



NATURAL RESOURCES DEFENSE COUNCIL

By Electronic Submission and Regular Mail

February 4, 2009

Kimberly Kler, Environmental Planner
Naval Facilities Engineering Command Northwest
Attention: NWTRC EIS/OEIS
1101 Tautog Circle, Suite 203
Silverdale, WA 98315-1101
Phone: (360) 396-0927

Re: *Petition for Extension of Public Comment Period on the Draft
Environmental Impact Statement/Overseas Environmental Impact
Statement for the Northwest Training Range Complex*

Dear Ms. Kler:

On behalf of the Natural Resources Defense Council ("NRDC") and our 1.2 million members and activists, I am writing to petition the Navy for an extension of the public comment period on its Draft Environmental Impact Statement/Overseas Environmental Impact Statement for the Northwest Training Range Complex ("NWTRC DEIS").

Notice of the comment period was published in the Federal Register on December 30, 2008. See 73 Fed. Reg. 79856. The public has been given 44 days to submit comments by February 11, 2008 on over 1000 pages of dense information. While 44 days is hardly enough time to digest and compose comments on the Navy's extensive plans, the public's opportunity to comment has been frustrated by numerous problems with the NWTRC DEIS website and electronic comment portal. We have received numerous reports that individuals have been unable to submit comments and/or unable to access information on the Navy's NWTRC DEIS website. I understand that the website itself was inoperable for at least 6 days and that the Navy was aware of the problem. In light of these difficulties, the dense information provided by the Navy in justifying its plans, and the extensive range of activity proposed, we respectfully request an extension to submit written comments of at least 30 days.

Such an extension is necessary to fully protect the public interest by giving citizens the time to thoroughly analyze the Navy's proposal and submit comments on the critical issues raised therein. The Navy's NWTRC DEIS raises many issues that the public has

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never been able to address before. Notably, some of the Navy's activities take place in critical habitat for Southern Resident killer whales and extend into the Olympic National Marine Sanctuary, affecting migration routes for gray and humpback whales as well as many other species. The public, as well as the scientific community, needs sufficient time to identify, analyze, and comment on range activities and on the Navy's analysis thereof.

Because of the size of the NWTRC DEIS, the many issues it raises, as well as the difficulties the public has faced in obtaining information and commenting thereon, we believe that an extension is warranted here. Therefore, we strongly urge you to grant this petition and extend the comment period. As always, we would welcome discussion with the Navy at any time.

Very truly yours,



Zak Smith
Litigation Fellow, Marine Mammal Program

Taryn G. Kiekow
Staff Attorney, Marine Mammal Program
Natural Resources Defense Council