

The Pacific Northwest Coast Alliance & Allies

September 5, 2017

Governor Jay Inslee
Office of the Governor
PO Box 40002
Olympia, WA 98504-0002

Dear Governor Inslee,

We are writing as a coalition of organizations—The Pacific Northwest Coast Alliance along with Friends and Allies representing thousands of people throughout Puget Sound—to ask for your assistance in requesting the Navy grant an extension to the September 21st comment deadline on its Northwest Training and Testing Range Supplemental EIS/OEIS.

The Department of the Navy (Navy) announces its intent to prepare a supplement to the 2015 Northwest Training and Testing Final EIS/OEIS to assess the potential environmental effects associated with military readiness activities, including training and research, development, testing, and evaluation (hereafter referred to as “training and testing”) activities conducted within the EIS/OEIS Study Area (hereafter referred to as the “Study Area”). 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 to support future military readiness activities within the Study Area beyond 2020.

The Supplemental EIS/OEIS will include an analysis of training and testing activities projected to occur after 2020 using the best available scientific information currently available, including an updated acoustic effects model and updated marine mammal density data. Proposed training and testing activities are generally consistent with those analyzed in the previous EIS/OEIS and approved in the 2016 Record of Decision, and are representative of activities the Navy has been conducting in the Study Area for decades.

The Navy-requested National Marine Fisheries Service permit basically authorizes harm to a wide number of species listed by Washington State as threatened or endangered (<http://wdfw.wa.gov/conservation/endangered/All/>), such as the chinook salmon, killer and grey whales, marbled murrelet, bull trout, spotted owl, and a number of marine mammals. The potential harms include, among others, displacement of feeding, reproductive disruptions, injury/death from concussion from explosions, and iterative aggravation and disturbance qualifying as harassment. Some of these state-listed species involve shared federal–state management responsibilities (e.g., the bull trout), and are of significant interest to Washingtonians and non-resident eco-tourists.

The Navy’s 30-day comment period includes August vacation time and the Labor Day holiday, ending comments on September 21st. Additionally, there are NO public hearings planned for this supplemental EIS/OEIS. This process is designed for public participation. Importantly, environmental experts from the private sector must be able to offer substantive comments on a vast area with planned complex activities that will have potentially deadly impacts on the environment and the sustainability of our endangered estuary ecology and endangered species. Many of these experts are affiliated with universities, colleges and other schools and non-profits returning to students and classes during this same busy time-period.

We would greatly appreciate your support for a 60-day extension of the comment period for the Northwest Training and Testing Range Supplemental EIS/OEIS, and several public hearings and/or forums throughout Puget Sound. The potential loss to our Puget Sound ecosystem is too great to risk to an insufficient allotment of time for critical public comment. Furthermore, the Navy encourages public participation:

*“Scoping, which is conducted in accordance with the National Environmental Policy Act (NEPA), is a process where **the public is encouraged to participate in the development of an environmental impact statement by identifying the scope of the analysis, including potential environmental issues and viable alternatives.***

Substantive comments received during the scoping process are used to determine the scope of issues to be addressed and to identify the significant issues to be analyzed in depth and the range of alternatives to be considered in a NEPA document.”

This Supplemental EIS/OEIS gets to the heart of many of our most serious concerns, expressed by many thousands of people who have commented on various other Navy DEIS's, EIS's and EA's throughout the past two years in Puget Sound. Public hearings are part of the process.

We appreciate your assistance in this important matter, and we hope staff at the Washington Department of Fish and Wildlife will have an opportunity for meaningful independent input. Thank you for your assistance in the past in securing an extension to the Navy's Growler DEIS comment period. With your help, we hope all of our efforts will provide more time for public comment once again.

Respectfully,
Citizens of Ebey's Reserve, COER, Whidbey and
Coupeville Community Allies, CCA, Whidbey;
Ground Zero for Nonviolent Action, Poulsbo WA;
Islanders for an Accountable Military, IAM, Langley;
Marrowstone Island Concerned Citizens, MICC;
The Next Generation Action Alliance
National Parks Conservation Association, Seattle;
The Olympic Peninsula, POP, Port Townsend;
Orca Network
Quiet Skies Over San Juan County, Lopez Island;
Save the Olympic Peninsula, STOP, Port Angeles;
Sustainable Military Collaborative, Whidbey;
Washington Environmental Council, WEC, Seattle;
West Coast Action Alliance, Port Townsend;
Whidbey Environmental Action Network, WEAN, Whidbey

Allied Friends:

Nancy Nordhoff and Lynn Hayes; Diana Macleod; Annette Huenke; and Tom Ewell

cc: Senators Cantwell and Murray
Representatives Kilmer and Larsen