

**Center for Biological Diversity • Friends of the Earth • Friends of the San Juans  
InterTribal Sinkyone Wilderness Council • Natural Resources Defense Council  
Olympic Environmental Council • Orca Network • People For Puget Sound  
Puget Soundkeeper Alliance • Seattle Audubon  
Washington State Chapter of the Sierra Club • Wild Fish Conservancy**

**By Electronic Mail and Facsimile**

March 13, 2012

Dr. Jane Lubchenco, Administrator  
National Oceanic and Atmospheric Administration  
1401 Constitution Avenue, N.W., Room 5128  
Washington, DC 20230

Mrs. Kimberly Kler, NWTT Project Manager  
Naval Facilities Engineering Command, Northwest  
1101 Tautog Circle  
Silverdale, WA 98315-1100

**Re: Scoping Meetings for the Navy's Northwest Training and Testing EIS**

Dear Dr. Lubchenco and Mrs. Kler:

On behalf of the Natural Resources Defense Council, Center for Biological Diversity, Friends of the Earth, Friends of the San Juans, InterTribal Sinkyone Wilderness Council, Olympic Environmental Council, Orca Network, People For Puget Sound, Puget Soundkeeper Alliance, Seattle Audubon, Washington State Chapter of the Sierra Club, Wild Fish Conservancy, and our millions of members and activists, many thousands of whom reside in Washington, Oregon, and California, we are writing to express our disappointment with the scoping process the Navy has initiated for the Northwest Training and Testing ("NWTT") Environmental Impact Statement ("EIS"). Because this process fails to provide an opportunity for meaningful public participation as required by the National Environmental Policy Act ("NEPA"), we have made a deliberate decision to not attend any of the Navy's scoping meetings or to encourage our members to do so.

The Navy published its Notice of Intent to prepare an EIS for the NWTT Study Area on February 27, 2012. The Notice provided dates and addresses for nine public scoping meetings (none of which are located in Washington or Oregon's major population centers), a brief description of pre-determined alternatives (none of which identify means of achieving the agencies' purposes and needs in ways that will result in different environmental impacts), and information on submitting written comments. The Notice specifically noted that no formal oral comments will be allowed at the scoping

meetings, yet inexplicably assured the public that all comments provided orally or in writing would receive the same consideration. *See* 77 Fed. Reg. 11497.

As you know, the scoping process is the best time to identify issues and provide recommendations to agencies on what should be analyzed in the EIS. However, a process developed for activities with controversial impacts, like those at issue here, that does not provide opportunity for the public to testify or speak to a broader audience, or to hear answers to questions raised by others, and that fails to engage major population centers is not designed to help citizens and organization effectively participate in agencies' environmental reviews.

Additionally, although organizations have repeatedly raised our concerns with both the Navy and NOAA on numerous occasions – calling, *e.g.*, for greater protections for the Olympic Coast National Marine Sanctuary and other biologically important areas – neither agency has taken the steps required by law to adequately protect marine wildlife and the marine environment. Nothing in the scoping notice suggests any change in the Navy's approach.

Under these circumstances we do not believe these scoping meetings have been designed to help our organizations and members effectively participate in this phase of the NEPA process. We do not believe our mere attendance will contribute to moving either agency to seriously address our concerns.

We would like to meet with you or your staff to discuss our concerns about how this scoping process was developed. We look forward to more substantive opportunities to participate in a manner that fulfills the purposes of NEPA. Thank you for your consideration.

Sincerely,

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