to increase the Navy fleet from 82 to 118 jets (Record of Decision for Growler Environmental Impact Statement - 2019), monitoring the increase in noise

and related impacts becomes more imperative. Read Ms. Kuehne's report [link to PDF]. Results of Ms. Kuehne's study (excerpts):

- *"The data were compared with the Whidbey Island airfield public notice of flights, 83% of which are the Growler aircraft.*
- *Of the 4,644 flight events identified.*
- *Of these, 85% were classified as military, 8% commercial, 6% propeller, and <1% were helicopters.*
- *On the busiest days, we recorded an average of up to 70-85 flight events per location.*
- *The maximum number of flight events recorded on a single day at locations were 73 (Hoh Watershed), 104 (River Trail), and 81 (Third Beach).*
- *The duration of time in each day and hour that military aircraft were audible was highly correlated across the three locations, indicating flight activities impacted a large geographic area at any given time.*
- *Military aircraft are a dominant contributor to the soundscape of the Olympic Peninsula, representing 85% of the total time aircraft are audible.*
- *Percent time audible was substantial during daytime hours, particularly at the coastal sites, which averaged 12% audible during daytime hours across all 40 recording days. However, to achieve this average level meant that on some individual days the percent time audible during these hours was far greater (e.g., 49-52% of the time). Individual locations can experience in the range of up to 80-100 events in a single day."*
- *Data showed that areas outside of the MOA are clearly impacted, with the Hoh River location averaging 9-12% audible during daytime hours (with a maximum of 52% recorded on one sampling day- hour).*
- *The River Trail location, positioned 1.8 km outside the MOA, receives consistent noise from military aircraft indicates that the noise footprint extends well beyond the MOA.*
- *An important outcome of this study was demonstrating feasibility in identifying different types of aircraft from audio recordings, that were processed using widely available software. [Kuehne] then used these data to calculate metrics relevant for people and wildlife, which do not experience and respond to noise and disturbance as calculated by long-term averages (i.e., the 24 hr day-night average sound level that is the standard applied by the Federal Aviation Administration).*

These findings are particularly relevant in wilderness areas, the Olympic National Park, and rural communities. As the Olympic Peninsula shoulders the burden for the entire country of training pilots on the new aircraft, Ms. Kuehne's study definitively demonstrates that ground monitoring of noise is feasible and can produce reliable data that on impacts, which can and should be used to drive mitigation strategies for endangered species like the Northern Spotted Owl and Marbled Murrelet, and rural resident's health. The Draft SEIS/OEIS provided a modeling study of sound impacts (Appendix J), but no actual data. The model employed day nit [sic] averages, critiqued in WCAA/OFCO previous comments, and unaddressed in the modeling. The Navy must consider this important new science in a revised EIS and incorporate a full spectrum of mitigation strategies for wildlife, human health and economic losses due to the detrimental impacts on the soundscape of the Olympic Peninsula. The Navy must also implement an independent monitoring program modeled on Ms. Kuehne's study and report to the public in the operational area on findings annually.

#### Inadequate Analysis of Impacts on Threatened and Endangered Species

The Draft EIS/OEIS does not provide new nor adequate information on impacts to threatened and endangered species such as the Marbled Murrelet and the Northern Spotted Owl, species that will be impacted by the training and testing exercises of the aircraft. The Draft SEIS/OEIS also proposes to use new technologies, such as the "high energy laser" equipment, without adequate information about the potential environmental impacts on threatened and endangered species. OFCO incorporates the concerns about threatened and endangered species in

previous comments, as the concerns are not adequately addressed in the Draft.

Marbled Murrelets, threatened throughout the MOA, will be impacted both on land and in the marine waters area. The populations are in decline in Washington State, as compared to the stable populations in Oregon and California. The expanded and increasing military operations in both the habitats of the Marbled Murrelet – terrestrial and marine – is of grave concern. The increased military operations will impact Murrelet nesting habitat, diving and foraging, marine habitat, and prey fish. The expanded MOA encompasses the marine and terrestrial areas designated as critical habitat for the Marbled Murrelet. While the SEIS made note of new scientific information about sound and climate impacts, no mitigation measures were proposed to address impacts to Murrelets. The Draft SEIS/OEIS reports that a sound study of impacts on Murrelets is in progress, but does not give the scope, methodology, timeline of the study. The Draft indicates no mitigation strategies are proposed for the impacts to Marbled Murrelets. The Navy should not expand the MOA without including mitigation measures to address this threatened species.

Northern Spotted Owls, also threatened throughout the MOA, will be impacted by expanded and increased terrestrial training activities. While the SEIS made note of new scientific information about sound and climate impacts, no mitigation measures were proposed to address impacts to Northern Spotted Owls. The SEIS indicates no mitigation strategies are proposed for the impacts to owls. The Navy should not expand the MOA without including mitigation measures to address this threatened species.

#### Inadequate Cumulative Impacts Analysis

The SEIS/OEIS includes a discussion of cumulative impacts that is overly narrow in scope, and does not incorporate all the functionally related activities and impacts, and clouds the analysis by relying on cumulative impacts “tiered” in other documents. The SEIS/OES excludes impacts outside of the narrowly defined project scope (Sec. 4.2), stating:

*“NEPA documents that analyze a specific type of aircraft operation at a military airfield (in this case, the Growler) are focused in and around that airfield and its facility needs. While the Navy has analyzed, and is currently analyzing, various other projects in the area, those projects are not preconditions for Growler operations at the NASWI complex. Growler operations at the NASWI complex are not a precondition for larger military readiness activities on range complexes in the Pacific Northwest. Even in the absence of these Growler operations, military training in the Pacific Northwest would continue independently from this Proposed Action...”*

The aircraft will fly beyond the air fields where the craft are stationed to conduct the training, including the MOAs and transit areas to the MOAs, therefore, cumulative impacts of flights in the MOAs and outside of the MOAs, and the area immediately surrounding the airfields must be considered. In particular the Navy must to assess the impacts over the northern tier of Olympics, including the National Park (Lake Crescent, Hurricane Ridge areas), the coastal communities such as Port Townsend, Port Angeles, Sequim, Forks and others, as flight activities transit between Whidbey Island air base and their official military airspace over the west side of the Olympics.

The impacts from the increased flights to air quality, soils and water from chemical loading due to the training flights are not considered adequately in the SEIS/OEIS, nor is the impacts of carbon. WCAA/OFCO pointed out these inadequacies in our comments on the Draft and scoping for this Supplemental EIS/OEIS. The Supplemental EIS/OEIS has not addressed these shortcomings.

The cumulative impacts of functionally related Navy activities must be fully disclosed and not obfuscated by narrow scope and tiering off other documents, equally narrow in scope. The Navy must undertake a revised EIS that adequately and fully analyzes the cumulative impacts, or take the no action alternative.

#### Reasonable Alternatives Not Considered

The Draft SEIS/OEIS does not adequately consider reasonable alternatives, such as moving the training to areas more suitable to the mission

and that protect the environmental resources. The Navy relied on its own personnel for the analysis of alternatives (Section 2). The Navy eliminated any consideration of other areas with the statement that no other area could provide the training needed for the Pacific Northwest region. This is circular reasoning. The Navy must train pilots for warfare, not only in the Pacific Northwest region. The analysis for dismissing other reasonable alternatives was not adequately shared in the Draft SEIS/OEIS.

The Navy dismissed setting geographic restrictions to protect specific species as creating a “patchwork” of training times and areas that would prevent the Navy from fulfilling its training requirements. This analysis also lacks validity and clearly dismisses mitigation for threatened and endangered species. If a species breeding season and forage areas create too great a burden for the Navy to manage in a scheduled training activity, it leaves open to grave concern how the Navy may handle any real-time complexity.

The Navy dismisses the “no action” alternative out of hand. The Navy must fully consider specific alternatives that would reduce impacts on marine, terrestrial and aquatic species and rural residents and economies in a revised EIS/OEIS and present the alternatives for public comment before a final decision is made.

#### Inadequate Mitigation Measures

The Draft Supplemental EIS/OEIS included a description of mitigation measures that will be taken by the Navy, indicating that the mitigation measures are updated from the NWTT FEIS (2015). Section 5 covers the mitigation measures. The Navy reports that it is conducting a study on Marbled Murrelets to refine its assessment of impacts and mitigation measures, but does not incorporate any preliminary findings nor information about the study. The Draft Supplemental EIS/OEIS is premature and does not have adequate recommendations to mitigate impacts. The Navy reports that it uses a “Protective Measures Assessment Protocol” software tool in planning phases to provide instructions during operations, which includes mitigation measures. The Protocol was not adequately described nor presented in the Draft SEIS/OEIS and should be made available for independent review to determine if it adequately provides mitigation measures for all natural resources and residents in the MOAs and affected areas.

The Navy indicates that it carries out monitoring and reporting, as well as research on its activities. These reports were not incorporated nor made publicly available for review, with the exception of the Marine Species Monitoring Program. The Navy monitoring, research and reporting regime on terrestrial and aquatic species should be made public for affected communities in the MOAs, for independent review, and to expand and assist academic research in relevant fields.

The Navy indicates that it established in 2010 and 2011, an “Integrated Comprehensive Monitoring Program” and a “Scientific Advisory Group”, which adopted planning level assessments, goals and strategies, but provided little in terms of concrete data on impacts, recommendations for mitigation. The Navy indicates it does and will report on Training and Testing activities, but the reports seem limited to wildlife “strikes” and incidents, and not environmental impacts. The reports are not made public.

The Navy reports that it adopted, and will expand, on mitigation measures in two areas: procedural and geographic based “mitigation zones”. Procedural mitigation is planned, but not specific in the Draft. Procedural mitigation includes “look outs” pre and during activities. The Navy will supplement look outs with “passive acoustic devices” that may detect marine mammals, but does not indicate the steps to mitigate the impacts if detected of other species. The Draft Supplemental EIS/OEIS focus’ on marine mammals and turtles, and states it “may” include seabirds. The section focus’ in any specificity on sea turtles as an example, without stating how this is relevant to the MOAs and adjacent areas and specific studies that will be undertaken by the Navy. The mitigation steps to take focus on marine resources, and little information is provided for mitigating the impacts of the aircraft on terrestrial resources, even in the technical section on mitigation zones (Appendix K), focus’ on marine resources in the water, and not the aircraft impacts. The mitigation measures given as examples seem to contradict with the



actual activities presented. For example, the Navy states it provides guidance to pilots to not fly over national parks and monuments, and other sensitive habitat areas. The activities in the MOAs include flights over precisely these areas. The Navy must clarify the contradictory mitigation measures presented in the Draft. The Draft SEIS/OEIS states that final mitigation measures will be provided in the Final EIS/OEIS. The Navy must outline with more specificity its recommendations and plans for the threatened and endangered species, terrestrial, aquatic and marine, impacted in the MOAs and adjacent areas in a Revised EIS/OEIS before making a final EIS/OEIS determination, in order to give adequate information to the public to comment.

For these reasons, the Olympic Forest Coalition requests that the Navy conduct a full, adequate and complete Revised EIS/OEIS, present the document to the public for comment, prior to making a final determination on a preferred alternative. In the alternative, the Navy must adopt the “no action” alternative and not increase the training and testing activities in the MOAs and adjacent areas.

#### ***West Coast Action Alliance***

For years the West Coast Action Alliance has provided extensive comments to the Navy on its proposed actions, including a 47-page letter that spelled out in detail the factual and ethical deficiencies of its previous plans and public processes to expand the Growler fleet and electronic warfare testing and training, in area waters and over our communities and public lands. Those comments remain standing, and those concerns, still unaddressed, are hereby brought forward onto the public record. Like many concerned citizens, we have spent hundreds of hours reading, analyzing and discussing Navy NEPA documents, have followed instructions to back up specific concerns with specific explanations, references, and facts, have attended public meetings, and have in turn, like every other commenter with serious, substantive concerns, been completely ignored.

Despite the trappings of yet another NEPA process in a long confusing line of EISs, Supplements, and EAs, each concluding no significant impacts, the message the Navy continues to transmit to the public who are not in its immediate circle of supporters, is the same message we were given verbally and in person in 2014: at a meeting in Pacific Beach, the Navy’s NWTT range manager said, “We’re here to listen to your objections, but we don’t have to do anything about them.” Despite NEPA’s intent, and with substantive and informed concerns being provided by the thousands over the years, and despite abundant evidence of harm to communities and wildlands, no concessions or changes in the Navy’s plans to reduce impacts have been made evident. No significant impacts have ever been found in any Navy NEPA products dating back more than a decade. This defies logic. If no significant impacts have ever been found, then why is the public so upset with the Navy’s actions, and why are communities and wildlands suffering in ways that have been extensively documented and were not there before the Navy’s actions? The Navy is also not responsive to FOIA requests for information that was once freely available to the public. Also: The limitation of 5,000 characters in your online comment form restricts the public’s ability to comment on a proposed action that affects many lives. By not informing the public of this online limit in advance, the Navy does not fulfill its statutory obligations for a public process. All of this adds up, and the public is taking note.

With the determination of noise impacts by a recent scientific study, published by the University of Washington, that military traffic was responsible for 85 percent of all audible air traffic in three locations on the west side of the Olympic Peninsula, including outside the Olympic Military Operations Area, there is no doubt in anyone’s mind but the Navy’s that disturbance events, some numbering as many as 80 – 100 per day, are damaging the unique ecological, cultural, social, educational, and economic qualities of the area. And based on the steady stream of ever expanding EISs, there also appears to be no upward limit to the noise the Navy is willing to inflict on surrounding communities and wildlands.

The Navy has failed to correct its own noise studies that omitted the low-frequency signatures of Growlers, used modeling and not actual

measurements, and relied on software that the DOD's own Strategic Environmental Research and Development Program has determined to be outdated. Thus, the Navy routinely underestimates and understates noise impacts, not only to communities but also to a World Heritage Site and Biosphere Reserve containing many species that rely on hearing to survive. Our comment letter on the original EIS describes this in detail. One hour of nonafterburner Growler flight emits 23 percent more carbon dioxide than a Washington resident emits in an entire year. The increase in exhaust emissions was deceptively presented for the entire impact area; the Navy cannot segment the very air by failing to analyze impacts of exhaust emissions outside the MOA, as it did for takeoffs and landings only in the original EIS. Our previous comment letter described this in detail.

The Navy does not consider impacts that occur outside the MOA, but Growlers fly and cause significant impacts well beyond MOA boundaries. Thus it renders estimates of noise and exhaust emission impacts invalid in yet another example of segmentation in the NEPA process. NEPA was never designed to provide the public with the equivalent of death by a thousand paper cuts. Our previous comment letter describes segmentation problems in detail.

The public largely views this incessant warfare activity newly expanded in and around civilian communities and public wildlands, along with the Navy's refusal to back off despite the evidence of harm, as if your neighbors are the enemy you are practicing on. In fact, it appears we are. This may sound off-topic for a Growler comment, but it is an example of the public's holistic view vs the Navy's segmented one: the intent was clearly stated by a Navy representative during a 2018 open house regarding SEALs training in our state parks, beaches, and on private lands along 260 miles of Puget Sound shoreline. He confirmed to a group of astonished listeners that civilians were intended to be used as proxies for the enemy: they would be surveilled as unwitting participants in military exercises, should they wander in unintentionally, and they will not be informed of this. He also said, "you should watch what you do in the woods, because you never know when we'll be watching."

Please do not assume that the public separates these issues—SEAL training, Growlers, at-sea exercises—and their impacts, which have been endlessly segmented to apparent insignificance, but which cumulatively are serious. You may win your NEPA argument by segmenting impacts, but only on paper, because the real impacts in their entirety cannot be segmented out of existence.

Therefore, please DO assume that the public has a long memory.

To most members of the public, the Navy is one giant behemoth of an organization, and when one of your commanding officers does a dress-uniformed meet and greet at our farmers market and tries to say he's at Indian Island and does not represent NASWI, nobody buys it. You wear the uniform, you represent the Navy. All of it. You cannot segment a Navy uniform. National Park Service employees cannot get away with such denial, and neither should the Navy. Any officer who believes that wearing the uniform entitles him to represent only part of the Navy is living in a bubble.

Former Secretary of Defense Ash Carter said in a recent interview that when he was Secretary he always tried to be careful, and that he told the troops the same thing. He told them, "You're doing a serious thing. War is a serious business, the public trust is a serious business, and I expect you to behave yourselves. Your conduct and comportment really matters."

By its behavior over the last few years, which includes an extremely low-altitude circling of my home twice by a Navy MH-60 helicopter shortly after I wrote an opinion piece in the local paper, it appears that the Navy no longer prizes good conduct and comportment. I did not include an address in this letterhead, not because I do not wish to hear from you, but because my trust that the Navy respects people who disagree with it no longer exists.

By promising its neighbors only a ten percent increase in Growler flights in the 2014 NEPA process and then increasing that to 400 percent in 2019, the Navy demonstrates what the public interprets as disingenuousness. Trust once lost is very slowly recovered, if at all.

***Skagit Audubon Society***

On-site monitoring of aircraft overflights, rather than modeling, is needed to truly evaluate impacts on people and wildlife in Olympic National Park.

We join many individuals and organizations in expressing concern for the impact that present and future military overflights of Olympic National Park and adjacent Olympic National Forest have on wildlife and on park visitors. These impacts will increase as more EA-18G Growlers based at Whidbey Naval Air Station fly over Puget Sound and the Olympic Peninsula to train in what the Supplemental EIS/OEIS calls the “Military Operations Area “ (MOA). Much of the MOA is what Audubon members and other civilians know and love as “Olympic National Park.” In the EIS/OEIS, the evaluation of impacts from sound is based on modeling rather than on actual monitoring of how aircraft noise affects wildlife and the experience of park visitors. This amounts to substituting speculation and unsupportable extrapolation for science. Potential serious impacts to Olympic National Park, a World Heritage site and International Biosphere Reserve famed for its natural quiet, should be based on science, not speculation.

The aircraft sound information in the Supplemental EIS/OEIS unrealistically minimizes the jet noise levels and frequency of overflights park visitors are already experiencing.

Living in western Skagit County we have direct experience with the noise generated by the EA-18G Growler under various weather conditions and altitudes. While the Supplemental EIS/OEIS claims that overflights of the Olympic Peninsula will typically be at least 2,000 feet above ground level, the document admits that these flights could be as low as 1,500 feet. To then suggest that Growler noise at that elevation will be roughly equivalent to a human whisper strongly contradicts our experience here in Skagit County. The Navy clearly needs to do monitoring, not just modeling, to realistically evaluate the noise impacts of the present, and soon to be expanded, overflights of the Olympic Peninsula.

We note this statement on page 9 of the EIS/OEIS Fact Sheet Booklet

([https://www.nwtteis.com/portals/nwtteis/files/public\\_information/dseis/NWTT\\_SEIS\\_OEIS-Fact\\_Sheet\\_Booklet.pdf](https://www.nwtteis.com/portals/nwtteis/files/public_information/dseis/NWTT_SEIS_OEIS-Fact_Sheet_Booklet.pdf)) (my words in italics):

“The noise modeling results show that the area underneath the Olympic MOAs (Military Operations Area, where electronic warfare training for Growler crews takes place.) would experience a cumulative noise exposure of less than 37 decibels (dB) DNL (day night average sound level) for current and proposed activities. The ocean area beneath W-237 (directly west of the Olympic Peninsula) would experience cumulative noise levels below 35 dB DNL. For comparison, 35 dB DNL would be considered the natural ambient noise level of a wilderness area, and 39 dB DNL the level of a rural residential area.”

Figure 2 on page 9 states that 30 decibels is the volume of a whisper. This narrative ignores the fact that natural noises and aircraft noises have distinctly different effects on people and wildlife in a national park. The former is expected; the latter is discordant and disruptive. Implying that the noise of Growlers is little more than a whisper does not at all match the experience of those of us who frequently hear and see these aircraft overhead in western Skagit County. The standard described or implied is certainly not suitable for Olympic National Park, which famously is, or until recently was, one of the quietest places in the U.S.

It should also be noted that cumulative, average noise levels do not reflect the lasting harm that can be done to species by single incidents. The one particularly loud overflight that flushes a murrelet chick off the nest does irreversible damage not reflected in a picture of average noise levels over time. Modeling does not capture this reality.

National Parks are, by law, to be preserved in their natural condition. The law does not exempt the Navy.

The law which Congress passed in 1916 establishing the National Park Service states that the agency’s purpose is to, “conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will

leave them unimpaired for the enjoyment of future generations.” (<https://home.nps.gov/pipe/learn/management/nps-organic-act-of-1916.htm>) Growler overflights whose noise degrades the natural conditions of Olympic National Park are not exempt from this act. It is highly inappropriate, and arguably illegal, to establish a “Military Operations Area” in whole or part over a national park. There are surely other places that the Navy could carry out its important training and equipment testing. These activities do not need to happen over or near a national park.

The Navy’s training and testing activities are incompatible with the protection of the Olympic Coast National Marine Sanctuary.

The Olympic Coast National Marine Sanctuary extends 25 to 50 miles seaward of the coastal area of Olympic National Park. As shown on the map at <https://www.nwtteis.com/About-the-Study-Area#/images/3>, the Navy’s Northwest Training and Testing Study Area appears to overlap this Congressionally established Sanctuary in its entirety. As vividly described in the Supplemental EIS/OEIS, a wide variety of weapons are tested here involving the use of various ships and aircraft, live ammunition, and explosives; yet we are urged to see the likely impact to marine mammals, birds, and other living things as very minimal. Taken as a whole, this speculative conclusion defies common sense, the more so given that the activities take place in an area designated a sanctuary.

In numerous places in the Supplemental EIS/OEIS we read that the reason for choosing the Olympic Peninsula and its offshore waters, as well as various locations in the Salish Sea/Puget Sound, for naval testing and training is that it is convenient and will save transit money. There are many Navy bases in Puget Sound, and it’s convenient to train in the nearest part of the Pacific Ocean and over the mountainous and shoreline terrain of the peninsula. No argument is made for why the Navy’s convenience preempts the protection of a premier National Park and a Marine Sanctuary, both established by Congress for preservation in perpetuity for the benefit of the American public. Navy testing and training can be done away from national parks and other protected areas.

The Supplemental EIS/OEIS fails to include a reasonable range of alternatives.

The scale and complexity of the activities which the EIS/OEIS examines are massive, yet only 3 alternatives are examined: a continuation of the present testing and training with some additions (e.g. more Growler flights), a continuation with a greater increase in activity, and the required no action alternative, which would mean a cessation of training and testing in the study area. There is no alternative that considers avoiding overflights of Olympic National Park, for example, and restricting water-based activities to areas outside the Olympic Coast National Marine Sanctuary. That these changes would be inconvenient or more expensive for the Navy is not sufficient reason for not including such an alternative. Environmental Impact Statements are to examine a range of reasonable alternatives, which in this case would certainly include more than the three presented. At the very least, the Navy should design a solid, scientifically-based plan for eliminating or severely limiting negative impacts of aircraft overflights to Olympic National Park visitors and wildlife.

The Supplemental EIS/OEIS fails to address all potential areas of negative impact in Olympic National Park.

To fly from Whidbey Naval Air Station to the Military Operations Area (MOA), Growlers pass over other parts of Olympic National Park, yet potential impacts in those areas, including such heavily visited year-round sites as Hurricane Ridge, are not examined. The EIS/OEIS only looks at impacts in the part of the park below the MOA. The study of sound which the National Park Service did in the park in 2010 (Olympic National Park Acoustic Monitoring Winter 2010 Natural Resource Report NPS/NRSS/NSNSD/NRR—2016/1310) found that Hurricane Ridge, beaches on the outer coast, the Hoh Rain Forest, and all other areas measured had very low levels of aircraft noise. Navy operations are already changing that condition and will increasingly do so unless there is mitigation to avoid degradation of the national park.

The proposed mitigation related to Marbled Murrelets at sea is unrealistic and inadequate.

The Supplemental EIS/OEIS notes that the Marbled Murrelet is listed as a threatened species under the federal Endangered Species Act. (We would add that because of its precipitous population decline in Washington State, this species is listed under state law as endangered, which is

not mentioned in the EIS/OEIS.) The EIS/OEIS states that murrelets in the marine environment where they forage could be affected by such Navy activities as testing and training with live ordnance. There is a vivid list of the harm which underwater explosions can do to the physiology of a Marbled Murrelet (p.3.6-56): “Marbled murrelets would be exposed to explosives during mine countermeasure and neutralization testing proposed in the Offshore Area, and existing mine warfare areas in Inland Waters (i.e., Crescent Harbor and Hood Canal Explosive Ordnance Disposal Training Ranges). ... In Inland Waters, marbled murrelets have an increased likelihood of exposure. Marbled murrelets exposed to underwater explosions may be subject to lethal or non-lethal injuries. Non-lethal injuries may include scarred or ruptured eardrums, or gastrointestinal tract lesions. ...”

The related mitigation plan calls for having a single on-board observer watching for marbled murrelets and, when spotting one, calling a stop to the training or testing activity (e.g. at 5.3.2.2 Weapons Firing Noise” on p. 5-24). As birders experienced with observing murrelets off Skagit County shorelines from land, we know how difficult it is to spot this Robin-sized, cryptically-colored, low-profile bird when it is on water anything other than very calm. To do so while using binoculars on a boat that is rocking or underway is especially difficult. From our own experience, we are skeptical that a single observer under typical conditions can effectively and consistently spot Marbled Murrelets on the water. Some more realistic form of mitigation needs to be devised; better yet, this type of potentially highly disruptive weapons training and testing should not take place anywhere near murrelet foraging or resting areas.

Speculation about habituation is no substitute for careful study and consideration of cumulative effects on listed species.

On page 3.6-41 the argument is made that Marbled Murrelets are habituated already to aircraft and ship noise and therefore more of that will have no effect:

“Habituation has likely already occurred in many murrelets because helicopters have been used in Navy training exercises within Puget Sound for decades. Marbled murrelet nesting habitats surrounding Puget Sound and foraging habitats within Puget Sound underlie extensive commercial air traffic routes (see Section 3.12, Socioeconomic Resources), which also likely contributes to habituation to noise by murrelets.” There is no consideration of the cumulative effects of yet more noise on Marbled Murrelets, Spotted Owls, or other species, especially from the impressively loud EA-18G Growlers.

This kind of speculation is unwarranted in an EIS where determinations should be made based on science, not speculation. As mentioned before, the Marbled Murrelet is in rapid decline in Washington. The noise they experience now may be one of the reasons. To speculate that one more stressor in the bird’s environment is just another inconsequential thing for the bird to get used to makes a mockery of the EIS process and the Endangered Species Act.

There is insufficient information to evaluate whether Navy aircraft overflights will negatively affect Marbled Murrelet nesting success and fledgling survival in and near Olympic National Park.

Table 3.6-1 on page 3.6-2 acknowledges that Marbled Murrelet and Spotted Owl designated critical habitat exists in both the coastal part of the training and testing area and under the Military Operating Area. Two maps in the EIS/OEIS dramatically show the extensive overlap of the MOA and critical habitat for the murrelet (page 3.6-18 Figure 3.6-1: Critical Habitat for the Marbled Murrelet) and the Spotted Owl (page 3.6-19 Figure 3.6-2: Critical Habitat for the Northern Spotted Owl).

The Supplemental EIS/OEIS depicts Navy jet flight paths over the Olympic Peninsula as being so high above ground level that the noise the planes generate will be at most a minor disturbance to birds such as the Marbled Murrelet. It should be noted that the flight path of murrelets from the marine waters where they forage to their nest sites is not always low and along river courses but can involve flying high enough to clear passes at 5,000 or more feet elevation. Murrelets are known to do this in transiting from the Strait of Juan de Fuca to the Hoh River Valley



in Olympic National Park, for example. Pertinent to this point is the footnote in section 3.6: “Note: MOA = Military Operating Area. The Olympic MOAs overlay both land and sea (extending to 3 nautical miles off the Washington coast) and include areas above 6,000 ft. Mean Sea Level but below 1,200 ft. above ground level at the higher terrain elevations of the mountains.”)

Thus, the proximity of aircraft and the impact of noise from jets such as the Growler are potentially much more severe than described in the EIS/OEIS. The temporary disturbance from aircraft noise which the EIS/OEIS acknowledges could, in the case of the Marbled Murrelet, readily result in nesting failure. The murrelet’s single chick leads a precarious existence in its moss bed atop a high, old growth branch. A chick once startled from the nest and fallen to the forest floor is unable to recover. The same is true during the fledgling’s first flight, when it must succeed in reaching marine waters as much as 50 miles distant or die on the ground. The rapidly declining state of this species in Washington calls for great caution in adding to the stress it is already under.

There is insufficient information to state that Navy aircraft overflights will not jeopardize Spotted Owls in and near Olympic National Park. There has apparently been no effort in preparing the Supplemental EIS/OEIS to study how Spotted Owls nesting and foraging in or near Olympic National Park are affected by Growler and other Navy overflights and could be affected by the planned increase in these flights. The EIS/OEIS extrapolates from a study of the Mexican Spotted Owl in relationship to helicopter noise, a subspecies in a very different habitat with significantly different foraging techniques. There is no specific study of the impacts on Spotted Owl foraging and nesting in Northwest old growth forests when the unusually loud EA-18G Growler repeatedly passes overhead. Like the Marbled Murrelet, the Spotted Owl is in serious decline in Washington. Adding stressors in its environment should not be done without carefully targeted studies rather than simply extrapolating from the very limited and not particularly applicable available science.

The Supplemental EIS/OEIS gives little or no attention to wildlife species listed under state but not federal law as endangered. Although the Tufted Puffin is not listed under the federal Endangered Species Act, under Washington State law this seabird is listed as endangered. The EIS/OEIS mentions the species in one place only (Table 3.6-2: Representative Birds of the Northwest Training and Testing Study Area) and gives no attention to how Navy testing and training off the Olympic Coast will affect this iconic bird on its island nesting grounds or where it forages on the open water. It should also be mentioned that while the EIS/OEIS addresses possible impacts to the Northern Sea Otter and correctly states that this species is not federally listed as threatened or endangered, the EIS/OEIS omits that the sea otter is listed as a federal species of concern and is designated under state law as endangered. (3.4.1.37.3 Distribution, p. 3.4-8) For a list of species marked for special protection under Washington State law go to <https://wdfw.wa.gov/species-habitats/at-risk/listed>.

## INDIVIDUALS

### ***Goldie***

As regards the Draft Northwest Training and Testing supplemental EIS, in Section 5 Mitigation, there is no plan for preventing injury to birds, mammals, turtles or other sea life. Reporting injury is after-the-fact. Furthermore the proven effect of loud sounds on whales is not addressed. The damage to their brains and hearing isn't noticed until they beach themselves or have died.

Appendix J (Airspace Noise) fails to consider specific alternatives that would greatly reduce Navy jet noise over Olympic National Park and that would reduce or completely eliminate Navy jet flyovers of the Park. The fact that such alternatives would not be as convenient for the Navy as what it currently does is not a valid reason for refusing to fully consider such alternatives. Flying over the Park, especially the parts of the park not directly on the west coast of the peninsula, is not a military necessity for training exercises. The Navy has many other airspaces it could fly in, but there is only one Olympic National Park.

### ***Miller R.***

The Navy says that noise levels over the Olympic airspace range from over 80 dB to 100 dB, which alone does damage to wildlife as well as humans. These measurements are even higher on Lopez Island. The actual noise levels quoted by the Navy's draft EIS are wrong, because they have been generated by a flawed and outdated computer model. A Department of Defense Strategic Environmental Research and Development Program determined that new software was needed to provide legally defensible noise assessments of current and future aircraft operations.

The final report found that NOISEMAP's linear acoustics were inadequate for modeling higher thrust engines used in the Growler.

In 2010 a new noise model, the Advanced Acoustic Model (AAM), was developed under DOD contract to address these shortcomings. Given acknowledgement by a DOD program that NOISEMAP is not legally defensible for the Growler, why did the Navy use the flawed and dated NOISEMAP as the modeling tool for this draft EIS? This choice rendered the noise analysis scientifically inaccurate.

The Naval Research Advisory Committee (NRAC) issued a report that highlighted the Navy's lack of empirical jet noise data measurements, lack of consistent measurement methodology and standards, and lack of jet noise database and its proper maintenance. NRAC's report was submitted to the Navy in April 2009. The Navy appears to have failed to act on the NRAC's recommendations. It should start now by taking proper Growler noise measurements as a key input into preparing a scientifically and legally defensible draft EIS.

In addition, the noise measurements represent only an average of flying and non-flying times. They are not actual noise measurements.

A moving aircraft causes compression and rarefaction, setting air molecules in motion and producing pressure waves. High-thrust engines, like those in the Growlers, emit low-frequency "window rattling" pressure waves that penetrate into body organs and cause medical problems. This impact is significant and different from any high decibel noise impact. Show actual scientific evidence of the impact on "Low frequency" vibrations on the human body and to that of wildlife.

We know that wildlife is severely impacted by noise, including the spotted owl, the marbled murrelet, and Orca whales. Referring to Title 10 US Code 35 Section 1536, this makes it possible for the Secretary of Defense to request an exemption from the Endangered Species Committee citing "reasons of national security" and we are required to issue an exemption. Only the military can take a species to extinction. The EIS must spell out how many species will be destroyed, decimated or damaged and provide thorough reasoning for any by-catch, mortality of wildlife expected.

Finally, the fuel consumption rate of the EA-18 Growler is 1,304 gallons per hour, or 12.5 metric tons of CO2 per hour. You could drive 38 Toyota Prius's from Anacortes to New York City and produce less emissions than a Growler makes in an hour. 5000 Growler jet flights a year over the Olympics adds significantly to global climate change, not to mention to the air quality over the peninsula. Each Growler costs \$81.5

M, so that 1.9 hours of flying is the same cost as an average Washington State elementary school teacher's salary of \$59,700. We must take action now for the future of this planet for the children of today.

I respectfully request:

- 1) Do actual real-time, accurate noise testing on the ground by a qualified independent agency—UW, for example.
- 2) Reduce the noise immediately, by mitigation and less jets and flights.
- 3) Request the Navy seriously explore other places to fly and train which won't degrade a premier landscape that is the pride of Washington State.
- 4) Show actual scientific evidence of the impact on "Low frequency" vibrations on the human body and to that of wildlife.

Enclosure 2. Activities occurring within 12 nautical miles of Washington's ocean shore and in state inland waters.<sup>1</sup>

Activity	Description	Location	Type of Action that Could Affect Historic Properties
<b>Air Combat Maneuver</b>	Basic flight maneuvers in which fixed-wing aircrew engage in offensive and defensive maneuvering against each other.	<b>Offshore Area</b> W-237 Olympic MOA	N/A
<b>Electronic Warfare Training</b>	Aircraft and ship crews control the electromagnetic spectrum used by enemy systems to degrade or deny the enemy's ability to take defensive actions. Electronic Warfare Operations can be active or passive, offensive or defensive.	<b>Offshore Area</b> W-237 Olympic MOA	N/A
<b>Civilian Port Defense—Homeland Security Anti-Terrorism/Force Protection Exercises</b>	Naval forces conduct mine warfare training in conjunction with Department of Homeland Security units. Helicopters, surface ships, and undersea (divers, marine mammals, and unmanned vehicles) mine countermeasures will be used. Non-permanent mine shapes will be laid in various places on the bottom and will be retrieved.	<b>Inland Waters</b> Naval Magazine Indian Island (NAVMAG) Naval Station Everett (NSE) NBK Bangor NBK Bremerton Manchester Port Angeles Port of Seattle	Anchors for mine shapes
<b>Mine Neutralization – Explosive Ordnance Disposal</b>	Navy divers disable threat mines with explosive charges to create a safe channel for friendly vessels to transit. Personnel detect, identify, evaluate, and neutralize mines in the water with an explosive device and may involve detonation.	<b>Inland Waters</b> Crescent Harbor EOD Training Range (CH EOD TR) Hood Canal EOD Training Range (HC EOD TR)	Explosive shock wave
<b>Intelligence, Surveillance, Reconnaissance</b>	Maritime Patrol Aircraft and unmanned aerial systems operators use all available sensors to collect data on threat vessels. Passive sonobuoys are used to collect and analyze acoustic data, and photographic equipment is used to document the vessel with visual information.	<b>Inland Waters</b> Restricted Area (R) 6701 NAVY 7 OPAREA	Introduction of incompatible visual elements from settling of military expended materials (MEM) such as sonobuoys, parachutes/decelerators, wires

<sup>1</sup> The following activities occur beyond 12 nautical miles from Washington's ocean shore or only in Alaska (SEAFAC) and therefore not addressed further: Gunnery Exercise Surface-to-Air; Missile Exercise Air-to-Air; Missile Exercise Surface-to-Air; Anti-Submarine Warfare Torpedo Exercise—Submarine; Anti-Submarine Warfare Tracking Exercise – Helicopter; Anti-Submarine Warfare Tracking Exercise—Maritime Patrol Aircraft; Anti-Submarine Warfare Tracking Exercise—Ship; Anti-Submarine Warfare Tracking Exercise—Submarine; Bombing Exercise Air-to-Surface; Gunnery Exercise Surface-to-Surface – Ship; Missile Exercise Air-to-Surface; Torpedo (explosive) Testing; Kinetic Energy Weapon Testing; Hydrodynamic and Maneuverability Testing; Anti-Submarine Warfare Tracking Test—Maritime Patrol Aircraft

<b>Activity</b>	<b>Description</b>	<b>Location</b>	<b>Type of Action that Could Affect Historic Properties</b>
<b>Maritime Security Operations</b>	Maritime security operations are predominantly maritime security escort events, including the Transit Protection Program and training of other escort units. All shell casings associated with use of blank ammunition shall be captured, to the greatest extent feasible, using either cofferdams around guns, capture bins, or capture on the deck of vessels.	<b>Inland Waters</b> NBK Bremerton Hood Canal Dabob Bay Range Complex (DBRC) TPS Route (169) NSE Puget Sound Strait of Juan de Fuca	N/A
<b>Personnel Insertion/Extraction Training—Non-Submersible</b>	Military personnel train for clandestine insertion and extraction into target areas using rotary wing aircraft, fixed-wing aircraft (insertion only), or small boats.	<b>Inland Waters</b> CH EOD TR NAVY 7 OPAREA	N/A
<b>Precision Anchoring</b>	Surface ship crews release and retrieve anchors in designated locations.	<b>Inland Waters</b> Designated areas near NAVMAG NSE NAVY 3 OPAREA	Anchors contacting and penetrating seafloor
<b>Search and Rescue</b>	Helicopter crews rescue military personnel at sea. Helicopters fly below 3,000 feet and locate personnel to be rescued, hover, recover the survivor, and then depart.	<b>Inland Waters</b> CH EOD TR R-6701	N/A
<b>Small Boat Attack Exercise</b>	Small boat crews engage pier side surface targets with small-caliber weapons. Only blank rounds are fired. Duration of firing will be approximately 2 hours with a total of 1,000 rounds fired the first day, and a duration of 1.5 hours with a total of 1,000 rounds fired the second day.	<b>Inland Waters</b> NSE NBK Bangor NBK Bremerton	Introduction of incompatible visual elements from settling of MEM such as ammunition brass and disintegrating ammunition belt links
<b>Submarine Sonar Maintenance</b>	Submarines conduct maintenance to their sonar systems in shallow water near their homeport; however, sonar maintenance could occur at sea as the system's performance may warrant.	<b>Offshore Area</b> Offshore Area <b>Inland Waters</b> NBK Bremerton NBK Bangor	N/A

Activity	Description	Location	Type of Action that Could Affect Historic Properties
<b>Surface Ship Sonar Maintenance</b>	Surface ships perform periodic maintenance to the sonar and other systems while in port or at sea. Surface ships operate active sonar systems for maintenance while in shallow water near their homeport; however, sonar maintenance could occur anywhere.	<b>Offshore Area</b> Offshore Area <b>Inland Waters</b> NSE NBK Bremerton	N/A
<b>Unmanned Underwater Vehicle Training</b>	Training with unmanned platforms on which various payloads are attached and used for different purposes. Training can range from basic remote control and autonomous navigation tests to deployment and activation of onboard systems that may include hydrodynamic instruments, launchers, and recovery capabilities.	<b>Offshore Area</b> Quinault Range Site <b>Inland Waters</b> CH EOD TR DBRC NBK Bangor NBK Bremerton Keyport Range Site Manchester NAVY 3 and 7 OPAREAs	Anchors for instruments
<b>Anti-Submarine Warfare Testing</b>	Ships conduct operations using airborne and surface assets. Active and passive acoustic systems are used to detect and track submarine targets, culminating in the deployment of lightweight torpedoes.	<b>Offshore Area</b> Offshore Area	Introduction of incompatible visual elements from settling of MEM such as torpedo accessories, decelerator/parachute, sonobuoys, and wires.
<b>At-Sea Sonar Testing</b>	At-sea sonar testing verifies the vessel meets design acoustic specifications, defines the underwater characteristics, determines effects of systems and equipment on ship's acoustic characteristics, and provides for design improvements.	<b>Offshore Area</b> Offshore Area <b>Inland Waters</b> DBRC	Introduction of incompatible visual elements from settling of MEM such as torpedo accessories, decelerator/parachute, sonobuoys, and wires.
<b>Countermeasure Testing</b>	Countermeasure testing evaluates the deployment, operation, and effectiveness of systems used to defend a vessel from an incoming threat. Countermeasures may be mechanical, chemical, or electronic devices that are released from a vessel to obscure its location or provide a false target. Countermeasures may also be systems operated from within the vessel to detect, localize, track, and respond to incoming threats. Most components are used off shore and are consumed, dissipate, or recovered.	<b>Offshore Area</b> Quinault Range Site <b>Inland Waters</b> DBRC Keyport Range Site	Introduction of incompatible visual elements from settling of MEM such as torpedo accessories, mobile subsurface target, and guidance wire.



Activity	Description	Location	Type of Action that Could Affect Historic Properties
<b>Pierside Sonar Testing</b>	Ships and submarines will activate mid- and high-frequency tactical sonars, underwater communications systems, and navigational devices. Testing may include the firing of inert torpedo shapes.	<b>Inland Waters</b> NBK Bangor Bremerton NSE	N/A
<b>Torpedo (non-explosive) Testing</b>	Aerial, surface, and subsurface assets fire exercise torpedoes against surface or subsurface targets, or programmed with a particular run geometry. Exercise torpedoes are typically recovered by ships and helicopters designed for this task.	<b>Offshore Area</b> Offshore Area <b>Inland Waters</b> DBRC	Anchors for stationary surface targets  Introduction of incompatible visual elements from settling of MEM such as small decelerator/parachutes, acoustic countermeasures, buoy (non-explosive), torpedo accessories, mobile sub-surface target, sonobuoy, sonobuoy wires, guidance wire.
<b>Mine Countermeasure and Neutralization Testing</b>	These systems may be deployed with a variety of ships, aircraft, submarines, or UAVs. Mines are neutralized by cutting mooring cables of buoyant mines, producing acoustic energy that fires acoustic-influence mines; or by employing radar or laser fields, detonate mines using remotely-operated vehicles, and use explosive charges to destroy threat mines.	<b>Offshore Area</b> Offshore Area (no explosives in OCNMS) <b>Inland Waters</b> NBK Bremerton Carr Inlet CH EOD TR DBRC HC EOD TR NSE Keyport Range Site NAVMAG NAVY 3 OPAREA	Explosive shock wave and anchors for mine shapes  Introduction of incompatible visual elements from settling of MEM such as fiber optic wires and cables
<b>Mine Detection and Classification Testing</b>	Systems may use acoustic, electro-optic, or laser sensors, and may be deployed from aircraft, surface or subsurface vessels, or unmanned platforms.	<b>Offshore Area</b> Quinault Range Site <b>Inland Waters</b> DBRC Keyport Range Site	Anchors from mine shapes (in place up to 12 months)
<b>Unmanned Aerial System Testing</b>	UASs are remotely piloted or self-piloted (i.e., preprogrammed flight pattern) aircraft that include fixed-wing, rotary-wing, and other vertical takeoff vehicles. They can carry cameras, sensors, communications equipment, or other payloads.	<b>Offshore Area</b> Quinault Range Site <b>Inland Waters</b> DBRC Keyport Range Site R-6701	N/A

Activity	Description	Location	Type of Action that Could Affect Historic Properties
<b>Unmanned Surface Vehicle System Testing</b>	Unmanned surface vehicles (USV) can include remotely operated craft and test vehicles. During testing, they can operate autonomously, semi-autonomously, or non-autonomously.	<b>Offshore Area</b> Quinault Range Site <b>Inland Waters</b> DBRC Keyport Range Site	Anchors for stationary surface targets
<b>Unmanned Underwater Vehicle Testing</b>	UUVs may be developed to carry out warfare missions (e.g., mine detection) or scientific missions (e.g., bottom mapping), while others are developed to support other testing objectives (e.g., performing as a target for anti-submarine warfare).	<b>Offshore Area</b> Quinault Range Site <b>Inland Waters</b> Carr Inlet DBRC Keyport Range Site	Anchors for stationary surface and sub-surface targets  Introduction of incompatible visual elements from settling of MEM such as torpedo accessories, mobile sub-surface target, decelerator/parachutes, wires, and cables
<b>Propulsion Testing</b>	Propulsion testing is one part of the total sea trial activity. The ship is tested for maneuverability, including full power and endurance runs.	<b>Offshore Area</b> Offshore Area beyond 10 nm from shore	N/A
<b>Undersea Warfare Testing</b>	Undersea warfare testing includes demonstrating the ability of the ship to search, detect, and track a target and conduct attacks with exercise torpedoes. Subsurface moving targets, rocket and air-dropped weapons, sonobuoys, towed arrays, and sub-surface torpedo-like devices may be used.	<b>Offshore Area</b> Offshore Area	Introduction of incompatible visual elements from settling of MEM such as decelerator/parachutes, acoustic countermeasures, expendable bathythermograph and wire, torpedo accessories, mobile subsurface target, sonobuoy and wires, and other cables and wires
<b>Vessel Signature Evaluation</b>	Signature testing is passive monitoring of surface ships and submarines to assess the vessel's vulnerability to various types of detection systems.	<b>Inland Waters</b> DBRC	N/A
<b>Acoustic and Oceanographic Research</b>	Active acoustic transmissions used for tests of acoustic sources, validation of ocean acoustic models, tests of signal processing algorithms, and characterization of acoustic interactions with the ocean bottom, fish and ocean surface.	<b>Offshore Area</b> Quinault Range Site <b>Inland Waters</b> DBRC Keyport Range Site	Possible incidental disturbance of sediments from anchors for instruments
<b>Acoustic Component Testing</b>	Pier side testing includes evaluation and troubleshooting of acoustic components. ROVs may be used to deploy sensors below the water line.	<b>Inland Waters</b> NBK Bangor Bremerton NSE NAVMAG	N/A

Activity	Description	Location	Type of Action that Could Affect Historic Properties
<b>Cold Water Support</b>	Training for divers in a cold water diver training environment, and other training supporting range/test facility operations and maintenance. Includes hand-held acoustic systems, underwater communication devices, in-water devices for transporting divers or cargo, and various dive targets such as mine-like shapes.	<b>Inland Waters</b> Carr Inlet DBRC Keyport Range Site	Mine shape anchors
<b>Non-Acoustic Component Testing</b>	Radio communication with submarines using tethered, untethered, or towed buoyant in-water devices to raise an antenna to the surface to broadcast the signal. Test may involve radar, environmental sensors, magnetic, passive acoustic, or optical instrumentation to measure, record, and analyze effectiveness, dependability, operational parameters, and durability.	<b>Offshore Area</b> Offshore Area <b>Inland Waters</b> DBRC Keyport Range Site Keyport Pier NBK Bangor Zelatched Point Pier	Instruments placed on bottom  Settling of MEM such as fiber optic cables
<b>Post Refit Sea Trial</b>	Testing activities following maintenance or repairs to evaluate submarine propulsion, sonar systems, and other mechanical tests.	<b>Inland Waters</b> DBRC	N/A
<b>Radar and other System Testing</b>	At-sea testing may include use of military or commercial radar, communication systems, simulators, or high-energy lasers. Testing of air and surface targets may include UAVs or small craft (e.g., floating cardboard tri-walls, towed, anchored, or self-propelled vessels).	<b>Offshore Area</b> Offshore Area	Introduction of incompatible visual elements from settling of MEM such as expendable drone, target fragments
<b>Semi-Stationary Equipment Testing</b>	Semi-stationary equipment calibration and testing is performed from a fixed site, suspended over the side of a boat, moored to the bottom, suspended in the water column, or on the surface; all devices and their anchors are recovered.	<b>Inland Waters</b> DBRC Keyport Range Site	Placement/removal of seafloor devices such as anchors  Introduction of incompatible visual elements from settling of MEM, such as fiber optic cables
<b>Simulant Testing</b>	The capabilities of defense systems to detect and protect in the event of chemical and biological attacks are tested via deployment of harmless compounds as substitutes for warfare agents.	<b>Offshore Area</b> Offshore Area beyond 3 nm	N/A
<b>ISR/EW Triton Testing</b>	Testing will evaluate the sensors and communication systems on board the MQ-4C Triton unmanned aerial system.	<b>Offshore Area</b> Offshore Area	N/A

Enclosure 3.

Figure 1. Inland Waters Area of Potential Effects.

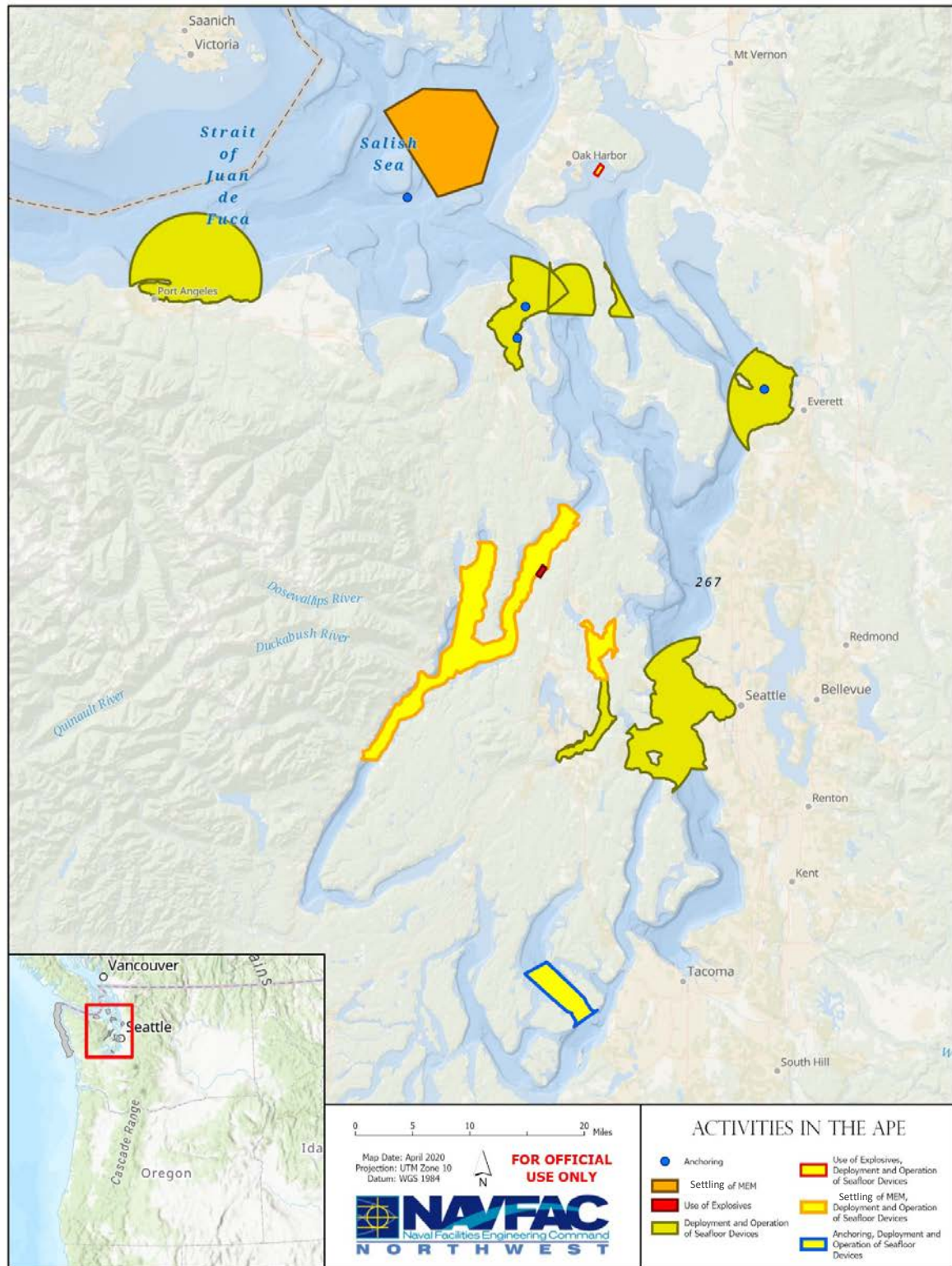
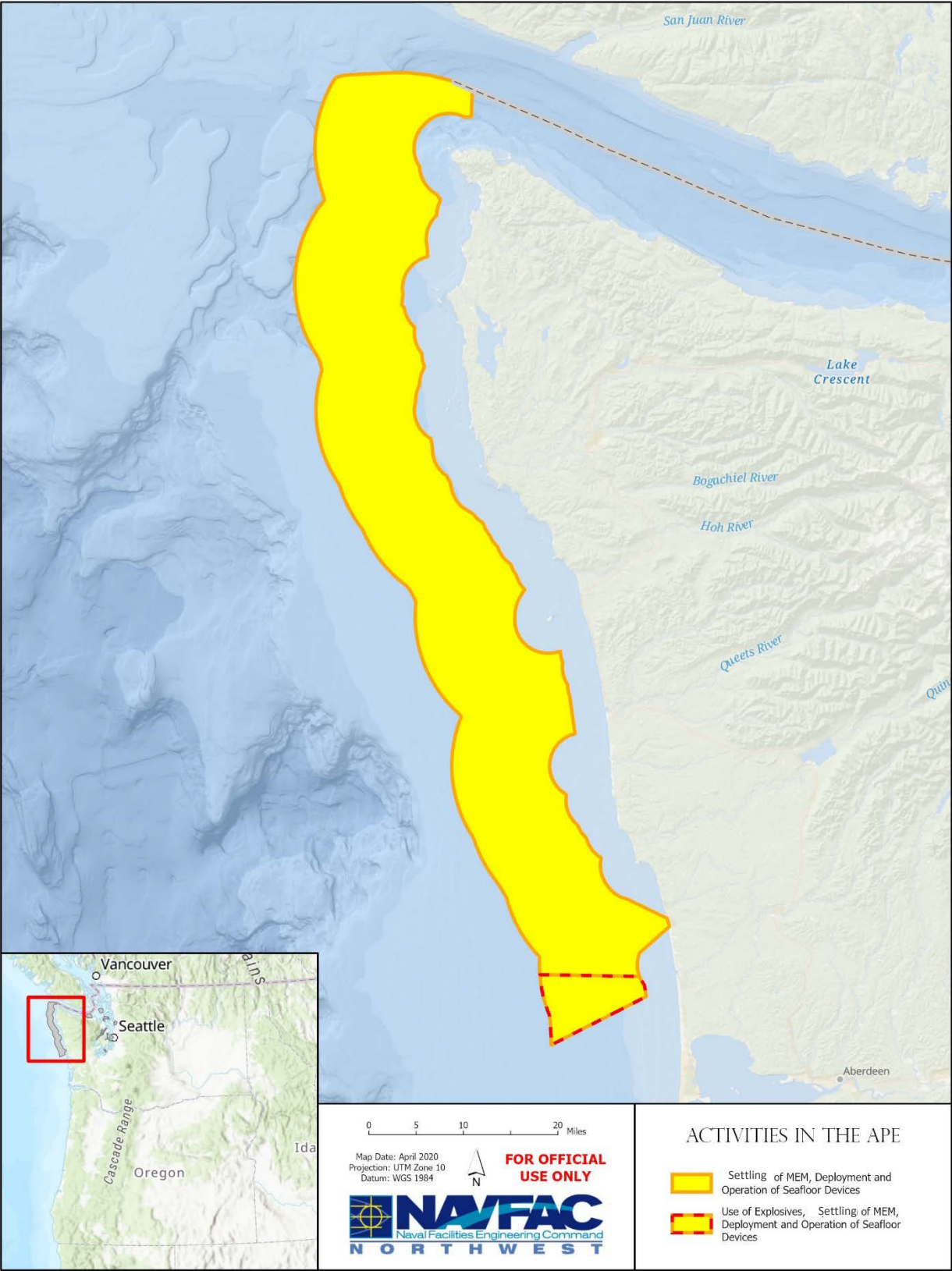




Figure 2. Offshore Area of Potential Effects.



## Enclosure 4. Finding of Effect

Table 1. Historic Sunken Craft Sites

Offshore/ Inshore	Location	Maritime Resource Name	Early Year Date	Late Year Date	NRHP Eligibility (For Purposes of	Activity Type(s)	Comments	Effect on Historic
Offshore	Offshore Area	Aloma	0	1924	Assumed	MEM	MEM settlement is ephemeral and inconsequential	No Effect
Offshore	Offshore Area	Anna Porter	1909	1919	Assumed	MEM	MEM settlement is ephemeral and inconsequential	No Effect
Offshore	Offshore Area	Karl Marx	1914	1925	Assumed	MEM	MEM settlement is ephemeral and inconsequential	No Effect
Offshore	Offshore Area	H & S No. 15	1913	1931	Assumed	MEM	MEM settlement is ephemeral and inconsequential	No Effect
Offshore	Offshore Area	Milky Way	1978	2005	Assumed	MEM	MEM settlement is ephemeral and inconsequential	No Effect
Offshore	Offshore Area	Chetzemoka	1927	1977	Assumed	MEM	MEM settlement is ephemeral and inconsequential	No Effect
Offshore	Offshore Area	Nika	1919	1923	Assumed	MEM	MEM settlement is ephemeral and inconsequential	No Effect
Offshore	Offshore Area	Blanco	1925	1936	Assumed	MEM	MEM settlement is ephemeral and inconsequential	No Effect
Offshore	Offshore Area	Catherine M.	1902	1924	Assumed	MEM	MEM settlement is ephemeral and inconsequential	No Effect
Offshore	Offshore Area	Moonbeam	0	2009	Assumed	MEM	MEM settlement is ephemeral and inconsequential	No Effect
Offshore	Offshore Area	Rose	1907	1951	Assumed	MEM	MEM settlement is ephemeral and inconsequential	No Effect
Offshore	Offshore Area	Pacific	1850	1875	Assumed	MEM	MEM settlement is ephemeral and inconsequential	No Effect
Offshore	Offshore Area	Swiftsure Bank	1909	1961	Assumed	MEM	MEM settlement is ephemeral and inconsequential	No Effect
Offshore	Offshore Area	Pacific Leader	0	1986	Assumed	MEM	MEM settlement is ephemeral and inconsequential	No Effect
Offshore	Offshore Area	Bugara, USS	1944	1971	Assumed	MEM	MEM settlement is ephemeral and inconsequential	No Effect



## Enclosure 4. Finding of Effect

### Table 1. Historic Sunken Craft Sites

Offshore/ Inshore	Location	Maritime Resource Name	Early Year Date	Late Year Date	NRHP Eligibility (For Purposes of	Activity Type(s)	Comments	Effect on Historic
Offshore	Offshore Area	*Niha (confirm, possibly same as Nika )			Assumed	MEM	MEM settlement is ephemeral and inconsequential	No Effect
Offshore	Offshore Area	*4 Wrecks Submerged Dangerous			Assumed	MEM	MEM settlement is ephemeral and inconsequential	No Effect
Offshore	Offshore Area	*2 UNKNOWNs			Assumed	MEM	MEM settlement is ephemeral and inconsequential	No Effect
Offshore	Offshore Area	**FM-2 Wildcat BuNo 16521	1943	1944	Assumed	MEM	MEM settlement is ephemeral and inconsequential	No Effect
Offshore	Offshore Area	**FM-2 Wildcat BuNo 16590	1943	1944	Assumed	MEM	MEM settlement is ephemeral and inconsequential	No Effect
Offshore	Offshore Area	**FM-2 Wildcat BuNo 55493	1943	1945	Assumed	MEM	MEM settlement is ephemeral and inconsequential	No Effect
Inshore	Port Angeles	Martha Foss	1886	1946	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Port Angeles	Prosper	0	1993	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Port Angeles	*Wrecks - Submerged, Dangerous			Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Port Angeles	*4 Obstructions			Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Port Angeles	*16 Unknowns			Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Navy 3 OPAREA	**USS Crow (Amc-20)	1940	1943	Assumed	MEM	MEM settlement is ephemeral and inconsequential	No Effect
Inshore	Navy 3 OPAREA	**NE-1 Grasshopper BuNo 26258	1942	1943	Assumed	MEM	MEM settlement is ephemeral and inconsequential	No Effect
Inshore	Navy 3 OPAREA	**F6F-3 Hellcat BuNo 40177	1943	1943	Assumed	MEM	MEM settlement is ephemeral and inconsequential	No Effect
Inshore	Navy 3 OPAREA	**F6F-3 Hellcat BuNo 42703	1942	1944	Assumed	MEM	MEM settlement is ephemeral and inconsequential	No Effect

## Enclosure 4. Finding of Effect

### Table 1. Historic Sunken Craft Sites

Offshore/ Inshore	Location	Maritime Resource Name	Early Year Date	Late Year Date	NRHP Eligibility (For Purposes of	Activity Type(s)	Comments	Effect on Historic
Inshore	Navy 3 OPAREA	*7 obstructions or wrecks			Assumed	MEM	MEM settlement is ephemeral and inconsequential	No Effect
Inshore	Port Townsend	Orca	0	1999	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Port Townsend	Alaska Reefer	1944	1961	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Port Townsend	Governor	1907	1921	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Port Townsend	*Comet			Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Port Townsend	*3 Wrecks - Submerged, Dangerous	0	0	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Port Townsend	*Wrecks - Visible	0	0	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Port Townsend	UNKNOWN WRECK	0	0	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Port Townsend	UNKNOWN WRECK	0	0	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Port Townsend	UNKNOWN WRECK	0	0	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Port Townsend	*41 Obstructions or Wrecks			Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Port Townsend	*23 Unknowns			Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Navy 7 OPAREA	**PV-1 Ventura BuNo 33414	1942	1945	Assumed	MEM	MEM Deposition is ephemeral and inconsequential	No Effect
Inshore	Navy 7 OPAREA	*8 Obstructions or Wrecks	0	0	Assumed	MEM	MEM settlement is ephemeral and inconsequential	No Effect

## Enclosure 4. Finding of Effect

### Table 1. Historic Sunken Craft Sites

Offshore/ Inshore	Location	Maritime Resource Name	Early Year Date	Late Year Date	NRHP Eligibility (For Purposes of Undertaking) ^	Activity Type(s)	Comments	Effect on Historic Properties
Inshore	Navy 7 OPAREA	*13 Unknowns			Assumed	MEM	MEM settlement is ephemeral and	No Effect
Inshore	Everett	Al-Ind-Esk-A-Sea	1945	1982	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Everett	UNKNOWN WRECK	0	0	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Everett	UNKNOWN WRECK	0	0	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Everett	UNKNOWN WRECK	0	0	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Everett	UNKNOWN WRECK	0	0	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Everett	*2 Wrecks - Submerged, Nondangerous			Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Everett	*1 Obstruction			Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Everett	*9 Unknowns			Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Dabob Bay Range	*Frances W.			Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Dabob Bay Range	*1 Obstruction			Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Dabob Bay Range	*35 Unknowns			Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Bremerton/NUWC	UNKNOWN WRECK	0	0	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Bremerton/NUWC	UNKNOWN WRECK	0	0	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect

# Enclosure 4. Finding of Effect

Table 1. Historic Sunken Craft Sites

Offshore/ Inshore	Location	Maritime Resource Name	Early Year Date	Late Year Date	NRHP Eligibility (For Purposes of	Activity Type(s)	Comments	Effect on Historic
Inshore	Bremerton/NUWC	UNKNOWN WRECK	0	0	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Bremerton/NUWC	*6 Wrecks - Submerged, Dangerous			Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Bremerton/NUWC	*25 Obstructions			Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Bremerton/NUWC	*22 Unknowns			Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Seattle/Elliot Bay	Boss	0	0	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Seattle/Elliot Bay	A.J. Fuller	1889	1918	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Seattle/Elliot Bay	Shilshole Barge	0	0	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Seattle/Elliot Bay	Shilshole Barge	0	0	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Seattle/Elliot Bay	Omar	1918	1995	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Seattle/Elliot Bay	UNKNOWN WRECK	0	0	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Seattle/Elliot Bay	UNKNOWN WRECK	0	0	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Seattle/Elliot Bay	UNKNOWN WRECK	0	0	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Seattle/Elliot Bay	UNKNOWN WRECK	0	0	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Seattle/Elliot Bay	UNKNOWN WRECK	0	0	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Seattle/Elliot Bay	UNKNOWN WRECK	0	0	Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect

## Enclosure 4. Finding of Effect

Table 1. Historic Sunken Craft Sites

Offshore/ Inshore	Location	Maritime Resource Name	Early Year Date	Late Year Date	NRHP Eligibility (For Purposes of	Activity Type(s)	Comments	Effect on Historic
Inshore	Seattle/Elliot Bay	*2 Wrecks			Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Seattle/Elliot Bay	*6 Wrecks - Submerged, Dangerous			Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Seattle/Elliot Bay	*6 Wrecks - Submerged, Nondangerous			Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Seattle/Elliot Bay	*29 Obstructions			Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Seattle/Elliot Bay	*43 Unknowns			Assumed	SD/MEM	Avoidance; MEM is ephemeral and inconsequential	No Effect
Inshore	Carr Inlet OPAREA	UNKNOWN WRECK	0	0	Assumed	HA	Avoidance During Anchoring of Test Platform Barge	No Effect
Inshore	Carr Inlet OPAREA	UNKNOWN WRECK	0	0	Assumed	HA	Avoidance During Anchoring of Test	No Effect
Inshore	Carr Inlet OPAREA	*6 Unknowns			Assumed	HA	Avoidance During Anchoring of Test	No Effect

^ Assumed eligible: All wreck listings assumed to meet the NRHP eligibility criteria per § 800.4(c)(2); however, as the site is not on Navy controlled property, formal evaluation has not been conducted (16 USC 470h-2(a)(1). However, pursuant to 16 USC 470h-2(C); the Navy recognizes that the preservation of properties not under the jurisdiction or control of the agency, but subject to be potentially affected by agency actions are given full consideration in planning. There is insufficient information about Unknowns and Obstructions to determine eligibility, but this analysis assumes they are potentially eligible properties.

Activities w/ Potential to Affect Resource: Explosions (EXP), Anchoring (HA), Seafloor Devices (including Small Inertial Anchors and UUVs) (SD), Military Expended Materials (MEM)

No Known Historic Properties Subject to Explosions and No Known Historic Properties in five areas subject to Heavy Anchor Deployment

Basis of Finding: Avoidance Through Standard Operating Procedures (SOPs) such as avoidance of known obstructions and sonar and/or diver assisted placement of seafloor devices.

Navy removed 30 Washington Information System for Architectural and Archaeological Records Data (WISAARD) property listings from in or near the APE boundaries for the following reasons: the listing is or was on land (e.g., lighthouses), it is land such as a topographic feature or landform (e.g., Admiralty Head), or it is not a place but a historic occurrence (e.g., Wilkes enter Port Discovery), it was at the margin of the APE but effects from the undertaking will not occur (e.g., docks, shipyards, port facilities), or it is a movable NRHP eligible or listed vessel (e.g., USS *Turner Joy* , the schooners *Adventuress* and *Martha* in Port Townsend, and the tug *Arthur Foss* ). This table may include redundant listings of unknowns, unknown wrecks, and/or obstructions.

Entry source is WISAARD unless indicated as coming from one of the sources below. Columns C, D, & E are WISAARD data fields.

\* Source: NOAA Automated Wreck and Obstruction Information System (AWOIS) (four 'soundings' listed in AWOIS deleted).

\*\* Source: Grant et. al., 1996, U.S. Navy Shipwrecks and Submerged Naval Aircraft in Washington: An Overview



## Enclosure 4. Finding of Effect

Table 2. Cultural Properties Identified by Tribes

Offshore/ Inshore	Location	Resource Name	Comments
Offshore	Offshore Area	Hoh Tribal Traditional Landscape	Adequate evaluation would exceed the reasonable and good faith identification efforts commensurate with the nature and magnitude of the proposed undertaking
Inshore	All Inshore Areas	Sk'aliCh'elh, (que'ihol'mechen) Southern Resident Killer Whales	Not a Property Type Eligible for the NRHP
Inshore	All Inshore Areas	Xw'ullemy (The Salish Sea)	Adequate evaluation would exceed the reasonable and good faith identification efforts commensurate with the nature and magnitude of the proposed undertaking (See image below)
Inshore	North Hood Canal	Port Gamble S'Klallam Tribe Maritime Cultural Landscape	Adequate evaluation would exceed the reasonable and good faith identification efforts commensurate with the nature and magnitude of the proposed undertaking
Washington Tribes have provided important information and cultural perspectives regarding a variety of resources that have religious and cultural importance. These may overlap or otherwise intersect with one, several, or all of the locations forming the NWTT APE.			

## Salish Sea and NWTT APE



## Enclosure 5. NWTT Section 106 Mailing List and Contact Information

Tribe	Salut.	First & Mi.	Last	Title	Address1	City	State	Zip	Phone	Email
Confederated Tribes and Bands of the Yakama Nation	Mr.	Gerald	Lewis	Culture Committee Chairman	PO Box 151	Toppenish	WA	98948	509-865-5121 x4340	Gerald_lewis@yakama.com
Confederated Tribes of the Chehalis Reservation	Mr.	Dan	Penn	Tribal Historic Preservation Officer	420 Howanut Drive	Oakville	WA	98562	360-709-1747	dpenn@chehalis tribe.org
Cowlitz Indian Tribe	Mr.	Nathan	Reynolds	Interim Director, Cultural Resources Department	PO Box 2547	Longview	WA	98632	360-575-6226	nreynolds@cowlitz.org
Hoh Indian Tribe	Ms.	Wendy	Largent	Tribal Historic Preservation Officer	PO Box 2196	Forks	WA	98331	360-374-6501	wendy.largent@hohtribe-nsn.org
Jamestown S'Klallam Tribe	Mr.	David	Brownell	Cultural Resources Specialist	1033 Old Blyn Highway	Sequim	WA	98382	360-683-1109	dbrownell@jamestowntribe.org
Lower Elwha Klallam Tribe	Mr.	Bill	White	Cultural Resource Archaeologist	2851 Lower Elwha Road	Port Angeles	WA	98363	360-460-1617; Fax 360-452-3428	bill.white@elwha.org
Lummi Tribe of the Lummi Reservation	Ms.	Lena	Tso	Tribal Historic Preservation Officer	2665 Kwina Road, Building I	Bellingham	WA	98226	360-312-2257	lenat@lummi-nsn.gov
Makah Indian Tribe of the Makah Reservation	Ms.	Janine	Ledford	Tribal Historic Preservation Officer	PO Box 115, 101 Resort Dr.	Neah Bay	WA	98357	360-645-2711; Fax 360-645-2656	mcrjanine@centurytel.net
Muckleshoot Indian Tribe of the Muckleshoot Reservation	Ms.	Laura	Murphy	Cultural Resources Specialist	39015 172nd Avenue SE	Auburn	WA	98092	253-686-4950	laura.murphy@muckleshoot.nsn.us
Nisqually Indian Tribe of the Nisqually Reservation	Ms.	Brad	Beach	Acting Tribal Historic Preservation Officer	4820 She-Nah-Num Drive SE	Olympia	WA	98513	360.456.5221 Ext. 2180	beach.brad@nisqually-nsn.gov
Nooksack Indian Tribe of Washington	Mr.	George	Swanaset, Jr.	Tribal Historic Preservation Officer	PO Box 157	Deming	WA	98244	360-592-5176; Fax 360-592-5164	George.swanasetjr@nooksack-nsn.gov
Port Gamble S'Klallam Tribe	Ms.	Stormy	Purser	Tribal Historic Preservation Officer	31912 Little Boston Road NE	Kingston	WA	98346	360-297-6241; Fax 360-297-7097	stormyp@pgst.nsn.us
Puyallup Tribe of the Puyallup Reservation	Mr.	Brandon	Reynon	THPO Cultural Resources	3009 E Portland Avenue	Tacoma	WA	98404	253.573.7986	brandon.reynon@puyalluptribe-nsn.gov
Quileute Tribe of the Quileute Reservation	Mr.	Rio	Jaime	Cultural Resources Specialist	PO Box 279	La Push	WA	98350	360-374-5091, 360-640-9023	rio.Jaime@quileutenation.org
Quinault Indian Nation	Ms.	Naomi	Brandenfels	Tribal Historic Preservation Officer	PO Box 189	Taholah	WA	98587	360-276-8211 #7309	naomi.brandenfels@quinault.org
Samish Indian Nation	Ms.	Jackie	Ferry	Tribal Historic Preservation Officer	2918 Commercial Ave.	Anacortes	WA	98221	360-293-6404 x126	jferry@samishtribe.nsn.us
Sauk-Suiattle Indian Tribe	Mr.	Kevin	Joseph	Tribal Historic Preservation Officer	5318 Chief Brown Lane	Darrington	WA	98241	360-436-0131; Fax 360-436-1511	kjoseph@sauk-suiattle.com

Tribe	Salut.	First & Mi.	Last	Title	Address1	City	State	Zip	Phone	Email
Shoalwater Bay Tribe of the Shoalwater Bay Reservation	Mr.	Earl	Davis	Cultural Resources Specialist	2373 Old Tokeland Rd	Tokeland	WA	98590	360-267-0731	edavis@shoalwaterbay-nsn.gov
Skokomish Indian Tribe	Ms.	Kris	Miller	Tribal Historic Preservation Officer	80 North Tribal Center Road	Skokomish Nation	WA	98584	360-426-4232 x2015	shlanay1@skokomish.org
Snoqualmie Indian Tribe	MR.	Steven	Mullen-Moses	Cultural Resource Director/THPO	PO Box 969	Snoqualmie	WA	98065	425-495-6097	steve@snoqualmietribe.us
Squaxin Island Tribe of the Squaxin Island Reservation (Initital Point of Contact)	Ms.	Rhonda	Foster	Tribal Historic Preservation Officer/Cultural Resource	200 S.E. Billy Frank Jr. Way	Shelton	WA	98584	360-432-3850	rfoster@squaxin.us
Squaxin Island Tribe of the Squaxin Island Reservation (Current Point of Contact)	Mr.	Shaun	Dinubilo	Tribal Archaeologist	200 S.E. Billy Frank Jr. Way	Shelton	WA	98584	360-432-3998; 360-870-6324	sdinubilo@squaxin.us
Stillaguamish Tribe of Indians of Washington	Mr.	Kerry	Lyste	THPO/GIS Database Administrator	3322 236th Street NE	Arlington	WA	98223	360-572.3072; 360-659-3113	Fax: klyste@stillaguamish.com
Suquamish Indian Tribe of the Port Madison Reservation	Mr.	Dennis	Lewarch	Tribal Historic Preservation Officer	PO Box 498	Suquamish	WA	98392	360-394-8529	dlewarch@suquamish.nsn.us
Swinomish Indians of the Swinomish Reservation of Washington	Ms.	Josephine	Jefferson	Tribal Historic Preservation Officer	11430 Moorage Way	La Conner	WA	98257	360-466-7352	jjefferson@swinomish.nsn.us
Tulalip Tribes of Washington	Mr.	Richard	Young	Cultural Preservation Officer	6406 Marine Drive NW	Tulalip	WA	98271	360-716-2652	ryoung@tulaliptribes-nsn.gov
Upper Skagit Indian Tribe	Mr.	Scott	Schuyler	Cultural Resources Manager	25944 Community Plaza Way	Sedro-Woolley	WA	98284	360-856-7009	ScottS@upperskagit.com
National Park Service	Mr.	Woody	Smeck	Acting Regional Director, Interior Region 8, 9, 10, and 12	333 Bush Street, Suite 500	San Francisco	CA	94104	415-623-2102	pwr_regional_director@nps.gov
Ebey's Landing National Historic Reserve	Ms.	Kristen	Griffin	Reserve Manager	PO Box 774	Coupeville	WA	98239	360-678-6084	kristen_griffin@nps.gov
National Parks Conservation Association	Mr.	Rob	Smith	Northwest Regional Director	1200 5th Avenue, Suite 1118	Seattle	WA	98101	206-903-1444	northwest@npca.org
Olympic Forest Coalition	Dr.	Patricia	Jones	President	PO Box 415	Quilcene	WA	98376	360-774-3384	jonespatriciann@gmail.com; info@olympicforest.org
West Coast Action Alliance c/o Olympic Forest Coalition	Ms.	Karen	Sullivan	Co-Founder	PO Box 461	Quilcene	WA	98376	N/A	karensullivan@gmail.com
Skagit Audubon Society	Mr.	Timothy	Manss	Conservation Chair	PO Box 1101	Mount Vernon	WA	98273-1101	360-333-89885	conservation@skagitaudubon.org
Individual	Ms.	Rhea	Miller	Citizen	PO Box 113	Lopez Island	WA	98261	N/A	turtle@rockisland.com
Individual	Dr.	Beverly	Goldie	Citizen	N/A	N/A	N/A	N/A	N/A	beverly.goldie@gmail.com