



**Jefferson County
Marine
Resources
Committee**

To: Jefferson County Board of County Commissioners
From: Jefferson County Marine Resources Committee
Date: January 15, 2021
Re: Naval Special Operations Training in WA State Parks

Dear Commissioners,

As Chair of the Jefferson County Marine Resources Committee (MRC), I am writing to express our serious concerns regarding the potential impacts of the Navy's proposed special operations training on our marine and nearshore resources, especially since there appears to be a disproportionate concentration of training activities planned for Region 1. During a Special Meeting on January 14th, the MRC discussed the potential impacts to critical marine habitats, such as eelgrass and kelp, which are essential for many marine species such as forage fish, salmon, and marine birds.

Potential Impacts on Marine Resources

- The Navy's proposal states that the training will have little to no environmental impact, however, there does not appear to have been a thorough assessment of potential impacts of the training on marine resources. In particular, the Navy mentions the use of submersibles, yet it does not address its potential impacts on aquatic vegetation, such as eelgrass and kelp.
- Eelgrass and kelp are critical habitats for ESA-listed species, such as Chinook salmon and their prey, which in turn are prey for southern resident killer whales.
- Naval training activities have the potential to disturb the foraging and feeding behavior of marine birds (e.g., Brant, Pigeon Guillemot, and endangered Marbled Murrelet) in the nearshore. For example, endangered Marbled Murrelets have been observed feeding on forage fish very close to shore.

Potential Impacts on MRC Conservation Efforts

- Naval training activities have the potential to disturb ongoing research and monitoring efforts. For example:
 - Nearshore restoration and forage fish monitoring at Fort Townsend
 - Kelp monitoring at North Beach and Fort Worden
 - Protected eelgrass and shellfish beds at Port Townsend Bay, Mystery Bay and Port Hadlock

- Herring spawning at Discovery Bay, Kilisut Harbor, Dabob Bay, Quilcene Bay and other areas in Jefferson County

Suggestions for Avoiding Impacts

- To plan its training activities to avoid impacts to critical resources, we recommend that the Navy consult existing databases and tools. For example:
 - DNR Marine Vegetation Atlas for eelgrass and kelp: <http://mva-test.apphb.com/index.html>
 - DFW SalmonScape for salmon: <http://apps.wdfw.wa.gov/salmonscape/map.html>
 - Forage Fish Spawning Map: <https://wdfw.maps.arcgis.com/home/webmap/viewer.html?webmap=19b8f74e2d41470cbd80b1af8dedd6b3&extent=-126.1368,45.6684,-119.6494,49.0781> - !
- State Parks should identify exclusion zones and timing restrictions to protect critical habitat and other marine resources.

Improving Communications with Jefferson County

- The previous Right-of-Entry stated that the Navy would inform State Park managers and local law enforcement of training activities, but there appear to be no records of compliance with these provisions.
- There is a need to clarify mechanisms of oversight, enforcement, and proof of compliance.
- The Navy and State Parks should establish a marine expert as a liaison, and the Navy should seek consultation prior to training events to avoid impacts to critical habitats. There should also be clear communication with the County regarding Navy training activities.
- Due to the lack of communication, the Navy may not be aware of local State Park uses, such as clam harvests at night and other recreational activities.

Thank you for your consideration of the MRC's concerns. If you have any further questions, please do not hesitate to contact the MRC (Jeff.Co.MRC@gmail.com).

Sincerely,



Neil Harrington, Chair
Jefferson County Marine Resources Committee

Approved by vote of the MRC on January 14, 2021.