

July 24, 2023

Ms. Sara Goodwin
code: EV22.SG
6506 Hampton Blvd
Norfolk, VA 23508-1212

COMMENTS ON COLUMBIA CLASS HOMEPORTING EA/KINGS BAY TRIDENT SUBMARINE BASE

Dear Ms. Goodwin,

Thank you for granting the request by Nuclear Watch South and others for a deadline extension on the Columbia Class Homeporting Environmental Assessment for Kings Bay Trident Submarine Base in the Cumberland Sound near St. Marys, Georgia. The original deadline was June 25, 2023. We requested a 90-day extension of which you granted 30 days for a July 24, 2023, deadline.

Nuclear Watch South (formerly Georgians Against Nuclear Energy) is drafting these comments and inviting additional signatories. Nuclear Watch South is a grassroots, direct action, environmental nonprofit based in Georgia since 1977. The Kings Bay Trident nuclear submarine base near St. Marys, Georgia, deploys enough nuclear firepower to destroy all life on Earth. The environmental impact of Kings Bay is planetary. Nuclear Watch South invites all U.S.-based organizations and individuals to co-sign these comments.

BACKGROUND AND HISTORY OF KINGS BAY

Georgia's 100 miles of Atlantic Ocean coastline is a globally unique, fertile, and fragile marshland environment of barrier islands, freshwater tidal forests, maritime forests, and endangered longleaf pine forest. Georgia's vast salt marshes support a staggering diversity of plant and animal life nurturing the eggs and hatchlings of countless sea creatures and providing significant nesting and migration habitat for 200 bird species.

Kings Bay, near the Georgia-Florida state line is home base for six Trident submarines and deploys 25% of the U.S. nuclear arsenal. A Trident submarine is the most expensive and deadly nuclear weapons system on Earth. The only other nation to possess a similarly powerful system is the United Kingdom, a longtime United States ally. The Trident has been controversial since its inception as it upsets the so-called MAD (Mutually Assured Destruction) power balance, fueling a dangerous and costly international arms race.

The Navy conducted an Environmental Impact Statement (EIS) in 1977 when Kings Bay Naval Submarine Base was first proposed. The EIS was performed to fulfill environmental and public accountability requirements of the newly instituted National Environmental Protection Act (NEPA) of 1969. In 1979, construction began on Kings Bay. In 1984, it was first discovered that the base had unwittingly intruded upon the (previously unknown and apparently only) birthing waters for the critically endangered North Atlantic right whales in the Cumberland Sound.

Kings Bay base began operations in 1989. The Soviet Union dissolved in 1991. At the same time, the U.S. nuclear weapons manufacturing complex occupying vast reservations in more than a dozen states from Washington to South Carolina was shuttering its reactors and facilities amidst revelations of widespread nuclear contamination and vast inventories of poorly managed radioactive wastes. The nuclear weapons complex suddenly and belatedly became subject to environmental law and NEPA has since proved to be a difficult filter through which to permit new nuclear weapons manufacture. For example, the U.S. Department of Energy and National Nuclear Security Agency have failed in five attempts over the past 30 years to establish a plutonium pit production facility at the Savannah River Site (SRS) on the South Carolina/Georgia state line (Savannah River).

Nuclear weapons manufacturing has languished since 1990 in all nuclear-armed nations and limited nuclear treaties have greatly reduced nuclear stockpiles. All nuclear testing ceased in 1992. Trident submarines now carry fewer nuclear weapons, but each Trident submarine currently can deploy the explosive power of 1,825 Hiroshimas.

In 2021, the U.N. ratified the Treaty on the Prohibition of Nuclear Weapons, presently counting 68 nations as parties. The treaty begins by expressing the parties' concern for "the catastrophic humanitarian consequences that would result from any use of nuclear weapons, and recognizing the consequent need to completely eliminate such weapons, which remains the only way to guarantee that nuclear weapons are never used again under any circumstances." This landmark, game-changing Treaty sets forth as international law that it is illegal to "develop, test, produce, manufacture, otherwise acquire, possess or stockpile nuclear weapons or other nuclear explosive devices."

The North Atlantic right whale population rebounded from near extinction when hunting the whales was outlawed in 1935. The whales encountered new hazards, however, with the industrialization of shipping and fishing. Ship strikes and entanglement in fishing gear are held responsible for mortality events which are now decimating the whale population. The current population of the critically endangered North Atlantic right whale has crashed to fewer than 350 animals. National Oceanic and Atmospheric Administration (NOAA) estimates 50 births per year are required to avoid extinction of these ancient, magnificent marine mammals. In 2022, only 15 North Atlantic right whales were born. *No environmental study has ever been conducted of the impact of the North Atlantic right whales' protected birthing waters being occupied by the massive Kings Bay naval station.*

Despite the moribund state of nuclear weapons manufacture, in 2022, the U.S. spent \$83,000 *per minute* on nuclear weapons. This budget includes items like the redundant Columbia class submarine which this environmental study narrowly contemplates. Earth's inhabitants now face extreme dislocation from climate change in addition to living under the Damocles sword of nuclear annihilation for the previous three generations. Clearly, resources now squandered on nuclear weapons can be converted to the task of making the lifestyle changes required to retain our planet's life-supporting atmosphere.

NATIONAL ENVIRONMENTAL POLICY ACT

It is the pleasure and duty of the public to participate in important decisions as framed and

codified by the National Environmental Policy Act of 1969. Nuclear Watch South lists here the pertinent portions of the Act upon which these comments rely. The powerful words of the opening paragraph declare, "The purposes of this chapter are: To declare a national policy which will encourage productive and enjoyable harmony between man and his environment; **to promote efforts which will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of man; to enrich the understanding of the ecological systems and natural resources important to the Nation;** and to establish a Council on Environmental Quality. (42 U.S.C. 4231) (Pub. L. 91-190, § 2, Jan. 1, 1970, 83 Stat. 852.) NEPA then says: "(a) The Congress, **recognizing the profound impact of man's activity on the interrelations of all components of the natural environment, particularly the profound influences of population growth, high-density urbanization, industrial expansion, resource exploitation, and new and expanding technological advances and recognizing further the critical importance of restoring and maintaining environmental quality to the overall welfare and development of man,** declares that it is the continuing policy of the Federal Government, in cooperation with state and local governments, and other concerned public and private organizations, to **use all practicable means and measures, including financial and technical assistance, in a manner calculated to foster and promote the general welfare, to create and maintain conditions under which man and nature can exist in productive harmony, and fulfill the social, economic, and other requirements of present and future generations of Americans.**"

NEPA continues in its statement of standards: "**(1) fulfill the responsibilities of each generation as trustee of the environment for succeeding generations; (2) assure for all Americans safe, healthful, productive, and esthetically and culturally pleasing surroundings**" (SUBCHAPTER I—POLICIES AND GOALS [TITLE I] 42 U.S.C. 4331. Congressional declaration of national environmental policy [Sec. 101])

NEPA requires analysis of: "**(i) reasonably foreseeable environmental effects of the proposed agency action;** (ii) any reasonably foreseeable adverse environmental effects which cannot be avoided should the proposal be implemented; **(iii) a reasonable range of alternatives to the proposed agency action,** including an analysis of any negative environmental impacts of not implementing the proposed agency action in the case of a no action alternative, that are technically and economically feasible, and meet the purpose and need of the proposal; (iv) the relationship between local short-term uses of man's environment and the maintenance and enhancement of long-term productivity; and (v) any irreversible and irretrievable commitments of Federal resources which would be involved in the proposed agency action should it be implemented." (42 U.S.C. 4332. Sec. 102 paragraph C)

Finally, at **42 U.S.C. 4336: "(b) Levels of review**

(1) Environmental impact statement An agency shall issue an **environmental impact statement** with respect to a proposed agency action requiring an environmental document that has a **reasonably foreseeable significant effect on the quality of the human environment.**

(2) Environmental assessment An agency shall prepare an **environmental assessment with respect to a proposed agency action that does not have a reasonably foreseeable significant effect on the quality of the human environment,** or if the significance of such effect is unknown, unless the agency finds that the proposed agency action is excluded pursuant to one of the agency's categorical exclusions, another agency's categorical exclusions consistent with

section 4336c of this title, or another provision of law. **Such environmental assessment shall be a concise public document prepared by a Federal agency to set forth the basis of such agency's finding of no significant impact or determination that an environmental impact statement is necessary."**

COMMENTS

AN ENVIRONMENTAL ASSESSMENT IS INADEQUATE. AN ENVIRONMENTAL IMPACT STATEMENT SHOULD BE PERFORMED.

An Environmental Impact Statement for Naval Base Kings Bay was last published in 1977. Base construction began in 1979 and continued until 1989. The original EIS failed to contemplate the impact of the submarine base on the critically endangered North Atlantic right whales. Indeed, it was not known until 1984 that the Georgia barrier islands, in particular the Cumberland Sound where Kings Bay is situated, is crucial habitat to North Atlantic right whales. The presence of a dead North Atlantic right whale calf on Little St. Simons Island in 1982 prompted a study which determined in 1984 that the protected waters behind the Georgia barrier islands, most notably Cumberland Sound, the site of Kings Bay, are where pregnant North Atlantic right whales migrate each November through April to give birth to and nurture their calves. In 1985, Georgia adopted the North Atlantic right whale as its Official State Marine Mammal. The impact of Kings Bay on the North Atlantic right whales must be analyzed in an EIS.

An Environmental Assessment is too narrow to contemplate the impacts on the North Atlantic right whales, nor the impacts listed below. As stated in NEPA, an EA is used when an agency intends to claim a finding of "no significant impact" rendering an EIS unnecessary. As we shall show, there are reasonably foreseeable environmental impacts from ongoing and future planned activities at Kings Bay which meet the threshold for an EIS.

Before 1984 it was unknown where the critically endangered North Atlantic right whales gave birth to their calves. Nuclear Watch South believes that the construction activities of the naval base forced the whales into open waters during a most vulnerable part of their life cycle which led to the death of the baby calf discovered in 1982 and puts ongoing pressure upon the dwindling population of this critically endangered, protected species. Kings Bay's presence must be counted among the human-created hazards driving the North Atlantic right whale to extinction.

THE REASONABLY FORESEEABLE IMPACT OF NUCLEAR WEAPONS IS WHOLESAL ENVIRONMENTAL DESTRUCTION

NEPA requires analysis of all foreseeable impacts from the proposed activity. The environmental impact from use of the nuclear weapons and nuclear weapons system housed at Kings Bay must be contemplated in an EIS. It is the nature of the SSBN (Sub-Surface Ballistic Nuclear) program that it is capable of destroying the whole Earth. The whole Earth is stakeholder.

Since Kings Bay was first started in 1979, the perceived enemy of the U.S., the Soviet Union has collapsed and disbanded, the United Nations has outlawed nuclear weapons, and the world urgently needs to address its changing climate. It is in the best national interest to divest from nuclear weapons and the new arms race, upon which \$83,000 tax dollars are lavished every minute. This is more than all other nuclear-armed nations combined spend to respond to the nuclear threat posed by the United States.

The environmental impact of converting the nuclear weapons budget to address the energy conversion that will save our planet's atmosphere is globally significant and should be analyzed as the "preferred action alternative."

KINGS BAY IMPACTS ON UNIQUE GEORGIA COASTAL ENVIRONMENT ARE ABSENT FROM EA AND MUST BE CONSIDERED IN AN EIS

Kings Bay is a complex and unique site with environmental impacts from 30 years of Kings Bay operation in the sensitive Georgia coastal eco-system. Kings Bay's previous environmental impacts, some of which are highlighted below, must be included in an EIS.

Kings Bay houses a considerable portion of the U.S. nuclear weapons arsenal. It is not only capable of destroying the Earth's biosphere, but also makes Georgia a target for other nation-states' nuclear doomsday arsenals. Use, and possession, of the death-dealing nuclear weapons deployed at Kings Bay pose catastrophic threats to Georgia and the Earth which must be considered in the EA. Nuclear weapons have been outlawed since 2021 by the U.N. Treaty on the Prohibition of Nuclear Weapons.

The sound where whales have given birth for previous millennia is regularly dredged to accommodate the five-story Trident submarines. In addition, U.S. Navy sonar testing has been shown to harm sea turtles and marine life including the large marine mammals, whales, and dolphins. The impacts of Kings Bay on the dwindling North Atlantic right whale population's southern range must be considered in addition to its impacts on other sea-life.

There are environmental threats to Kings Bay infrastructure, especially underground nuclear weapons bunkers, from sea-level rise and monster hurricanes and storm surges fueled by the climate crisis that must be considered. The carbon footprint of Kings Bay must also be analyzed in an EIS.

Tritium contamination from routine radiation releases from the nuclear reactors on-board the Trident submarines must be considered.

The Atomic Age is notably absent from the historical section in the EA. It is important, and mandatory, to consider all the above impacts of the proposal to renovate and operate the Kings Bay Trident submarine base in the context of future nuclear weapons manufacture and use. The

proposed action to renovate Kings Bay to support a new fleet of submarines far into the future, a future directly threatened by the proposed action, is out-of-step with the U.N. Treaty on the Prohibition of Nuclear Weapons which internationally outlaws the possession and use of nuclear weapons. This profound, burgeoning cultural shift must be considered in the EA.

The U.S. Navy is not only embarking on significant renovation for Kings Bay base that is projected to deteriorate out of compliance by 2050, but it is also planning to replace most of the Trident fleet by 2050, at a cost of \$100 billion U.S. tax dollars. The justification for continuing to deploy this weapons system, capable of destroying all life on Earth, and of which no other nation besides the U.K. is in possession, is absent from the EA.

We are at a cultural crossroads that requires contemplation of whether to continue planet-killing nuclear arms roulette or to denuclearize and end the Atomic Age to avert annihilation. The NEPA process provides for a public and transparent exploration of the "big picture" with respect to large projects. Indeed, NEPA was borne out of the previously unforeseen environmental misadventures of the military industrial complex and instituted as a method to avert disaster with experience and deep foresight.

An alternative to continued "business as usual" at Kings Bay would be to remove the submarine killing machines and nuclear weapons from this sensitive, fragile, and vital eco-system and instead maintain a presence of national defense in the coastal marsh with a Coast Guard base and marine wildlife sanctuary.

Nuclear Watch South, and the undersigned, oppose the proposed action and propose an alternative, more benign project for our national defense that will also defend our wildlife and restore a healthy atmosphere to our planet.

Respectfully submitted,

Glenn Carroll, Coordinator

Nuclear Watch South

Atlanta, GA

ORGANIZATIONS

Linda Pentz Gunter, International Specialist

Beyond Nuclear

Takoma Park, MD

Deb Katz, Executive Director

Citizens Awareness Network

Shelburne Falls, MA

Michael Keegan

Coalition for a Nuclear Free Great Lakes

Monroe, MI

Stephen Brittle, President

Don't Waste Arizona

Phoenix, AZ

Alice Hirt

Don't Waste Michigan

Holland, MI

Mary Beth Brangan, Co-Director

Ecological Options Network, EON

Bolinas, CA

Kimberly Scott, Executive Director

Georgia WAND Education Fund, Inc.

Atlanta, GA

Bruce Gagnon, Secretary/Coordinator

Global Network Against Weapons and Nuclear Power in Space

Brunswick, ME

Glen Milner

Ground Zero Center for Nonviolent Action

Poulsbo, WA

Lisa Savage, Co-founder

Maine Natural Guard

Solon, ME

Judy Treichel, Executive Director

Nevada Nuclear Waste Task Force

Las Vegas, NV

Jack and Felice Cohen-Joppa

The Nuclear Resister

Tucson, AZ

George Rodkey

Pax Christi Tahoma

Tacoma, WA

Ann Suellentrop, M.S.R.N.

Physicians for Social Responsibility Kansas City

Kansas City, Kansas

Robert Kinsey

The Colorado Coalition for the Prevention of Nuclear War

Colorado Springs CO

INDIVIDUALS

Barbara Antonoplos

Atlanta, GA

Patti Bergeron

Cincinnati NY

Jackie Brown

Atlanta, GA

Dr. Marci Culley
Brunswick, GA
Mary Gleysteen
Kingston, WA
Barbara Joye
Decatur, GA
Nicole Lunsford
Atlanta, GA
Jean Merrigan
Martinez, CA
Gary Michael
Cincinnati NY
Stephanie Miller
Atlanta, GA
Elizabeth Murray
Escondido, CA
Carol Sandiford
Atlanta, GA
Michael Siptroth
Belfair, WA
Henry M. Stoever
Board Member of PeaceWorks
Kansas City, Kansas
Joanne Sweeney, Grandmother
Nuclear Watch South Board President
Sautee Nacoochee, GA
Caroline K. Wildflower
Port Townsend, WA
Mary Jane Williams
Winter Springs, FL
ADDITIONAL SIGNATORIES