

**BIOLOGICAL ASSESSMENT
FOR NAVAL SPECIAL OPERATIONS TRAINING
IN WESTERN WASHINGTON STATE**



April 2018

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ACRONYMS AND ABBREVIATIONS

Acronym	Definition
ASW	Anti-Submarine Warfare
BA	Biological Assessment
BMP	Best Management Practice
BO	Biological Opinion
CV	Coefficient of Variations
dB re 1 μ Pa	Decibel(s) referenced to 1 micropascal
DIP	Demographically Independent Population
DPS	Distinct Population Segment
EA	Environmental Assessment
ESA	Endangered Species Act
ESU	Evolutionary Significant Unit
FAA	Federal Aviation Administration
FR	Federal Register
INRMP	Integrated Natural Resource Management Plan
kHz	kilohertz
MMPA	Marine Mammal Protection Act
MSAT	Marine Species Awareness Training
NAVSEA	Naval Sea Systems Command
NMFS	National Marine Fisheries Service
NMML	National Marine Mammal Lab
NOAA	National Oceanographic and Atmospheric Administration
NSWC	Naval Special Warfare Command
NUWC	Naval Undersea Warfare Center
NWTT	Northwest Training and Testing
OPNAVINST	Chief of Naval Operations Instruction
PMAP	Protective Measures Assessment Protocol
ROD	Record of Decision
ROV	Remote Operated Vehicle
UAS	Unmanned Aircraft System
U.S.	United States
USFWS	U.S. Fish and Wildlife Service
USSOCOM	U.S. Special Operations Command
UUV	Unmanned Underwater Vehicle

EXECUTIVE SUMMARY

The United States (U.S.) Naval Special Warfare Command (herein after referred to as NSWC), is the U.S. Navy's special operations force and maritime component of the U.S. Special Operations Command. NSWC is proposing to conduct special operations training at multiple locations throughout western Washington. The Proposed Action supports small-unit, intermediate, and advanced cold-water maritime and land-based training activities for naval special operations personnel on selected nearshore lands and in the inland waters of Puget Sound, including Hood Canal, as well as the southwestern Washington coast. Training would start in 2018 and occur into the foreseeable future.

The Action Area, for the purposes of this Biological Assessment, is divided into three primary regions. Region 1 is the southern portion of Puget Sound, Region 2 includes the northern portion of Puget Sound and portions of the Strait of Juan de Fuca, and Region 3, coastal regions along the Pacific Coast of Washington. The regions of the Action Area contain both Navy-administered lands, as well as lands that would be used for training pursuant to agreements between the Navy and land owners. These non-federal lands include properties owned by the State of Washington, counties and municipalities, as well as lands under private ownership.

NSWC assessed the effects of the Proposed Action on species listed under the Endangered Species Act (ESA). NSWC assessed the various stressors associated with the Proposed Action and analyzed the potential of the following stressor types to impact ESA-listed species: physical and acoustic stressors. After a review of listed species potentially present in the Action Area, and analysis of potential project effects to species, NSWC determined the proposed action **may affect, but is not likely to adversely affect**, listed species potentially present within the Action Area. The Navy, on behalf of NSWC, is requesting concurrence with the U.S. Fish and Wildlife Service and National Marine Fisheries Service for the effect determination for each ESA-listed species determinations shown in Table ES-1.

Table ES-1: Effect Determinations for Endangered Species Act-Listed Species

Common Name/Scientific Name	Effects Determination
Marbled murrelet/ <i>Brachyramphus marmoratus</i>	NLAA
Western snowy plover/ <i>Charadrius lexandrinus nivosus</i>	NLAA
Streaked horned lark/ <i>Eremophila alpestris strigata</i>	NLAA
Leatherback sea turtle/ <i>Dermochelys coriacea</i>	NLAA
Humpback whale Mexico DPS and Central America DPS/ <i>Megaptera novaeangliae</i>	NLAA
Southern resident killer whale/ <i>Orcinus orca</i>	NLAA
Puget Sound Chinook salmon/ <i>Oncorhynchus tshawytscha</i>	NLAA
Columbia River chum salmon/ <i>Oncorhynchus keta</i>	NLAA
Hood Canal summer-run chum salmon/ <i>Oncorhynchus keta</i>	NLAA
Puget Sound steelhead/ <i>Oncorhynchus mykiss</i>	NLAA
Puget Sound/Georgia Basin DPS bocaccio/ <i>Sebastes paucispinis</i>	NLAA
North American Green Sturgeon Southern DPS/ <i>Acipenser medirostris</i>	NLAA
Pacific Eulachon Southern DPS/ <i>Thaleichthys pacificus</i>	NLAA
Bull trout/ <i>Salvelinus confluentus</i>	NLAA

Notes: NLAA = Not likely to adversely affect, DPS = distinct population segment

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1 Introduction

The U.S. Naval Special Warfare Command (NSWC) proposes to conduct small-unit intermediate and advanced land and cold-water maritime training activities for naval special operations personnel. NSWC is the U.S. Navy's special operations force and the maritime component of the U.S. Special Operations Command (USSOCOM). The proposed Navy training activities consist of training by naval special operations personnel with occasional integration of other USSOCOM components, including United States Army Special Operations Command, Marine Corps Special Operations Command, Air Force Special Operations Command, and Joint Special Operations Command. The occasional integration of other USSOCOM components would occur only with NSWC-led training.

1.1 Project Location and Setting

The proposed training would occur in western Washington State, to include on selected nearshore lands and in the inland waters of Puget Sound, including Hood Canal, as well as the southwestern Washington coast (Figure 1-1).

Section 7(a)(2) of the Endangered Species Act (ESA) of 1973, as amended (16 United States Code section 1531 et seq.), requires federal agencies to consult with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) to ensure that any action authorized, funded, or carried out by such agency is not likely to jeopardize the continued existence of any endangered or threatened species. This Biological Assessment (BA) evaluates the potential effects of conducting special operations training in the region for the foreseeable future.

1.2 Background

Some naval special operations training activities were covered under previous Biological Opinions (BOs). The potential environmental impacts of water and land-based naval special operations training activities ("Naval Special Warfare [NSW] Training") conducted at the unit level, from Port Townsend Marina to Naval Magazine Indian Island, were evaluated in the August 12, 2010, USFWS BO (13410-2009-F-0104) (U.S. Fish and Wildlife Service, 2010) and the November 12, 2010, NMFS BO for the 2010 Northwest Training Range Complex (NWTRC), and Record of Decision (ROD) signed on October 10, 2010 (National Marine Fisheries Service, 2010b). This training was twice a year for up to three weeks. It included land-based activities (over the beach and special reconnaissance) and limited water-based activities (launch and recovery from Port Townsend, Insertion and Extraction and Diver/Swimmer). The only activity addressed in the BO was "in-water vessel movement." There were no impacts identified for on-land species on Indian Island. The NWTRC BO for "in-water vessel movement" was subsequently superseded by the Northwest Training and Testing (NWTT) BO.

The potential environmental impacts of water-based naval special operations training activities ("Personnel Insertion/Extraction-Submersible") conducted at the unit level within inland waters were evaluated in the July 21, 2016, USFWS BO (01 EFWW00-2015-F-0251) (U.S. Fish and Wildlife Service, 2016) and the November 9, 2015, NMFS BO (FPR-2015-9110) (National Marine Fisheries Service, 2015a) for the NWTT Final Environmental Impact Statement/Overseas Environmental Impact Statement (EIS/OEIS), dated October 2015, and ROD signed on October 31, 2016. However, NWTT only provided environmental coverage for this activity at the following five locations: inland waters of Keyport Range Complex, Indian Island, Dabob Bay Range Complex, Crescent Harbor, and Navy 7. The NWTT BOs also looked at unmanned underwater vehicles (UUVs) and unmanned aircraft system (UAS) testing activities. However, this current BA analyzes the impacts from training with these systems.

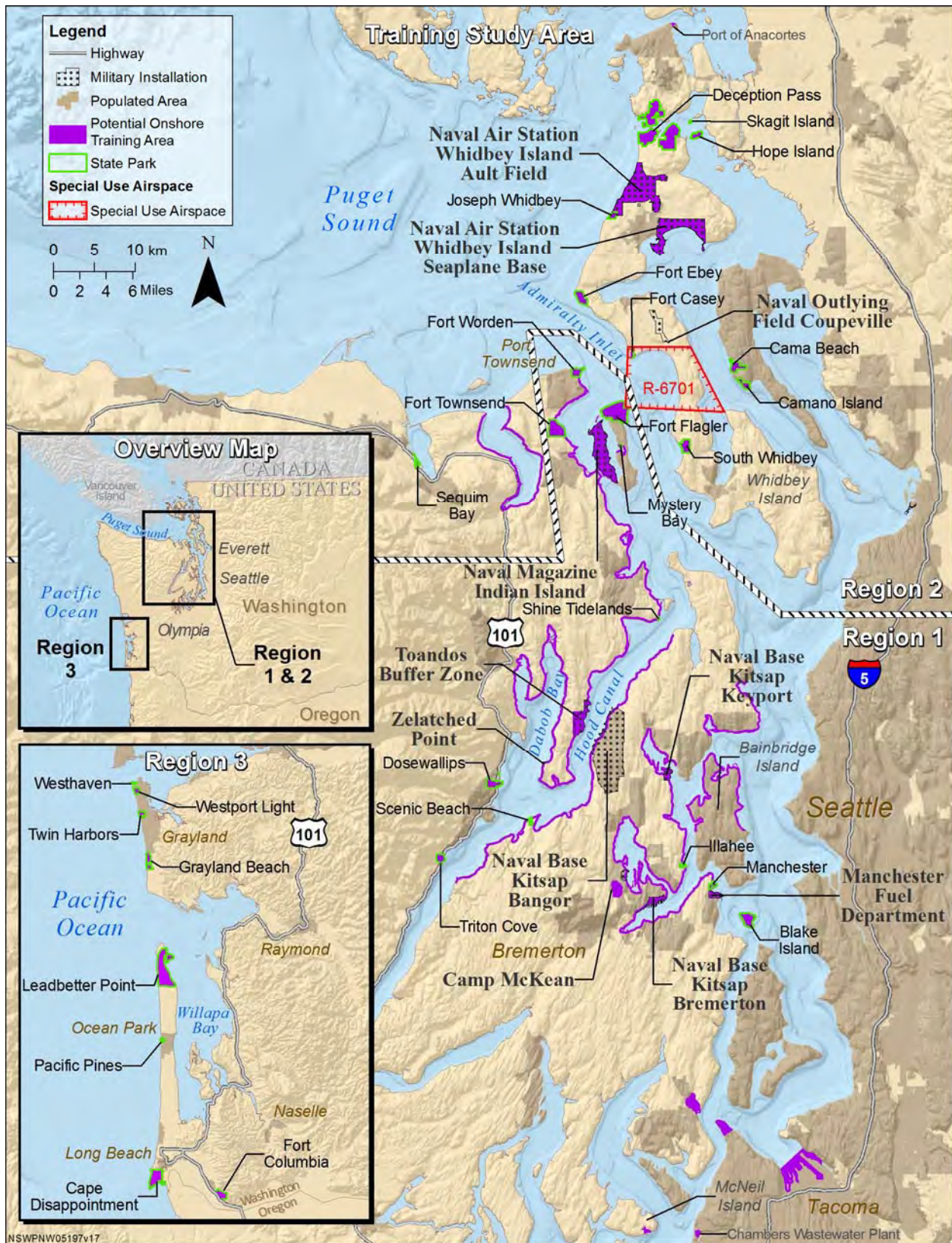


Figure 1-1: Area Overview

The stressors identified in the NWTT BOs associated with “Personnel Insertion/Extraction-Submersible” included physical disturbance (vessel strikes and in-water devices), and sediment and water quality. These activities are very similar to those proposed in this BA: launch and recovery, insertion and extraction, and diver/swimmer, over the beach, and special reconnaissance. However, the NWTT EIS/OEIS did not cover the full range of activities, locations, and duration needed, or provide the diversity required of naval special operations personnel. The Naval Special Operations Training in Western Washington State BA is intended to supersede the same Naval Special Warfare activities (“Personnel Insertion/Extraction-Submersible” and “NSW Training”) identified in the NWTT BO.

On April 12, 2017, the Navy, on behalf of NSWC, sent a notice of open house and outreach meetings to USFWS Washington Fish and Wildlife Office and NMFS. On May 16, 2017, the USFWS Washington Fish and Wildlife Office sent a letter (01EWF00-2017-CPA-0029) to Naval Facilities Engineering Command Northwest providing recommendations for minimizing potential impacts on the snowy plover and streaked horned lark during over-the-beach training activities at Grayland Beach and Leadbetter Point State Parks. The USFWS recommended that the proposed training activities do not occur during the nesting season (mid-March through early September) or that the Navy does not enter into posted areas indicating nesting activity.

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2 Proposed Action

2.1 Training Description

Training would be conducted in training blocks. A training block is defined as the two-to-eight-week period of time where naval special operations trainees and support personnel arrive in western Washington State to participate in cold-water maritime and land-based training and ends when they leave. The maximum amount of personnel travelling to the area would be 84, which would consist of up to 24 trainees and 60 support personnel.

A training block consists of single or multiple simultaneous training events on land and in the water. A training event may consist of one or multiple training activities (e.g., launch and recovery, diver/swimmer, over the beach) dispersed throughout the Action Area (see Section 2.4, Action Area). During a typical training event, there would be up to eight trainees transitioning from water to land. Up to 26 support personnel would be divided between the land and water areas to monitor trainees at both water and land training sites. A training event transitioning from water to land would not exceed a total of 34 personnel. In a few instances, there could be up to 14 trainees with up to 20 support personnel. Support personnel would again be divided between the land and water areas to monitor the trainees, however total personnel would not exceed 34 and not all 34 personnel would be in the water or on land at any given time. Training events are progressive in nature and would range between 2 and 72 hours depending on the activity.

There is no use of live fire ammunition, explosives, manned air operations, off-road driving, vegetation removal or cutting, digging, tree climbing, construction, or the building of camp fires or infrastructure. There is no requirement to assemble training devices or structures at any site. The training in and around existing military facilities or other facilities designated for simulated building clearance training activities would include the use of simulated weapons that use water-soluble paint pellets.

Not all sites within the Action Area would be utilized over a one-year period. Under the Proposed Action, a site would be used no more than 36 times a year. Additionally, some locations would not be used for training during certain times of the year when weather, currents, scheduled public events or protected species concerns are present. Other sites may not be used at all during a given year, and other sites may be used intermittently throughout a year. The size of the study area allows for this flexibility, which also helps to prevent overuse.

Systems used during training may include UAS, and submersible craft such as manned or UUV and other personal underwater propulsion devices. Trainees may also utilize equipment such as a remote operated vehicle (ROV) which can operate on or below the surface of the water and provides the operator with real-time feedback of underwater conditions. Vessels such as small ships, jet skis, or small boats may be used in conjunction with training systems during certain training scenarios.

Personnel traveling to training sites would utilize government and public waterways and roads. Waterborne transportation would include the movement of training vessels (such as small surface support vessels or small boats from Naval Base Kitsap Keyport/Bangor/Bremerton), safety equipment, and military personnel from the staging base to the event location. Typically, submersibles are launched from boat ramps near the site where training activity is scheduled.

2.1.1 Training Activities

The training activities associated with the Proposed Action broadly fit into two categories: water-based training and land-based training.

2.1.1.1 Water-Based Training

Water-based training activities are identified as diver/swimmer, insertion/extraction, UUV training, and launch/recovery. Dive sites would avoid locations that experience heavy traffic patterns, such as the Washington State Ferry System routes or fishing activities.

Water-based training activities would use existing boat ramps near the selected training location to launch the training platform (small submersible vehicle, surface support craft, or small inflatable boat) into the waterway. However, some training scenarios require an ocean launch using a small ship (occasionally in Region 1, typically in Regions 2 and 3). A small ship launch may also occur during training activities in locations that are not served by an existing boat ramp or if weather or tidal conditions hinder a boat ramp launch.

2.1.1.1.1 Diver/Swimmer Training Activities

During diver/swimmer training events, trainees swim or dive to an objective area (e.g., harbor, beach, and or moored vessel) for up to six hours. Diver/swimmer training would be confined to the ocean (Region 3), inland water areas (Region 1 and 2), and Kitsap Lake (Region 1). During night training, the trainees would use buoys marked with a glow stick (Chemlight) to identify their location.

2.1.1.1.2 Insertion and Extraction Training Activities

During insertion/extraction training events, trainees may approach or depart an objective area using submersible craft, to include UUVs and ROVs, or water crafts (jet skis or small boats). Insertion/extraction training events utilizing submersible craft would operate along the shoreline to conduct water-based training.

2.1.1.1.3 Launch and Recovery Training Activities

During launch and recovery training events, training would be conducted in water areas and consist of launching and recovering submersibles or surface craft, or a combination of both, from a boat ramp, water platform, or via a crane located on a ship or a barge.

2.1.1.1.4 Unmanned Underwater Vehicle Activities

A subset of water-based training would involve the use of a UUV and on occasion an ROV (herein both described as UUVs). A UUV is a battery-powered, unmanned submersible that is hand launched from a host vessel and would be used to assist with swimmer navigation. The UUVs operate within the water column and would not be set on the floor of the ocean or Puget Sound. UUVs would be used during the time that other water-based training activities would be taking place. The launching and recovery of the UUV would be conducted in water areas only and would utilize a fish finder type of device for navigation. UUVs can be autonomous or tethered and are controlled from the water surface or by a diver for real-time feedback to the operator. Diving personnel may be in the water in the near vicinity of the host vessel for the launch or retrieval portions of the activity. UUVs are tracked by personnel on the host vessel to ensure they remain on course and, if needed, can be recalled any point along the pre-programmed track.

2.1.1.2 Land-Based Training Activities

Land-based training events are identified as Over-the-Beach, Special Reconnaissance, Simulated Building Clearance, and High-Angle Climbing. As part of the training intent that the activities be undetected, the support personnel teach trainees that no expended equipment, human waste, or transported liquids

remain on site after the training activity is completed. Identical travel routes would rarely be used, and the level of foot traffic associated with each group would not wear paths in the terrain.

2.1.1.2.1 Over-The-Beach Training Activities

During an Over-The-Beach training activity, trainees would exit water, cross the beach, and quietly transition to land-based activities. Upon arrival at a pre-designated area, trainees would remain out of sight for several hours before exiting the site or continue moving towards a pre-determined objective. Typically, when trainees conduct Over-The-Beach at a site, they cross the beach twice (arrival and departure). However, when conducting Over-The-Beach training at Naval Base Kitsap Keyport, trainees could move over the beach multiple times.

2.1.1.2.2 Special Reconnaissance Training Activities

Upon arrival at a designated area, trainees would hike to a designated observation point. Trainees are taught the techniques for conducting reconnaissance without alerting anyone to their presence or location. Trainees would remain undetected with the goal of leaving no trace of their presence behind. This includes no vegetation being trampled, no branches broken, no footprints visible, or any other indicators that they were there.

2.1.1.2.3 High-Angle Climbing Training Activities

High-Angle Climbing events are training evolutions where trainees negotiate cliffs, rock faces, and other vertical challenges using ropes and other climbing gear to traverse obstacles while carrying gear.

2.1.1.2.4 Simulated Building Clearance Training Activities

The activity would consist of trainees conducting simulated actions against a site, or a military individual designated as part of the exercise, within a confined area or building. The scenarios involve the use of simulated weapons and simulated munitions. As with all naval special operations activities, the intent is for trainees to remain concealed and silent throughout the activity, and then departing the area with minimal disturbance and avoiding detection. The training includes the use of weapons configured to only fire plastic or paint pellets. No live-fire weapons or ammunition would be used. The simulated munitions would be marking rounds, which are specialized plastic/paint capsules that are environmentally friendly and water soluble. The temporary marks these simulated munitions make are about the circumference of a dime. Sounds associated with the firing of the simulated munitions sound similar to an air rifle. No property damage would occur, and cleanup (picking up simulated marking rounds/washing away paint marks if present) would be handled by the instructors and support staff immediately at the conclusion of the training scenario.

2.1.1.2.5 Unmanned Aircraft Systems Training Activities

UAS would be utilized concurrently with other water-based or land-based training activities. The UAS consists of a hand-launched or catapult system, a control system, and a remotely piloted or self-piloted (i.e., preprogrammed flight pattern) air vehicle that may be fixed-wing or rotary-wing. They would carry only non-hazardous payloads such as cameras, sensors, and communications equipment.

For the smaller UASs, the propulsion is through electrical motor-driven propellers powered by rechargeable batteries. For the larger UASs, propulsion is provided through a gas-powered motor. UASs would be used in Federal Aviation Administration (FAA)-designated restricted airspace (R6701) (Figure 1-1) and at Navy properties (Naval Base Kitsap Keyport, Toandos Buffer Zone, and Naval Magazine Indian Island). UAS utilized for the proposed training would

- be categorized as FAA Group 1 or Group 2 systems, weighing up to 55 pounds;
- vary in size up to approximately two meters in length, with a wingspan of three meters;
- normally operate below 2,000 feet above ground level; and
- would utilize on the ground observers (no manned aircraft observers).

2.1.2 Training Equipment

Table 2-1 lists the current and proposed equipment that may be used during training activities across the Action Area in western Washington State. Each activity would require a specific mix of personnel, equipment, and supporting systems.

Table 2-1: Current and Proposed Equipment for Naval Special Operations Training

Equipment Type	Description	Area of Utilization
Signaling Devices and Simulated Weapons		
Audible Recall Device	Audible signal similar to a small firecracker that is used to communicate potential danger with divers and submersible drivers, in accordance with established procedures and prearranged instructions.	Training Study Area Waters
Simulated Weapon	Trainees carry simulated weapons throughout each training event to accurately represent the combat weight and balance of the weapon and to experience the considerations needed to maintain and keep functioning in undersea and cold-weather maritime conditions. No real bullets are carried at any time throughout any training evolution (paint pellets are used). Live fire is not part of any training event.	Action Area
Simunitions Cartridge	A small cartridge (plastic/paint capsules) that emits a plastic projectile that leaves a mark the size of dime and is utilized only during simulated building clearance exercises. All traces of the marks are removed by rubbing with water and a cloth, and all expended shell casings are picked up by the instructors, support staff, and trainees.	Only at sites where Simulated Building Clearance would occur
Boats		
Surface Support Craft	Surface support craft includes commercial or military boats (generally in the 20–30 foot range) for open water utility operations and jet skis (NSWC-owned <i>Wave Runners</i> are used for swimmer safety in certain events during training).	Action Area Waters
Submersibles	Submersible craft are manned and include other underwater propulsion devices. The manned submersible craft is the primary transit and delivery vehicle for all naval special operations undersea maritime training events.	Action Area Waters
Small Inflatable Boats	Small rubber inflatable boats, typically no greater than 9 meters in length.	Action Area Waters
UUV	UUVs and small remote-operated vehicles controlled by a trainee with real-time feedback. UUVs can be tethered, untethered, or autonomous when operated and can operate on or below the surface.	Action Area Waters

Table 2-1: Current and Proposed Equipment for Naval Special Operations Training (continued)

Equipment Type	Description	Area of Utilization
Ground Support Vehicles		
Passenger Van	Personnel transport in support of training.	Action Area Lands
Emergency Response Vehicle	Navy medical command and NSWC control vehicle in support of training.	Action Area Lands
Pick-up Truck	Transport of essential equipment, including surface support craft and personnel in support of training.	Action Area Lands
Unmanned Aircraft Systems		
UASs	UASs consists of a hand-launched or catapult system, a control system, and a remotely piloted or self-piloted (i.e., preprogrammed flight pattern) air vehicle that may be fixed wing or rotary wing. They would carry only non-hazardous payloads such as cameras, sensors, and communications equipment.	Action Area Water and Lands, in accordance with FAA rules and regulations

Notes: UUV = Unmanned Underwater Vehicles, UAS = Unmanned Aircraft System, FAA = Federal Aviation Administration, NSWC = Naval Special Warfare Command

2.2 Impact Avoidance and Minimization Measures

This section identifies general and activity-specific avoidance and minimization measures that are incorporated into the Proposed Action. Some of these measures apply specifically to Navy-owned properties (e.g., training constraints included in Integrated Natural Resource Management Plan [INRMP] documents). For other potential training locations, sensitive ecological resources are identified in real-estate agreements as part of the Navy's due diligence process. These ecological resource locations are treated as "off limits" to training activities.

2.2.1 Best Management Practices and Standard Operating Procedures

This section presents an overview of the best management practices (BMPs) and standard operating procedures that are incorporated into the proposed naval special operations training activities for naval special operations personnel. BMPs are existing policies, practices, and measures that the Navy would adopt to reduce the environmental impacts of designated activities, functions, or processes. Although BMPs mitigate potential impacts by avoiding, minimizing, reducing, or eliminating impacts, BMPs are distinguished from potential mitigation measures because BMPs are (1) existing requirements for the Proposed Action; (2) ongoing, regularly occurring practices; or (3) not unique to this Proposed Action. In other words, the BMPs identified in this document are inherently part of the Proposed Action and are not potential mitigation measures proposed as a function of the National Environmental Policy Act environmental review process for the Proposed Action. Table 2-2 includes a list of BMPs. Minimization and avoidance measures are discussed separately in Chapter 3 (Affected Environment and Environmental Consequences). In addition to the BMPs provided in Table 2-2 below, naval special operations training would follow the current version of the NWTRC User's Manual and the Keyport Range Operating Procedures Manual. In addition to the BMPs provided, Navy special operations training would follow the Protective Measures Assessment Protocol (PMAP) general training category. The measures used in the PMAP general training category would also follow current versions of the NWTRC's User's manual and the Keyport Range Operating Procedures Manual, which also reiterate the PMAP general training category measures.

Dedicated lookouts would not likely be on board the small support boats; however, boat operators will have completed the Marine Species Awareness Training (MSAT), which provides information on sighting cues, visual observation tools and techniques, and sighting notification procedures.

Table 2-2: Best Management Practices for Naval Special Operations Training

Training Activity	Best Management Practice Description	Purpose
Water-Based Training Activities		
Swimmer/Diver	Diving and swimming events would have on-site safety support. For dives there would be a minimum of two boats with support personnel. Boat 1 would have the Safety Supervisor with coxswain, crewperson, and qualified medic. Boat 1 would maintain proximity to the divers or swimmers. Boat 2 would serve as a lookout boat and interdict oncoming vessel traffic. Additionally, depending on the length of the dive or swim, jet skis would be onsite to provide additional safety coverage.	Maintain safety of trainees and the public
All Activities	Vessels would avoid contact with hard surfaces during in-water training activities, vessels and personnel would avoid marine mammals, and vessels would remain within the water column (with the exception of small inflatable boats, which would be carried ashore).	Maintain safety of trainees and avoidance of marine mammals
Land-Based Training Activities		
All Activities	Land-based training would have onsite safety personnel. At a minimum, there would be three personnel, a Lead Safety Supervisor, Assistant Safety Supervisor, and a qualified medic. The medic would stage an emergency response vehicle onsite.	Maintain safety of trainees and the public
All Activities	Vehicles would remain on existing established roadways, and sound would be minimized during training to avoid detection.	Maintain safety of trainees and the public
All Training Activities		
Unmanned Aircraft System	Support personnel would maintain line of sight at all times with UAS. Personnel would enact immediate recovery in the event of a platform error.	Maintain positive control of the UAS before, during, and after training event
All Activities	Activities are coordinated with park rangers and property owners.	Awareness of sensitive areas and species

Relevant requirements as identified in the NWTRC User's Manual are summarized below, and are standard operating procedures to avoid collisions with marine mammals and sea turtles in all in-water training locations:

- All commanding officers, executive officers, lookouts, officers of the deck, junior officers of the deck supporting NSO training exercises will have completed the MSAT. All bridge lookouts will complete both parts one and two of the MSAT; part two is optional for other personnel. This training addresses the lookout's role in environmental protection, laws governing the protection

of marine species, Navy stewardship commitments, and general observation information to aid in avoiding interactions with marine species.

- Naval special operations personnel piloting the small boats will complete coxswain training and operate the boats in accordance with all U.S. Coast Guard rules and regulations.
- While in transit, naval vessels will be alert at all times, use extreme caution, and proceed at a safe speed so that the vessel can take proper and effective action to avoid a collision with any marine animal and can be stopped within a distance appropriate to the prevailing circumstances and conditions.
- When marine mammals have been sighted in the area, Navy vessels will increase vigilance and take reasonable and practicable actions to avoid collisions and activities that might result in close interaction of naval assets and marine mammals. Actions may include changing speed and/or direction and are dictated by environmental and other conditions (e.g., safety, weather).
- Naval vessels will maneuver to keep at least 1,500 feet away from any observed whale and avoid approaching whales head-on. This requirement does not apply if a vessel's safety is threatened, such as when change of course will create an imminent and serious threat to a person or vessel, and to the extent vessels are restricted in their ability to maneuver. Vessels will take reasonable steps to alert other vessels in the vicinity of the whale.
- Where feasible and consistent with mission and safety, vessels will avoid closing to within 200 yards of sea turtles and marine mammals other than whales (whales addressed above).
- Floating weeds and kelp, algal mats, clusters of seabirds, and jellyfish are good indicators of sea turtles and marine mammals. Therefore, where these circumstances are present, the Navy will exercise increased vigilance in watching for sea turtles and marine mammals.
- All vessels will maintain logs and records documenting training activities should they be required for event reconstruction purposes.

Proposed training activities within the Naval Sea Systems Command Naval Undersea Warfare Center Keyport Range Complex would be in compliance with existing Section 7 consultation requirements.

Table 2-3 lists relevant Range Operations Procedures for the Naval Sea Systems Command Naval Undersea Warfare Center Keyport Range Complex. Text provided are direct quotes from the procedures, but not all portions may apply. For example, a procedure may list multiple units (torpedoes, mobile ASW targets, inert mines, UUVs, etc.), but UUVs may be the only one that applies to this training.

In the event of a collision between a NSWC vessel and a marine mammal, NSWC would immediately notify, up through their chain of Command, NMFS.

Table 2-3: Relevant Range Operations Procedures for NAVSEA NUWC Keyport Range Complex

ROP	ROP Implementation
ROP 10-1	Establishes policies and procedures to be followed in the event of an OTTO Fuel II spill within the NAVSEA NUWC Keyport Range Complex or aboard a NUWC Keyport craft during the loading/offloading, retrieval/recovery, or stowage of test units containing OTTO Fuel II; and the handling of OTTO Fuel II waste material or reclaimable liquids by range or craft personnel.
ROP 10-4 Safety/Environmental and Operational Restrictions for Test Units	Establishes safety/environmental requirements and operational restrictions for all test units (this includes, but is not limited to, torpedoes, mobile ASW targets, inert mines, UUVs, and research and developmental vehicles) to be tested within the NAVSEA NUWC Keyport Range Complex or used in support of range activities. Ensures that NAVSEA NUWC Keyport Range Complex personnel from NUWC Keyport comply with OPNAVINST 5090.1C, <i>Navy Environmental and Natural Resources Program Manual</i> (or latest version of this document: OPNAVINST 5090.1D and associated Manual [M-5090.1]); MMPA; and Endangered Species Act (ESA). In particular, the following marine mammal protection measures are implemented per ROP 6-4: 1. Range activities shall be conducted in such a way as to ensure marine mammals are not harassed or harmed by human-caused events.
ROP 6-4 Range Operations and Marine Mammals	2. Marine mammal observers are on board ship during range activities. All range personnel shall be trained in marine mammal recognition. Marine mammal observer training is normally conducted by qualified organizations such as NOAA/National Marine Mammal Lab (NMML) on an as needed basis. 3. Vessels on a range use safety lookouts during all hours of range activities. Lookout duties include looking for any and all objects in the water, including marine mammals. These lookouts are not necessarily looking only for marine mammals. They have other duties while aboard. All sightings are reported to the Range Officer in charge of overseeing the activity. 4. Visual surveillance shall be accomplished just prior to all in-water exercises. This surveillance shall ensure that no marine mammals are visible within the boundaries of the area within which the test unit is expected to be operating. Surveillance shall include, as a minimum, monitoring from all participating surface craft and, where available, adjacent shore sites. 5. The Navy shall postpone activities until cetaceans (whales, dolphins, and porpoises) leave the project area. When cetaceans have been sighted in an area, all range participants increase vigilance and take reasonable and practicable actions to avoid collisions and activities that may result in close interaction of naval assets and marine mammals. Actions may include changing speed and/or direction and are dictated by environmental and other conditions (e.g., safety, weather). 6. In accordance with the MMPA and ESA, which address marine mammal protection, an "exclusion zone" shall be established and surveillance will be conducted to ensure that there are no marine mammals within this exclusion zone prior to the commencement of each in-water exercise. For cetaceans (whales, dolphins, and porpoises), the exclusion zone must be at least as large as the entire area within which the test unit may operate, and must extend at least 1,000 yards from the intended track of the test unit. For pinnipeds, the exclusion zone extends out 100 yards (91 meters) from the intended track of the test unit. 7. The minimum marine mammal exclusion zones defined above are sufficient to mitigate the effects of the acoustic energy transmitted by the test units, range tracking equipment, and the range target simulators currently in operation on U.S. ranges as of this writing. The exclusion zones specified in ROP 6-4 meet the requirements of Navy and NOAA and thereby ensure that active acoustic emissions from the acoustic sources currently in use do not constitute marine mammal harassment.

Table 2-3: Relevant Range Operations Procedures for NAVSEA NUWC Keyport Range Complex (continued)

ROP	ROP Implementation
	8. The NMFS recommendation that vessels not approach within 100 yards (91 meters) of marine mammals shall be followed to the extent practicable considering human and vessel safety priorities. All Navy vessels and aircraft, including helicopters, are expected to comply with this directive. This includes marine mammals “hauled-out” on islands, rocks, and other areas such as buoys. 9. In the event of a collision between a Navy vessel and a marine mammal, NUWC Keyport activities will notify the Navy chain of Command, which would result in notification to NMFS. 10. Procedures for reporting marine mammal sightings on the NAVSEA NUWC Keyport Range Complex shall be promulgated, and sightings shall be entered into the Range Operating System and forwarded to NOAA/NMML Platforms of Opportunity Program.

Source: National Oceanic and Atmospheric Administration (1993); U.S. Dept of the Navy (2001, 2002, 2003)

Notes: ROP = Range Operations Procedure, NAVSEA = Naval Sea Systems Command, NUWC = Naval Undersea Warfare Center, OPNAVINST = Chief of Naval Operations Instruction, UUV = Unmanned Underwater Vehicle, ASW = Anti-Submarine Warfare, MMPA = Marine Mammal Protection Act, NOAA = National Oceanic and Atmospheric Administration, NMFS = National Marine Fisheries Service

2.2.2 Standard Operating Procedures: Terrestrial Biological Resources

There are no specific standard operating procedures deemed applicable to other ESA-listed species that occur on land. Ecologically sensitive areas that may support species analyzed in this BA would be identified in land-use agreements (with state park units) and real-estate agreements (with private property owners, where the Navy would conduct due diligence procedures to identify potential environmental training constraints). Training activities would also be in compliance with training area constraints identified in INRMP documents on Navy properties. The general measures described below would apply to ESA-listed species.

- Installation-specific natural resources.** Various installations where training activities occur have identified a number of site-specific training restrictions that are included in INRMPs (U.S. Department of the Navy, 2012, 2017). These restrictions are the result of stewardship and compliance actions in consultation with USFWS NMFS for other military proposed actions. The Navy and other services conduct training operations at various installations in Puget Sound. Training operations can require that equipment and personnel utilize the nearshore areas. Prior to scheduling of activities, natural resource managers recommend shoreline areas or seasonal timing that would result in minimal or no impact to sensitive wildlife species. These training constraints are also adhered to for training activities and are considered in the analysis of potential impacts of the Proposed Action.
- State park-specific natural resources.** Training activities that may occur on state parks would be by agreement with the Washington State Parks and Recreation Commission. Training activities would be consistent with management objectives of individual parks, including prohibiting training in sensitive areas containing important natural and cultural resources. Some state parks have management plans with designated conservation areas that support conservation activities (e.g., providing important refugia for species, supporting reintroduction sites) or higher land use classifications (e.g., “heritage”), which is the most restrictive for access and is used to protect extremely rare species (e.g., snowy plover populations). The following state parks have management plans that proscribe land use classifications that would protect specific species and

habitats from stressors of the Proposed Action: Blake Island State Park, Camano Island State Park, Dosewallips State Park, Fort Casey State Park, Fort Ebey State Park, Fort Flagler State Park, Fort Worden State Park, Grayland Beach State Park, Hope Island State Park, Illahee State Park, Joseph Whidbey State Park, Manchester State Park, Scenic Beach State Park, and Sequim Bay State Park (Washington State Parks and Recreation Commission, 1997, 2006a, 2006b, 2007, 2008a, 2008b, 2008c, 2009, 2013). As identified earlier, prior to the commencement of any training activity, NSWC personnel will coordinate with park rangers for the latest updates on restricted areas and access. This includes restrictions at Leadbetter Point State Park and Grayland Beach State Park for snowy plover and streak-horned lark nesting sites and appropriate avoidance measures.

- **Biosecurity Standard Operating Procedures.** Biosecurity planning is also a standard operating procedure during exercise planning and execution. For example, an activity that originates in one location may form an exchange pathway for vegetation (e.g., hitchhiking seeds on clothing and equipment). In this case, self-inspection procedures are warranted, along with equipment washdowns to remove cultigens that may spread to new locations, or supplement the numbers and genetic variability of already-established invasive species. Together with site-specific recommendations for specific Navy installations and Washington state parks, the transport, introduction, and establishment of potentially invasive species is minimized to the maximum extent practical. Because of the types of training activities discussed in this BA, and with biosecurity procedures actively in place, the potential for invasive species transport and spread associated with the proposed training activities is not analyzed as a potential stressor on biological resources.
- **Siting for potentially invasive training activities.** Siting of certain activities is an important consideration for the analysis of potential impacts on biological resources. For example, the use of simulated munitions would only occur at specific locations during simulated building clearance training activities. The noise generated from simulated munitions (which is similar to air rifles and significantly less than actual live rounds) would not likely impact biological resources in any measureable way. UAS training would only occur at four locations; Naval Base Kitsap Keyport, Toandos Buffer Zone, Naval Magazine Indian Island, and R-6701. These siting restrictions for potentially disturbing training activities reduces the potential for biological resources to be exposed to noise-related stressors.
- **Low impact/minimally invasive training activities.** Further, it is important in the consideration of potential impacts on biological resources that the training activities considered in this BA are designed to be minimally invasive. Potential impacts from stressors on biological resources are minimized by the nature and objectives of the training activity, because the stressors that would potentially impact biological resources are similar to factors that may alert potential adversaries and non-combatants in real-world operations.

2.3 Interrelated and Interdependent Activities

Naval special operations training is a unique and specialized skill set not shared by the rest of the Naval service. Routinely, and due to the clandestine nature of naval special operations missions, they operate in small independent and self-sustaining teams, typically far removed from other more traditional naval assets (ships, submarines, and aircraft). The Proposed Action does not have other training activities dependent on it, nor is it dependent on other projects or actions in the Pacific Northwest for its justification. Therefore, no interrelated or interdependent actions are associated with the Proposed Action.

2.4 Action Area

The Action Area encompasses terrestrial and nearshore marine habitats on selected nearshore lands and in the inland waters of Puget Sound, including Hood Canal, as well as the southwestern Washington coast (Figure 2-1). These areas represent the extent of the anticipated physical, biological, and chemical effects of the action on the environment (discussed in Chapter 5). Under the Proposed Action, the proposed training activities would occur at pre-approved sites throughout the Action Area in western Washington State (Figure 2-1). Three geographic areas within western Washington State (Regions 1, 2, and 3) are identified as areas supporting the proposed training activities. The Action Area offers a varied topography, hydrography, and bathymetry (to include strong and shifting currents and varying salinity) to units conducting extended, recurring, and sustainment training.



3 Status/Presence of Federally Listed Species

The lists of endangered and threatened species that may be affected by the proposed project were obtained from the NMFS and USFWS endangered species Web sites. Additional information was gathered from species experts, a review of available literature. Table 3-1 lists 15 species that have the potential to occur in the Action Area and their listing status. Additional information regarding species distribution and presence within the Action Area is discussed in the following sections.

Table 3-1: Threatened and Endangered Species Known to Occur or Potentially Occurring in the Action Area

Species	Federal Listing Status	Species Occurrence in the Action Area (Region)		
		1	2	3
Marbled murrelet <i>Brachyramphus marmoratus</i>	Threatened	X	X	X
Western snowy plover <i>Charadrius lexandrinus nivosus</i>	Threatened	-	-	X
Streaked horned lark <i>Eremophila alpestris strigata</i>	Threatened	-	-	X
Leatherback sea turtle <i>Dermochelys coriacea</i>	Endangered	-	-	X
Humpback whale Mexico DPS and Central America DPS <i>Megaptera novaeangliae</i>	Threatened & Endangered	X	X	X
Southern resident killer whale <i>Orcinus orca</i>	Endangered	X	X	X
Puget Sound Chinook salmon <i>Oncorhynchus tshawytscha</i>	Threatened	X	X	-
Columbia River chum salmon <i>Oncorhynchus keta</i>	Threatened	-	-	X
Hood Canal summer-run chum salmon <i>Oncorhynchus keta</i>	Threatened	X	X	-
Puget Sound steelhead <i>Oncorhynchus mykiss</i>	Threatened	X	X	-
Puget Sound/Georgia Basin DPS bocaccio <i>Sebastes paucispinis</i>	Endangered	X	X	-
Puget Sound/Georgia Basin DPS yelloweye rockfish <i>Sebastes ruberrimus</i>	Threatened	X	X	
Green sturgeon <i>Acipenser medirostris</i>	Threatened	-	X	X
Pacific Eulachon Southern DPS <i>Thaleichthys pacificus</i>	Threatened	-	-	X
Bull trout <i>Salvelinus confluentus</i>	Threatened	X	X	X

Note: DPS = Distinct Population Segment

3.1 Marbled Murrelet

Status

The Washington, Oregon, and California Distinct Population Segment (DPS) of the marbled murrelet was federally listed as threatened in 1992 by the USFWS (57 Federal Register [FR] 45328).

Threats and Trends

Primary causes for the decline of this species include direct mortality from oil spills, by catch in gillnet fisheries, and loss of nesting habitat (61 FR 26256). Marbled murrelet populations have suffered significant declines in the Pacific Northwest, caused primarily by the removal of habitat by logging and coastal development (International Union for Conservation of Nature and Natural Resources, 2010). Miller et al. (2012) reviewed survey data from 2000 and 2010 and concluded the marbled murrelet population in all Conservation Zones had declined about 29 percent over the survey period. Falxa and Raphael (2016) found population declines in Washington of 3.9 percent (95th percentile confidence interval: -7.6 to 0) for Conservation Zone 1 and 6.7 percent (95th percentile confidence interval: -11.4 to -1.8) for Conservation Zone 2 for the period 2000 to 2013 (Conservation Zone 1 includes the Strait of Juan de Fuca, San Juan Islands, and Puget Sound; Conservation Zone 2 includes the outer coast of Washington).

Occurrence in the Action Area

Marbled murrelets occur in all regions of the Action Area. Marbled murrelets generally forage in waters within 1 mile (1.6 kilometers) of the shore (Raphael et al., 2007; U.S. Fish and Wildlife Service, 2005) out to depths of about 1,300 feet (400 meters) and are reported to dive at least as deep as 90 feet (27 meters), based on their capture in gillnets set at this depth. The species' wintering range is poorly documented but includes most of the marine areas used for foraging during the breeding season (Raphael et al., 2007). Marbled murrelets are unique among alcids in their use of old-growth forest stands (Falxa & Raphael, 2016). Marbled murrelets do not build a nest but use natural features, such as moss, clumps of mistletoe, or piles of needles as a nest site on tree limbs. Nests are in large conifers, such as coastal redwood and western hemlock, in old-growth stands typically within 35 miles (56 kilometers) of marine waters. Nesting season is asynchronous between April 1 and September 23. During the breeding season, murrelets trend to forage in well-defined areas along the shoreline in relatively shallow marine waters. Important features in nesting habitat are stands of 500 acres (202.3 hectares) or larger, multistoried canopy layers, and less-than-average canopy closures (Barbaree et al., 2014).

Region 1. Marbled murrelets have been identified on the Hood Canal south of Delta Pier. No nest sites have been discovered on Naval Base Kitsap Bangor; however, suitable habitat may exist on base (U.S. Department of the Navy, 2017). No nesting activity has been reported at two proposed state parks along Dabob Bay (Dosewalips State Park and Triton Cove State Park); however, the USFWS identified known nesting sites along the Dosewalips River and Big Quilcene River inland from the park units in old growth forests (National Oceanic and Atmospheric Administration, 2017). Although marbled murrelets can potentially forage throughout Puget Sound, higher occurrences of murrelets in foraging habitats can be expected in waters in close proximity to known nesting habitat on the Olympic Peninsula.

Region 2. There are no known nesting sites within the Action Area in Region 2; however, nearshore waters of the Strait of Juan de Fuca (as with Dabob Bay and Hood Canal in Region 1) are important foraging areas for marbled murrelets.

Region 3. There are no known nesting sites within the Action Area in Region 3. Nearshore waters off of coastal Washington are likely used for foraging because of close proximity of nesting habitat along the

coastal portions of Olympic Peninsula. The closest occupied nesting sites to areas identified for potential training include areas inland from Grays Harbor and areas inland from Willapa Bay National Wildlife Refuge along the Naselle River.

3.2 Western Snowy Plover

Status

The Pacific coast population of the western snowy plover was listed as threatened under the ESA in 1993 (58 FR 12864). The Pacific coast population is defined as those individuals that nest within 50 miles (80 kilometers) of the Pacific Ocean on the mainland coast, peninsulas, offshore islands, bays, estuaries, or rivers of the United States and Baja California, Mexico.

Threats and Trends

The main reasons for declines have been attributed to poor reproductive success resulting from human disturbance, predation, and inclement behavior. Invasive species encroachment has also degraded nesting habitats, along with urban development, have contributed to declines in active nesting. Between 2006 and 2009, the population declined significantly, but has remained fairly stable since 2012 (Olesiuk, 2008).

Occurrence in the Action Area

The Pacific coast population of the western snowy plover breeds in March and April and winters on coastal beaches, including sand spits, dune-backed beaches, beaches at river and creek mouths, and lagoon/estuarine salt pans (Olesiuk, 2008). Individuals also occasionally use bluffbacked beaches, dredged material disposal sites, salt pond levees, dry salt ponds, and river bars. Nest sites are usually found on sandy or saline substrates with little or no vegetation and debris. Although western snowy plovers move up and down the West Coast during the nonbreeding season, they primarily winter on the same beaches used for breeding (Harvey et al., 2017). The waterlines of these same beaches constitute their foraging habitat. In the Pacific Northwest, western snowy plovers generally feed in the wet sand or among surf-cast kelp, where they visually forage for flies, beetles, small clams and crabs, amphipods, seed shrimp (ostracods), and polychaetes (U.S. Fish and Wildlife Service, 2007). During the winter, western snowy plovers often feed in loose flocks and roost in depressions or behind sheltering debris, such as driftwood or kelp. Specific locations of known occurrence of western snowy plovers within the Action Area are discussed below.

Region 1. Western snowy plovers are not known to occur in Region 1.

Region 2. Western snowy plovers are not known to occur in Region 2.

Region 3. In Washington, which is the northern extent of the range of the species, snowy plovers nest on coastal beaches between Damon Point (in Grays Harbor) and the Long Beach Peninsula. Between 2006 and 2009, the population declined significantly, but has remained fairly stable since 2012. In 2014, the mean breeding adult population in Washington was 41 individuals (Olesiuk, 2008). All of the current nesting within the Action Area occurs at Leadbetter Point State Park and Grayland Beach State Park. Leadbetter Point State Park is included in the Washington State Parks and Recreation Commission *Long Beach Area Parks Management Plan*, while Grayland Beach State Park is included in the *South Beach Area Parks Management Plan*. These plans contain specific restrictions to preserve western snowy plover nesting habitat. For example, during the nesting period of the western snowy plover (April 1 through Labor Day of each year), dogs are not allowed on the park beach areas.

3.3 Streaked Horned Lark

Status

The streaked horned lark is endemic to the Pacific Northwest and is a subspecies of the wide-ranging horned lark. The streaked horned lark was listed as threatened in November 2013 (78 FR 61451).

Threats and Trends

Historically, streaked horned larks bred from southern British Columbia, through the Puget Trough in Washington and in the Willamette and Rogue River Valleys in Oregon (Stinson, 2005). The breeding range of the lark has contracted over time with extirpation from former breeding sites in northern Puget trough, southern British Columbia, the Washington Coast north of Grays Harbor, and the Rogue River Valley of Oregon (Stinson, 2005; Washington Department of Fish and Wildlife, 2013). More than 90 percent of the original grasslands have been lost in the south Puget Sound region as a result of development, and the incursion of trees, shrubs, and non-native invasive species, such as Scotch broom (*Cytisus scoparius*) (Pearson & Altman, 2005). Population estimates indicate that there are probably fewer than 1,000 streaked horned larks remaining, with about 330 birds breeding in Washington and 440 in Oregon (Washington Department of Fish and Wildlife, 2013).

Occurrence in the Action Area

Streaked horned larks nest on the ground in sparsely vegetated sites dominated by grasses and forbs in habitats such as native prairies, coastal dunes, fallow and active agricultural fields, wetland mudflats, sparsely vegetated edges of grass fields, and disturbed areas such as grazed pastures, gravel roads or gravel shoulders of lightly traveled roads, and airports. Breeding and wintering habitat along the Washington Coast consists of sparsely vegetated expanses of sand adjacent to the ocean that are dominated by grasses and forbs with few or no trees and shrubs. Foraging occurs in the same habitat, as well as in intertidal habitat (Stinson, 2005).

According to (Pearson & Altman, 2005), “the streaked horned lark has been extirpated as a breeding species throughout much of its range, including all of its former range in British Columbia, the San Juan Islands, the northern Puget Trough, the Washington coast north of Grays Harbor, the Oregon coast, and the Rogue and Umpqua Valleys in southwestern Oregon.” Recent site visits suggest that streaked horned larks in Washington currently breed on six sites in the Puget lowlands (one site on McChord Air Force Base, three sites on Ft. Lewis, Olympia Airport, and Shelton Airport), four sites on the coast (Damon Point, Midway Beach, Graveyard Spit, and Leadbetter Point), and two sites on islands in the lower Columbia River (White’s/Brown’s Island and the Washington portion of Rice Island). In addition, three new probable breeding sites were discovered in 2012 outside the Action Area, including two along the Columbia River (Kalama and Sand Island Marine Park near St. Helens, Oregon) and on Johns River Island, on the Washington Coast (Washington Department of Fish and Wildlife, 2013). Specific locations of known occurrence of streaked horned larks within the Action Area include:

Region 1. Streaked horned larks are not known to occur in the Region 1 portion of the Action Area.

Region 2. Streaked horned larks are not known to occur in Region 2 portion of the Action Area.

Region 3. Leadbetter Point State Park is the only location within the Action Area that supports streaked horned lark occupied habitat. Leadbetter Point State Park is included in the Washington State Parks and Recreation Commission *Long Beach Area Parks Management Plan*. This plan does not specifically call out streaked horned lark protection areas, but the state park is included in an annual monitoring effort for both streaked horned larks and western snowy plovers.

3.4 Leatherback Sea Turtle

Status

The leatherback sea turtle is listed as a single population and is classified as endangered under the ESA (35 FR 8491). Although USFWS and NMFS believe the current listing is valid, preliminary information indicates an analysis and review of the species should be conducted under the DPS policy (National Marine Fisheries Service & U.S. Fish and Wildlife Service, 2013).

Threats and Trends

Unlike populations in the Caribbean and Atlantic Ocean, which are generally stable or increasing, western Pacific leatherbacks have declined more than 80 percent and eastern Pacific leatherbacks have declined by more than 97 percent since the 1980's (Kobayashi et al., 2016). Western leatherbacks occur off of Washington's coast. Because the threats to these subpopulations have not ceased, the International Union for Conservation of Nature has predicted a decline of 96 percent for the western Pacific subpopulation and a decline of nearly 100 percent for the eastern Pacific subpopulation by 2040 (Nachtigall et al., 2016; Wallace et al., 2016).

The eastern and western Pacific leatherback populations have been the subjects of several action plans and recovery plans over the last two decades including the Bellagio Blueprint for Action on Pacific Sea Turtles (Polasek et al., 2017), the U.S. Recovery Plan for Pacific populations of Leatherbacks (National Marine Fisheries Service & U.S. Fish and Wildlife Service, 1998), and the North American Conservation Action Plan for Pacific Leatherback Sea Turtles (Seymour et al., 2017). National Oceanographic and Atmospheric Administration (NOAA) Fisheries has updated their conservation strategy for Pacific leatherback sea turtles with the publication of Species in the Spotlight Priority Actions: 2016-2020 Pacific Leatherback Turtle *Dermochelys coriacea* (National Marine Fisheries Service, 2016a). This plan focuses on five primary areas: (1) reducing fisheries interactions, (2) improving nesting beach protections and increasing reproductive output, (3) international cooperation, (4) monitoring and research, and (5) public engagement.

Occurrence in the Action Area

Occurrence within the Action Area should be considered extremely rare, as this species would only occur in the Action Area under certain oceanographic conditions. Recent research using satellite telemetry indicates that Washington's outer coast (especially the area near the Columbia River plume, an upwelling that is favorable to leatherback foraging) is an important foraging area for the species (Benson et al., 2011).

Region 1. Leatherback sea turtles are not anticipated to be present in the Region 1 portion of the Action Area.

Region 2. Leatherback sea turtles are not anticipated to be present in the Region 1 portion of the Action Area. However, this species has been reported on rare occasions within the Strait of Juan de Fuca and (Vanselow et al., 2009; Witteveen & Wynne, 2017).

Region 3. Commercial and recreational fishermen have noted occasional sightings of single individuals or small groups of leatherbacks off the coast of Washington. There were 78 documented occurrences from a variety of sources from 1975 to 2013, with records extending from the mouth of the Columbia River north to Cape Flattery. The number of western Pacific leatherbacks in Washington is likely decreasing over time, based on the strong declines in the nesting population in Indonesia (Athens, 2002).

3.5 Humpback Whale Mexico Distinct Population Segment and Central America Distinct Population Segment

Status

Humpback whales of the Mexico DPS are listed as threatened, and those from the Central America DPS are listed as endangered under the ESA (National Marine Fisheries Service, 2016c). Together these two DPSs are considered the California, Oregon, and Washington stock of humpback whales and are listed as depleted under the Marine Mammal Protection Act (MMPA) (Carretta et al., 2017b; National Marine Fisheries Service, 2016c). This BA only addresses the Mexico DPS, listed as threatened, and the Central America DPS, listed as endangered (81 FR 62260). Both DPSs are considered depleted under the MMPA (81 FR 62260). The humpback whale DPSs were generally defined by NMFS based on breeding areas, while the stock structure is based on feeding areas because of the species' fidelity to feeding grounds (Carretta et al., 2016). As a result, current stock designations are inconsistent with DPS designations, and although NMFS proposed to conduct a review of humpback whale stock delineations to determine whether any stocks should be realigned, no changes to current stock structure have been provided to date (81 FR 62260). The California, Oregon, and Washington humpback whale stock occurs within Puget Sound and off the coast of Washington, and partially or fully coincides with the ESA-listed Mexico and Central America DPSs. The abundance estimate for the Mexico DPS is 3,264 individuals (coefficient of variation [CV] = 0.06) and the abundance estimate for the Central individuals (CV = 0.30) (Wade et al., 2016). The current best abundance estimate for the California, Oregon, and Washington stock is 1,918 (CV = 0.03) (Carretta et al., 2016).

Threats and Trends

Threats to humpback whales include entanglement in fishing gear, ship strikes, whale watch harassment, and impacts within aggregation areas from recreational boat traffic and acoustic impacts (Carretta et al., 2013). Population trends for the Mexico DPS and Central America DPS are unknown (81 FR 62260). Ship surveys and mark-recapture population estimates of the California, Oregon, and Washington stock show a long-term population increase with some variable trends, depending on the choice of model and time frame used. The growth rate appears to have been 6–7 percent per year since ship surveys and modeling began in 1979/80 (Carretta et al., 2016), but recent estimates show variable trends, depending on the choice of model and time frame used (Carretta et al., 2016).

Occurrence in the Action Area

Humpback whales tend to occur more frequently in summer and fall, but could occur in the Action Area in any season. Published density estimates for humpback whales in Washington inland waters are not available. Humpback whale sightings in inland Washington waters has increased. Inland water opportunistic sightings primarily occur from April through July, but sightings are reported in every month of the year. Most sightings occur in the Strait of Juan de Fuca and in the San Juan Island area, with only occasional sightings in Puget Sound. Visual surveys and acoustic monitoring studies in offshore areas have detected humpbacks along the Washington coast year-round, with peak occurrence during the summer and fall (Oleson et al., 2009).

Region 1. Occurrence of humpback whales in the southern portion of Puget Sound is rare, but has been occurring more frequently in recent years (U.S. Department of the Navy, 2016). Sightings of humpback whales in Puget Sound vary by location, but were infrequent historically. A small number of humpback whales (based on concurrent sightings of one to four individuals, including a cow/calf pair) was present in Puget Sound from September 2015 to July 2016 (U.S. Department of the Navy, 2016). Most of the sightings reported to Orca Network since 2003 were in the main basin of Puget Sound, with numerous

sightings in the waters between Point No Point and Whidbey Island, Possession Sound. Sightings have been reported of humpbacks in Colvos Passage (near Vashon Island) (U.S. Department of the Navy, 2016).

Region 2. Most humpback whale sightings in the inland waters occur in the Strait of Juan de Fuca and in the San Juan Island area, which tend to follow the seasonal migrations offshore, with increases occurring in summer/fall and lower numbers occurring in the winter/spring (U.S. Department of the Navy, 2016).

Region 3. Primary humpback habitat is offshore waters on the continental shelf and seaward. The Mexico and Central America DPS utilize the Washington coast for feeding and migration.

3.6 Southern Resident Killer Whale

Status

Among the genetically distinct assemblages of killer whales in the northeastern Pacific, the Eastern North Pacific Southern Resident stock is one of two that may occur in the Proposed Action Area. The Southern Resident stock is listed as endangered under the ESA (70 FR 69903) and is protected and designated as depleted under the MMPA. The Southern Resident stock contains three pods (J, K, and L pods), considered one stock under the MMPA and as a DPS (therefore, "species") under the ESA.

Threats and Trends

When they were listed under the ESA, three main threats to the survival of Southern Resident killer whales were identified: (1) scarcity of prey, (2) high levels of contaminants from pollution, and (3) disturbance from vessels and sound (70 FR 69903). In addition, small population size and vulnerability to oil spills and disease were identified as significant concerns. The stock declined steeply from 98 animals in 1996 to 80 in 2001. An increase to 88 whales in 2005 was followed by a decline through 2014 (Center for Whale Research, 2017). A population size of 84 individuals was estimated as of December 31, 2015 and a total of 78 Southern Resident killer whales was estimated as of December 31, 2016 (Center for Whale Research, 2017).

Occurrence in the Action Area

The Eastern North Pacific Southern Resident stock is a transboundary stock that occurs in inland waters of Washington and British Columbia. They regularly visit coastal sites off Washington State and Vancouver Island (Ford et al., 2000) and are known to travel as far south as central California (Black, 2011). Tagging and acoustic data has shown that, throughout their range, K/L pods occurred almost exclusively on the continental shelf, with high use areas mainly between Grays Harbor and the Columbia River (Hanson et al., 2017). Photo-identification of individual whales in the stock through the years has resulted in a substantial understanding of this stock's structure, behaviors, and movements in inland waters. Southern Resident killer whales are most frequently observed in the inland waters of Washington State and British Columbia during the late spring, summer, and fall (Hanson et al., 2017). In Washington inland waters, Southern Residents are most often observed outside the Action Area in Haro Strait, along the west side of San Juan Island, and in the Strait of Juan de Fuca and enter Puget Sound typically in the fall or winter months (Hanson et al., 2017). Southern Resident killer whales regularly occur throughout the San Juan Islands and Strait of Juan de Fuca, and occur less frequently through main basins of Puget Sound (Orca Network, 2017).

Region 1. Southern Resident killer whales may occur occasionally in Puget Sound, with the exception of Hood Canal, including Dabob Bay, as they have not been documented there since 1995 (National Marine Fisheries Service, 2006). Southern Residents typically enter Puget Sound in the fall or winter months (National Marine Fisheries Service, 2006).

Region 2. In Region 2, Southern Residents are most often observed outside the Action Area in Haro Strait, along the west side of San Juan Island, and in the Strait of Juan de Fuca (Houghton et al., 2015; Kriete, 2007). Southern Residents enter Puget Sound typically in the fall or winter months (National Marine Fisheries Service, 2006). They are less frequently seen off northern Whidbey Island and within the Region 2 action area (Hanson et al., 2017).

Region 3. They regularly visit coastal sites off Washington state and Vancouver Island (Ford et al., 1994) and are known to travel as far south as central California (Black, 2011). Tagging and acoustic data have shown that, throughout their range, K and L pods occurred almost exclusively on the continental shelf, with high use areas mainly between Grays Harbor and the Columbia River (Hanson et al., 2017).

3.7 Puget Sound Chinook Salmon Evolutionary Significant Unit

Status

On 28 June 2005, the Puget Sound Chinook Salmon Evolutionary Significant Unit (ESU) was listed as threatened (70 FR 37160–37204). This ESU includes all wild (naturally spawned) populations of Chinook salmon from rivers and streams flowing into Puget Sound, including the Strait of Juan de Fuca from the Elwha River, eastward, including rivers and streams flowing into Hood Canal, South Sound, North Sound, and the Strait of Georgia in Washington, and 26 artificial propagation programs. These programs include Kendal Creek Hatchery, Marblemount Hatchery (fall, spring yearlings, spring subyearlings, and summer-run), Harvey Creek Hatchery, Whitehorse Springs Pond, Wallace River Hatchery (yearlings and subyearlings), Tulalip Bay, Issaquah Hatchery, Soos Creek Hatchery, Icy Creek Hatchery, Keta Creek Hatchery, White River Hatchery, White Acclimation Pond, Hupp Springs Hatchery, Voights Creek Hatchery, Diru Creek, Clear Creek, Kalama Creek, George Adams Hatchery, Rick's Pond Hatchery, Hamma Hatchery, Dungeness/Hurd Creek Hatchery, and Elwha Channel Hatchery.

Threats and Trends

The NOAA Fisheries Biological Review Team identified the following risks to the Puget Sound Chinook salmon ESU: (1) the concentration of the majority of natural production in just two basins; (2) high levels of hatchery production in many areas of the ESU; and (3) widespread loss of estuary and lower floodplain habitat diversity (Good et al., 2005). All Puget Sound Chinook salmon populations are considered well below escapement abundance levels identified for recovery in the recovery plan and hatchery-origin spawners are present in high fractions in most populations outside the Skagit watershed, and in many watersheds the fraction of spawner abundances that are natural-origin have declined over time (National Marine Fisheries Service, 2016b). Since the last status review conducted in 2011, most populations have declined in abundance across the ESU. NOAA Fisheries' most recent 5-year review concluded the updated information on abundance, productivity, spatial structure and diversity since the last review did not indicate a change in the ESU's biological risk category (National Marine Fisheries Service, 2016b).

Occurrence in the Action Area

The Puget Sound Chinook Salmon ESU entering the inland waters of the Study Area are predominantly ocean-type fish. Like other species of Pacific salmon, Chinook salmon die after spawning and are therefore not able to spawn more than once (Chasco et al., 2017).

Regions 1, 2, and 3. Puget Sound Chinook salmon could occur throughout Regions 1, 2, and 3 in the Action Area, but are likely most common in Regions 1 and 2.

3.8 Columbia River Chum Salmon Evolutionary Significant Unit

Status

The Columbia River Chum Salmon ESU was listed as threatened on 28 June 2005 (70 FR 37160) and includes all naturally spawned populations of chum salmon in the Columbia River and its tributaries in Washington and Oregon, as well as the three artificial propagation programs: Chinook River (Sea Resources Hatchery), Grays River, and Washougal River/Duncan Creek chum hatchery programs. In 2013, NOAA Fisheries published a recovery plan for lower Columbia River salmon and steelhead that provides a road map to recover four salmon and steelhead species that spawn and rear in the lower Columbia River or its tributaries in Oregon and Washington, including the Columbia River chum salmon (National Marine Fisheries Service, 2013).

Threats and Trends

Columbia River chum salmon have historically been affected and continue to be affected by numerous factors, including loss and degradation of spawning and rearing habitat, the impacts of mainstem hydropower dams on upstream access and downstream habitats, and the legacy effects of historical harvest (National Marine Fisheries Service, 2013). Threats to this species can be organized into six main categories: tributary habitat degradation, estuary habitat degradation, hydropower, harvest, hatcheries, and predation.

Under baseline conditions, constrained spatial structure at the ESU level (related to conversion, degradation, and inundation of habitat) contributes to very low abundance and low genetic diversity in most populations and increases risk to the ESU from local disturbances (National Marine Fisheries Service, 2013). Impaired side channel and wetland conditions, along with degraded floodplain habitat are identified as primary limiting factors for all life stages, while channel structure and form issues and degraded riparian conditions being the primary limiting factors for juveniles in all Washington populations. Water quantity issues in estuaries related to altered hydrology and flow timing are identified as a primary limiting factor for all populations, as well as channel structure issues, in the form of reduced habitat complexity and diversity, and reduced access to peripheral and transitional habitats such as side channels and wetlands can dramatically affect juveniles.

Occurrence in the Action Area

Region 1. Columbia River chum salmon are not anticipated to be present in the Region 1 portion of the Action Area.

Region 2. Columbia River chum salmon are not anticipated to be present in the Region 2 portion of the Action Area.

Region 3. Columbia River chum salmon are most commonly found in the Columbia River in the Region 3 portion of the Action Area.

3.9 Hood Canal Summer-Run Chum Salmon Evolutionary Significant Unit

Status

The Hood Canal summer-run chum salmon ESU was listed as threatened in June 2005 (70 FR 37160). The listing includes all naturally spawned populations of summer-run chum salmon in Hood Canal and its tributaries, as well as populations in Olympic Peninsula rivers between Hood Canal and Dungeness Bay, Washington, and eight artificial propagation programs (81 FR 72759). However, all Hood Canal summer chum hatchery programs except Lilliwaup were terminated by 2014. The last supplementation-origin spawners, outside of Lilliwaup River, are expected to return to the Tahuya River in 2018 (Northwest

Fisheries Science Center, 2015). The NMFS recovery plan for this species was adopted on May 24, 2007 (72 FR 29121). The Puget Sound Technical Review Team designated two independent populations for the Hood Canal summer-chum ESU, one that includes spawning aggregations from rivers and creeks draining into the Strait of Juan de Fuca and one that includes spawning aggregations within Hood Canal proper (National Marine Fisheries Service, 2016b).

Threats and Trends

Reduced viability, lower survival, and listing of extant stocks of summer-run chum and recent stock extinctions in Hood Canal are attributed to the combined impacts of three primary factors: (1) habitat loss and degradation, (2) climate change, and (3) increased fishery harvest rates (National Marine Fisheries Service, 2016b). Additional factors include impacts associated with the releases of hatchery salmonids, which compete with naturally spawning stocks for food and other resources.

Based on the most recent 5-Year Review, NMFS (2016b) found that the overall trend in spawning abundance, productivity, and spatial structure and viability parameters has increased since ESA-listing for the Hood Canal population (all natural spawners and natural-origin only spawners) and Strait of Juan de Fuca population (all natural spawners). However, the ESU did not meet all of the recovery criteria for population viability (National Marine Fisheries Service, 2016b).

Occurrence in the Action Area

Regions 1 and 2. Hood Canal summer-run chum occur seasonally in the Region 1 and 2 portions of the Action Area.

Region 3. Hood Canal summer-run chum salmon are not anticipated to be present in the Region 3 portion of the Action Area.

3.10 Puget Sound Steelhead Distinct Population Segment

Status

The Puget Sound steelhead DPS was listed in May 2007 under the ESA as a threatened DPS (72 FR 26722). The DPS includes all naturally spawned anadromous winter-run and summer-run *O. mykiss* (steelhead) populations in streams in the river basins of the Strait of Juan de Fuca, Puget Sound, and Hood Canal, Washington, bounded to the west by the Elwha River (inclusive) and to the north by the Nooksack River and Dakota Creek (inclusive), as well as the Green River natural and Hamma Hamma winter-run steelhead hatchery stocks (National Marine Fisheries Service, 2016d). The winter-run steelhead is the predominant run in Puget Sound, in part because there are relatively few basins in the Puget Sound DPS with the flow and watershed characteristics necessary to establish the summer-run life history (National Marine Fisheries Service, 2016d). All summer-run stocks are depressed and concentrated in northern and central Puget Sound and Hood Canal.

Threats and Trends

Threats to Puget Sound steelhead are mainly due to reduced life history, diversity of stocks, and the potential threats posed by artificial propagation and harvest in the Puget Sound. NMFS (2016d) indicated the principal factor for decline for Puget Sound steelhead is the present or threatened destruction, modification, or curtailment of its habitat or range. Within Puget Sound these threats may include barriers to fish passage, adverse effects on water quality, loss of wetland and riparian habitats, and other urban development activities contributing to the loss and degradation of steelhead habitats (National Marine Fisheries Service, 2016d).

The Puget Sound Technical Recovery Team identified three major population groups in the Puget Sound

steelhead DPS (Myers et al., 2015). These include (1) Northern Cascades, (2) Central and South Puget Sound, and (3) Hood Canal and Strait of Juan de Fuca. These major population groups are composed of 32 steelhead demographically independent populations in Puget Sound (Table 3-2).

Table 3-2: Demographically Independent Populations in Puget Sound Steelhead Distinct Population Segment

MPG	Number of Winter-Run DIPs	Number of Summer-/Winter-Run DIPs ¹	Number of Summer-Run DIPs
Northern Cascades	8	3	5
Central and South Puget Sound	8	0	0
Hood Canal and Strait of Juan de Fuca	7	1	0

Source: Myers et al., 2015

Notes: DIP = demographically independent population.

Overlap of summer-run and winter-run steelhead spawning. Considered one demographically independent population (DIP) where noted in Myers (2015) until further genetic analysis is conducted.

Occurrence in the Action Area

Regions 1 and 2. Steelhead are most commonly found in the Region 1 and 2 portions of the Action Area. The winter-run steelhead is the predominant run in Puget Sound, in part because there are relatively few basins in the Puget Sound DPS with the flow and watershed characteristics necessary to establish the summer-run life history (National Marine Fisheries Service, 2010a). All summer-run stocks are depressed and concentrated in northern and central Puget Sound and Hood Canal. Production of hatchery stocks that are either out-of-DPS-derived stocks (Skamania River summer-run) or within-DPS stocks that are substantially diverged from local populations (Chambers Creek winter-run) largely outnumber naturally-produced steelhead in many basins throughout Puget Sound (National Marine Fisheries Service, 2016d).

Region 3. Puget Sound steelhead are not anticipated to be present in the Region 3 portion of the Action Area.

3.11 Puget Sound/Georgia Basin Bocaccio Distinct Population Segment and Yelloweye Rockfish Distinct Population Segment

Status

Puget Sound/Georgia Basin DPSs of bocaccio (*Sebastes paucispinis*) was federally listed as endangered under the ESA in 2010 (75 FR 22276). The listing indicated that bocaccio occupy all waters of Puget Sound/Georgia basin to the northern boundary of the Northern Strait of Georgia along the southern contours of Quadra Island and the western boundary of the U.S. side of the Strait of Juan de Fuca in a straight line to the Canadian side (82 FR 7711).

Puget Sound/Georgia Basin DPSs of yelloweye rockfish (*Sebastes ruberrimus*) were federally listed as threatened under the ESA in 2010 (75 FR 22276). Yelloweye rockfish are found within Puget Sound/Georgia Basin, inclusive of the Queen Charlotte Channel to Malcom Island and the western boundary of the U.S. side of the Strait of Juan de Fuca in a straight line to the Canadian side (National Marine Fisheries Service, 2017).

Threats and Trends

Rockfish decline in Puget Sound is estimated at 70 percent in the last 40 years (National Marine Fisheries Service, 2017). A five-year review of bocaccio, yelloweye rockfish, and canary rockfish (now delisted [81 FR 7711]) was completed in 2016 that updated and summarized threats based on information compiled since 2010 (National Marine Fisheries Service, 2016e). Threats to bocaccio and yelloweye rockfish species in Puget Sound are from the present or threatened destruction, modification, or curtailment of habitat or range. An example of this includes continued accumulation of derelict crab and shrimp pots that alter deepwater habitat, nearshore development although more shoreline armoring has been legally removed than installed, and dissolved oxygen events in Hood Canal that may be a natural event but still remain a threat to rockfish and their prey.

The Washington Department of Fish and Wildlife developed a Fisheries Conservation Plan for two fisheries with NOAA that includes monitoring recreational bottom fish fishery and commercial shrimp trawl fishery to minimize interactions with listed rockfish. Reported bycatch rates from prawn traps in British Columbia determined that a majority of rockfish bycatch were juveniles. Washington Department of Fish and Wildlife spot prawn test fishery data recorded a catch rate of 0.023 rockfish per trap from 2004 to 2013. Most Puget Sound tribes in Puget Sound limit rockfish harvest to subsistence only with no targeted commercial fisheries for rockfish. Scientific research through authorized take of listed rockfish was determined to not be a contributing factor for decline of rockfish nor does it affect recovery of the species.

The final recovery plan (National Marine Fisheries Service, 2017) evaluated current and future threats updated in the five-year review to determine severity of the threat by management unit. In Hood Canal, derelict fishing gear, recreational and commercial catch/bycatch, and deepwater habitat disruption were determined to be very low to low risk. Nearshore habitat disruption, chemical contamination/bioaccumulation, and hypoxia/nutrient addition were determined to be moderate to high risk threats to listed rockfish occurring in Hood Canal.

The recovery strategy that pertains to Hood Canal is to protect and restore habitat from threats such as hypoxia and contaminants, focus on improvements to nearshore (< 30 meters) habitat, rehabilitation of altered shorelines to improve rearing habitats, and continued clean-up of contaminated sediments (National Marine Fisheries Service, 2017).

Occurrence in the Action Area

Regions 1 and 2. Bocaccio and yelloweye rockfish may be present in the Region 1 and 2 portions of the Action Area. Adult Bocaccio and adult and juvenile yelloweye rockfish are not expected to be present in Hood Canal or Liberty Bay due to a lack of habitat and depth (water < 30 meters). They may be present in the deeper waters of Puget Sound (Rich Passage) and Dabob Bay. Juvenile bocaccio may be present within the nearshore eelgrass habitat of Hood Canal, Liberty Bay, Clam Bay and Dabob Bay. They may also occur further offshore in the waters of Sinclair Inlet and Possession Sound.

Region 3. Bocaccio and yelloweye rockfish are not anticipated to be present in the Region 3 portion of the Action Area.

3.12 North American Green Sturgeon Southern Distinct Population Segment

Status

The North American green sturgeon Southern DPS was listed by as threatened under the ESA on April 7, 2006 (71 FR 17757). Green sturgeon are the most wide-ranging and most marine-oriented species of the

sturgeon family and are believed to spend a majority of their lives in nearshore oceanic waters, bays, and estuaries. They spawn and rear outside of the study area. (National Marine Fisheries Service, 2015b).

Threats and Trends

The main factor for decline of the green sturgeon southern DPS has been from the reduction of spawning grounds. The Sacramento River in California contains the only known green sturgeon spawning population in this DPS. Habitat blockages (via dams) have removed access to historical spawning grounds that occurred in the Feather River, California. Dredging is a potential threat that could entrain juvenile or adults as well as smothering of eggs. Incidental catch is also a threat. Due to the trophy status of large white sturgeon, green sturgeon have been caught incidentally in white sturgeon fisheries (National Marine Fisheries Service, 2015b). Protection has been established for this DPS in the form of ESA Section 4(d) Rule where regulating the incidental take of this species would be applied wherever the southern green sturgeon DPS occurs, unless otherwise specified. Areas include but are not limited to bays and estuaries along Washington coasts (including Puget Sound) and coastal waters within 360 foot depth (including Strait of Juan de Fuca) (National Marine Fisheries Service, 2015b).

Occurrence in the Action Area

Region 1. Green sturgeon are not anticipated to be present in the Region 1 portion of the Action Area.

Region 2. Occurrence of green sturgeon in the Region 2 portion of the Action Area is possible, but expected to be rare.

Region 3. Occurrence of green sturgeon in the Region 3 portion of the Action Area is possible, but expected to be rare.

3.13 Pacific Eulachon Southern DPS

Status

The Pacific eulachon southern DPS was listed as threatened under the ESA on March 18, 2010 (75 FR 13012). This listing encompassed all subpopulations of eulachon within the states of Washington, Oregon, and California and extended from the Skeena River in British Columbia south to the Mad River in Northern California.

Threats and Trends

Threats to the southern eulachon DPS include habitat loss, blocked access to historical spawning grounds from hydroelectric dams, and dredging that can cause either entrainment of adults or smothering of eggs. The Fraser and Columbia rivers experienced rapid declines in the mid-1990s, increases in 2001 and 2003, and more recently are declining again (Gustafson et al., 2010).

Occurrence in the Action Area

Region 1. Pacific eulachon do not occur in the Region 1 portion of the Action Area.

Region 2. Pacific eulachon do not occur in the Region 2 portion of the Action Area.

Region 3. Pacific eulachon is most commonly found in the Columbia River in the Region 3 portion of the Action Area.

3.14 Bull Trout

Status

On November 1, 1999, the Bull Trout was listed as threatened across five states in the coterminous United States (64 FR 58910). Bull trout are listed as a single DPS but are managed via six biologically based Recovery Units, of which only the Coastal Recovery Unit is adjacent to the Action Area (Lowery & Beauchamp, 2015; U.S. Fish and Wildlife Service, 2004). The Coastal Recovery Unit encompasses Washington and western Oregon. Within Washington, the major geographic regions containing this unit include the Olympic Peninsula, Puget Sound, and Lower Columbia River basins. The Olympic Peninsula and Puget Sound geographic regions also include their associated marine waters (Puget Sound, Hood Canal, Strait of Juan de Fuca, and Pacific Coast). The Puget Sound region contains eight core areas (Chilliwack River, Nooksack River, Upper Skagit River, Lower Skagit River, Stillaguamish River, Snohomish and Skykomish Rivers, Chester Morse Lake, and Puyallup River). The Olympic Peninsula Region contains six core areas (Dungeness River, Elwha River, Hoh River, Queets River, Quinault River, and Skokomish River). The only core areas currently supporting anadromous populations of bull trout are located within the Puget Sound and Olympic Peninsula regions.

Threats and Trends

Bull trout have declined in overall range and numbers of fish and are severely reduced throughout the Study Area. Though still widespread, there have been numerous local extirpations reported throughout the Columbia River basin. Bull trout generally occur as isolated sub-populations in headwater lakes or tributaries where migratory fish have been lost. Threats to bull trout include habitat loss and fragmentation due to historically human-caused land and water management activities; overutilization for commercial, scientific, or educational purposes; disease or predation by native or nonnative/invasive species; inadequacy of existing regulatory mechanisms; fish passage issues; competition and hybridization; and climate change impacts such as warming climates, changing precipitation, and hydrologic regimes (Lowery & Beauchamp, 2015).

Various conservation measures have been implemented within the Coastal Recovery Unit and are closely interrelated with conservation and restoration of salmon and steelhead populations that are also affected by many of the same threats. However, bull trout have the most specific habitat requirements which are cold clean water temperatures, complex habitats (deep pools, overhanging banks), and connectivity between spawning and rearing areas and downstream foraging, migration, and overwintering habitats (Rieman & McIntyre, 1993). These conditions are typically found at the furthest accessible upstream habitats and thus these headwater tributary habitats utilized by bull trout may require additional conservation and protection measures as compared to salmon and steelhead. Conservation and restoration efforts to date include upstream and downstream fish passage developed at major hydropower facilities, monitoring, habitat protection, and ongoing efforts to acquire land for conservation through the Service's non-traditional Section 6 Land Acquisition Grant Program (U.S. Fish and Wildlife Service, 2015).

Occurrence in the Action Area

Regions 1, 2, and 3. Bull trout may occur in all regions of the Action Area, but their overall range and numbers are severely reduced throughout the Action Area.

4 Environmental Baseline

The current condition of species considered in this BA is attributed to the adverse effects of climate change, mining and contamination by heavy metals, nonnative species, modified instream flows, migratory barriers (e.g., dams), habitat fragmentation, forest practices (e.g., logging, roads), agriculture practices (e.g., irrigation, livestock grazing), and residential development. Conservation measures or recovery actions implemented include habitat improvement and instream habitat restoration, installations of fish passages, and removal of nonnative species.

4.1 Environmental Setting

A suite of actions has impacted, and is continuing to impact, the environment within the action area, including: commercial and recreational fishing, maritime traffic, shoreline development, ocean noise, water quality degradation, and climate change.

4.1.1 Commercial and Recreational Fishing

Commercial and recreational fishing constitutes an important and widespread use of ocean resources in waters off the Pacific Coast and within Puget Sound. Fishing can adversely affect fish populations, other species, and habitats. Potential impacts of fishing include overfishing of targeted species, bycatch, entanglement, and habitat destruction, all of which negatively affect fish stocks and other marine resources. Bycatch is the capture of fish, marine mammals, sea turtles, seabirds, and other nontargeted species that occur incidentally to normal fishing operations. Use of mobile fishing gear such as bottom trawls disturbs the seafloor and reduces habitat structural complexity. Indirect impacts of trawls include increased turbidity, alteration of surface sediment, removal of prey (leading to declines in predator abundance), removal of predators, ghost fishing (i.e., lost fishing gear continuing to ensnare fish and other marine animals), habitat destruction, and the generation of marine debris. Lost gill nets, purse seines, and long-lines may foul and disrupt bottom habitats and have the potential to entangle or be ingested by marine animals.

Fisheries bycatch has been identified as a primary driver of population declines in several marine species, including sharks, mammals, seabirds, and sea turtles (Wallace et al., 2010; Wallace et al., 2016). For example, entanglement in nets from the Pacific Northwest coastal salmon fisheries has been shown to increase mortality in seabirds (Carretta et al., 2017a; Hamel et al., 2009). Habitat destruction caused by bottom trawling and other fishing methods also contributes to the negative effects of commercial and recreation fishing on multiple species, such as the North American groundfish (Melnichuk et al., 2013).

4.1.2 Maritime Traffic

Portions of the Action Area are heavily traveled by commercial, recreational, and government marine vessels, with several commercial ports occurring in or near the Action Area. Several harbor facilities of interest to the U.S. Navy are located in the Puget Sound: NAVSTA Everett; NAVBASE Kitsap Bremerton, NAVBASE Kitsap Bangor, Naval Undersea Warfare Center (NUWC) Keyport, Naval Magazine Indian Island, NASWI, the Port of Seattle, and the Port of Tacoma. Maritime traffic on the Puget Sound is heavy, many large commercial vessels use the Ports of Everett, Seattle, Tacoma, and others in the area, and they enter and depart Puget Sound each day. Additional traffic within Puget Sound is created by the frequent runs of large Washington State vehicle and passenger ferries as they cross the Sound on generally east-west traffic routes that are perpendicular to normal inbound and outbound maritime traffic channels (Puget Sound Regional Council, 2017). Additionally, many recreational and commercial small craft operate throughout the Puget Sound and adjacent waters.

4.1.3 Shoreline Development

Shoreline development within the Action Area is both intensive and extensive. Development has impacted and continues to impact coastal resources through point and nonpoint source pollution, concentrated recreational use, and intensive ship traffic using major port facilities. The Action Area also includes extensive coastal tourism development (hotels, resorts, restaurants, food industry, residential homes, etc.) and the infrastructure supporting coastal development (retail businesses, marinas, fishing tackle stores, dive shops, fishing piers, recreational boating harbors, beaches, recreational fishing facilities, etc.).

The construction and maintenance of structures in and along the waterways within the Action Area, including piers, wharfs, and fencing, have similar direct and indirect impacts to listed species and habitat. The construction of these types of structures and associated paved access roads increases the impervious footprint near open surface waters. Removal and installation of the pier piles would likely disturb the sea floor and cause elevated turbidity into the water column, but this effect would be temporary and minimal to existing background turbidity levels. Sound levels from vibratory hammers are low and emit different sound frequencies than impact hammers, which are more likely to cause barotrauma and other disruptions to fish. SPL levels from the use of vibratory hammers are non-lethal to fish in the area and short-lived in duration. Shading of the water surface from the pier structure overhead is likely to decrease algae and zooplankton that play an integral role in the food chain.

Watershed development and associated urbanization throughout the Puget Sound, Hood Canal, and Strait of Juan de Fuca regions have resulted in direct loss of riparian vegetation and soils, significantly altered hydrologic and erosion rates and processes by creating impervious surfaces (roads, buildings, parking lots, sidewalks, etc.), polluted waterways, increased water temperatures, decreased large woody debris recruitment, decreased gravel recruitment, reduced river pools and spawning areas, and dredged and filled estuarine rearing areas (Puget Sound Regional Council, 2017).

4.1.4 Ocean Noise

Noise, the unintentional byproduct of acoustic emissions (waste) such as vessel or aircraft engine noise, is generally described as unwanted sound (i.e., sound that clutters and masks other sounds of interest (Richardson et al. 1995). Anthropogenic sources of noise that are most likely to contribute to increases in ocean noise are vessel noise from commercial shipping and general vessel traffic, oceanographic research, oil and gas exploration, underwater construction, and naval and other use of sound navigation and ranging (sonar).

Any potential for cumulative impacts should be put into the context of recent changes to ambient sound levels in the world's oceans as a result of anthropogenic activities. However, there is a large and variable natural component to the ambient noise level as a result of events such as earthquakes, rainfall, waves breaking, and lightning hitting the ocean as well as biological noises such as those from snapping shrimp and the vocalizations of marine mammals.

4.1.5 Water Quality Degradation

Residency in Washington State has more than doubled since 1960 and with 67 percent of the population living in the 12 counties surrounding the Puget Sound. Encroachment of urban development and agriculture activities has resulted in artificial reinforcement to some 30 percent of the 2,500 miles of Puget Sound shoreline with bulkheads, seawalls, and other structures, consequently destroying shoreline vegetation and eliminating cover and food sources for young salmon (Partridge et al., 2014).

Toxic chemicals are delivered into the sound through surface runoff, groundwater discharge, and municipal and wastewater outfall pipes. Contaminants enter into the Puget Sound through direct drainage over impervious surfaces. These areas were once protective wetlands and riparian areas that functioned as traps, absorbing the contaminants and preventing them from entering surface waters. Some of the more troublesome contaminants entering the system include oil and grease; PCBs and phthalates; and toxic heavy metals like copper, lead, and zinc. Contaminants enter and alter the water quality and can stay in the water column and sediments for extended time depending on their environmental fates. Contaminants (like PCBs) can readily be taken up by fishes and marine birds.

4.1.6 Climate Change

The Intergovernmental Panel on Climate Change (Intergovernmental Panel on Climate Change, 2014) reports that physical and biological systems on all continents and in most oceans are already being affected by recent climate changes. Global-scale assessment of observed changes shows that it is likely that anthropogenic warming over the last three decades has had a discernible influence on many physical and biological systems. Some of the major potential concerns for the marine environment include (Doney et al. 2012):

- change in sea temperature
- melting of polar ice
- rising sea levels
- changes to major ocean current systems
- ocean acidification

In the eastern North Pacific, model simulations indicate a potential synergistic effect from climate change on the marine ecosystem, including fisheries, in the region. Multiple variables were incorporated into the simulation, including primary productivity, ocean acidification, and the size and structure of zooplankton communities. Di Lorenzo et al. (2010) examined large scale ocean-atmosphere fluctuations (e.g., El Niño) and their effects on climate and weather in the North Pacific and noted that increasing amounts of greenhouse gasses may result in an increase in the frequency of El Niño events. Changes in these variables as a result of climate change may affect fisheries and foodwebs differently, with some increasing in size and others decreasing depending on the magnitude of each variable and interactions between variables (Bignami et al., 2013; Leising, 2015). By way of example, Greene et al. (2015) found fluctuations of forage fish and jellyfish across a dataset that covered 40 years, and attributed changes to anthropogenic and climate-related factors.

4.2 Federal Actions

Federal actions that are relevant to the environmental baseline include Waterfront Restricted Area Land-Water Interface, NAVBASE Kitsap Bangor; Waterfront Restricted Area Service Pier Extension, NAVBASE Kitsap Bangor; USCG Training, Pile Repair and Replacement Program; coastal and marine spatial planning; coastal land development and tourism; commercial and recreational fishing; maritime traffic; ocean pollution; and those actions analyzed in the Northwest Training and Testing EIS/OEIS and Supplemental EIS/OEIS, Environmental Impact Statement for the EA-18G Growler Airfield Operations, Swimmer Interdiction Security System EIS, and the P-8A MMA Supplemental EIS.

On properties within the Action Area not under Navy administration, activities such as recreational use (e.g., hiking, fishing, camping), natural resources management (e.g., conservation programs, environmental restoration, species reintroductions and habitat enhancement projects), commercial use (e.g., commercial fishing), and light industrial use (e.g., commercial and private marina operations) will

continue at locations proposed for training activities, regardless if the Navy chooses to implement the Proposed Action.

Properties administered by the Navy within the Action Area have Section 7(a)(1) and Section 7(a)(2) responsibilities under the ESA. Training constraints that minimize or avoid potential impacts on ESA-listed species are specified in INRMP documents. INRMPs are authorized under the Conservation Programs on Military Installations (Sikes Act), which requires military installations to prepare and implement INRMPs to provide for:

- Fish and wildlife management, land management, forest management, and fish and wildlife-oriented recreation
- Fish and wildlife habitat enhancement or modifications;
- Wetlands protection, enhancement, and restoration, where necessary for support of fish, wildlife, or plants
- Integration of and consistency among the various activities conducted under the plan;
- Establishment of specific natural resources management goals and objectives and timeframes for proposed actions;
- Sustainable use by the public of natural resources to the extent that the use is consistent with the needs of the fish and wildlife resources;
- Public access to the military installation that is necessary and appropriate for natural resource uses, subject to requirements necessary to ensure safety and military security;
- Enforcement of applicable natural resources laws and regulations;
- No net loss in the capability of military installation lands to support the military mission of the installation; and
- Such other activities as the Secretary of the Navy determines appropriate.

4.3 State and Local Actions

Current projects in Washington State include the Baseline Characterization of Coastal and Ocean Recreational Use Patterns and Mapping Marine Mammals and Identifying Ecologically Important Areas. The Recreational Use Patterns project is being launched by the Surfrider Foundation and is an Internet survey for coastal and ocean recreational users to summarize the intensity with which certain coastal areas are used for recreational activities and the specific recreational activities occurring along the Washington coast. The Washington Department of Fish and Wildlife is continuing a forage fish survey along the Washington coast, creating a bird and mammal geodatabase while conducting marine mammal aerial surveys, and using existing data to identify Ecologically Important Areas off of the Washington Coast for the Mapping Project.

5 Effects of the Action

This section analyzes direct and indirect effects of the action on listed species and their habitats. The analysis includes activities that are interrelated or interdependent with the action and considers the environmental baseline (50 Code of Federal Regulations 402.2). As stated in Section 2.3 (Interrelated and Interdependent Activities), no other projects were identified that are dependent on actions undertaken as part of this Proposed Action for their implementation or justification. Any potential future actions identified that will be dependent on this Proposed Action for their implementation or justification will be analyzed to determine their potential effects to ESA-listed species and, if potential effects are identified, will be consulted on in future Section 7 consultations. Therefore, no effects from interrelated or interdependent actions are associated with the Proposed Action.

To conduct the analysis, the Navy first identified individual training activities that may result in environmental stressors that have the potential to directly or indirectly affect ESA-listed species and, their habitats. For listed species, the potential for an individual of a species to be exposed to a stressor was evaluated in conjunction with the frequency, duration, and intensity of the stressor and the status of existing baseline conditions.

The Navy has identified two primary potential stressors from the Proposed Action that may impact ESA-listed species and are described below.

- **Physical Stressors.** The physical presence of submersibles, swimmers, surface vessels, and trainees on land.
- **Acoustic Stressors.** Some training activities generate noise in the environment, such as vessel noise, vehicular noise, the use of simulated munitions, and noise generated from the use of UAS.

Since the types of wires and cables proposed for UUV training, which includes ROVs, would be monitored by the operator, are rigid, do not form loops, and would not be discarded, entanglement was eliminated as a potential stressor and not carried forward for analysis.

Under the NWTT BOs, “Personnel Insertion/Extraction-Submersible” addressed sediment and water quality as a stressor. Under the proposed action, the three actions that would potentially disturb the sediment and water quality are walking through the intertidal zone to go over the beach (throughout the study area), parking, and anchoring of the submersible (only occurring in Region 3). Walking, parking, and anchoring would present less of a disturbance to the sandy bottom than that caused by natural waves, tides, currents, storm energy, and cycles of erosion and deposition. Therefore, this potential stressor was eliminated and not carried forward for further analysis.

Under the NWTRC BOs, “NSW Training” addressed contaminants as a stressor. The submersible is battery operated and would not be expended. Since there are no contaminants associated with the submersible, this potential stressor was eliminated and not carried forward for further analysis.

The audible recall device is an MK-137 that is intended for underwater use only. It contains a small pyrotechnic of 1.75 grams of double-based propellant composition, an ignition charge of black powder, a primer, and a blasting fuse to produce a 6.6-second delay. The total net explosive weight of the audible recall device is 0.007490 pound. The device is used to communicate potential danger with divers and submersible drivers, in accordance with established procedures and prearranged instructions, during an in-water training event that has already commenced. It is dropped into the water, adjacent to the personnel to alert them that a potential situation is occurring. Due to specific protection measures described further in the document, it is not anticipated that any species would congregate near the

personnel nor the submersible during a training event. Therefore, the audible recall device was eliminated as a potential stressor and not carried forward for further analysis.

5.1 Marbled Murrelet

The Navy has identified physical and acoustic stressors as potentially impacting the marbled murrelet. Physical presence could induce behavioral responses during land-based training activities and in-water training activities in land training areas and foraging areas of Regions 1, 2, and 3 of the Action Area. Because logistical support vehicles use established roads, the potential to affect marbled murrelets can be discounted and is not analyzed further.

Physical Stressors. Although no nesting is known to occur within public or private lands proposed for training activities, Over-the-Beach and Special Reconnaissance training activities may require trainees to traverse areas where unknown marbled murrelet nesting may occur. These areas would be areas proposed for training that contain old growth forests and secondary forests that may be considered marginal habitats for nesting activities. Dosewalips State Park and Triton Cove State Park meet these criteria, along with Naval Base Kitsap properties. These locations are analyzed for potential effects because of their close proximity to suitable nesting habitat, as well as important foraging areas in Dabob Bay and Hood Canal.

In forested areas of these training locations, Over-the-Beach and Special Reconnaissance training activities may be scheduled. In recreational areas that support marbled murrelet nesting, noise from hikers and camping activities may disturb murrelets, and trash left behind by recreational use may attract known nest predators, such as ravens, crows, and jays (Simonis et al., 2017). Because of the non-intrusiveness of the training activities, and the nature of the training activity to avoid detection, it is highly unlikely that trainees would make noise that would disturb nesting murrelets and, because of SOPs, they will not leave behind any food or attractants for nest predators.

In-water training may occur in foraging areas used by marbled murrelets in Regions 1, 2, and 3 of the Action Area). Important foraging areas in Region 1 include Dabob Bay and Hood Canal. Important foraging areas in Region 2 include the Strait of Juan de Fuca and in coastal Pacific waters in Region 3. The small vessels used to transport trainees, support vessel to observe trainees in water, submersible use, and swimmers in the water may elicit behavioral responses from noise or visual detection by murrelets. Camp et al. (2016) observed responses of hundreds of murrelets presumably from motor and sailing vessels and large ferries. Camp et al. (2016) made these observations from a skiff, and also noted reactions of murrelets from their boat. Most observations showed that murrelets paddled for a few meters away from the vessels and resumed normal activities (e.g., foraging) after the vessel passed through the area. Other observations included flying away and diving to avoid vessels. On a few occasions, murrelets were observed to swallow prey items that were likely intended for chicks at nest sites. Adult marbled murrelets usually deliver prey to chicks before sunrise or at dusk, and adults sitting on the water with unconsumed prey items are typically waiting for dawn to deliver prey items to chicks. The loss of prey items (through premature swallowing in response to vessels) can be considered a significant energetic cost to adults if they have to repeat foraging trips to feed chicks. If it is too late in the evening, murrelets may not feed chicks because of the lack of light (Camp et al., 2016). It is important to note that the eight instances where adult murrelets were observed consuming prey items likely intended for chicks were in response to the observation skiff directly approaching the murrelet to identify the fish species, with the response observed when the skiff was within 10 meters of the murrelet. Therefore, unless a small boat used in training activities directly approaches a foraging murrelet, which would be unlikely, responses would be minor and temporary, and would not induce premature consumption of prey items.

Training activities are not expected to reduce the availability of marbled murrelet prey species primarily because activities occur at infrequent intervals and for a brief duration of time. Forage fish in the vicinity of training activities would be expected to respond by leaving the area and would return to normal activities within the area after the activity ends (e.g., foraging, resting). These impacts would be short term and minor, with no long-term impacts to individual fish or the marbled murrelet forage base. Therefore, reductions to prey availability are expected to be insignificant.

Under the Proposed Action, impacts to ESA-listed marbled murrelets foraging in nearshore areas where this species can occur are expected to be limited to short-term, insignificant behavioral reactions. This is mainly due to the training activities occurring at infrequent intervals and for only a brief duration of time.

Marbled murrelet nesting is not known to occur in the forested portions of the Action Area; however, suitable nesting habitat may be present in some areas of the study area. Potential impacts, such as temporary behavioral responses, could occur on nesting marbled murrelet from the physical presence of trainees. This would likely occur in response to visual or audible cues (seeing or hearing movement of trainees during over-the-beach and special reconnaissance training), with a return to normal activities after the trainees leave the area. Although marbled murrelets may detect the presence of trainees in these areas, the goal of training is for trainees to be in the field undetected, and activities are not expected to result in adverse impacts to nesting activities.

Acoustic Stressors. Marbled murrelets have the potential to be disturbed by acoustic sources from sonars, vessels, and UASs.

When underwater, diving birds, such as murrelets, could be exposed to the sound emitted by the navigational devices. Submersibles and UUV's use a sonar device similar to commercially available "fish finders" for navigation. While there are no published studies specific to sonar and its effects on any seabirds, the frequency used does not rise to the level of causing injury to the seabirds (U.S. Fish and Wildlife Service, 2016). Devices with these specifications are considered "*de minimis*" sources of sound in the water.

Vessel noise has the potential to expose marbled murrelets to sound and general disturbance, which could result in short-term behavioral or physiological responses (e.g., avoidance, stress, increased heart rate). Moderate- to low-level passive sound sources, including vessel noise, would not likely cause any direct injury or trauma due to characteristics of the sounds and the moderate source levels. Navy vessels make up a very small percentage of the overall traffic (Mintz, 2012). Under the Proposed Action, the use of small vessels during training activities would not substantially increase ambient noise levels in the Action Area.

UASs could be used over the water as well as over the land at Naval Magazine Indian Island, Naval Base Kitsap Keyport, and the Toandos Buffer Zone in Region 1. Marbled murrelets may respond to audible cues of a UAS in the same manner as they respond to vessel noise, with a return to normal activities after the UAS flies over the area.

The Proposed Action may affect the marbled murrelet because training activities may overlap with nearshore areas used for foraging and forested areas used for nesting. However, as described above, effects resulting from the training activities are expected to be insignificant. In addition, training activities would not affect the abundance or distribution of the prey base (i.e., forage fishes) for this species. Therefore, under the Proposed Action, Navy activities may affect, but are not likely to adversely affect, marbled murrelets.

5.2 Western Snowy Plover

The Navy has identified physical stressors as the only stressors potentially impacting the western snowy plover. Physical presence could induce behavioral responses during land-based training activities, and physical disturbance is analyzed for potential direct impacts on nests and chicks. Because of the current distribution of the western snowy plover, the analysis for potential effects of the Proposed Action on the western snowy plover is limited to Region 3 of the Action Area. Acoustic stressors are not analyzed for this species because they are shorebirds and would not be affected by underwater noise. In addition, UAS use would not overlap with areas where western snowy plovers would be present.

Physical Stressors. The Action Area includes Grayland Beach and Leadbetter Point State Parks along the coast that may contain occupied western snowy plover nesting habitat (during the nesting season only, from early April through late August). Typical plover responses to perceived threats in nesting is to exhibit a “broken wing” display, where adult plovers extend a wing to signal a potential predator that the plover is injured, leading the predator away from the nest, then flying away once the predator is away from the nest. Western snowy plovers would likely respond in this way if trainees were to approach an area with western snowy plover nests. Training activities, however, do not occur in delineated conservation areas, which are sometimes integrated into the training activity by simulating a minefield (and therefore avoided).

Plover nests are difficult to detect on the ground, more so during nighttime training activities. Crushing of eggs by pedestrian traffic in recreational beach locations that also support plover nesting sites is a primary reason why nesting locations are fenced with stakes and string symbolic barriers. For the reasons stated above, it is highly unlikely that trainees would enter a nesting area, and therefore, highly unlikely that nests or chicks would be crushed by trainees during Over-the-Beach or Special Reconnaissance training activities.

Under the Proposed Action, potential impacts on the western snowy plover from the physical presence of trainees would likely be limited to temporary behavioral responses, such as moving away from human presence. This would likely occur in response to visual or audible cues (seeing or hearing movement of trainees during over-the-beach and special reconnaissance training), with a return to normal activities after the trainees leave the area or if the plover moves to another location away from the training activity. This impact is assumed to be temporary and minor, with no adverse impacts resulting from training activities. This is mainly due to the training activities occurring at infrequent intervals and for only a brief duration of time. Naval special operations support staff would work with state park managers to identify and avoid sensitive areas.

Therefore, the Navy has determined that land-based training activities under the Proposed Action may affect, but are not likely to adversely affect, the western snowy plover.

5.3 Streaked Horned Lark

The Navy has identified physical stressors as the only stressors to potentially affect the streaked horned lark. Physical presence could induce behavioral responses during land-based training activities, and physical disturbance is analyzed for potential direct impacts on nests and chicks. Because of the current distribution of the streaked horned lark, the analysis for potential effects of the Proposed Action on the streaked horned lark is limited to Region 3 of the Action Area. Acoustic stressors are not analyzed for this species because they are not diving birds and would not be affected by underwater noise. In addition, UAS use would not overlap with areas where streaked horn larks would be present.

Physical Stressors. The Action Area includes Grayland Beach and Leadbetter Point State Parks along the coast that may contain occupied streaked horned lark nesting habitat. Unlike the snowy plover, the

streaked horned lark is a year-round resident. Likely responses to pedestrian traffic near nesting locations include loud vocalizations, as well as distraction displays (similar to the broken wing display). Training activities, however, do not occur in delineated conservation areas, which are sometimes integrated into the training activity by simulating a minefield (and therefore avoided). It is highly unlikely that trainees would enter into nesting habitat; therefore, it is highly unlikely that streaked horned larks would be disturbed by the physical presence of trainees.

As with plovers, streaked horned larks are ground nesters, and the nests are difficult to detect on the ground, more so during nighttime training activities. Crushing of eggs by pedestrian traffic in recreational beach locations that also support plover nesting sites is a primary reason why nesting locations are fenced with stakes and string symbolic barriers. For the reasons stated above, it is highly unlikely that trainees would enter a nesting area, and therefore, highly unlikely that nests or chicks would be crushed by trainees during Over-the-Beach or Special Reconnaissance training activities.

Under the Proposed Action, potential impacts on streaked horned larks from the physical presence of trainees would likely be limited to temporary behavioral responses, such as moving away from human presence. This would likely occur in response to visual or audible cues (seeing or hearing movement of trainees during over-the-beach and special reconnaissance training), with a return to normal activities after the trainees leave the area or if the streaked horned lark moves to another location away from the training activity. This impact is assumed to be temporary and minor, with no adverse impacts. This is mainly due to the training activities occurring at infrequent intervals and for only a brief duration of time. Naval special operations support staff would work with state park managers to identify and avoid sensitive areas.

Therefore, the Navy has determined that land-based training activities under the Proposed Action may affect, but are not likely to adversely affect, the streaked horned lark.

5.4 Leatherback Sea Turtle

Navy has identified physical and acoustic stressors could potentially impact leatherback sea turtles. This species would not be exposed to changes in water quality from the proposed training activities.

Physical Presence. In-water training activities that involve vessels, UASs, personnel, and submersible operations in the water could impact sea turtles present in Region 3 of the Action Area. Such activities would include small vessel movements, submersible movements under the water, and in-water presence of trainees swimming from boats to shore and walking in the intertidal and nearshore zones. Although sea turtle presence in the Action Area would be rare, training activities do have the potential to disturb turtles and elicit an alerting, avoidance, or other behavioral reaction. Sea turtles can detect approaching vessels, likely by sight rather than by sound (Bartol & Ketten, 2006). Vessel-related injuries to sea turtles in Region 3 of the Action Area is unlikely since their presence in the region would be rare and activities occur at infrequent intervals and for a brief duration of time. During proposed training activities, a crewman would act as a lookout during training evolutions on boats and support vessels to avoid sea turtles that may enter the area during training activities. During nighttime training, the lookout would likely be equipped with night vision goggles. If a sea turtle is in the immediate area of a training activity, the activity would cease until the sea turtle leaves the area.

Acoustic Stressors. Submersibles use a sonar device to report depths to aid in navigation during a training activity. These devices have similar specifications to commercially available “fish finders” and other hand-held sonar devices, which typically generate frequencies over 200 kilohertz (kHz) and source levels less than 160 decibels referenced to 1 micropascal (dB re 1 μ Pa). In the NMFS’ 2015 *Biological Opinion on Navy Activities on the Northwest Training Range Complex and NMFS’s Issuance of an MMPA*

Letter of Authorization (National Marine Fisheries Service, 2015c), devices with these specifications are considered “*de minimis*” sources of sound in the water. For sea turtles, the behavioral effects threshold used by the NMFS is 175 decibels or greater; therefore, no behavioral effects would be expected because the sonar devices would not exceed the source level threshold for behavioral effects. Similarly, sound generated from UUV operation may introduce a relatively small amount of additional noise into the marine environment. UUVs are designed to be as quiet as possible to avoid detection, it is highly unlikely that sound generated from UUVs would disturb sea turtles in any measureable or meaningful way.

Under the Proposed Action, activities that involve vessels and personnel in the water may affect ESA-listed leatherback sea turtles in Region 3. As described above, impacts to leatherback sea turtle are avoided through standard operating procedures, and effects to the leatherback sea turtle population would not occur. Noise associated with these activities is expected to be *de minimis*. Based on the above analysis, effects to leatherback sea turtles are expected to be insignificant and discountable. Therefore, the Navy has determined that in-water training activities under the Proposed Action may affect, but are not likely to adversely affect, leatherback sea turtles.

5.5 Humpback Whale Mexico Distinct Population Segment and Central America Distinct Population Segment

The Navy has identified physical and acoustic stressors as potentially impacting humpback whales (Mexico DPS and Central America DPS) in the Action Area. As stated in Section 3.5 (Humpback Whale Mexico Distinct Population Segment and Central America Distinct Population Segment), humpback whales may occur in the Action Area in any season in low densities.

Physical Stressors. In-water training activities that involve vessels, UASs, personnel, and submersible operations are not expected to impact ESA-listed humpback whales. Such activities would include small vessel movements, submersible movements through the water, UASs flying over the water, and in-water presence of trainees swimming to beaches. These activities are proposed to occur in a variety of nearshore areas of the Action Area. Boats carrying trainees for specific qualification training activities comply with established boating laws and reduce speed in accordance with established safety procedures, avoiding contact and proximity to marine mammals such as humpback whales.

Marine mammals engage in avoidance behavior when surface vessels move toward them (Magalhães et al., 2002; Senigaglia et al., 2016). It is not clear whether these responses are caused by the physical presence of a surface vessel, the underwater noise generated by the vessel, or an interaction between the two. However, the noise generated by the vessels is probably an important contributing factor to the responses of cetaceans to the vessels. In one study, North Atlantic right whales were documented to show little overall reaction to the playback of sounds of approaching vessels, but they did respond to an alert signal by swimming strongly to the surface (Nowacek et al., 2016). Aside from the potential for a risk of collision, physical disturbance from vessel use is not expected to result in more than a short-term behavioral response because marine mammals engage in these avoidance behaviors. Furthermore, most vessel use would be nearshore and by small craft within the Action Area, and the potential for contact with marine mammals, which generally occur off the Pacific coast (Region 3) and Juan de Fuca Strait (Region 2), would be extremely low.

It is most likely that any humpback whale in the Action Area would have an initial reaction to the boat’s presence, such as leaving the area or tolerating the activity e.g., continuing feeding, socializing, migrating, sleeping); a secondary reaction to the multiple students’ presence in the water would not be likely to occur. Due to the passage of time (less than an hour) between the boat presence and students

entering the water, humpback whales are likely to continue with their initial reaction of either retreating from the area or tolerating the activity at the site.

All Navy vessels would comply with established boating laws and reduce speed in accordance with established safety procedures, avoiding contact and proximity to marine mammals. A crewman on the vessels would act as a lookout during training evolutions to avoid marine mammals that may enter the area during training activities. If a marine mammal is observed in the vicinity of the training area when submersibles are used, the support vessel would signal the submersible for recall. If a marine mammal is in the immediate area of a training activity, the activity would cease until the marine mammal leaves the area. In some instances, canceling the training for the night may be necessary. All vessels, including UASs, would avoid direct “head-on” approaches to marine mammals and would maneuver to maintain a mitigation zone of 1,500 feet around observed whales and 600 feet around all other marine mammals (with the exception of bow wave-riding dolphins). It should be noted that these requirements do not apply when a vessel’s safety is at risk (e.g., a course correction would cause an imminent and serious threat to personnel and equipment). Due to these standard operating procedures, it is highly unlikely that collisions between a humpback whale and a vessel would occur during training.

Acoustic Stressors. The three sources of noise analyzed for potential impacts on marine mammals such as humpback whales are vessel noise, sonar navigation device, and the use of UAS.

Noise generated by the vessels is probably an important contributing factor to the responses to vessels. In one study, North Atlantic right whales were documented to show little overall reaction to the playback of sounds of approaching vessels, but they did respond to an alert signal by swimming strongly to the surface (Nowacek et al., 2016). Moderate- to low-level passive sound sources, including vessel noise, would not likely cause any direct injury or trauma due to characteristics of the sounds and the moderate source levels. Navy vessels make up a very small percentage of the overall traffic (Mintz, 2012). Under the Proposed Action, the use of small vessels during training activities would not substantially increase ambient noise levels in the Action Area.

Submersibles use a sonar device to report depths to aid in navigation during a training activity. These devices have similar specifications to commercially available “fish finders” and other hand-held sonar devices, which typically generate frequencies over 200 kHz and source levels less than 160 dB re 1 μ Pa. In the NMFS’ 2015 *Biological Opinion on Navy Activities on the Northwest Training Range Complex and NMFS’s Issuance of an MMPA Letter of Authorization* (National Marine Fisheries Service, 2015c), devices with these specifications are considered “*de minimis*” sources of sound in the water and are not considered in models that estimate potential behavioral or injurious effects on marine mammals. This is because these types of devices do not produce pressure waves that are considered dangerous or that would cause temporary changes in behavior when exposed to the sound source. In addition, because the frequency bands used in these types of devices are very narrow, masking of underwater sounds that marine mammals use for orientation or underwater vocalizations would not occur, as would be expected for broader frequency bandwidths of other sonar systems (Au et al., 2000; Popper & Hawkins, 2016).

UASs would be categorized as FAA Group 1 or Group 2 systems and are small hand-launched, battery-operated models or small gasoline-powered models. UAS would be used in training activities during approximately 10 percent of the land-based training activities, and only on federal property in Region 1. These locations include Naval Magazine Indian Island, Naval Base Kitsap Keyport, and the Toandos Buffer Zone. The UASs would fly over the land at these locations as well as the adjacent waterways. Marine mammals on the surface of the water such as humpback whales may hear the noise from the UAS engine. It is expected that an individual would react to the UAS similar to marine vessels described above under Physical Stressors. The same standard operating procedures and avoidance

measures would occur and are designed to not disturb these animals. In addition, sound generated from UUV operation may introduce a relatively small amount of additional noise into the marine environment. UUVs are designed to be as quiet as possible to avoid detection, it is highly unlikely that sound generated from UUVs would disturb humpback whales in any measureable or meaningful way.

As described above, impacts to ESA-listed humpback whales are avoided through standard operating procedures. Noise associated with these activities is expected to be *de minimis*. Based on the above analysis, effects to humpback whale whales are expected to be insignificant and discountable. Therefore, the Navy has determined that in-water training activities under the Proposed Action may affect, but are not likely to adversely affect, the Mexico Distinct Population Segment and Central America Distinct Population Segment of humpback whale.

5.6 Southern Resident Killer Whale

The Navy has identified physical and acoustic stressors as potentially impacting southern resident killer whales. The potential effects of the proposed training activities under the Proposed Action are the same as described above for the humpback whale.

As described above for humpback whales, impacts to ESA-listed southern resident killer whales are avoided through standard operating procedures. Noise associated with these activities is expected to be *de minimis*. In addition, training activities would not affect the abundance or distribution of the prey base (i.e., salmon) for this species. Based on the above analysis, effects to southern resident killer whales are expected to be insignificant and discountable. Therefore, the Navy has determined that in-water training activities under the Proposed Action may affect, but are not likely to adversely affect, southern resident killer whales.

5.7 Puget Sound Chinook Salmon Evolutionary Significant Unit

The Navy has identified physical and acoustic stressors as potentially impacting fishes in the Action Area, including ESA-listed Puget Sound Chinook salmon.

Physical Stressors. Activities proposed under the Proposed Action that involve vessels, personnel, and submersible operations in the water could impact Puget Sound Chinook salmon. The Proposed Action includes small inflatable boat landings, moving through water in a submersible vehicle, and foot traffic from students swimming from boats to shore and walking in the intertidal and nearshore zones. Puget sound Chinook salmon that may be present in areas where activities are occurring would likely respond to trainees in the water by fleeing the area and would return to normal activities after the activity (e.g., foraging, resting). Primarily because activities occur at infrequent intervals and for a brief duration of time, impacts would be short term and minor, with no long-term impacts on individual salmon or Puget Sound Chinook populations in the areas where training activities would occur.

Vessels do not normally collide with fish since it is expected that fish are capable of detection and avoidance. One study on fishes' behavioral responses to vessels showed that most adults exhibit avoidance responses to engine noise (Jørgensen et al., 2004), reducing the potential for vessel strikes.

Activities involving vessel movements occur intermittently and range in duration from a few minutes to a few hours. While vessel movements have the potential to expose fish occupying the water column to sound and general disturbance, potentially resulting in short-term behavioral or physiological responses, such responses would not be expected to compromise the general health or condition of individual fish. Both submersibles and support vessels would operate with lights. Lighting would likely attract fish, including Puget Sound Chinook salmon, but the lighting sources are minimal under the surface (e.g., chemical lights or "light sticks" so that the support vessel can track the trainees' use of the submersible).

Because of the minimal lighting used under the surface, any behavioral change by a fish would be minimal and temporary.

The risk of physical disturbance or strike from vessels and people in the water during training activities under the Proposed Action would be extremely low because (1) most fishes, including Puget Sound Chinook salmon, can detect and avoid vessel (surface and submersible) and human movements, and (2) activities occur at infrequent intervals and for a brief duration of time. Potential impacts of exposure to vessels are not expected to result in substantial changes to an individual's behavior, fitness, or species recruitment.

Acoustic Stressors. The two sources of noise analyzed for potential impacts on fishes under the Proposed Action are vessel noise and sonar navigation device.

Vessel noise has the potential to expose fish to sound and general disturbance, which could result in short-term behavioral or physiological responses (e.g., avoidance, stress, increased heart rate). Moderate- to low-level passive sound sources, including vessel noise, would not likely cause any direct injury or trauma due to characteristics of the sounds and the moderate source levels. Navy vessels make up a very small percentage of the overall traffic (Mintz, 2012). Under the Proposed Action, the use of small vessels during training activities would not substantially increase ambient noise levels in the Action Area.

Submersibles use a sonar device to report depths to aid in navigation during a training activity. These devices have similar specifications to commercially available "fish finders" and other hand-held sonar devices, which typically generate frequencies over 200 kHz and source levels less than dB re 1 μ Pa. In the NMFS' 2014 *Biological Opinion of U.S. Navy's Training Exercises and Testing Activities in the Northwest Training and Testing Area* (National Marine Fisheries Service, 2014, 2015c), devices with these specifications are considered "*de minimis*" sources of sound in the water. For fishes, the frequencies over 200 kHz overlaps with the hearing sensitivities of some fish species (e.g., a few species of shad within the Clupeidae family), but the low-intensity sound levels generated by these devices, the rapid dissipation of high frequency sonar in water, and the localized area of impacts are unlikely to impact fishes (Popper & Hawkins, 2016). Similarly, sound generated from UUV operation may introduce a relatively small amount of additional noise into the marine environment. UUVs are designed to be as quiet as possible to avoid detection, it is highly unlikely that sound generated from UUVs would disturb fish in any measureable or meaningful way.

Under the Proposed Action, training activities that involve vessels and personnel in the water may affect ESA-listed Puget Sound chinook salmon. However, impacts to this species would be limited to short-term, insignificant behavioral reactions. In addition, training activities would not affect the abundance or distribution of the prey base (i.e., forage fishes) for this species. Therefore, based on the above analysis, the Navy has determined that in-water training activities under the Proposed Action may affect, but are not likely to adversely affect, Puget Sound Chinook salmon.

5.8 Columbia River Chum Salmon Evolutionary Significant Unit

The Navy has identified physical and acoustic stressors as potentially impacting fishes in the Action Area, including ESA-listed Columbia River chum salmon.

Physical Stressors. Columbia River chum salmon would react to the physical presence of trainees and equipment in the same way as described above for Puget Sound Chinook salmon. Columbia River chum salmon would have the same potential of physical disturbance and strike from in-water activities under the Proposed Action as described above for Puget Sound Chinook salmon.

Acoustic Stressors. Columbia River chum salmon would have the same potential to be affected by acoustic stressors from activities during the Proposed Action as described for Puget Sound Chinook salmon.

Under the Proposed Action, training activities that involve vessels and personnel in the water may affect ESA-listed Columbia River chum salmon. However, impacts to this species would be limited to short-term, insignificant behavioral reactions, and population-level effects would not occur. In addition, training activities would not affect the abundance or distribution of the prey base (i.e., forage fishes) for this species primarily because activities occur at infrequent intervals and for a brief duration of time. Therefore, based on the above analysis, the Navy has determined that in-water training activities under the Proposed Action may affect, but are not likely to adversely affect, Columbia River chum salmon.

5.9 Hood Canal Summer-Run Chum Salmon Evolutionary Significant Unit

The Navy has identified physical and acoustic stressors as potentially impacting fishes in the Action Area, including ESA-listed Hood Canal summer-run chum salmon.

Physical Stressors. Hood Canal summer-run chum salmon would react to the physical presence of trainees and equipment in the same way as described above for Puget Sound Chinook salmon. Hood Canal summer-run chum salmon would have the same potential of physical disturbance and strike from activities during the Proposed Action as described above for Puget Sound Chinook salmon.

Acoustic Stressors. Hood Canal summer-run chum salmon would have the same potential to be affected by acoustic stressors from activities during the Proposed Action as described above for Puget Sound Chinook salmon.

Under the Proposed Action, training activities that involve vessels and personnel in the water may affect ESA-listed Hood Canal summer-run chum salmon. However, impacts to this species would be limited to short-term, insignificant behavioral reactions, and population-level effects would not occur. In addition, training activities would not affect the abundance or distribution of the prey base (i.e., forage fishes) for this species primarily because activities occur at infrequent intervals and for a brief duration of time. Therefore, based on the above analysis, the Navy has determined that in-water training activities under the Proposed Action may affect, but are not likely to adversely affect, Hood Canal summer-run chum salmon.

5.10 Puget Sound Steelhead Distinct Population Segment

The Navy has identified physical and acoustic stressors as potentially impacting fishes in the Action Area, including ESA-listed Puget Sound steelhead.

Physical Stressors. Puget Sound steelhead would react to the physical presence of trainees and equipment in the same way as described above for Puget Sound Chinook salmon. Puget Sound steelhead would have the same potential of physical disturbance and strike from activities during the Proposed Action as described above for Puget Sound Chinook salmon.

Acoustic Stressors. Puget Sound steelhead would have the same potential to be affected by acoustic stressors from activities during the Proposed Action as described above for Puget Sound Chinook salmon.

Under the Proposed Action, training activities that involve vessels and personnel in the water may affect ESA-listed Puget Sound steelhead. However, impacts to this species would be limited to short-term, insignificant behavioral reactions, and population-level effects would not occur. In addition, training activities would not affect the abundance or distribution of the prey base (i.e., forage fishes) for this

species primarily because activities occur at infrequent intervals and for a brief duration of time. Therefore, based on the above analysis, the Navy has determined that in-water training activities under the Proposed Action may affect, but are not likely to adversely affect, Puget Sound steelhead.

5.11 Puget Sound/Georgia Basin Bocaccio Distinct Population Segment and Yelloweye Rockfish Distinct Population Segment

The Navy has identified physical and acoustic stressors as potentially impacting fishes in the Action Area, including ESA-listed the Puget Sound/Georgia Basin bocaccio and yelloweye rockfishes.

Physical Stressors. Puget Sound/Georgia Basin bocaccio and yelloweye rockfishes would react to the physical presence of trainees and equipment in the same way as described above for Puget Sound Chinook salmon. Puget Sound/Georgia Basin bocaccio and yelloweye rockfishes would have the same potential of physical disturbance and strike from activities under the Proposed Action as described above for Puget Sound Chinook salmon.

Acoustic Stressors. Puget Sound/Georgia Basin bocaccio and yelloweye rockfishes would have the same potential to be affected by acoustic stressors from training activities under the Proposed Action as described above for Puget Sound Chinook salmon.

Under the Proposed Action, training activities that involve vessels and personnel in the water may affect ESA-listed Puget Sound/Georgia Basin bocaccio and yelloweye rockfishes. However, impacts to this species would be limited to short-term, insignificant behavioral reactions, and population-level effects would not occur. In addition, training activities would not affect the abundance or distribution of the prey base for this species primarily because activities occur at infrequent intervals and for a brief duration of time. Therefore, based on the above analysis, the Navy has determined that in-water training activities under the Proposed Action may affect, but are not likely to adversely affect, Puget Sound/Georgia Basin bocaccio and yelloweye rockfishes.

5.12 North American Green Sturgeon Southern Distinct Population Segment

The Navy has identified physical and acoustic stressors as potentially impacting fishes in the Action Area, including ESA-listed North American green sturgeon.

Physical Stressors. North American green sturgeon would react to the physical presence of trainees and equipment in the same way as described above for Puget Sound Chinook salmon. This species would have the same potential of physical disturbance and strike from activities under the Proposed Action as described above for Puget Sound Chinook salmon.

Acoustic Stressors. North American green sturgeon would have the same potential to be affected by acoustic stressors from training activities under the Proposed Action as described above for Puget Sound Chinook salmon.

Under the Proposed Action, training activities that involve vessels and personnel in the water may affect ESA-listed North American green sturgeon. However, impacts to this species would be limited to short-term, insignificant behavioral reactions, and population-level effects would not occur. In addition, training activities would not affect the abundance or distribution of the prey base for this species primarily because activities occur at infrequent intervals and for a brief duration of time. Therefore, based on the above analysis, the Navy has determined that in-water training activities under the Proposed Action may affect, but are not likely to adversely affect, North American green sturgeon.

5.13 Pacific Eulachon Southern Distinct Population Segment

The Navy has identified physical and acoustic stressors as potentially impacting fishes in the Action Area, including ESA-listed Pacific eulachon.

Physical Stressors. Pacific eulachon would react to the physical presence of trainees and equipment in the same way as described above for Puget Sound Chinook salmon. Pacific eulachon would have the same potential of physical disturbance and strike from activities under the Proposed Action as described above for Puget Sound Chinook salmon.

Acoustic Stressors. Pacific eulachon would have the same potential to be affected by acoustic stressors from activities under the Proposed Action as described above for Puget Sound Chinook salmon.

Under the Proposed Action, training activities that involve vessels and personnel in the water may affect ESA-listed Pacific eulachon. However, impacts to this species would be limited to short-term, insignificant behavioral reactions, and population-level effects would not occur. In addition, training activities would not affect the abundance or distribution of the prey base for this species primarily because activities occur at infrequent intervals and for a brief duration of time. Therefore, based on the above analysis, the Navy has determined that in-water training activities under the Proposed Action may affect, but are not likely to adversely affect, Pacific eulachon.

5.14 Bull Trout

The Navy has identified physical and acoustic stressors as potentially impacting fishes in the Action Area, including ESA-listed Bull trout.

Physical Stressors. Bull trout would react to the physical presence of trainees and equipment in the same way as described above for Puget Sound Chinook salmon. Bull trout would have the same potential of physical disturbance and strike from activities under the Proposed Action as described for Puget Sound Chinook salmon.

Acoustic Stressors. Bull trout would have the same potential to be affected by acoustic stressors from activities under the Proposed Action as described above for Puget Sound Chinook salmon.

Under the Proposed Action, training activities that involve vessels and personnel in the water may affect ESA-listed bull trout. However, impacts to this species would be limited to short-term, insignificant behavioral reactions, and population-level effects would not occur. In addition, training activities would not affect the abundance or distribution of the prey base (i.e., forage fishes) for this species primarily because activities occur at infrequent intervals and for a brief duration of time. Therefore, based on the above analysis, the Navy has determined that in-water training activities under the Proposed Action may affect, but are not likely to adversely affect, bull trout.

6 Conclusions and Effect Determinations

6.1 Marbled Murrelet

As stated in Section 5.1 (Marbled Murrelet), in-water training activities would only induce minor and temporary impacts on foraging marbled murrelets. During the training activities, murrelets may move to adjacent areas to forage, and would likely return after activities cease. Therefore, potential effects to this species would be immeasurable and therefore insignificant. In addition, the Navy and individual state parks (e.g., Dosewalips State Park, Triton Cove State Park) would enter into a land-use agreement prior to scheduling training activities. This agreement would identify any ecologically sensitive areas that may be important for marbled murrelets. This may include unoccupied nesting habitat, areas that may support nesting habitat in the future, or areas that may not be suitable for nesting but serve as buffer habitat for occupied nesting habitat. Any adverse effects associated with land-based training activities at Dosewalips State Park, Triton Cove State Park, or any other public non-federal property are likely discountable (unlikely to occur) because sensitive areas can be identified in use agreements and subsequently avoided during training exercises.

Potential impacts on nesting murrelets are discountable (unlikely to occur) because no known marbled murrelet nest locations occur within the Action Area and most training locations do not support suitable nesting habitat for the marbled murrelet. If there are nests in training areas unknown to the Navy or other stakeholders, potential impacts on nesting murrelets would likely be insignificant (not likely measureable) because training activities that would occur in forested habitats (e.g., Over-the-Beach training activities, Special Reconnaissance training activities) are designed to be quiet, unobtrusive, and undetectable to potential adversaries in real-world scenarios.

Therefore, the Navy has determined that in-water and land-based training activities under the Proposed Action may affect, but are not likely to adversely affect, the marbled murrelet.

6.2 Western Snowy Plover

As described above in Section 5.2 (Western Snowy Plover), Grayland Beach and Leadbetter Point State Parks has specific areas identified as sensitive ecological areas, which are delineated with signage and symbolic barriers (e.g., ground stakes connected by ropes), as specified in the Washington State Parks and Recreation Commission's Long Beach Area Parks Management Plan. This plan specifically calls out western snowy plover nest protection measures. Because trainees would not enter delineated sensitive ecological areas, impacts to nests (e.g., trampling) would be avoided, adverse effects on western snowy plovers are likely discountable (unlikely to occur).

The Navy and state parks would enter into a land-use agreement prior to scheduling training activities. This agreement would identify any ecologically sensitive areas that may be important for western snowy plover. Therefore, any adverse effects associated with land-based training activities at State Parks are likely discountable (unlikely to occur) because sensitive areas can be identified in use agreements and subsequently avoided during training exercises.

Therefore, the Navy has determined that land-based training activities under the Proposed Action may affect, but are not likely to adversely affect, the western snowy plover.

6.3 Streaked Horned Lark

Grayland Beach and Leadbetter Point State Parks have specific areas identified as sensitive ecological areas, which are delineated with signage and symbolic barriers (e.g., ground stakes connected by ropes), as specified in the Washington State Parks and Recreation Commission's Long Beach Area Parks

Management Plan. This plan does not specifically call out streaked horned lark protection areas, but the state park is included in an annual monitoring effort for both streaked horned larks and western snowy plovers. Because trainees would not enter delineated sensitive ecological areas, impacts to nests (e.g., trampling) would be avoided, and adverse effects on streaked horned larks are likely discountable (unlikely to occur).

The Navy and state parks would enter into a land-use agreement prior to scheduling training activities. This agreement would identify any ecologically sensitive areas that may be important for streaked horned lark. Any adverse effects associated with land-based training activities at State Parks are likely discountable (unlikely to occur) because sensitive areas can be identified in use agreements and subsequently avoided during training exercises.

Therefore, the Navy has determined that land-based training activities under the Proposed Action may affect, but are not likely to adversely affect, streaked horned larks.

6.4 Leatherback Sea Turtle

Leatherback sea turtle occurrence within the Action Area should be considered very rare. As stated in Section 5.4 (Leatherback Sea Turtle), in-water training activities would only induce minor and temporary impacts on foraging leatherback sea turtles. As detailed in Section 5.4 (Leatherback Sea Turtle), the Navy will use a number of activity-specific protection measures, installation of natural resource training constraints, and other factors to reduce the potential impacts of stressors on ESA-listed species such as leatherback sea turtles. These measures include watch-out and avoidance procedures for marine mammals in water and avoiding training activities in certain areas during specific times of year when abundances of sensitive species are higher.

Under the Proposed Action, leatherbacks would likely move to adjacent areas and could return after activities cease. Potential effects to this species would be immeasurable and therefore insignificant.

Therefore, the Navy has determined that in-water training activities under the Proposed Action may affect, but are not likely to adversely affect, leatherback sea turtles.

6.5 Humpback Whale Mexico Distinct Population Segment and Central America Distinct Population Segment

As described above in Section 5.5 (Humpback Whale Mexico Distinct Population Segment and Central America Distinct Population Segment), marine mammals typically engage in avoidance behavior when surface vessels move toward them. A number of activity-specific protection measures would be used to reduce the potential impacts of stressors on marine mammals such as humpback whales.

In-water training activities that involve vessels, UASs, personnel, and submersible operations are not expected to impact ESA-listed humpback whales. It is most likely that any humpback whale in the Action Area would have an initial reaction to the boat's presence, such as leaving the area or tolerating the activity (e.g., continuing feeding, socializing, migrating, sleeping); a secondary reaction to the multiple students' presence in the water would not be likely to occur. Due to the passage of time (less than an hour) between the boat's presence and students entering the water, humpback whales are likely to continue with their initial reaction of either retreating from the area or tolerating the activity at the site. Under the Proposed Action, the use of small vessels during training activities would not substantially increase ambient noise levels. In addition, marine mammals on the surface of the water may hear the noise from the UAS engine. It is expected that an individual would react to the UAS similar to marine vessels noise, and these sound levels are expected to be *de minimis*.

Therefore, the Navy has determined that in-water training activities under the Proposed Action may affect, but are not likely to adversely affect, humpback whales.

6.6 Southern Resident Killer Whale

The same minimization and avoidance measures described above for humpback whales are applicable to avoiding and minimizing impacts on southern resident killer whales. In-water training activities that involve vessels, UASs, personnel, and submersible operations are not expected to impact ESA-listed southern resident killer whales. It is most likely that any individual in the Action Area would have an initial reaction to the boat's presence, such as leaving the area or tolerating the activity (e.g., continuing feeding, socializing, migrating, sleeping); a secondary reaction to the multiple students' presence in the water would not be likely to occur. Due to the passage of time (less than an hour) between the boat's presence and students entering the water, humpback whales are likely to continue with their initial reaction of either retreating from the area or tolerating the activity at the site. Under the Proposed Action, the use of small vessels during training activities would not substantially increase ambient noise levels. In addition, marine mammals on the surface of the water may hear the noise from the UAS engine. It is expected that an individual would react to the UAS similar to marine vessels noise, and these sound levels are expected to be *de minimis*.

Therefore, the Navy has determined that in-water training activities under the Proposed Action may affect, but are not likely to adversely affect, southern resident killer whales.

6.7 Puget Sound Chinook Salmon Evolutionary Significant Unit

As described above in Section 5.7 (Puget Sound Chinook Salmon Evolutionary Significant Unit), the use of vessels and submersibles, as well as Over-the-Beach and other in-water training activities with pedestrian movement through subtidal and intertidal areas, may induce behavioral responses in Puget Sound Chinook salmon. However, these responses are expected to be limited to short-term, insignificant behavioral reactions. Chinook salmon that move into adjacent areas to forage would likely return after activities cease.

Therefore, the Navy has determined that in-water training activities under the Proposed Action may affect, but are not likely to adversely affect, Puget Sound Chinook salmon.

6.8 Columbia River Chum Salmon Evolutionary Significant Unit

As described above in Section 5.8 (Columbia River Chum Salmon Evolutionary Significant Unit), the use of vessels and submersibles, as well as Over-the-Beach and other in-water training activities with pedestrian movement through subtidal and intertidal areas, may induce behavioral responses in Columbia River chum salmon. However, these responses are expected to be limited to short-term, insignificant behavioral reactions. Chum salmon that move into adjacent areas to forage would likely return after activities cease.

Therefore, the Navy has determined that in-water training activities under the Proposed Action may affect, but are not likely to adversely affect, Columbia River chum salmon.

6.9 Hood Canal Summer-Run Chum Salmon Evolutionary Significant Unit

As described above in Section 5.9 (Hood Canal Summer-Run Chum Salmon Evolutionary Significant Unit), the use of vessels and submersibles, as well as Over-the-Beach and other in-water training activities with pedestrian movement through subtidal and intertidal areas, may induce behavioral responses in Hood Canal summer-run chum salmon. However, these responses are expected to be limited to short-term,

insignificant behavioral reactions. Hood Canal summer-run salmon that may be present in areas where activities are occurring would likely respond to trainees in the water by fleeing the area and would return to normal activities after the activity (e.g., foraging, resting). These impacts would be short term and minor, with no long-term impacts on individual salmon or Hood Canal summer-run salmon populations in the areas where training activities would occur. The potential effects (direct injury or harm to juvenile or adult fish) are discountable (unlikely to occur) because fish are likely to move away from trainees and approaching vessels.

Therefore, the Navy has determined that in-water training activities under the Proposed Action may affect, but are not likely to adversely affect, Hood Canal summer-run salmon.

6.10 Puget Sound Steelhead Distinct Population Segment

As described above in Section 5.10 (Puget Sound Steelhead Distinct Population Segment), the use of vessels and submersibles, as well as Over-the-Beach and other in-water training activities with pedestrian movement through subtidal and intertidal areas, may induce behavioral responses in Puget Sound steelhead. During the training activities, steelhead may move to adjacent areas to forage, and would likely return after activities cease. Potential effects to this species would be immeasurable and insignificant.

Therefore, the Navy has determined that in-water training activities under the Proposed Action may affect, but are not likely to adversely affect, Puget Sound Steelhead.

6.11 Puget Sound/Georgia Basin Bocaccio Distinct Population Segment and Yelloweye Rockfish Distinct Population Segment

As described above in Section 5.11 (Puget Sound/Georgia Basin Bocaccio Distinct Population Segment and Yelloweye Rockfish Distinct Population Segment), the use of vessels and submersibles, as well as Over-the-Beach and other in-water training activities with pedestrian movement through subtidal and intertidal areas, may induce behavioral responses in Puget Sound/Georgia Basin bocaccio and yelloweye rockfishes. These species may be present in areas where activities are occurring would likely respond to trainees in the water by fleeing the area and would return to normal activities after the activity (e.g., foraging, resting). These impacts would be short term and minor, with no long-term impact on rockfish populations in the areas where training activities would occur. Potential effects (direct injury or harm to juvenile or adult fish) are insignificant (unlikely to occur) because fish are likely to move away from trainees and approaching vessels.

Therefore, the Navy has determined that in-water training activities under the Proposed Action may affect, but are not likely to adversely affect, Puget Sound/Georgia Basin bocaccio and yelloweye rockfishes.

6.12 North American Green Sturgeon Southern Distinct Population Segment

As described above in Section 5.12 (North American Green Sturgeon Southern Distinct Population Segment), the use of vessels and submersibles, as well as Over-the-Beach and other in-water training activities with pedestrian movement through subtidal and intertidal areas, may induce behavioral responses in North American green sturgeon. Because this species does not spawn within the Action Area, proposed training would not contribute to the primary reason for decline of the North American green sturgeon southern DPS (loss of spawning habitat).

Under the Proposed Action, sub-adult and adult green sturgeon would be expected to exhibit temporary behavioral responses in close proximity to trainees, vessels, and submersibles. The impact of these

behavioral responses would be temporary and minor, with no discernable impact on individual fish or populations. Potential impacts to sub-adult and adult North American green sturgeon southern DPS would be insignificant.

Therefore, the Navy has determined that in-water training activities under the Proposed Action may affect, but are not likely to adversely affect, North American green sturgeon southern DPS.

6.13 Pacific Eulachon Southern Distinct Population Segment

As described above in Section 5.13 (Pacific Eulachon Southern Distinct Population Segment), the use of vessels and submersibles, as well as Over-the-Beach and other in-water training activities with pedestrian movement through subtidal and intertidal areas, may induce behavioral responses in Pacific eulachon. Spawning habitat for eulachon does not overlap with the Action Area, as these areas are further upstream from where proposed training activities would occur. Sub-adult and adult eulachon would be expected to exhibit temporary behavioral responses in close proximity to trainees, vessels, and submersibles. The impact of these behavioral responses would be temporary and minor, with no discernable impact on individual fish or populations. Potential impacts to Pacific eulachon would be insignificant.

Therefore, the Navy has determined that in-water training activities under the Proposed Action may affect, but are not likely to adversely affect, Pacific eulachon.

6.14 Bull Trout Distinct Population Segment

As described above in Section 5.14 (Bull Trout), the use of vessels and submersibles, as well as Over-the-Beach and other in-water training activities with pedestrian movement through subtidal and intertidal areas, may induce behavioral responses in bull trout. Spawning habitat for bull trout does not overlap with the Action Area, these areas are further upstream from where proposed training activities would occur. Sub-adult and adult bull trout would be expected to exhibit temporary behavioral responses in close proximity to trainees, vessels, and submersibles. The impact of these behavioral responses would be temporary and minor, with no discernable impact on individual fish or populations. Potential impacts to sub-adult and adult bull trout would be insignificant.

Therefore, the Navy has determined that in-water training activities under the Proposed Action may affect, but are not likely to adversely affect, bull trout. The Navy's effects determinations for each species is presented in Table 6-1.

Table 6-1: Effect Determinations for Endangered Species Act-Listed Species

Common Name/Scientific Name	Effects Determination
Marbled murrelet / <i>Brachyramphus marmoratus</i>	NLAA
Western snowy plover / <i>Charadrius lexandrinus nivosus</i>	NLAA
Streaked horned lark / <i>Eremophila alpestris strigata</i>	NLAA
Leatherback sea turtle / <i>Dermochelys coriacea</i>	NLAA
Humpback whale Mexico DPS and Central America DPS / <i>Megaptera novaeangliae</i>	NLAA
Southern resident killer whale / <i>Orcinus orca</i>	NLAA
Puget Sound Chinook salmon / <i>Oncorhynchus tshawytscha</i>	NLAA
Columbia River chum salmon / <i>Oncorhynchus keta</i>	NLAA
Hood Canal summer-run chum salmon / <i>Oncorhynchus keta</i>	NLAA
Puget Sound steelhead / <i>Oncorhynchus mykiss</i>	NLAA
Puget Sound/Georgia Basin DPS bocaccio / <i>Sebastes paucispinis</i>	NLAA
North American Green Sturgeon Southern DPS / <i>Acipenser medirostris</i>	NLAA
Pacific Eulachon Southern DPS / <i>Thaleichthys pacificus</i>	NLAA
Bull trout / <i>Salvelinus confluentus</i>	NLAA

Notes: NLAA = Not likely to adversely affect, DPS = distinct population segment

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Appendix B: Correspondence for Naval Special Operations Training in Western Washington State

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Final Environmental Assessment

Naval Special Operations Training in Western Washington State

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There are no tables in this appendix.

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B.1 Navy Tribal Correspondence



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUTOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

5090
Ser N45/17-189
12 Apr 2017

The Honorable Frances G. Charles
Lower Elwha S'Klallam Tribe
2851 Lower Elwha Road
Port Angeles, WA 98363

Dear Chairwoman Charles,

The U.S. Navy (Navy) is proposing to conduct small-unit land and maritime training activities for naval special operations personnel on selected nearshore lands and in the inland waters of Puget Sound, including Hood Canal, as well as the southwestern Washington coast. Our preliminary assessment is that this proposed action does not have the potential to significantly affect tribal treaty rights and protected tribal resources.

Enclosed is a fact sheet which describes the proposed training with a location map. The proposed training would consist of diving and swimming; inserting and extracting trainees and/or equipment using small watercraft; launching and recovering small watercraft; using unmanned underwater vehicles; moving on foot over the beach; hiking to an observation point and using observation techniques while remaining hidden; clearing areas/structures using paint pellets as simulated munitions (used only in limited locations); conducting high-angle climbing; and using small unmanned aircraft systems on military installations, designated warning areas, or restricted airspace.

The proposed training does not include the use of live-fire ammunition, explosive demolitions, manned air operations, off-road driving, vegetation cutting, digging, tree climbing, or the building of camp fires or infrastructure. The Navy would not build training devices or structures at any site during the proposed training activities. Access to areas would not be impacted by the proposed training and most training would be conducted during the night.

The intent of the proposed training is to: 1) teach trainees the skills needed to avoid detection and 2) not leave any trace of their presence during or after training activities. It is needed to meet training and readiness requirements, and to ensure that naval special operations personnel are prepared for worldwide deployment.

Puget Sound, including Hood Canal, and the southwestern Washington coast offer unique conditions which create opportunities for realistic and challenging special operations training in a safe, sheltered, cold-water environment. Sites have been identified to support the

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unique training-environment requirements of naval special operations. The combination of proximity to Navy installations and sites with diverse shoreline terrain, hydrography, and bathymetry is vital to the progressive improvement of skill sets and enables navy special operations personnel to meet readiness requirements.

The Navy will be conducting open house outreach meetings for interested parties from 5 to 8 p.m. on: Tuesday, May 2, 2017 at North Kitsap High School Commons, Poulsbo, WA; Wednesday, May 3, 2017 at Blue Heron School Commons, Port Townsend, WA, and; Thursday, May 4, 2017 at Oak Harbor School District ASC Board Room, Oak Harbor, WA. Or see our website at <https://navfac.navy.mil/NSOEA>.

Pursuant to the Navy's policies for consultation with federally recognized American Indian tribes, I ask you to consider whether implementation of the proposed action as described has the potential to significantly affect tribal treaty rights of protected resources. If you determine there may be a potential for significant affects, please specify which tribal rights and resources will be affected and how they will be significantly affected.

I request that you provide your response to this letter within sixty (60) days. We look forward to working with you to address any concerns you may have regarding this proposed action.

If you have questions or concerns, please contact Ms. Renee Wallis, Navy Region Northwest Tribal Liaison, at (360)315-5400 or by email, renee.wallis@navy.mil.

Sincerely,



T. H. Lazo, P.E.
Environmental Business Line
Coordinator
By Direction of the Commanding Officer

Enclosure: 1. Proposed Naval Special Operations Training in Western Washington State

Copy to: Mr. William S. White, Cultural Resources Archaeologist
Mr. Doug Morrill, Natural Resources Director

October 2019



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUTOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

5090
Ser N45/17-189
12 Apr 2017

The Honorable W. Ron Allen
Jamestown S'Klallam Tribe
1033 Old Blyn Highway
Sequim, WA 98382

Dear Chairman Allen,

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Sincerely,



T. H. Lazo, P.E.
Environmental Business Line
Coordinator
By Direction of the Commanding Officer

Enclosure: 1. Proposed Naval Special Operations Training in Western Washington State

Copy to: Ms. Zickie Carroll, Cultural Resources Director
Mr. Scott Chitwood, Natural Resources Director

October 2019



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUTOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

5090
Ser N45/17-189
12 Apr 2017

The Honorable Virginia Cross
Muckleshoot Indian Tribe of the Muckleshoot Reservation
39015 172nd Ave SE
Auburn, WA 98092

Dear Chairwoman Cross,

The U.S. Navy (Navy) is proposing to conduct small-unit land and maritime training activities for naval special operations personnel on selected nearshore lands and in the inland waters of Puget Sound, including Hood Canal, as well as the southwestern Washington coast. Our preliminary assessment is that this proposed action does not have the potential to significantly affect tribal treaty rights and protected tribal resources.

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Sincerely,



T. H. Lazo, P.E.
Environmental Business Line
Coordinator
By Direction of the Commanding Officer

Enclosure: 1. Proposed Naval Special Operations Training in Western Washington State

Copy to: Ms. Laura Murphy, Archaeologist, Cultural Resources
Ms. Melissa Calvert, Wildlife Dept. General Services Director

October 2019



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUTOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

5090
Ser N45/17-189
12 Apr 2017

The Honorable Farron McCloud
Nisqually Indian Tribe of the Nisqually Reservation
4820 She-Nah-Num Dr SE
Olympia, WA 98513-9199

Dear Chairman McCloud,

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I request that you provide your response to this letter within sixty (60) days. We look forward to working with you to address any concerns you may have regarding this proposed action.

If you have questions or concerns, please contact Ms. Renee Wallis, Navy Region Northwest Tribal Liaison, at (360)315-5400 or by email, renee.wallis@navy.mil.

Sincerely,



T. H. Lazo, P.E.
Environmental Business Line
Coordinator
By Direction of the Commanding Officer

Enclosure: 1. Proposed Naval Special Operations Training in Western Washington State

Copy to: Ms. Jacqueline Wall, Tribal Historic Preservation Officer
Mr. David Troutt, Natural Resources Director

October 2019



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUTOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

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12 Apr 2017

The Honorable Bob Kelly
Nooksack Indian Tribe of Washington
P.O. Box 157
Deming, WA 98244

Dear Chairman Kelly,

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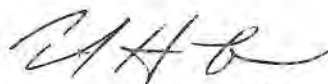
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If you have questions or concerns, please contact Ms. Renee Wallis, Navy Region Northwest Tribal Liaison, at (360)315-5400 or by email, renee.wallis@navy.mil.

Sincerely,



T. H. Lazo, P.E.
Environmental Business Line
Coordinator
By Direction of the Commanding Officer

Enclosure: 1. Proposed Naval Special Operations Training in Western Washington State

Copy to: Mr. George D. Swanaset, Jr., Tribal Historic Preservation Officer
Mr. Gary MacWilliams, Natural Resources Director

October 2019



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

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12 Apr 2017

The Honorable Jeromy Sullivan
Port Gamble S'Klallam Tribe
31912 Little Boston Road, NE
Kingston, WA 98346

Dear Chairman Sullivan,

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Sincerely,



T. H. Lazo, P.E.
Environmental Business Line
Coordinator
By Direction of the Commanding Officer

Enclosure: 1. Proposed Naval Special Operations Training in Western Washington State

Copy to: Ms. Stormy Purser, Tribal Historic Preservation Officer
Mr. Paul McCollum, Natural Resources Director

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DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUTOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

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The Honorable Bill Sterud
Puyallup Tribe of the Puyallup Reservation
3009 E Portland Avenue
Tacoma, WA 98404

Dear Chairman Sterud,

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T. H. Lazo, P.E.
Environmental Business Line
Coordinator
By Direction of the Commanding Officer

Enclosure: 1. Proposed Naval Special Operations Training in Western Washington State

Copy to: Mr. Brandon Reynon, Cultural Resources
Natural Resources Director

October 2019



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUTOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

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The Honorable Thomas Wooten
Samish Indian Nation
P.O. Box 217
Anacortes, WA 98221

Dear Chairman Wooten,

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T. H. Lazo, P.E.
Environmental Business Line
Coordinator
By Direction of the Commanding Officer

Enclosure: 1. Proposed Naval Special Operations Training in Western Washington State

Copy to: Ms. Jackie Ferry, Tribal Historic Preservation Officer/Cultural Director
Mr. Todd Woodard, Natural Resources Director

October 2019



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUTOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

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The Honorable Charlene Nelson
Shoalwater Bay Tribe of the Shoalwater Bay Reservation
P.O. Box 130
Tokeland, WA 98590

Dear Chairman Nelson,

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T. H. Lazo, P.E.
Environmental Business Line
Coordinator
By Direction of the Commanding Officer

Enclosure: 1. Proposed Naval Special Operations Training in Western Washington State

Copy to: Mr. Earl Davis, Cultural Resources Specialist
Mr. Steve Spencer, Natural Resources Director

October 2019



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUTOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

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The Honorable Charles "Guy" Miller
Skokomish Indian Tribe
80 N Tribal Center Road
Skokomish Nation, WA 98584

Dear Chairman Miller,

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T. H. Lazo, P.E.
Environmental Business Line
Coordinator
By Direction of the Commanding Officer

Enclosure: 1. Proposed Naval Special Operations Training in Western Washington State

Copy to: Ms. Kris Miller, Tribal Historic Preservation Officer
Mr. Joseph Pavel, Natural Resources Director

October 2019



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

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The Honorable Carolyn Lubenau
Snoqualmie Indian Tribe
P.O. Box 969
Snoqualmie, WA 98065

Dear Chairwoman Lubenau,

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Environmental Business Line
Coordinator
By Direction of the Commanding Officer

Enclosure: 1. Proposed Naval Special Operations Training in Western Washington State

Copy to: Ms. Lora Pennington, Cultural Resources Director/Tribal
Historic Preservation Officer
Ms. Cindy Spiry, Environment and Natural Resources Director

October 2019



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUTOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

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The Honorable David Lopeman
Squaxin Island Tribe of the Squaxin Island Indian Reservation
10 SE Squaxin Lane
Shelton, WA 98584

Dear Chairman Lopeman,

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Pursuant to the Navy's policies for consultation with federally recognized American Indian tribes, I ask you to consider whether implementation of the proposed action as described has the potential to significantly affect tribal treaty rights of protected resources. If you determine there may be a potential for significant affects, please specify which tribal rights and resources will be affected and how they will be significantly affected.

I request that you provide your response to this letter within sixty (60) days. We look forward to working with you to address any concerns you may have regarding this proposed action.

If you have questions or concerns, please contact Ms. Renee Wallis, Navy Region Northwest Tribal Liaison, at (360)315-5400 or by email, renee.wallis@navy.mil.

Sincerely,



T. H. Lazo, P.E.
Environmental Business Line
Coordinator
By Direction of the Commanding Officer

Enclosure: 1. Proposed Naval Special Operations Training in Western Washington State

Copy to: Ms. Rhonda Foster, Cultural Resources Director
Mr. Andy Whitener, Natural Resources Director

October 2019



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUTOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

5090
Ser N45/17-189
12 Apr 2017

The Honorable Shawn Yanity
Stillaguamish Tribe of Indians of Washington
P.O. Box 277
Arlington, WA 98223

Dear Chairman Yanity,

The U.S. Navy (Navy) is proposing to conduct small-unit land and maritime training activities for naval special operations personnel on selected nearshore lands and in the inland waters of Puget Sound, including Hood Canal, as well as the southwestern Washington coast. Our preliminary assessment is that this proposed action does not have the potential to significantly affect tribal treaty rights and protected tribal resources.

Enclosed is a fact sheet which describes the proposed training with a location map. The proposed training would consist of diving and swimming; inserting and extracting trainees and/or equipment using small watercraft; launching and recovering small watercraft; using unmanned underwater vehicles; moving on foot over the beach; hiking to an observation point and using observation techniques while remaining hidden; clearing areas/structures using paint pellets as simulated munitions (used only in limited locations); conducting high-angle climbing; and using small unmanned aircraft systems on military installations, designated warning areas, or restricted airspace.

The proposed training does not include the use of live-fire ammunition, explosive demolitions, manned air operations, off-road driving, vegetation cutting, digging, tree climbing, or the building of camp fires or infrastructure. The Navy would not build training devices or structures at any site during the proposed training activities. Access to areas would not be impacted by the proposed training and most training would be conducted during the night.

The intent of the proposed training is to: 1) teach trainees the skills needed to avoid detection and 2) not leave any trace of their presence during or after training activities. It is needed to meet training and readiness requirements, and to ensure that naval special operations personnel are prepared for worldwide deployment.

Puget Sound, including Hood Canal, and the southwestern Washington coast offer unique conditions which create opportunities for realistic and challenging special operations training in a safe, sheltered, cold-water environment. Sites have been identified to support the

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If you have questions or concerns, please contact Ms. Renee Wallis, Navy Region Northwest Tribal Liaison, at (360)315-5400 or by email, renee.wallis@navy.mil.

Sincerely,



T. H. Lazo, P.E.
Environmental Business Line
Coordinator
By Direction of the Commanding Officer

Enclosure: 1. Proposed Naval Special Operations Training in Western Washington State

Copy to: Ms. Tara Boser, Cultural Resources Director
Ms. Gina Gray, Natural Resources Director

October 2019



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUTOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

5090
Ser N45/17-189
12 Apr 2017

The Honorable Leonard Forsman
Suquamish Tribe
PO Box 498
Suquamish, WA 98392

Dear Chairman Forsman,

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Sincerely,



T. H. Lazo, P.E.
Environmental Business Line
Coordinator
By Direction of the Commanding Officer

Enclosure: 1. Proposed Naval Special Operations Training in Western Washington State

Copy to: Mr. Wayne George, Executive Director
Mr. Dennis Lewarch, THPO Cultural Resources
Mr. Steve Todd, Ecologist

October 2019



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUTOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

5090
Ser N45/17-189
12 Apr 2017

The Honorable Brian Cladoosby
Swinomish Indians of the Swinomish Reservation of Washington
11404 Moorage Way
La Conner, WA 98257

Dear Chairman Cladoosby,

The U.S. Navy (Navy) is proposing to conduct small-unit land and maritime training activities for naval special operations personnel on selected nearshore lands and in the inland waters of Puget Sound, including Hood Canal, as well as the southwestern Washington coast. Our preliminary assessment is that this proposed action does not have the potential to significantly affect tribal treaty rights and protected tribal resources.

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Sincerely,



T. H. Lazo, P.E.
Environmental Business Line
Coordinator
By Direction of the Commanding Officer

Enclosure: 1. Proposed Naval Special Operations Training in Western Washington State

Copy to: Ms. Josephine Jefferson, Cultural Resources Technician
Mr. Todd Mitchell, Environmental Protection

October 2019



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUTOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

5090
Ser N45/17-189
12 Apr 2017

The Honorable Melvin Sheldon, Jr.
Tulalip Tribes of Washington
6406 Marine Dr. NW
Tulalip, WA 98271

Dear Chairman Sheldon, Jr.,

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Sincerely,



T. H. Lazo, P.E.
Environmental Business Line
Coordinator
By Direction of the Commanding Officer

Enclosure: 1. Proposed Naval Special Operations Training in Western Washington State

Copy to: Mr. Terry Williams, Treaty Rights Program Manager
Mr. Richard Young, Cultural Preservation Officer
Mr. Ray Fryberg, Natural Resources Executive Director

October 2019



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUTOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

5090
Ser N45/18-00068
22 Jan 2018

The Honorable Frances G. Charles
Lower Elwha Klallam Tribe
2851 Lower Elwha Road
Port Angeles, WA 98363

Dear Chairwoman Charles,

SUBJ: NOTICE OF AVAILABILITY OF THE DRAFT ENVIRONMENTAL ASSESSMENT FOR
NAVAL SPECIAL OPERATIONS TRAINING IN WESTERN WASHINGTON

This letter is to follow up to the early information provided in April 2017 (Enclosure (1)) and to inform you that the Naval Special Warfare Command has prepared a draft environmental assessment for its proposed training in western Washington in accordance with the National Environmental Policy Act of 1969 and Navy procedures. We invite you to review and comment on the enclosed draft EA and evaluate whether you believe there may be a potential for this proposed action to significantly affect tribal rights or protected resources.

The draft EA (see Enclosure (2)) analyzes the potential environmental effects of the Navy's proposal to conduct small-unit land and cold-water maritime training activities for naval special operations personnel on selected nearshore lands and in the inland waters of Puget Sound, including Hood Canal, as well as the southwestern Washington coast. The intent of the proposed training is to build trainees skills, experience, and confidence by challenging them in a location with dynamic weather, land and cold-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Our preliminary assessment is that this proposed action does not have the potential to significantly affect tribal rights or protected resources.

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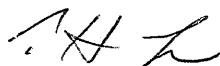
Naval Facilities Engineering Command Northwest
Attention: Project Manager, EV21.AW
1101 Tautog Circle, Suite 203
Silverdale, WA 98315-1101

October 2019

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If your staff has questions, please contact Mrs. Carolyn Winters, Tribal Liaison, at (360)315-5400 or by email, carolyn.winters@navy.mil.

Sincerely,



T. H. Lazo, P.E.
Navy Environmental Program Director
Northwest Region
By Direction of the Commanding Officer

Enclosures: 1. Proposed Naval Special Operations Training in Western Washington State
2. DVD - Draft Environmental Assessment

Copy to: Mr. William S. White, Cultural Resources Archaeologist
Mr. Doug Morrill, Natural Resources Director

October 2019



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUTOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

5090
Ser N45/18-00068
22 Jan 2018

The Honorable W. Ron Allen
Jamestown S'Klallam Tribe
1033 Old Blyn Highway
Sequim, WA 98382

Dear Chairman Allen,

SUBJ: NOTICE OF AVAILABILITY OF THE DRAFT ENVIRONMENTAL ASSESSMENT FOR
NAVAL SPECIAL OPERATIONS TRAINING IN WESTERN WASHINGTON

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Naval Facilities Engineering Command Northwest
Attention: Project Manager, EV21.AW
1101 Tautog Circle, Suite 203
Silverdale, WA 98315-1101

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T. H. Lazo, P.E.
Navy Environmental Program Director
Northwest Region
By Direction of the Commanding Officer

Enclosures: 1. Proposed Naval Special Operations Training in Western Washington State
2. DVD - Draft Environmental Assessment

Copy to: Ms. Vickie Carroll, Cultural Resources Director
Mr. Scott Chitwood, Environmental Policy Analyst

October 2019



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUTOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

5090
Ser N45/18-00068
22 Jan 2018

The Honorable Virginia Cross
Muckleshoot Indian Tribe of the Muckleshoot Reservation
39015 172nd Ave SE
Auburn, WA 98092

Dear Chairwoman Cross,

SUBJ: NOTICE OF AVAILABILITY OF THE DRAFT ENVIRONMENTAL ASSESSMENT FOR
NAVAL SPECIAL OPERATIONS TRAINING IN WESTERN WASHINGTON

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Attention: Project Manager, EV21.AW
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Navy Environmental Program Director
Northwest Region
By Direction of the Commanding Officer

Enclosures: 1. Proposed Naval Special Operations Training in Western Washington State
2. DVD - Draft Environmental Assessment

Copy to: Ms. Laura Murphy, Archaeologist, Cultural Resources
Ms. Melissa Calvert, Wildlife Dept. General Services Director

October 2019



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUTOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

5090
Ser N45/18-00068
22 Jan 2018

The Honorable Farron McCloud
Nisqually Indian Tribe of the Nisqually Reservation
4820 She-Nah-Num Dr SE
Olympia, WA 98513-9199

Dear Chairman McCloud,

SUBJ: NOTICE OF AVAILABILITY OF THE DRAFT ENVIRONMENTAL ASSESSMENT FOR
NAVAL SPECIAL OPERATIONS TRAINING IN WESTERN WASHINGTON

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Naval Facilities Engineering Command Northwest
Attention: Project Manager, EV21.AW
1101 Tautog Circle, Suite 203
Silverdale, WA 98315-1101

October 2019

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Navy Environmental Program Director
Northwest Region
By Direction of the Commanding Officer

Enclosures: 1. Proposed Naval Special Operations Training in Western Washington State
2. DVD - Draft Environmental Assessment

Copy to: Ms. Jacqueline Wall, Tribal Historic Preservation Officer
Mr. David Troutt, Natural Resources Director

October 2019



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUTOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

5090
Ser N45/18-00068
22 Jan 2018

The Honorable Bob Kelly
Nooksack Indian Tribe of Washington
P.O. Box 157
Deming, WA 98244

Dear Chairman Kelly,

SUBJ: NOTICE OF AVAILABILITY OF THE DRAFT ENVIRONMENTAL ASSESSMENT FOR
NAVAL SPECIAL OPERATIONS TRAINING IN WESTERN WASHINGTON

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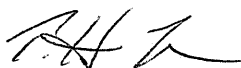
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If your staff has questions, please contact Mrs. Carolyn Winters, Tribal Liaison, at (360)315-5400 or by email, carolyn.winters@navy.mil.

Sincerely,



T. H. Lazo, P.E.
Navy Environmental Program Director
Northwest Region
By Direction of the Commanding Officer

Enclosures: 1. Proposed Naval Special Operations Training in Western Washington State
2. DVD - Draft Environmental Assessment

Copy to: Mr. George D. Swanaset, Jr., Tribal Historic Preservation Officer
Mr. Gary MacWilliams, Natural Resources Director

October 2019



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUTOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

5090
Ser N45/18-00068
22 Jan 2018

The Honorable Jeromy Sullivan
Port Gamble S'Klallam Tribe
31912 Little Boston Road, NE
Kingston, WA 98346

Dear Chairman Sullivan,

SUBJ: NOTICE OF AVAILABILITY OF THE DRAFT ENVIRONMENTAL ASSESSMENT FOR
NAVAL SPECIAL OPERATIONS TRAINING IN WESTERN WASHINGTON

This letter is to follow up to the early information provided in April 2017 (Enclosure (1)) and to inform you that the Naval Special Warfare Command has prepared a draft environmental assessment for its proposed training in western Washington in accordance with the National Environmental Policy Act of 1969 and Navy procedures. We invite you to review and comment on the enclosed draft EA and evaluate whether you believe there may be a potential for this proposed action to significantly affect tribal rights or protected resources.

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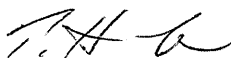
Naval Facilities Engineering Command Northwest
Attention: Project Manager, EV21.AW
1101 Tautog Circle, Suite 203
Silverdale, WA 98315-1101

October 2019

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Sincerely,



T. H. Lazo, P.E.
Navy Environmental Program Director
Northwest Region
By Direction of the Commanding Officer

Enclosures: 1. Proposed Naval Special Operations Training in Western Washington State
2. DVD - Draft Environmental Assessment

Copy to: Ms. Stormy Purser, Tribal Historic Preservation Officer
Mr. Paul McCollum, Natural Resources Director

October 2019



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUTOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

5090
Ser N45/18-00068
22 Jan 2018

The Honorable Bill Sterud
Puyallup Tribe of the Puyallup Reservation
3009 E Portland Avenue
Tacoma, WA 98404

Dear Chairman Sterud,

SUBJ: NOTICE OF AVAILABILITY OF THE DRAFT ENVIRONMENTAL ASSESSMENT FOR
NAVAL SPECIAL OPERATIONS TRAINING IN WESTERN WASHINGTON

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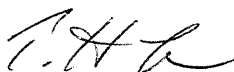
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T. H. Lazo, P.E.
Navy Environmental Program Director
Northwest Region
By Direction of the Commanding Officer

Enclosures: 1. Proposed Naval Special Operations Training in Western Washington State
2. DVD - Draft Environmental Assessment

Copy to: Mr. Brandon Reynon, Cultural Resources
Natural Resources Director

October 2019



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUTOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

5090
Ser N45/18-00068
22 Jan 2018

The Honorable Thomas Wooten
Samish Indian Nation
P.O. Box 217
Anacortes, WA 98221

Dear Chairman Wooten,

SUBJ: NOTICE OF AVAILABILITY OF THE DRAFT ENVIRONMENTAL ASSESSMENT FOR
NAVAL SPECIAL OPERATIONS TRAINING IN WESTERN WASHINGTON

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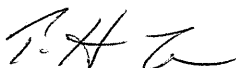
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T. H. Lazo, P.E.
Navy Environmental Program Director
Northwest Region
By Direction of the Commanding Officer

Enclosures: 1. Proposed Naval Special Operations Training in Western Washington State
2. DVD - Draft Environmental Assessment

Copy to: Ms. Jackie Ferry, Tribal Historic Preservation Officer/Cultural Director
Mr. Todd Woodard, Natural Resources Director

October 2019



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUTOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

5090
Ser N45/18-00068
22 Jan 2018

The Honorable Charlene Nelson
Shoalwater Bay Tribe of the Shoalwater Bay Reservation
P.O. Box 130
Tokeland, WA 98590

Dear Chairwoman Nelson,

SUBJ: NOTICE OF AVAILABILITY OF THE DRAFT ENVIRONMENTAL ASSESSMENT FOR
NAVAL SPECIAL OPERATIONS TRAINING IN WESTERN WASHINGTON

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Sincerely,



T. H. Lazo, P.E.
Navy Environmental Program Director
Northwest Region
By Direction of the Commanding Officer

Enclosures: 1. Proposed Naval Special Operations Training in Western Washington State
2. DVD - Draft Environmental Assessment

Copy to: Mr. Earl Davis, Cultural Resources Specialist
Mr. Steve Spencer, Natural Resources Director

October 2019



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUTOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

5090
Ser N45/18-00068
22 Jan 2018

The Honorable Charles "Guy" Miller
Skokomish Indian Tribe
80 N Tribal Center Road
Skokomish Nation, WA 98584

Dear Chairman Miller,

SUBJ: NOTICE OF AVAILABILITY OF THE DRAFT ENVIRONMENTAL ASSESSMENT FOR
NAVAL SPECIAL OPERATIONS TRAINING IN WESTERN WASHINGTON

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Sincerely,



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Navy Environmental Program Director
Northwest Region
By Direction of the Commanding Officer

Enclosures: 1. Proposed Naval Special Operations Training in Western Washington State
2. DVD - Draft Environmental Assessment

Copy to: Ms. Kris Miller, Tribal Historic Preservation Officer
Mr. Joseph Pavel, Natural Resources Director

October 2019



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUTOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

5090
Ser N45/18-00068
22 Jan 2018

The Honorable Sunny Clear
Snoqualmie Indian Tribe
P.O. Box 969
Snoqualmie, WA 98065

Dear Chairwoman Clear,

SUBJ: NOTICE OF AVAILABILITY OF THE DRAFT ENVIRONMENTAL ASSESSMENT FOR
NAVAL SPECIAL OPERATIONS TRAINING IN WESTERN WASHINGTON

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Navy Environmental Program Director
Northwest Region
By Direction of the Commanding Officer

Enclosures: 1. Proposed Naval Special Operations Training in Western Washington State
2. DVD - Draft Environmental Assessment

Copy to: Ms. Lora Pennington, Cultural Resources Director/Tribal Historic Preservation Officer
Ms. Cindy Spiry, Environment and Natural Resources Director

October 2019



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUTOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

5090
Ser N45/18-00068
22 Jan 2018

The Honorable Arnold Cooper
Squaxin Island Tribe of the Squaxin Island Indian Reservation
10 SE Squaxin Lane
Shelton, WA 98584

Dear Chairman Cooper,

SUBJ: NOTICE OF AVAILABILITY OF THE DRAFT ENVIRONMENTAL ASSESSMENT FOR
NAVAL SPECIAL OPERATIONS TRAINING IN WESTERN WASHINGTON

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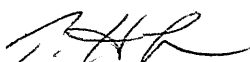
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Navy Environmental Program Director
Northwest Region
By Direction of the Commanding Officer

Enclosures: 1. Proposed Naval Special Operations Training in Western Washington State
2. DVD - Draft Environmental Assessment

Copy to: Ms. Rhonda Foster, Cultural Resources Director
Mr. Andy Whitener, Natural Resources Director

October 2019



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUTOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

5090
Ser N45/18-00068
22 Jan 2018

The Honorable Shawn Yanity
Stillaguamish Tribe of Indians of Washington
P.O. Box 277
Arlington, WA 98223

Dear Chairman Yanity,

SUBJ: NOTICE OF AVAILABILITY OF THE DRAFT ENVIRONMENTAL ASSESSMENT FOR
NAVAL SPECIAL OPERATIONS TRAINING IN WESTERN WASHINGTON

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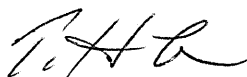
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Navy Environmental Program Director
Northwest Region
By Direction of the Commanding Officer

Enclosures: 1. Proposed Naval Special Operations Training in Western Washington State
2. DVD - Draft Environmental Assessment

Copy to: Ms. Tara Boser, Cultural Resources Director
Ms. Gina Gray, Natural Resources Director

October 2019



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUTOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

5090
Ser N45/18-00068
22 Jan 2018

The Honorable Leonard Forsman
Suquamish Tribe
PO Box 498
Suquamish, WA 98392

Dear Chairman Forsman,

SUBJ: NOTICE OF AVAILABILITY OF THE DRAFT ENVIRONMENTAL ASSESSMENT FOR
NAVAL SPECIAL OPERATIONS TRAINING IN WESTERN WASHINGTON

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Navy Environmental Program Director
Northwest Region
By Direction of the Commanding Officer

Enclosures: 1. Proposed Naval Special Operations Training in Western Washington State
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Copy to: Mr. Wayne George, Executive Director
Mr. Dennis Lewarch, THPO Cultural Resources
Mr. Steve Todd, Ecologist

October 2019



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NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUTOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

5090
Ser N45/18-00068
22 Jan 2018

The Honorable Brian Cladoosby
Swinomish Indians of the Swinomish Reservation of Washington
11404 Moorage Way
La Conner, WA 98257

Dear Chairman Cladoosby,

SUBJ: NOTICE OF AVAILABILITY OF THE DRAFT ENVIRONMENTAL ASSESSMENT FOR
NAVAL SPECIAL OPERATIONS TRAINING IN WESTERN WASHINGTON

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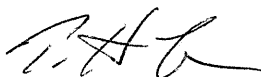
Naval Facilities Engineering Command Northwest
Attention: Project Manager, EV21.AW
1101 Tautog Circle, Suite 203
Silverdale, WA 98315-1101

October 2019

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If your staff has questions, please contact Mrs. Carolyn Winters, Tribal Liaison, at (360)315-5400 or by email, carolyn.winters@navy.mil.

Sincerely,



T. H. Lazo, P.E.

Navy Environmental Program Director
Northwest Region

By Direction of the Commanding Officer

Enclosures: 1. Proposed Naval Special Operations Training in Western Washington State
2. DVD - Draft Environmental Assessment

Copy to: Ms. Josephine Jefferson, Cultural Resources Technician
Mr. Todd Mitchell, Environmental Protection

October 2019



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUTOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

5090
Ser N45/18-00068
22 Jan 2018

The Honorable Marie Zackuse
Tulalip Tribes of Washington
6406 Marine Dr. NW
Tulalip, WA 98271

Dear Chairwoman Zackuse,

SUBJ: NOTICE OF AVAILABILITY OF THE DRAFT ENVIRONMENTAL ASSESSMENT FOR
NAVAL SPECIAL OPERATIONS TRAINING IN WESTERN WASHINGTON

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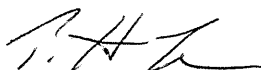
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Sincerely,



T. H. Lazo, P.E.

Navy Environmental Program Director
Northwest Region

By Direction of the Commanding Officer

Enclosures: 1. Proposed Naval Special Operations Training in Western Washington State
2. DVD - Draft Environmental Assessment

Copy to: Mr. Terry Williams, Treaty Rights Program Manager
Mr. Richard Young, Cultural Preservation Officer
Mr. Ray Fryberg, Natural Resources Executive Director

October 2019



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUTOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

5090
Ser N45/18-00068
22 Jan 2018

The Honorable Frances G. Charles
Lower Elwha Klallam Tribe
2851 Lower Elwha Road
Port Angeles, WA 98363

Dear Chairwoman Charles,

SUBJ: NOTICE OF AVAILABILITY OF THE DRAFT ENVIRONMENTAL ASSESSMENT FOR
NAVAL SPECIAL OPERATIONS TRAINING IN WESTERN WASHINGTON

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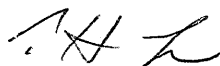
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Sincerely,



T. H. Lazo, P.E.
Navy Environmental Program Director
Northwest Region
By Direction of the Commanding Officer

Enclosures: 1. Proposed Naval Special Operations Training in Western Washington State
2. DVD - Draft Environmental Assessment

Copy to: Mr. William S. White, Cultural Resources Archaeologist
Mr. Doug Morrill, Natural Resources Director

October 2019



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUTOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

5090
Ser N45/18-00068
22 Jan 2018

The Honorable W. Ron Allen
Jamestown S'Klallam Tribe
1033 Old Blyn Highway
Sequim, WA 98382

Dear Chairman Allen,

SUBJ: NOTICE OF AVAILABILITY OF THE DRAFT ENVIRONMENTAL ASSESSMENT FOR
NAVAL SPECIAL OPERATIONS TRAINING IN WESTERN WASHINGTON

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Sincerely,



T. H. Lazo, P.E.
Navy Environmental Program Director
Northwest Region
By Direction of the Commanding Officer

Enclosures: 1. Proposed Naval Special Operations Training in Western Washington State
2. DVD - Draft Environmental Assessment

Copy to: Ms. Vickie Carroll, Cultural Resources Director
Mr. Scott Chitwood, Environmental Policy Analyst

October 2019



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUTOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

5090
Ser N45/18-00068
22 Jan 2018

The Honorable Virginia Cross
Muckleshoot Indian Tribe of the Muckleshoot Reservation
39015 172nd Ave SE
Auburn, WA 98092

Dear Chairwoman Cross,

SUBJ: NOTICE OF AVAILABILITY OF THE DRAFT ENVIRONMENTAL ASSESSMENT FOR
NAVAL SPECIAL OPERATIONS TRAINING IN WESTERN WASHINGTON

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Attention: Project Manager, EV21.AW
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Sincerely,



T. H. Lazo, P.E.
Navy Environmental Program Director
Northwest Region
By Direction of the Commanding Officer

Enclosures: 1. Proposed Naval Special Operations Training in Western Washington State
2. DVD - Draft Environmental Assessment

Copy to: Ms. Laura Murphy, Archaeologist, Cultural Resources
Ms. Melissa Calvert, Wildlife Dept. General Services Director

October 2019



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUTOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

5090
Ser N45/18-00068
22 Jan 2018

The Honorable Farron McCloud
Nisqually Indian Tribe of the Nisqually Reservation
4820 She-Nah-Num Dr SE
Olympia, WA 98513-9199

Dear Chairman McCloud,

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Navy Environmental Program Director
Northwest Region
By Direction of the Commanding Officer

Enclosures: 1. Proposed Naval Special Operations Training in Western Washington State
2. DVD - Draft Environmental Assessment

Copy to: Ms. Jacqueline Wall, Tribal Historic Preservation Officer
Mr. David Troutt, Natural Resources Director

October 2019



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUTOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

5090
Ser N45/18-00068
22 Jan 2018

The Honorable Bob Kelly
Nooksack Indian Tribe of Washington
P.O. Box 157
Deming, WA 98244

Dear Chairman Kelly,

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NAVAL SPECIAL OPERATIONS TRAINING IN WESTERN WASHINGTON

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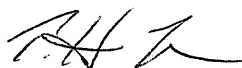
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Navy Environmental Program Director
Northwest Region
By Direction of the Commanding Officer

Enclosures: 1. Proposed Naval Special Operations Training in Western Washington State
2. DVD - Draft Environmental Assessment

Copy to: Mr. George D. Swanaset, Jr., Tribal Historic Preservation Officer
Mr. Gary MacWilliams, Natural Resources Director

October 2019



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUTOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

5090
Ser N45/18-00068
22 Jan 2018

The Honorable Jeromy Sullivan
Port Gamble S'Klallam Tribe
31912 Little Boston Road, NE
Kingston, WA 98346

Dear Chairman Sullivan,

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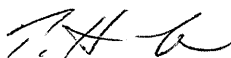
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Navy Environmental Program Director
Northwest Region
By Direction of the Commanding Officer

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2. DVD - Draft Environmental Assessment

Copy to: Ms. Stormy Purser, Tribal Historic Preservation Officer
Mr. Paul McCollum, Natural Resources Director

October 2019



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUTOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

5090
Ser N45/18-00068
22 Jan 2018

The Honorable Bill Sterud
Puyallup Tribe of the Puyallup Reservation
3009 E Portland Avenue
Tacoma, WA 98404

Dear Chairman Sterud,

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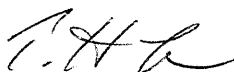
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Navy Environmental Program Director
Northwest Region
By Direction of the Commanding Officer

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2. DVD - Draft Environmental Assessment

Copy to: Mr. Brandon Reynon, Cultural Resources
Natural Resources Director

October 2019



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUTOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

5090
Ser N45/18-00068
22 Jan 2018

The Honorable Thomas Wooten
Samish Indian Nation
P.O. Box 217
Anacortes, WA 98221

Dear Chairman Wooten,

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NAVAL SPECIAL OPERATIONS TRAINING IN WESTERN WASHINGTON

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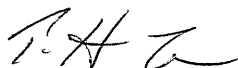
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If your staff has questions, please contact Mrs. Carolyn Winters, Tribal Liaison, at (360)315-5400 or by email, carolyn.winters@navy.mil.

Sincerely,



T. H. Lazo, P.E.
Navy Environmental Program Director
Northwest Region
By Direction of the Commanding Officer

Enclosures: 1. Proposed Naval Special Operations Training in Western Washington State
2. DVD - Draft Environmental Assessment

Copy to: Ms. Jackie Ferry, Tribal Historic Preservation Officer/Cultural Director
Mr. Todd Woodard, Natural Resources Director

October 2019



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUTOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

5090
Ser N45/18-00068
22 Jan 2018

The Honorable Charlene Nelson
Shoalwater Bay Tribe of the Shoalwater Bay Reservation
P.O. Box 130
Tokeland, WA 98590

Dear Chairwoman Nelson,

SUBJ: NOTICE OF AVAILABILITY OF THE DRAFT ENVIRONMENTAL ASSESSMENT FOR
NAVAL SPECIAL OPERATIONS TRAINING IN WESTERN WASHINGTON

This letter is to follow up to the early information provided in April 2017 (Enclosure (1)) and to inform you that the Naval Special Warfare Command has prepared a draft environmental assessment for its proposed training in western Washington in accordance with the National Environmental Policy Act of 1969 and Navy procedures. We invite you to review and comment on the enclosed draft EA and evaluate whether you believe there may be a potential for this proposed action to significantly affect tribal rights or protected resources.

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Naval Facilities Engineering Command Northwest
Attention: Project Manager, EV21.AW
1101 Tautog Circle, Suite 203
Silverdale, WA 98315-1101

October 2019

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Sincerely,



T. H. Lazo, P.E.
Navy Environmental Program Director
Northwest Region
By Direction of the Commanding Officer

Enclosures: 1. Proposed Naval Special Operations Training in Western Washington State
2. DVD - Draft Environmental Assessment

Copy to: Mr. Earl Davis, Cultural Resources Specialist
Mr. Steve Spencer, Natural Resources Director

October 2019



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUTOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

5090
Ser N45/18-00068
22 Jan 2018

The Honorable Charles "Guy" Miller
Skokomish Indian Tribe
80 N Tribal Center Road
Skokomish Nation, WA 98584

Dear Chairman Miller,

SUBJ: NOTICE OF AVAILABILITY OF THE DRAFT ENVIRONMENTAL ASSESSMENT FOR
NAVAL SPECIAL OPERATIONS TRAINING IN WESTERN WASHINGTON

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Sincerely,



T. H. Lazo, P.E.
Navy Environmental Program Director
Northwest Region
By Direction of the Commanding Officer

Enclosures: 1. Proposed Naval Special Operations Training in Western Washington State
2. DVD - Draft Environmental Assessment

Copy to: Ms. Kris Miller, Tribal Historic Preservation Officer
Mr. Joseph Pavel, Natural Resources Director

October 2019



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUTOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

5090
Ser N45/18-00068
22 Jan 2018

The Honorable Sunny Clear
Snoqualmie Indian Tribe
P.O. Box 969
Snoqualmie, WA 98065

Dear Chairwoman Clear,

SUBJ: NOTICE OF AVAILABILITY OF THE DRAFT ENVIRONMENTAL ASSESSMENT FOR
NAVAL SPECIAL OPERATIONS TRAINING IN WESTERN WASHINGTON

This letter is to follow up to the early information provided in April 2017 (Enclosure (1)) and to inform you that the Naval Special Warfare Command has prepared a draft environmental assessment for its proposed training in western Washington in accordance with the National Environmental Policy Act of 1969 and Navy procedures. We invite you to review and comment on the enclosed draft EA and evaluate whether you believe there may be a potential for this proposed action to significantly affect tribal rights or protected resources.

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1101 Tautog Circle, Suite 203
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Sincerely,



T. H. Lazo, P.E.
Navy Environmental Program Director
Northwest Region
By Direction of the Commanding Officer

Enclosures: 1. Proposed Naval Special Operations Training in Western Washington State
2. DVD - Draft Environmental Assessment

Copy to: Ms. Lora Pennington, Cultural Resources Director/Tribal Historic Preservation Officer
Ms. Cindy Spiry, Environment and Natural Resources Director

October 2019



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUTOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

5090
Ser N45/18-00068
22 Jan 2018

The Honorable Arnold Cooper
Squaxin Island Tribe of the Squaxin Island Indian Reservation
10 SE Squaxin Lane
Shelton, WA 98584

Dear Chairman Cooper,

SUBJ: NOTICE OF AVAILABILITY OF THE DRAFT ENVIRONMENTAL ASSESSMENT FOR
NAVAL SPECIAL OPERATIONS TRAINING IN WESTERN WASHINGTON

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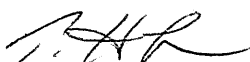
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If your staff has questions, please contact Mrs. Carolyn Winters, Tribal Liaison, at (360)315-5400 or by email, carolyn.winters@navy.mil.

Sincerely,



T. H. Lazo, P.E.
Navy Environmental Program Director
Northwest Region
By Direction of the Commanding Officer

Enclosures: 1. Proposed Naval Special Operations Training in Western Washington State
2. DVD - Draft Environmental Assessment

Copy to: Ms. Rhonda Foster, Cultural Resources Director
Mr. Andy Whitener, Natural Resources Director

October 2019



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUTOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

5090
Ser N45/18-00068
22 Jan 2018

The Honorable Shawn Yanity
Stillaguamish Tribe of Indians of Washington
P.O. Box 277
Arlington, WA 98223

Dear Chairman Yanity,

SUBJ: NOTICE OF AVAILABILITY OF THE DRAFT ENVIRONMENTAL ASSESSMENT FOR
NAVAL SPECIAL OPERATIONS TRAINING IN WESTERN WASHINGTON

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Attention: Project Manager, EV21.AW
1101 Tautog Circle, Suite 203
Silverdale, WA 98315-1101

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Sincerely,



T. H. Lazo, P.E.
Navy Environmental Program Director
Northwest Region
By Direction of the Commanding Officer

Enclosures: 1. Proposed Naval Special Operations Training in Western Washington State
2. DVD - Draft Environmental Assessment

Copy to: Ms. Tara Boser, Cultural Resources Director
Ms. Gina Gray, Natural Resources Director

October 2019



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUTOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

5090
Ser N45/18-00068
22 Jan 2018

The Honorable Leonard Forsman
Suquamish Tribe
PO Box 498
Suquamish, WA 98392

Dear Chairman Forsman,

SUBJ: NOTICE OF AVAILABILITY OF THE DRAFT ENVIRONMENTAL ASSESSMENT FOR
NAVAL SPECIAL OPERATIONS TRAINING IN WESTERN WASHINGTON

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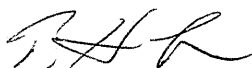
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T. H. Lazo, P.E.

Navy Environmental Program Director
Northwest Region

By Direction of the Commanding Officer

Enclosures: 1. Proposed Naval Special Operations Training in Western Washington State
2. DVD - Draft Environmental Assessment

Copy to: Mr. Wayne George, Executive Director
Mr. Dennis Lewarch, THPO Cultural Resources
Mr. Steve Todd, Ecologist

October 2019



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUTOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

5090
Ser N45/18-00068
22 Jan 2018

The Honorable Brian Cladoosby
Swinomish Indians of the Swinomish Reservation of Washington
11404 Moorage Way
La Conner, WA 98257

Dear Chairman Cladoosby,

SUBJ: NOTICE OF AVAILABILITY OF THE DRAFT ENVIRONMENTAL ASSESSMENT FOR
NAVAL SPECIAL OPERATIONS TRAINING IN WESTERN WASHINGTON

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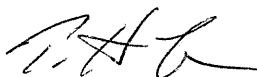
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Sincerely,



T. H. Lazo, P.E.

Navy Environmental Program Director
Northwest Region

By Direction of the Commanding Officer

Enclosures: 1. Proposed Naval Special Operations Training in Western Washington State
2. DVD - Draft Environmental Assessment

Copy to: Ms. Josephine Jefferson, Cultural Resources Technician
Mr. Todd Mitchell, Environmental Protection

October 2019



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUTOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

5090
Ser N45/18-00068
22 Jan 2018

The Honorable Marie Zackuse
Tulalip Tribes of Washington
6406 Marine Dr. NW
Tulalip, WA 98271

Dear Chairwoman Zackuse,

SUBJ: NOTICE OF AVAILABILITY OF THE DRAFT ENVIRONMENTAL ASSESSMENT FOR
NAVAL SPECIAL OPERATIONS TRAINING IN WESTERN WASHINGTON

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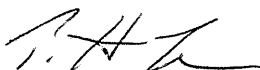
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T. H. Lazo, P.E.

Navy Environmental Program Director
Northwest Region

By Direction of the Commanding Officer

Enclosures: 1. Proposed Naval Special Operations Training in Western Washington State
2. DVD - Draft Environmental Assessment

Copy to: Mr. Terry Williams, Treaty Rights Program Manager
Mr. Richard Young, Cultural Preservation Officer
Mr. Ray Fryberg, Natural Resources Executive Director

October 2019



PHONE (360) 598-3311
Fax (360) 598-6295
<http://www.suquamish.nsn.us>

THE SUQUAMISH TRIBE

PO Box 498 Suquamish, WA 98392-0498

February 21, 2018

Naval Facilities Engineering Command, Northwest
1101 Tautog Circle
Silverdale, WA 98315-1101
ATTN: Project Manager, EV21.AW

Subject: Draft EA for Naval Special Operations Training in Western Washington

Dear Project Manager, EV21.AW:

This letter provides comments on the Draft Environmental Assessment (EA) for Naval Special Operations Training in Western Washington.

The Suquamish Tribe ("Suquamish") is a signatory to the 1855 Treaty of Point Elliott and the proposed training activities are located within and adjacent to Suquamish's usual and accustomed fishing grounds and stations ("U&A"). Based on information provided in the 22 January letter and in the Draft EA, existing training activities along beaches, nearshore, and shoreline areas and the proposed significant expansion of these training activities may impact treaty-reserved fishing activities, including the gathering of shellfish by Suquamish tribal members.

We request government-to-government consultation with the Navy to discuss the proposed activities in greater detail. The main purpose of this consultation is to develop good communication and coordination between the Navy and Suquamish with the intent to avoid potential impacts from the Navy's training on tribal fisheries activities.

The Draft EA describes the 'No Action' alternative that would continue the same levels of training activity that have been on-going in Puget Sound for the past several decades. This involves 2 training blocks per year in limited areas (note: a 'training block' is defined as 2-8 week period involving up to 84 people). In the 'No Action' alternative, each training site is used no more than 10 times per year.

Action alternatives 1, 2, and 3 progressively increase (above the 'No Action' alternative) the levels and frequency of special operations training along beaches and shoreline areas. Alternative 3 (the Navy's preferred alternative) would include additional training areas in the Whidbey Island and North Puget Sound areas and along the Washington Coast (in addition to that already occurring in central Puget Sound and Hood Canal). Training blocks would be increased from 2 ('No Action') to 6 per year and each training site could be used up to 36 times per year (which

October 2019

Project Manager, EV21.AW
February 21, 2018
Page 2

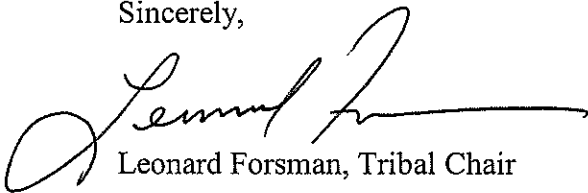
equates to about every 10 days on average). Training sites include State Parks, other public properties, and private properties where the Navy is granted approval from the land owner(s). A single training event at a given site can include as many as 34 Navy personnel, with the event lasting from 2 – 72 hours.

To provide an example of a scenario (i.e., potential conflict) that Suquamish wishes to avoid is one where tribal members are gathering shellfish on a beach or beaches (which often occurs at night), or are scheduled to gather, at the same time that Navy Special Operations training is scheduled to take place at or in close proximity to the tribal fishing activity. Consultation with the tribe, including close coordination, is needed to avoid this type of scenario.

The Navy's "preliminary assessment" in the Draft EA is that the proposed actions do not potentially have significant impacts to tribal resources, tribal rights or Indian lands. Based on this assessment, the Navy elected not to carry out a detailed analysis of impacts to American Indian Traditional Resources. Suquamish views this as a flawed determination. The Navy needs to consult with the affected tribes prior to making such a decision. Suquamish also disagrees specifically with the Navy's conclusion of no significant impacts to Traditional Cultural Properties (TCPs) regarding cultural resources (see Table ES-1). Only the individual affected tribe(s), not the Navy, can make this determination after they have been consulted specifically on the subject. At p. 3.2-12 (3.2.2.3) the Draft EA states: "To date, no TCPs have been identified in the APEs. Tribes are being consulted ... for identifying TCPs".

Please contact Steve Todd, Suquamish Tribe Ecologist, at 360-394-8667 to coordinate a government-to-government meeting. For issues concerning cultural resources, including Section 106 consultation, please contact Dennis Lewarch, the Suquamish Tribal Historic Preservation Officer, at 360-394-8529.

Sincerely,

A handwritten signature in black ink, appearing to read "Leonard Forsman", with a stylized, flowing script.

Leonard Forsman, Tribal Chair

October 2019

B.2 Navy ACHP and SHPO Correspondence



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUTOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

5090
Ser N45/19-00336
02 July 2019

Reid Nelson
Director, Federal Agency Programs
Advisory Council on Historic Preservation
1100 Pennsylvania Avenue
Suite 803
Old Post Office Building Washington, DC 20004

SUBJECT: REQUEST FOR REVIEW OF THE FINDING OF NO ADVERSE EFFECTS
TO HISTORIC PROPERTIES, NAVAL SPECIAL OPERATIONS TRAINING IN
WESTERN WASHINGTON (DAHP Log. No. 2017-05-03022-USN and ACHP Log.
No. 0011669)

Dear Mr. Nelson:

In accordance with 36 CFR 800.5(c)(2)(i), the Navy requests review of its finding of No Adverse Effect by the proposed Naval Special Operations Training in Western Washington. There are five conditions to support the finding of No Adverse Effect. The conditions were developed and agreed upon during consultation with the Washington State Historic Preservation Officer (SHPO) and consulting tribes. The SHPO is requesting the agreed upon conditions be stipulated in a two-party memorandum of agreement (MOA) as a prerequisite to her concurrence with the finding of effect. Under the Navy's interpretation of the regulations, the Navy has met all the requirements imposed by 36 CFR 800.5(b) and has no obligation to enter into a MOA stipulating to the five conditions.

As reflected in the enclosed correspondence, after six months of discussions, SHPO failed to formally agree or disagree with the Navy's finding of No Adverse Effect with conditions. As a result, the Navy is proceeding forward by considering SHPO's lack of response as a disagreement with the finding per 36 CFR 800.5(c)(2), and requests ACHP review.

Enclosed is a chronology of our Section 106 consultation (enclosure 1). The Navy began discussing the subject undertaking with SHPO's staff in late 2015 and formally initiated

October 2019

consultation in April 2017. Enclosure 2 is correspondence evidencing the Section 106 process including letters relating to SHPO's request for a MOA. Although enclosure 2 provides key correspondence between the Navy, SHPO, and ACHP, additional documentation specified in 36 CFR 800.11(e) is available upon request. In accordance with 36 CFR 800.5(c)(2)(i), this letter and enclosures have been made available to the public via <https://navfac.navy.mil/NSOEA>

If you require additional information, please contact Mr. David Grant, NAVFAC NW Archaeologist at (360) 396-0919 or at dave.m.grant@navy.mil.

Sincerely,



T. H. LAZO, P.E.
Navy Environmental Program
Director, Northwest Region
By Direction of the Commanding
Officer

Enclosures: 1. Chronology of Consultation
2. Consultation Record of Key Correspondence

Copy to:

WA SHPO

Confederate Tribes of the Grand Ronde Community of Oregon (Ms. Cheryl K. Pouley, Archaeologist, on behalf of Briece Edwards, Historic Preservation Office Manager)

Jamestown S'Klallam Tribe (Mr. David Brownell, THPO)

Lower Elwha Klallam Tribe (Mr. Bill White, Cultural Resources Archaeologist)

Muckleshoot Tribe (Ms. Laura Murphy, Archaeologist)

Nisqually Tribe THPO (Ms. Jackie Wall, THPO)

Port Gamble S'Klallam Tribe (Ms. Stormy Purser, THPO)

Shoalwater Tribe of Shoalwater Bay Tribe of the Shoalwater Bay CR (Mr. Earl Davis, CR Specialist)

Skokomish Tribe (Ms. Kris Miller, THPO)

Squaxin Tribe (Ms. Stephanie Neil, Archaeologist, on behalf of THPO Rhonda Foster)

Suquamish Tribe (Mr. Dennis Lewarch, THPO)

Upper Skagit Tribe (Mr. Scott Shuyler, Cultural Resources Manager)

2 July 2019

MEMORANDUM FOR THE RECORD

Subj: NAVAL SPECIAL OPERATIONS TRAINING IN WESTERN WASHINGTON SECTION 106 CHRONOLOGY
(DAHP Log No: 2017-05-03022-USN; ACHPConnect Log No: 0011669)

Ref: (a) Consulting Tribes and Responses at Steps in Section 106 Process
(b) Interested Party Mailing List

- 9 Nov 2015 Navy call to Deputy State Historic Preservation Officer to discuss proposed types of training and define which types meet the definition of an undertaking.
- Apr 2016-2017 Navy invites SHPO and Department of Archaeology and Historic Preservation staff to attend equipment demonstrations and discuss details of training five times during this period. One meeting was cancelled due to weather. DAHP unable to attend the other offerings.
- 24 Apr 2017 Navy letters initiating consultation to SHPO, ACHP¹, tribes, and interested parties.** In addition, e-mails and telephone calls to 26 Tribes (whose traditional territory covered the proposed area of potential effect [APE]). Thirty-three interested parties also receiving initiating consultation letters (historic societies, museums, Certified Local Governments, and governments within or directly adjacent to the proposed APE).
- 9 May 2017 SHPO letter replying they look forward to consultation**
- 26 May 2017 ACHP letter replying they will not be actively participating**
- Apr/May 2017 Nisqually Tribe, Lower Elwha Klallam Tribe, and the Skokomish Tribe express interest. Nisqually requests Navy remove McNeil Island from consideration. Upon further discussion with Nisqually Tribe, only the area around the closed prison site will be included in APE. One response from interested party unrelated to undertaking.
- 22 Jan 2018 Navy letters defining of APE sent to SHPO and interested parties and letters, emails, and phone calls to each tribe.** No response from Interested Parties.
- 29 Jan 2018 Shoalwater Bay Tribe of the Shoalwater Bay agrees with APE and requests IDP and Upper Skagit Tribe agree with APE.
- 30 Jan 2018 Snoqualmie Tribe and Squaxin Tribe agree with APE.
- 31 Jan 2018 Lower Elwha Klallam Tribe, Muckleshoot Tribe, and Port Gamble S'Klallam Tribe agree with APE.

¹ Bold indicates key correspondence letters included in enclosure 2.

8 Feb 2018	SHPO letter conveying agreement with APE
28 Feb 2018	Navy letter defining “reasonable and good faith” effort on identifying historic properties sent to SHPO and interested parties. Tribal consultation in form of letter followed by email and telephone calls to each tribe.
28 Mar 2018	SHPO letter response providing additional interested parties to include in consultation
3 Apr 2018	Jamestown S’Klallam Tribe provides information on resources of concern in their territory requested development of an inadvertent discovery plan (IDP).
4 Apr 2018	Shoalwater Bay Tribe of the Shoalwater Bay also request development of an IDP.
Apr-Jun 2018	Requests from Muckleshoot Tribe and Squaxin Tribe to review IDP (dates or if conveyed by email or via phone call undetermined, but both received prior to Navy email transmitting IDP to four tribes who made requests on 20 June 2018).
14 Jun 2018	Navy letter to SHPO determining National Register of Historic Places (NHPA) eligibility of previously un-evaluated buildings
5 July 2018	SHPO letter concurring with determination building are not eligible for listing in the NHPA
22 Oct 2018	Navy submits letter dated 18 Oct 2018 to SHPO with finding of No Adverse Effect with two conditions (sensitivity training and implementation of an inadvertent discovery plan) and request for concurrence. Letter copied to Tribes and interested parties with follow up emails and telephone calls to each tribe. No response from Interested Parties.
29 Oct 2018	The Lower Elwha Klallam Tribe responds but have no comment on the finding of effect
20 Nov 2018	The Confederated Tribes of the Grand Ronde Community of Oregon responds but also with no comment
20 Nov 2018	SHPO response letter requesting further information including 1) maps of proposed training areas, 2) protocols to avoid damaging all cultural resource types, 3) proof of Secretary of the Interior (Sol) Qualifications of NAVFAC NW staff archaeologists, and 4) cultural resources sensitivity training materials.
19 Dec 2018	Navy letter to SHPO responding for providing requested information and repeating request for concurrence with finding of effect

- 15 Jan 2019** **SHPO letter acknowledging Navy's adequate documentation and request Navy enter into a programmatic agreement** to include 1) a process for new locations in future (when a new undertaking/expansion of APE), 2) Assurance Sol qualified staff review all proposed training activities/area, and 3) details of a notification process to SHPO when review/clearance complete.
- 26 Feb 2019** **Navy letter stating position that a 'concise' Programmatic Agreement is unnecessary and the Navy is already committing to five conditions:** 1) new undertakings or expansion of the APE already necessitate reopening consultation, 2) Sol qualified staff review of proposed properties prior to pursuit of real estate agreements for training, 3) Implementation of the approved IDP, 4) cultural resources sensitivity training, and 5) periodic affirmation/confirmation to SHPOs that the Sol reviews were being completed. Letter included third request for concurrence with Finding of Effect.
- 28 Mar 2019** **SHPO letter requesting Navy enter into a memorandum of agreement (MOA) capturing the five conditions**
- 15 Apr 2019** **Navy letter reiterating any form of agreement document is unnecessary and requesting SHPO respond with agreement or disagreement in writing**
- 25 Apr 2019** **SHPO letter reiterating an MOA is necessary to codify the agreement and five conditions and requesting a draft MOA for review at Navy's earliest convenience and copies of correspondence received from affected tribes**

DAVID M. GRANT
NAVFAC NW EV-9

TRIBES CONTACTED LETTER, EMAIL, PHONE	TRIBAL RESPONSES DURING 106 PROCESS					
TRIBE	Initiation	APE	HP ID	IDP	DOE	FOE
Clatsop-Nehalem Confederated Tribes						
Confederated Tribes of Grand Ronde Community of Oregon						X
Confederated Tribes and Bands of the Yakama Nation						
Confederated Tribes of the Chehalis Reservation						
Cowlitz Indian Tribe						
Hoh Indian Tribe						
Jamestown S'Klallam Tribe			X	X*		
Lower Elwha Klallam Tribe	X	X				X
Muckleshoot Indian Tribe of the Muckleshoot Reservation		X	X	X		
Nisqually Indian Tribe of the Nisqually Reservation	X					
Nooksack Indian Tribe of Washington						
Port Gamble S'Klallam Tribe		X				
Puyallup Tribe of the Puyallup Reservation						
Quinault Indian Nation						
Samish Indian Nation						
Shoalwater Bay Tribe of the Shoalwater Bay Reservation		X	X	X**		
Skokomish Indian Tribe	X					
Snoqualmie Indian Tribe		X				
Squaxin Island Tribe of the Squaxin Island Reservation		X	X	X		
Stillaguamish Tribe of Indians of Washington						
Suquamish Indian Tribe of the Port Madison Reservation						
Swinomish Indians of the Swinomish Reservation of Washington						
Tulalip Tribes of Washington						
Upper Skagit Indian Tribe		X				
Chinook Indian Nation						
APE = area of potential effect, HP ID = historic properties identification, IDP = inadvertent discovery plan, DOE= determination of effect, FOE = finding of effect						
* draft IDP requested at time but not received by tribe (IDP provided June 2019)						
** tribal agreement with IDP						

Anacortes Museum
1305 8th Street
Anacortes, WA 98221

Anderson Island Historical
Society
9306 Otso Point Road
Anderson Island, WA 98303

Bainbridge island Historical
Society
215 Ericksen Avenue NE
Bainbridge, WA 98110

Heather Beckmann
Associate Planner
City of Bainbridge Island
280 Madison Avenue North
Bainbridge, WA 98110

Rob Chave
Planning Manager
City of Edmonds
121 5th Avenue North
Edmonds, WA 98020

Lindey Sehmel
City Planner
City of Gig Harbor
3510 Grandview Street
Gig Harbor, WA 98335

Rian Shay
Planner
City of Hoquiam
609 8th Street
Hoquiam, WA 98550

John McKonagh
Associate Planner
City of Port Townsend
250 Madison Street
Port Townsend, WA 98368

Reuben McKnight
Historic Preservation Officer
City of Tacoma
747 Market Street
Tacoma, WA 98402

Clallam County Historical
Society
P.O. Box 1327
Port Angeles, WA 98362-1327

Kristen Griffin
Reserve Manager
Ebey's Landing National
Historic Reserve
P.O. Box 774
Coupeville, WA 98239-0774

Edmonds South Snohomish
County
P.O. Box 52
Edmonds, WA 98020-0052

Fox Island Historical Society
P.O. Box 242
Fox Island, WA 98333-0242

Ilwaco Heritage Foundation
P.O. Box 153
Ilwaco, WA 98624-0153

Island County Historical
Society
P.O. Box 305
Coupeville, WA 98239-0305

Jefferson County Historical
Society
210 Madison
Port Townsend, WA 98368

Kitsap Historical Society
280 4th Street
Bremerton, WA 98337
Lopez Island Historical
Society and Museum
P.O. Box 163
Lopez Island, WA 98261-0163

Mason County Historical
Society
P.O. Box 843
Belfair, WA 98528-0843

Peninsula Historical Society
P.O. Box 744
Gig Harbor, WA 98335-0744

Sean Gaffney
Long Range Planner
Pierce County
2401 So. 35th
Tacoma, WA 98409

Poulsbo Historical Society
P.O. Box 844
Poulsbo, WA 98370-0844

Randy Harder
Executive Director
Point No Point Treaty Council
19472 Powder Hill Place NE
Poulsbo, WA 98370-8684

Polson Park and Museum
Historical Society
1611 Riverside Avenue,
Hoquiam, WA 98550

Puget Sound Maritime
Historical Society
P.O. Box 81142
Seattle, WA 98108-1142

Salmon Beach Historical
Committee
P.O. Box 70931
Tacoma, WA 98407-0931

San Juan Historical Society
P.O. Box 441
Friday Harbor, WA 98250-0441

Sumner Historical Society
P.O. Box 517
Sumner, WA 98390-0517

Tacoma Historical Society
P.O. Box 1865
Tacoma, WA 98401-1865

Vashon Maury Island Heritage
Association
P.O. Box 723
Vashon, WA 98070

Washington State Historical
Society
1911 Pacific Avenue
Tacoma, WA 9840

October 2019



ATTN: Dave Grant
Archaeologist
Naval Facilities Engineering Command (NAVFAC) Northwest EV-9

July 25, 2019

Re: Naval Special Operations Training in Western Washington

Mr. Grant,

The Jamestown S'Klallam Tribe has received a packet of materials the Navy has submitted to the Advisory Council on Historic Preservation regarding the Navy's proposed Naval Special Operations Training in Western Washington. The Jamestown Tribe does not concur with the Navy's determination of no adverse effects to historic and cultural properties. The Jamestown Tribe has informed Navy staff since April 2018 of concerns regarding sites of great cultural and historic importance to the Tribe that are within the proposed area of undertaking. **These include sites that are not recorded in any state or federal database and are known only to Tribal Elders.** The Tribe has requested meetings with the Navy, starting in April of 2018, to consult regarding the avoidance of spits and beaches listed on the Navy's proposed area of operations list that contain burials and sites of sensitivity.

The Jamestown Tribe requests an in-person government-to-government consultation meeting regarding the proposed training activities in Sequim Bay, Discovery Bay, and Port Townsend Bay. At your earliest convenience, please contact me at 360-681-4638 or dbrownell@jamestowntribe.org to arrange meeting.

Sincerely,

A handwritten signature in black ink, appearing to read "David Brownell".

David Brownell
Tribal Historic Preservation Officer
Jamestown S'Klallam Tribe

October 2019



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUTOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

5090
Ser N45/17-200
24 Apr 2017

Allyson Brooks, Ph.D.
State Historic Preservation Officer
Washington Department of Archaeology & Historic Preservation
PO Box 48343
Olympia, WA 98504-8343

Dear Dr. Brooks:

In accordance with 36 CFR Part 800, this letter is to initiate Section 106 consultation on the proposed undertaking; Naval Special Operations Training in Western Washington State. The Navy proposes to conduct small-unit land and maritime training activities for naval special operations personnel. Proposed training would occur on selected nearshore lands and in the inland waters of Puget Sound, including the Hood Canal, as well as southwestern Washington Coast (Enclosure 1).

The training involves small-units of personnel. The intent of the proposed training is to: 1) teach trainees the skills needed to avoid detection, and 2) not leave any trace of their presence during or after the training activities. The undertaking does not include the use of live-fire ammunition, explosive demolitions, manned air operations, off-road driving, vegetation cutting, digging, tree climbing, the building of camp fires, or the building of infrastructure. The two regions identified in Enclosure (1) offer unique conditions, which create opportunities for realistic and challenging special operations training in a safe, sheltered, cold-water environment. The combination of military presence in proximity to sites with diverse shoreline terrain, hydrography, and bathymetry is vital to the progressive improvement of skill sets and readiness requirements. Additionally, the close proximity to several existing Navy installations maximizes logistics, safety, and security. As specific training objectives are identified and scheduled, compatible sites within the two regions would be selected to support the activity.

The purpose of the proposed undertaking is to support small-unit training activities of Navy Special Operations personnel in maritime and land training environments. The need for the undertaking is to provide capabilities for training and equipping combat-capable special operations personnel ready to deploy worldwide.

October 2019

5090
Ser N45/17-200
24 Apr 2017

Training will consist of both water-based and land-based training. For certain events, the activity will be a combination of the two. Training events will typically be between 2 and 72 hours in duration. For short-duration events, it is possible that multiple iterations of the same activity will be conducted to maximize the periodic use of an individual training site and for trainee throughput. The training activities may include: Diving and Swimming, Insertion and Extraction, Launch and Recovery, Unmanned Underwater Vehicle, Over-the-Beach, Special Reconnaissance, High-Angle Climbing, Simulated Building Clearance, and Unmanned Aircraft Systems (Enclosure 2).

The Navy looks forward to consulting with you on the proposed Naval Special Operations Training. Open House Outreach Meetings with the public have been scheduled to provide further information on this undertaking. These meetings are scheduled as follows:

- May 2: 5-8pm, North Kitsap High School, 1780 NE Hostmark Street, Poulsbo, WA.
- May 3: 5-8pm, Blue Heron Elementary School, 3939 San Juan Avenue, Port Townsend, WA.; and
- May 4: 5-8pm, Oak Harbor School District Boardroom, 350 S Oak Harbor Street, Oak Harbor, WA

If you require additional information or have questions regarding this project, my point of contact is Russell Sackett, NAVFAC NW Historical Architect. Mr. Sackett can be reached at (360)396-0927 or by email at russell.h.sackett1@navy.mil.

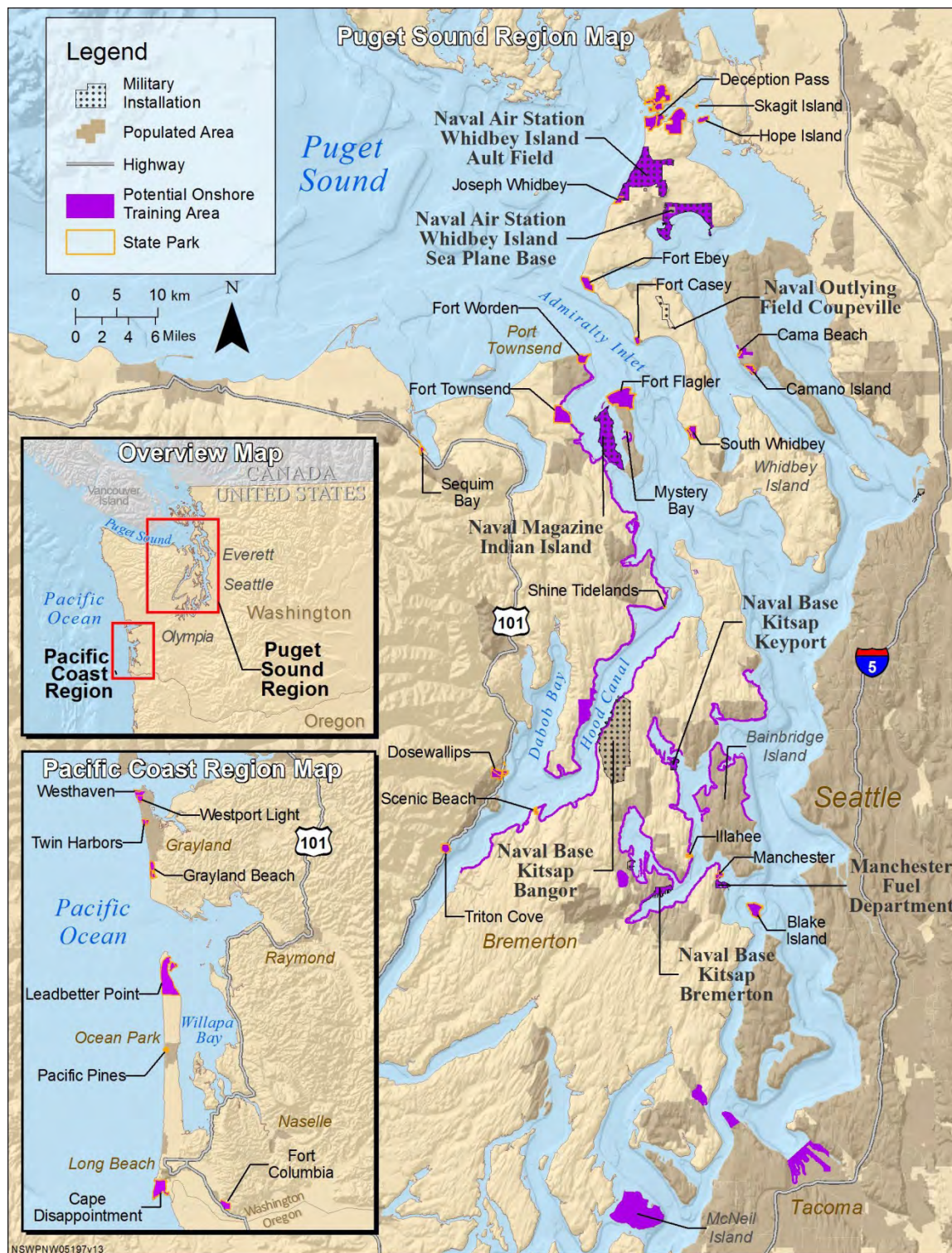
Sincerely,



T. H. Lazo, P.E.
Environmental Business Line Leader,
Northwest Region
By Direction of the Commanding Officer

Enclosures: 1. Proposed Naval Special Operations Training Areas
2. Training Activities Defined

ENCLOSURE 1: PROPOSED NAVAL SPECIAL OPERATIONS TRAINING AREAS



ENCLOSURE 2: TRAINING ACTIVITIES DEFINED

Diver and Swimmer Training: Trainees would maneuver to an objective area, such as a beach, harbor, or moored vessel, and conduct a variety of water-based activities.

Insertion and Extraction Training: Trainees would approach or depart an objective area using small watercraft. This activity trains personnel to effectively insert and extract swimmers, divers, and/or equipment during the day or night.

Launch and Recovery Training: Trainees would launch and recover up to two watercraft from a boat ramp or vessel.

Unmanned Underwater Vehicle Training: Trainees would hand-launch and recover a battery-powered watercraft.

Over-the-Beach Training: Trainees would exit the water, quietly move into upland areas, and remain hidden.

Special Reconnaissance Training: Trainees would hike to an observation point while remaining hidden, use observation techniques, follow procedures, and report back on a scenario involving role-play with military instructors or support staff.

High-Angle Climbing Training: Trainees would use climbing gear to navigate cliffs, rock faces, and other vertical structures to develop infiltration rescue and recover techniques.

Simulated Building Clearance Training: Trainees would conduct area/structure clearance activities at a secure site or engage in role-play threat scenarios. Training would include the use of simulated munitions, which are specialized plastic or paint capsules that are water soluble.

Unmanned Aircraft Systems Training: Unmanned aircraft systems would be used on military installations, designated warning areas, or restricted airspace and operated in accordance with the Federal Aviation Administration's Small Unmanned Aircraft Rule (Part 107). Trainees would hand-launch and recover lightweight, battery-powered systems for low-altitude training.

October 2019



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

5090
Ser N45/17-201
24 Apr 2017

Reid Nelson, Director
Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington, DC 20001-2637

Dear Mr. Nelson:

In accordance with 36 CFR Part 800, the Navy is initiating Section 106 consultation on the proposed undertaking; Naval Special Operations Training in Western Washington State. The Navy proposes to conduct small-unit land and maritime training activities for naval special operations personnel. Proposed training would occur on selected nearshore lands and in the inland waters of Puget Sound, including the Hood Canal, as well as southwestern Washington Coast (Enclosure 1). The purpose of this letter is to request whether the Advisory Council on Historic Preservation has an interest in participating in the consultation.

The training involves small-units of personnel. The intent of the proposed training is to: 1) teach trainees the skills needed to avoid detection, and 2) not leave any trace of their presence during or after the training activities. The undertaking does not include the use of live-fire ammunition, explosive demolitions, manned air operations, off-road driving, vegetation cutting, digging, tree climbing, the building of camp fires, or the building of infrastructure. The two regions identified in Enclosure (1) offer unique conditions, which create opportunities for realistic and challenging special operations training in a safe, sheltered, cold-water environment. The combination of military presence in proximity to sites with diverse shoreline terrain, hydrography, and bathymetry is vital to the progressive improvement of skill sets and readiness requirements. Additionally, the close proximity to several existing Navy installations maximizes logistics, safety, and security. As specific training objectives are identified and scheduled, compatible sites within the two regions would be selected to support the activity.

The purpose of the proposed undertaking is to support small-unit training activities of Navy Special Operations personnel in maritime and land training environments. The need for the undertaking is to provide capabilities for training and equipping combat-capable special operations personnel ready to deploy worldwide.

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5090
Ser N45/17-201
24 Apr 2017

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I look forward to hearing from you as to whether ACHP wishes to participate in Section 106 consultation for this undertaking. If you require additional information or have questions regarding this project, my point of contact is Russell Sackett, NAVFAC NW Historical Architect. Mr. Sackett can be reached at (360)396-0927 or by email at russell.h.sackett1@navy.mil.

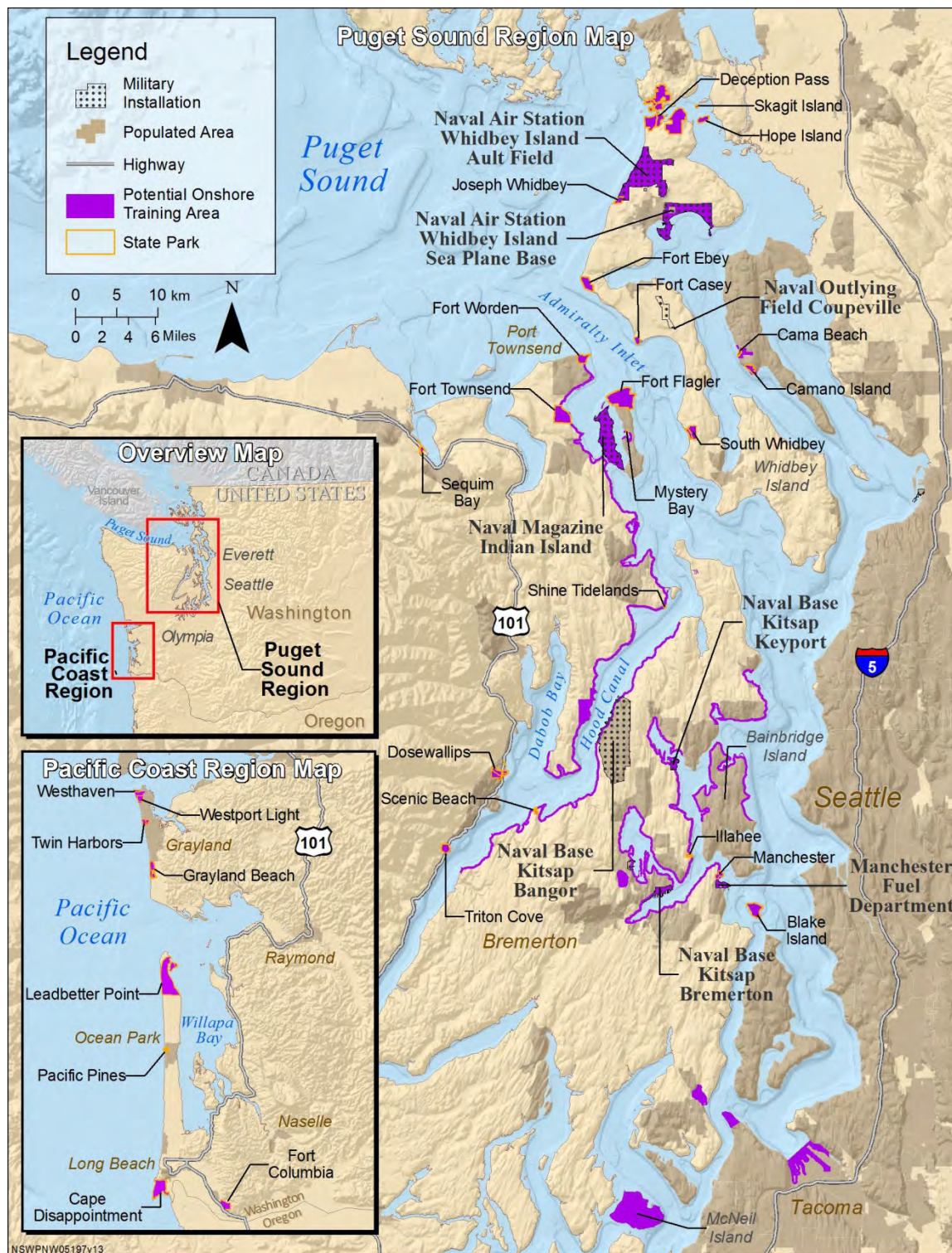
Sincerely,



T. H. Lazo, P.E.
Environmental Business Line Leader,
Northwest Region
By Direction of the Commanding Officer

Enclosures: 1. Proposed Naval Special Operations Training Areas
2. Training Activities Defined

ENCLOSURE 1: PROPOSED NAVAL SPECIAL OPERATIONS TRAINING AREAS



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October 2019



Allyson Brooks Ph.D., Director
State Historic Preservation Officer

May 9, 2017

Mr. T.H. Lazo, P.E.
Naval Facilities Engineering Command Northwest
1101 Tautog Circle
Silverdale, WA 98315-11-1

In future correspondence please refer to:
Project Tracking Code: 111215-15-USN
Re: Navy Special Operations Training in Western Washington State
Re: Section 106 Consultation Initiation

Dear Mr. Lazo:

Thank you for contacting the Washington State Department of Archaeology and Historic Preservation (DAHP) regarding the above referenced proposal. Based upon your letter, we understand that the Navy proposes to conduct small-unit land and maritime training activities for naval special operations personnel. Proposed training would occur on selected near-shore lands and in the inland waters of Puget Sound including Hood Canal as well as the southwest Washington coast, as identified in Enclosure 1.

In response thank you for your letter initiating Section 106 consultation regarding this undertaking. We look forward to your definition of the project area of potential effect (APE) and your survey methodology before proceeding with any inventories.

These comments are based on the information available at the time of this review and on behalf of the State Historic Preservation Officer (SHPO) in conformance with Section 106 of the National Historic Preservation Act and its implementing regulations 36 CFR 800. Also, we appreciate receiving copies of any correspondence or comments from affected tribes, local historic preservation agencies, and other parties that you receive as you consult under the requirements of 36 CFR 800.4(a)(4). Should additional information become available, our assessment may be revised.

Finally, please note that in order to streamline our responses, DAHP requires that all documents related to project reviews be submitted electronically. Correspondence, reports, notices, photos, etc. must now be submitted in PDF or JPG format. For more information about how to submit documents to DAHP please visit: <http://www.dahp.wa.gov/programs/shpo-compliance>. To assist you in conducting a cultural resource survey and inventory effort, DAHP has developed guidelines including requirements for survey reports. You can view or download a copy from our website.

Thank you for the opportunity to review and comment. If you have any questions, please contact me at 360-586-3073 or greg.griffith@dahp.wa.gov.

Sincerely,

A handwritten signature in blue ink, reading 'Greg Griffith', written over a light blue horizontal line.

Gregory Griffith
Deputy State Historic Preservation Officer

C: Russell Sacket, NAVFAC NW



October 2019



Preserving America's Heritage

May 26, 2017

Ms. Terilynn Lazo
Environmental Business Line Leader
Navy Region Northwest
1101 Tautog Circle
Silverdale, WA 98315-1101

Ref: *Naval Special Operations Training in Western Washington State
Puget Sound Region and Pacific Coast Region, Washington
ACHPConnect Log Number: 0011669*

Dear Ms. Lazo:

On May 1, 2017, the Advisory Council on Historic Preservation (ACHP) received your notification and supporting documentation regarding the initiation of the Section 106 consultation regarding referenced undertaking. Based upon the information you provided, we have concluded that Section 800.2(b)(1), of our regulations, "Protection of Historic Properties" (36 CFR Part 800) implementing Section 106 of the National Historic Preservation Act, does not apply to this consultation. Accordingly, we do not believe our participation in the consultation is needed at this time.

Navy Region Northwest should continue consultation with the Washington SHPO, Indian tribes, and other consulting parties to identify and evaluate historic properties and to assess any potential adverse effects on those historic properties. If you determine, through consultation with the consulting parties, that the undertaking will adversely affect historic properties, or that the development of a Section 106 agreement document (Agreement) is necessary, Navy Region Northwest must notify the ACHP and provide the documentation detailed at 36 CFR § 800.11(e). In the event that this undertaking is covered under the terms of an existing Agreement, you should follow the process set forth in the applicable Agreement.

If you have any questions or require our further assistance, please contact Ms. Katharine R. Kerr at (202) 517-0216 or by e-mail at kkerr@achp.gov and reference the ACHPConnect Log Number above.

Sincerely,

Artisha Thompson
Historic Preservation Technician
Office of Federal Agency Programs

ADVISORY COUNCIL ON HISTORIC PRESERVATION
401 F Street NW, Suite 308 1-2637

• Washington, DC 2000

Phone: 202-517-0200 • Fax: 202-517-6381 • achp@achp.gov • www.achp.gov

October 2019



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUTOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

5090
Ser N45/18-00084
22 Jan 2018

Allyson Brooks, PhD
State Historic Preservation Officer
Washington Department of Archaeology and Historic Preservation
P.O. Box 48343
Olympia, WA 98504-8343

SUBJECT: LOG NO 2017-05-03022: SECTION 106 CONSULTATION ON THE
DEFINITION OF THE AREA OF POTENTIAL EFFECTS FOR NAVAL SPECIAL
OPERATIONS TRAINING IN WESTERN WASHINGTON STATE

Dear Dr. Brooks:

Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations in 36 CFR Part 800, the Navy is continuing consultation that was initiated on April 24, 2017 (Project Number 2017-05-03022) and asks for your comments on the Navy's proposed definition of the Area of Potential Effects (APE) for the proposed Naval Special Operations Training in Western Washington State (Enclosure 1).

The purpose of the proposed undertaking is to support small-unit training activities of Navy Special Operations personnel in cold-water maritime and land training environments. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, land, and cold-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. The locations identified in Enclosure (1) offer optimum training venues because of the diverse representative cold-water maritime environment, land infrastructure, topography, and bathymetry. Additionally, the proximity of several existing Navy installations maximizes logistics, safety, and security.

The undertaking does not include the use of live-fire ammunition, explosive demolitions, manned air operations, off-road driving, vegetation cutting, digging, tree climbing, the building of camp fires, construction, or the building of infrastructure. The transit to training areas depicted in Enclosure (1) is incorporated into the APE and will include public waterways and roads.

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DEFINITION OF THE AREA OF POTENTIAL EFFECTS FOR NAVAL SPECIAL
OPERATIONS TRAINING IN WESTERN WASHINGTON STATE

Per 36 CFR §800.4(a), the Navy's definition of the APE is based on the scale and scope of the proposed training. The Environmental Assessment that is under preparation for the training identifies three regions in Western Washington State under consideration for the proposed training (Enclosure 1). Each region is defined by the various training options under consideration. For each region, training activities along the shoreline may occur up to 900 feet upland from the shore. In addition, the APE extends out into adjacent water. The APE for the three regions is as follows:

Region 1 (Enclosures 1A-1C): Region 1 extends from Port Townsend in the north to McNeal Island to the south. For clarity, this area has been arbitrarily divided into three areas; northern, central, and southern as follows:

APE for northern area consist of (Enclosure 1A):

- Fort Worden State Park;
- Fort Townsend State Park;
- Fort Flagler State Park;
- Mystery Bay State Park;
- Naval Magazine Indian Island; and
- The shoreline from Fort Worden State Park to south of Port Ludlow.

APE for the central area of Region 1 include (Enclosure 1B):

- Shine Tidelands State Park;
- Toandos Buffer Zone;
- Zelatched Point;
- Dosewallips State Park;
- Triton Cove State Park;
- Scenic Beach State Park;
- Naval Base Kitsap (NBK) Keyport;
- Illahee State Park;
- NBK Bremerton;
- McKean Camp and adjacent Kitsap Lake;
- Manchester State Park;
- NBK Manchester;
- Blake Island State Park;
- Shoreline from Port Ludlow south to Whitney Point on the west side of Dabob Bay;
- Shoreline on east side of Hood Canal across from Triton Cove State Park north to the Hood Canal Floating Bridge;
- Shoreline from Kingston south to Port Madison Reservation;

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- Shoreline from Port Madison Reservation, south to NBK Manchester (includes Liberty Bay, Dyes Inlet, and Sinclair Inlet); and
- Shoreline along the northern half of Bainbridge Island.

APE for the southern area of Region 1 include (Enclosure 1C):

- Gig Harbor;
- Point Defiance Park;
- Port of Tacoma;
- McNeal Island Prison buildings; and
- Chambers Creek Regional Wastewater Treatment Plant.

Region 2 (Enclosure 1D): Region 2 is located at the northern end of Puget Sound. Areas in Region 2 under consideration for training activities are as follows:

- Port of Anacortes;
- Deception Pass State Park;
- Skagit Island State Park;
- Hope Island State Park;
- Naval Air Station Whidbey Island Ault Field;
- Naval Air Station Whidbey Island Seaplane Base;
- Joseph Whidbey State Park;
- Fort Ebey State Park;
- Fort Casey State Park;
- South Whidbey State Park;
- Cama Beach State Park;
- Camano Island State Park;
- Sequim Bay State Park; and
- Discovery Bay and its shoreline.

Region 3 (Enclosure 1E): Region 3 is located along Washington's southwest coast. Region 3 areas under consideration for training activities are defined by the boundaries of the following state parks:

- Westhaven State Park;
- Westport Light State Park;
- Twin Harbors State Park;
- Grayland Beach State Park;
- Leadbetter Point State Park;
- Pacific Pines State Park;
- Cape Disappointment State Park; and
- Fort Columbia State Park.

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The Navy recognizes that the proposed APE may include historic properties of interest to state and federal agencies, local governments, community groups, and individuals on and near proposed training areas. In accordance with 36 CFR §800.3(f), the Navy has invited the interested parties identified in Enclosure 2 to participate as consulting parties. The Advisory Council on Historic Preservation informed the Navy on May 26, 2017 that their participation in the consultation is not needed.

The Navy also understands that the APE may include properties of cultural importance and significance to members of the Indian tribes of Washington. In order to identify possible religious or cultural significance to potentially affected tribes, the Navy has invited consultation with the following federally recognized tribes:

- Confederated Tribes and Bands of the Yakama Nation
- Confederated Tribes of the Chehalis Reservation
- Cowlitz Indian Tribe
- Jamestown S’Klallam Tribe
- Lower Elwha Klallam Tribe
- Muckleshoot Indian Tribe
- Nisqually Indian Tribe
- Nooksack Indian Tribe
- Port Gamble S’Klallam Tribe
- Puyallup Tribe of the Puyallup Reservation
- Quinault Indian Nation
- Samish Indian Nation
- Shoalwater Bay Indian Tribe of the Shoalwater Bay Indian Reservation
- Skokomish Indian Tribe
- Snoqualmie Indian Tribe
- Squaxin Island Tribe of the Squaxin Indian Reservation
- Stillaguamish Tribe of Indians of Washington
- Suquamish Indian Tribe of the Port Madison Reservation
- Swinomish Indian Tribal Community
- Tulalip Tribes of Washington
- Upper Skagit Indian Tribe

The Navy will take into consideration the results of consultation with all identified parties in the final defining of the APE.

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SUBJECT: LOG NO 2017-05-03022: SECTION 106 CONSULTATION ON THE
DEFINITION OF THE AREA OF POTENTIAL EFFECTS FOR NAVAL SPECIAL
OPERATIONS TRAINING IN WESTERN WASHINGTON STATE

I look forward to receiving your comments with our defining of the
APE for this undertaking. If you require additional information or
have questions regarding this project, my point of contact is Russell
Sackett, Historical Architect. Mr. Sackett can be reached at
(360)396-0927 or by email at russell.h.sackett1@navy.mil.

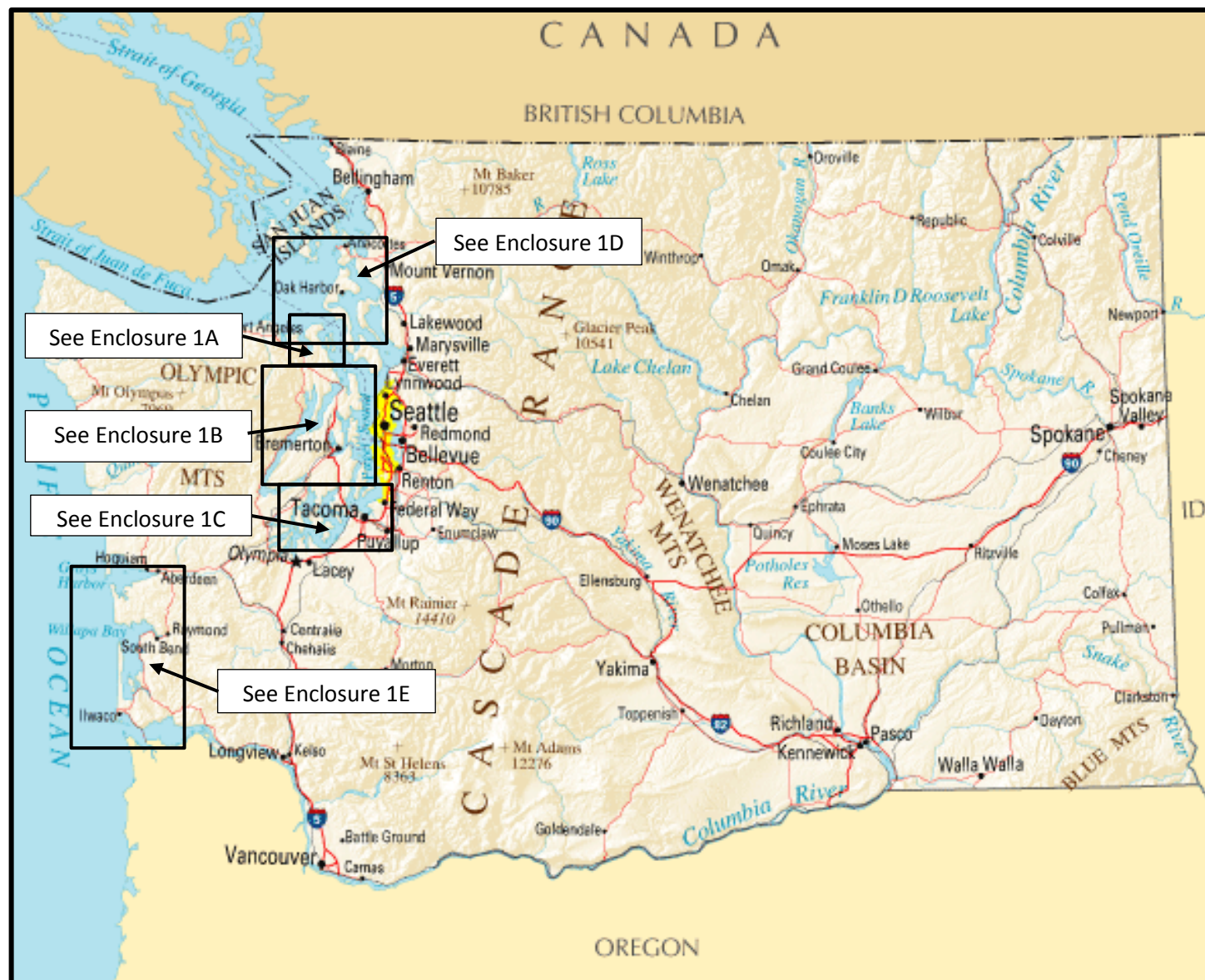
Sincerely,



T. H. LAZO, P.E.
Navy Environmental Program Director,
Northwest Region
By Direction of the Commanding Officer

Enclosures: 1. Area of Potential Effects
2. List of Invited Interested Parties

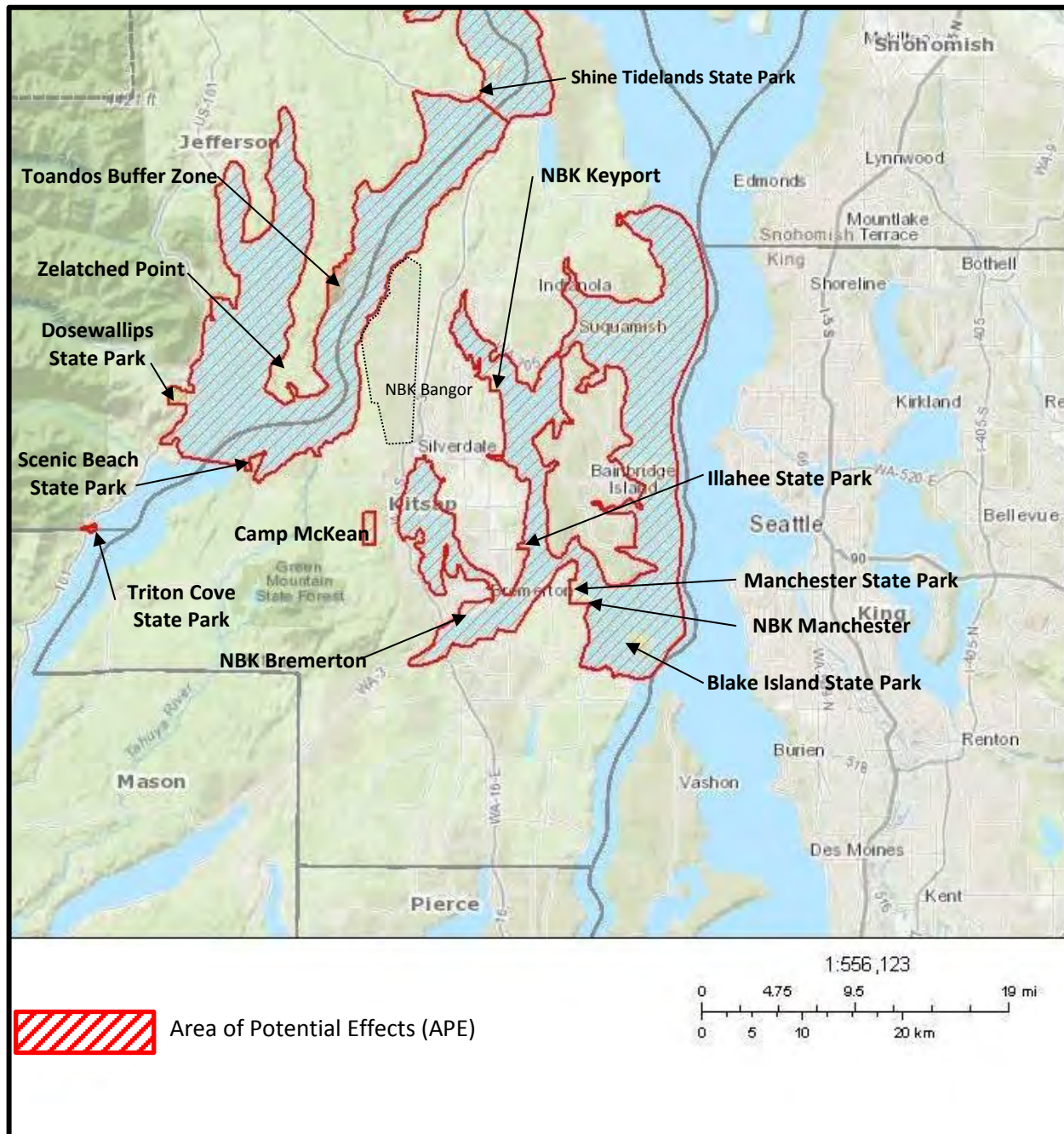
ENCLOSURE 1: AREA OF POTENTIAL EFFECTS



ENCLOSURE 1A: REGION 1 NORTHERN APE



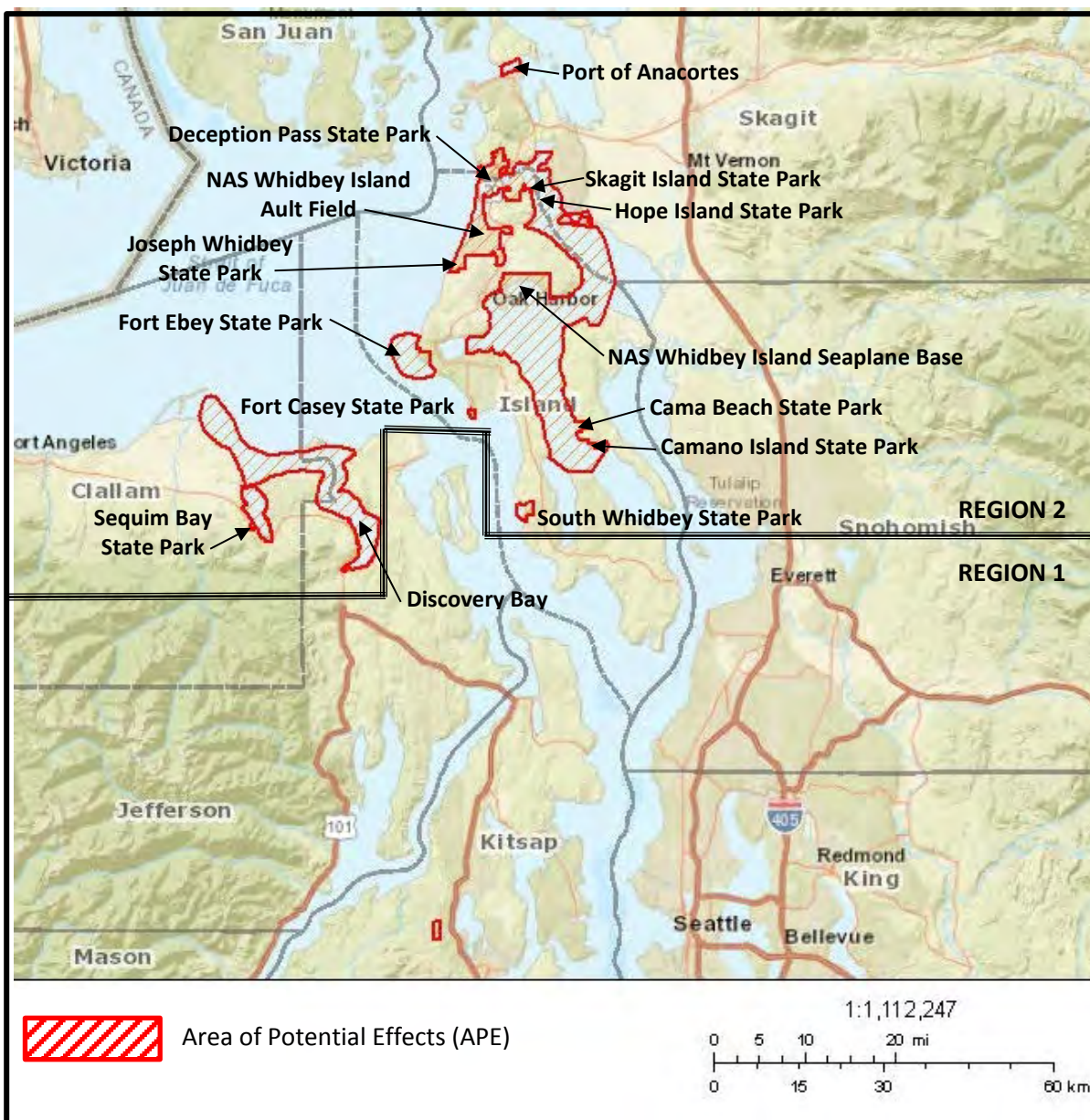
ENCLOSURE 1B: REGION 1 CENTER APE



ENCLOSURE 1C: REGION 1 SOUTHERN APE



ENCLOSURE 1D: REGION 2 APE



ENCLOSURE 1E: REGION 3 APE



ENCLOSURE 2: LIST OF INVITED INTERESTED PARTIES

Historical Societies

- Washington State Historical Society
- Bainbridge Island Historical Society
- Anderson Island Historical Society
- Clallam County Historical Society
- Edmonds South Snohomish County Historical Society
- Fox Island Historical Society
- Ilwaco Heritage Foundation
- Island County Historical Society
- Jefferson County Historical Society
- Kitsap County Historical Society
- Lopez Island Historical Society and Museum
- Mason County Historical Society
- Peninsula County Historical Society
- Polson Park and Museum Historical Society
- Poulsbo Historical Society and Museum
- Puget Sound Maritime Historical Society
- Salmon Beach Historical Committee
- San Juan Historical Society
- Sumner Historical Society
- Tacoma Historical Society
- Vashon Maury Island Heritage Association
- Anacortes Museum

Community Leadership Groups and Local Governments

- City of Bainbridge Island
- City of Coupeville
- City of Edmonds
- City of Gig Harbor
- City of Hoquiam
- City of Langley
- Mason County Department of Community Development
- Pierce County
- City of Port Townsend
- City of Shelton
- Snohomish County
- Town of Steilacoom
- City of Tacoma
- Island County

Others

- Ebey's Landing National Historic Reserve
- Point No Point Treaty Council

October 2019



Allyson Brooks Ph.D., Director
State Historic Preservation Officer

February 8, 2018

Mr. T.H. Lazo
Naval Facilities Engineering Command NW
Department of the Navy
1101 Tautog Circle
Silverdale, Washington 98315-1101

RE: Naval Special Operations Training Project
Log No. 2017-05-03022-USN

Dear Mr. Lazo;

Thank you for contacting our department. We have reviewed the materials you provided for the proposed Area of Potential Effect for the proposed Naval Special Operations Training Project at multiple locations in Western Washington.

We concur with your determination of the Area of Potential Effect (APE) as described and presented in your figures and text and accompanying materials.

We look forward to the results of your professional cultural resources identification efforts and the professional identification report, results of consultations with the concerned tribes, your Determination of Effect.

We request copies any correspondence or comments from concerned tribes or other parties that you receive as you consult under the requirements of 36CFR800.4(a)(4).

These comments are based on the information available at the time of this review and on the behalf of the State Historic Preservation Officer in conformance with Section 106 of the National Historic Preservation Act, as amended, and its implementing regulations 36CFR800. Should additional information become available, our assessment may be revised. Thank you for the opportunity to comment and a copy of these comments should be included in subsequent environmental documents.

Sincerely,

Robert G. Whitlam, Ph.D.
State Archaeologist
(360) 890-2615
email: rob.whitlam@dahp.wa.gov



October 2019



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUTOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

5090
Ser N45/18-377
14 Jun 2018

Allyson Brooks, PhD
State Historic Preservation Officer
Washington Department of Archaeology and Historic Preservation
1110 South Capital Way, Suite 30
P.O. Box 48343
Olympia, WA 98504-8343

Dear Dr. Brooks:

SUBJECT: DAHP PROJECT NO. 2017-05-03022-USN: CONTINUING SECTION
106 CONSULTATION ON DETERMINATIONS OF ELIGIBILITY, NAVAL SPECIAL
OPERATIONS TRAINING IN WESTERN WASHINGTON

Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations 36 CFR 800, the Navy is continuing consultation and asks for your concurrence on the determinations that Chambers Creek Maintenance Building, Seabeck Elementary School, and Port Anacortes Transit Shed are not eligible for inclusion in the National Register of Historic Places. Please refer to the Historic Property Inventory forms submitted in WISAARD under Project Number 2017-05-03022-USN for detail on these determinations.

The Navy requests your concurrence with the finding of No Adverse Effect to Historic Properties for the proposed undertaking within 30 days of receipt of this letter, as per 36 CFR 800.3 (c)(4). If you require additional information, please contact Mr. Russell Sackett, NAVFAC NW Historical Architect at (360) 396-0927 or russell.h.sackett1@navy.mil.

Sincerely,

A handwritten signature in black ink, appearing to read "T. H. LAZO", is positioned above the typed name.

T. H. LAZO, P.E.
Navy Environmental Program
Director, Northwest Region

October 2019



Allyson Brooks Ph.D., Director
State Historic Preservation Officer

July 5, 2018

T.H. Lazo, Director
Navy Environmental Program
US Dept. of the Navy
NAVFAC NW EV-1
1101 Tautog Circle
Silverdale, Washington 98315-1101

In future correspondence please refer to:
Project Tracking Code: 2017-05-03022
Property: Naval Special Operations Training in Western Washington State
Re: Determinations of Eligibility for Three Properties

Dear Mr. Lazo:

Thank you for contacting the Washington State Historic Preservation Officer (SHPO) and Department of Archaeology and Historic Preservation (DAHP). The above referenced properties have been reviewed on behalf of the SHPO under provisions of Section 106 of the National Historic Preservation Act of 1966 (as amended) and 36 CFR Part 800. Our review is based upon documentation in the Historic Property Inventory (HPI) forms.

As a result of our review, we concur with your determination that the inventoried properties are NOT ELIGIBLE for the National Register of Historic Places under criterion C. Although over 50 years in age, your documentation and photographs indicate that all three properties have undergone extensive alterations/additions within the past 50 years. Our concurrence addresses the following properties only: Seabeck Elementary School (property ID # 679338), the Chambers Creek Maintenance Building (#715923), and the Port of Anacortes Transit Shed (#715950). Although these three resources are not National Register eligible, we look forward to receiving your project determination of effect on other National Register listed and eligible properties in the area of potential effect (APE).

Thank you for the opportunity to review and comment. Should you have any questions, please feel free to contact me at greg.griffith@dahp.wa.gov or 360-586-3073.

Sincerely,

A handwritten signature in blue ink that reads 'Greg Griffith'.

Gregory Griffith
Deputy State Historic Preservation Officer



October 2019



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUTOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

5090
Ser N45/18-00605
18 Oct 2018

Allyson Brooks, Ph.D.
State Historic Preservation Officer
Washington Department of Archaeology & Historic Preservation
PO Box 48343
Olympia, WA 98504-8343

Dear Dr. Brooks:

SUBJECT: LOG NO. 2017-05-03022-USN: CONTINUING SECTION 106
CONSULTATION ON FINDING OF NO ADVERSE EFFECTS TO HISTORIC
PROPERTIES, NAVAL SPECIAL OPERATIONS TRAINING IN WESTERN
WASHINGTON

Pursuant to Section 106 of the National Historic Preservation Act of 1966 (as amended) and its implementing regulations 36 CFR 800, the Navy is continuing consultation on the proposed Naval Special Operations Training in Western Washington and asks for your concurrence on the finding of No Historic Properties Adversely Effected. The Washington State Historic Preservation Officer (SHPO) concurred with the Navy's defined Area of Potential Effects (APE) on February 8, 2018 (Log No. 2017-05-03022). Of note, as a result of consultation with tribes, SHPO, and other interested parties, McNeal Island's Area of Potential Effect (APE) has been reduced to include only the immediate area around the old federal prison buildings.

There are a number of activities that may occur singularly or in combination under the proposed Naval Special Operations Training within the APE. The undertaking does not include the use of live-fire ammunition, explosive demolitions, manned air operations, off-road driving, vegetation cutting, digging, tree climbing, the building of camp fires, construction, or the building of infrastructure. A detailed list of training activities, along with description of each activity, are provided in Enclosure 1.

The Navy invited twenty-three (23) Tribes, as identified in its APE letter dated January 22, 2018 (DAHP Log 2017-05-03022), to participate in the consultation process on this undertaking. Tribal outreach was by letters (3), phone calls (3), and emails (3). The comments the Navy received from responding tribes indicated that it was preferred that McNeal Island not be used by Naval Special Operations Training, that any eroding archaeological sites and known

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burial sites be avoided, and that the Navy put in place an Inadvertent Discovery Plan to address sites/burials that may be discovered during training activities. A large Traditional Cultural Property (TCP) was identified during consultation with the tribes with the tribes indicating that eroding archaeological sites in this TCP should be avoided. As a result of tribal consultation, proposed training will avoid eroding archaeological sites and known burials, and an Inadvertent Discovery Plan will be implemented if previously unknown archaeological or burials are encountered.

The Navy invited thirty-three (33) interested parties, as identified in its APE letter dated January 22, 2018 (DAHP Log 2017-05-03022), to consult on this undertaking. The Navy did not receive any comments from potentially interested parties in response to these letters.

The Navy held six (6) public meetings to provide an opportunity for the public to learn more about the proposed training and to provide comment on cultural resource concerns. These public meetings were held on:

- May 2, 2017: 5-8pm, at North Kitsap High School in Poulsbo;
- May 3, 2017: 5-8pm at Blue Heron Elementary School in Port Townsend;
- May 4, 2017: 5-8pm at Oak Harbor School District Boardroom in Oak Harbor;
- February 6, 2018: 5-8pm at North Kitsap High School;
- February 7, 2018: 5-8pm at Blue Heron Elementary School; and
- February 8, 2018: 5-8pm at Oak Harbor School District Boardroom.

During the public meetings, the public requested further information on what Section 106 is, and how the Navy is fulfilling the law's requirements. No concerns were expressed specific to historic properties at these meetings. Written comments received following the meetings consisted of one comment claiming that the Navy had not consulted with the Tribes and another concerning the Navy's use of tribal lands. Of note, tribal lands are not part of the Navy's defined APE and are not under consideration for the proposed Navy Special Operations Training.

The Navy has determined that there are recorded historic properties that have been listed in or determined eligible for listing in the National Register of Historic Places (NRHP) within the APE per our proposed inventory methodology dated February 28, 2018 (Enclosure

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2). The Navy has applied the criteria of adverse effect per 36 CFR §800.5(2)(1) and determined that Naval Special Operations Training in Western Washington will not adversely affect historic properties.

The proposed Simulated Building Clearance Training Activities is limited to the buildings identified in Enclosure 3. All of these buildings have previously been determined not eligible for inclusion in the National Register of Historic Places (NRHP) with SHPO concurrence. In response to Governor Inslee's request, no Washington State Park's buildings are proposed for Simulated Building Clearance Training Activities.

Archaeological sites determined eligible for listing in or that are listed in the NRHP are found throughout the proposed APE (Enclosure 2). Naval Special Operations Training will avoid eroding archaeological sites and known burials. Prior to training activities, NAVFAC NW cultural resources staff will be consulted to determine whether there may be archaeological sites or burials within the proposed training event area. Training activities will be relocated if sites are known in the proposed training area. Cultural Resources Sensitivity training will be made part of the in-class portion of all training (Enclosure 4). In the event that unknown archaeological sites or burials are encountered during training exercises, training will stop and the enclosed Inadvertent Discovery Plan will be implemented (Enclosure 5).

The Navy requests your concurrence with the finding of No Historic Properties Adversely Effected by the proposed Naval Special Operations Training in Western Washington. If you require additional information, please contact Mr. Russell Sackett, NAVFAC NW Historical Architect at (360) 396-0927 or russell.h.sackett1@navy.mil.

Sincerely,



T. H. LAZO, P.E.
Navy Environmental Program Director,
Northwest Region
By Direction of the Commanding Officer

Enclosures: 1. Description of Training Activities
2. Inventory of Historic Properties Located in Area of Potential Effects
3. Buildings Proposed for Simulated Building Clearance Training Activities
4. Cultural Sensitivity Training
5. Inadvertent Discovery Plan

Enclosure 1: Descriptions of Training Activities

1 Diver/Swimmer Training Activities

During diver/swimmer training events, trainees swim or dive to an objective area (e.g., harbor, beach, and or moored vessel) for up to six hours. During night training, the trainees would use buoys marked with a glow stick (Chemlight) to identify their location to the support staff. Rubber replica weapons could be carried by trainees to reproduce the bulk and weight of the gear the trainee would carry during an actual mission.

2 Insertion and Extraction Training Activities

During insertion/extraction training events, trainees may approach or depart an objective area using submersible craft, to include UUVs and ROVs, or water crafts (jet skis or small boats). This activity trains personnel to effectively insert and extract people and equipment during the day or night. Submersible and surface crafts would have lighting for night training. Insertion/extraction training events utilizing submersible craft would operate along the shoreline to conduct water-based training.

3 Launch and Recovery Training Activities

During launch and recovery training events, training would be conducted in water areas and consist of launching and recovering submersibles or surface craft, or a combination of both, from a boat ramp, water platform, or via a crane located on a ship or a barge, or Navy pier/wharf.

4 Unmanned Underwater Vehicle Activities

A subset of water-based training would involve the use of a UUV and on occasion an ROV (herein both described as UUVs). A UUV is a battery-powered, unmanned submersible that is hand-launched from a host vessel and would be used to assist with swimmer navigation. The UUVs operate within the water column and would not be set on the floor of the ocean or Puget Sound. UUVs operate under the same navigational rules as any water vessel and would be operated to avoid other vessels. UUVs would be used during approximately 10 percent of the time that other water based training activities would be taking place. The launching and recovery of the UUV would be conducted in water areas only and would utilize a fish finder type of device for navigation. UUVs can be autonomous or tethered and are controlled from the water surface or by a diver for real-time feedback to the operator. Diving personnel may be in the water in the near vicinity of the host vessel for the launch or retrieval portions of the activity. UUVs are tracked by personnel on the host vessel to ensure they remain on course and, if needed, can be recalled any point along the pre-programmed track.

5 Over-The-Beach Training Activities

During an Over-The-Beach training activity, trainees would exit water, cross the beach, and quietly transition to land-based activities. Upon arrival at a pre-designated area, trainees would remain out of sight for several hours before exiting the site or continue moving towards a pre-determined objective. Typically, when trainees conduct Over-The-Beach at a site, they cross the beach twice (arrival and departure). However, when conducting Over-The-Beach training at Naval Base Kitsap Keyport, trainees could move over the beach multiple times. This is a core training competency, as such, trainees are required to conduct this activity until they perform it correctly.

6 Special Reconnaissance Training Activities

Upon arrival at a designated area, trainees would hike to a designated observation point. Trainees are taught the techniques for conducting reconnaissance without alerting anyone to their presence or location. Trainees would remain undetected for a period of time with the goal of leaving no trace of their presence behind. This includes no vegetation being trampled, no branches broken, no footprints visible, or any other indicators that they were there. Trainees would use observation techniques, follow procedures, and report back on a scenario involving role play with military instructors or support staff. Special reconnaissance would be performed on activities that are staged and pre-arranged for training purposes.

7 High-Angle Climbing Training Activities

High-Angle Climbing events are training evolutions where trainees negotiate cliffs, rock faces, and other vertical challenges to develop infiltration and retrieval of climbing equipment techniques. Trainees are instructed in the use of ropes and other climbing gear to traverse obstacles while carrying gear. This training activity will occur in climbing areas designated by Washington State Parks at Deception Pass State Park.

8 Simulated Building Clearance Training Activities

The activity would consist of trainees conducting simulated actions against a site, or a military individual designated as part of the exercise who is simulating a threat or enemy, within a confined area or building. Simulated Building Clearance training develops the trainees' ability to operate within a small unit, move into a structure, conduct clearance from room to room, and engage in role play (military instructors or support staff) simulated combat scenarios. The combat scenarios involve the use of simulated weapons

and simulated munitions from both trainees and support staff acting as enemy opponents. The intent is for trainees to remain concealed and silent, and then departing the area with minimal disturbance and avoiding detection. The training includes the use of weapons configured to only fire plastic or paint pellets. No live-fire weapons or ammunition would be used. The simulated munitions would be marking rounds, which are specialized plastic/paint capsules that are environmentally friendly and water soluble. The temporary marks these simulated munitions make are about the circumference of a dime. Sounds associated with the firing of the simulated munitions sound similar to an air rifle. No property damage would occur, and cleanup (picking up simulated marking rounds/washing away paint marks if present) would be handled by the instructors and support staff immediately at the conclusion of the training scenario. Support staff would be on site at all times in order to ensure the overall safety in the training environment. Simulated Building Clearance sites would typically be separated from the public and would support the appropriate progression of training. These sites would be approved by property owners or land managers. Simulated Building Clearance training would comprise approximately 10 percent of each training block. Buildings identified for this training consist of:

- Building 957: Storage Disposal Facility on Naval Base Kitsap (NBK) Keyport;
- Building 1017: Covered Material Storage on NBK Keyport;
- Building 1018: Truck Loading Platform on NBK Keyport;
- Building 832: Ammunition Wharf on Naval Magazine (NAVMAG) Indian Is.;
- Building 833: Waterfront Operations Building on NAVMAG Indian Is.;
- Building 834: Blockers & Bracers Shop on NAVMAG Indian Is.;
- Building 910: Gasoline Storage Facility on NAVMAG Indian Is.;
- Building 986: Pier Cargo Staging Area on NAVMAG Indian Is.;
- Building 7070: MSF Storage Shed on NBK Bangor;
- Building 7079: Cable Storage Shed on NBK Bangor;
- Warehouse at Chambers Creek Wastewater Treatment Plant;
- Seabeck Elementary School at Seabeck; and
- Transit Shed at Port Anacortes.

9 Unmanned Aircraft Systems Training Activities

UAS would be utilized 10 percent of the time concurrent with other water-based or land-based training activities. The UAS consists of a hand-launched or catapult system, a control system, and a remotely

piloted or self-piloted (i.e., preprogrammed flight pattern) air vehicle that may be fixed-wing or rotary-wing. They would carry only non-hazardous payloads such as cameras, sensors, and communications equipment.

Propulsion is through electrical motor-driven propellers powered by rechargeable batteries. UASs are allowed in FAA designated restricted airspace (R6701). For training outside of R6701, the UAS would be flown at military installations in accordance with a valid FAA Certificate of Authorization. UAS training may be a standalone activity or used in conjunction with other training activities. UAS utilized for the proposed training would:

- be categorized as FAA Group 1 or Group 2 systems, weighing up to 55 pounds,
- vary in size up to approximately two meters in length, with a wingspan of three meters,
- operate below 2,000 feet above ground level,
- would utilize on the ground observers (no manned aircraft observers), and
- fly in accordance with FAA authorizations.

Enclosure 2: Inventory of Historic Properties in Area of
Potential Effects

**NRHP LISTED/ELIGIBLE ARCHAEOLOGICAL/SHIPWRECK PROPERTIES IN REGION 1 TRAINING
AREA**

#	PROPERTY NAME	LOCATION	DATE LISTED NRHP/ DETERMINED ELIGIBLE	DAHP RESOURCE ID
1	JE00006: Bugge Spit Site	Indian Island	Determined Eligible	639580
2	JE00080: Port Ludlow Sawmill and Towns	Port Ludlow	Potentially Eligible	639616
3	JE00202: Burials	South of Port Ludlow	Potentially Eligible	639646
4	JE00302: Historic Railroad	Dosewalips State Park	Potentially Eligible	639717
5	KP00146- Historic Bridge/Debris	West of Kingston	Potentially Eligible	641463
6	KP00049: Historic Debris	Blake Island	Potentially Eligible	641429
7	JE00276: Shell Midden	Indian Island	Potentially Eligible	639698
8	JE00376: Sheridan Site	Indian Island	Potentially Eligible	659443
9	JE00023: Pond-Farm Site	Indian Island	Potentially Eligible	639597
10	JE00020: Bishop Point Site	Indian Island	Potentially Eligible	639594
11	JE00028: Jorgen Hill	Indian Island	Potentially Eligible	639601
12	JE00397: Crescent Bay Site	Indian Island	Potentially Eligible	661529
13	JE00018: Dynamite Point	Indian Island	Potentially Eligible	639592
14	JE00016: Walan Point Site	Indian Island	Potentially Eligible	639590
15	JE00377: Ferry Master's Site	Indian Island	Potentially Eligible	659444
16	<i>Alaska Reefer</i> (Shipwreck)	Indian Island	Unevaluated	No Number
17	Unknown Wreck	Indian Island	Unevaluated	No Number
18	Unknown (Shipwreck)	Off Old Fort Townsend	Unevaluated	No Number
19	Unknown (Shipwreck)	East of Mats Mats Bay	Unevaluated	No Number
20	Unknown (Shipwreck)	East of Mats Mats Bay	Unevaluated	No Number
21	JE000368: Port Ludlow Log Booming	Port Ludlow	Potentially Eligible	659085
22	Unknown Wreck	Port Ludlow	Unevaluated	No Number
23	Unknown Wreck	Port Ludlow	Unevaluated	No Number
24	Unknown Wreck	Port Ludlow	Unevaluated	No Number
25	JE00203: Burials	South shore Port Ludlow	Unevaluated	639646
26	JE00206: Shell Midden/Burials	South shore Port Ludlow	Unevaluated	639649
27	JE00333: Historic Debris	Point Hannon State Park	Potentially Eligible	639725
28	JE00365: Shell Midden	Shine Tidelands State Park	Potentially Eligible	658433
29	JE00364: Shell Midden	Shine Tidelands State Park	Potentially Eligible	658432
30	JE00357: Brinnon Hotel/Road Grade	Dosewalips State Park	Potentially Eligible	656455
31	JE00356: Historic Bridge	Dosewalips State Park	Potentially Eligible	656454
32	KP00227-Shell Midden	NBK Bangor	Determined Eligible	657676
33	KP00151: Port Madison Mill	East shore Bainbridge Is.	Potentially Eligible	641468
34	Unknown Wreck	East of Fay Bainbridge	Unevaluated	No Number

		Park		
35	Unknown Wreck	Liberty Bay	Unevaluated	No Number
36	KP00236: Pig Bone Site	NBK Keyport	Potentially Eligible	659473
37	Unknown Wreck	SE of Gilberton	Unevaluated	None
38	Unknown Wreck	SE of Gilberton	Unevaluated	None
39	KP00009: Burial	East side Manette Bridge, Bremerton	Determined Eligible	641395
40	KP00116: Shell Midden	Elwood Point	Determined Eligible	641448
41	KP00120: Shell Midden	Southwest shore Ostrich Bay	Listed in NRHP	641452
42	KP00123: Shell Midden	Central Rocky Point Peninsula, Dyes Inlet	Determined Eligible	641455
43	KP00121: Shell Midden	Evergreen Park	Determined Eligible	641453
44	KP00117: Midden	NBK Manchester	Potentially Eligible	641449
45	KP00119: Midden	NBK Manchester	Potentially Eligible	641451
46	KP00118: Midden	NBK Manchester	Potentially Eligible	641450
47	KP00014: Midden	Blake Island	Potentially Eligible	641400
48	KP00013: Midden	Blake Island	Potentially Eligible	641399
49	PI00102: Midden	Gig Harbor	Potentially Eligible	646873
50	PI01335: Dickman Mill Headsaw	Point Defiance	Potentially Eligible	660702
51	JE00012	Kunn Spit	Listed in NRHP	639586
52	JE00027	Port Hadlock	WA State Register	639600
53	JE00085	Near Quilcene Boat Haven	Listed in NRHP	639620
54	JE00289	North of Port Hadlock	Potentially Eligible	639704
55	JE00290	Head of Quilcene Bay	Potentially Eligible	639705
56	JE00300	Head of Pleasant Harbor	Potentially Eligible	639715
57	JE00358	Irondale	Potentially Eligible	656619
58	JE00026	Old Fort Townsend	Potentially Eligible	657015
59	JE00368	Port Ludlow	Potentially Eligible	659085
60	KP00110	Port Blakely	Potentially Eligible	641442
61	KP00146	West of Kingston	Potentially Eligible	641463
62	PI00447	Near Chambers	Potentially Eligible	647050
63	PI00706	Port of Tacoma	Potentially Eligible	647173
64	PI00975	Port of Tacoma	Potentially Eligible	653467
65	JE00344	NW of Bywater Bay	Potentially Eligible	653977
66	JE00371	Westside Quilcene Bay	Potentially Eligible	659288
67	JE00372	Port Hadlock	Potentially Eligible	659289
68	JE00373	Indian Island	Potentially Eligible	659290
69	JE00374	Indian Island	Potentially Eligible	659441
70	JE00375	Indian Island	Potentially Eligible	659442
71	KP00237	Keyport	Potentially Eligible	659474
72	KP00240	Bangor	Potentially Eligible	659898
73	KP00284	Near Harper Park	Potentially Eligible	661497
74	KP00287	North of Poulsbo	Potentially Eligible	670027
75	PI01331	Chambers	Potentially Eligible	660565
76	PI00159	Point Defiance Park	Potentially Eligible	661596
77	PI01350	Point Defiance Park	Potentially Eligible	661997

NRHP LISTED/ELIGIBLE ARCHITECTURAL PROPERTIES IN REGION 1 TRAINING AREA

#	PROPERTY NAME	LOCATION	DATE LISTED NRHP/ DETERMINED ELGIBLE	DAHP RESOURCE ID
78	Fort Warden Historic District (FWHD)	Fort Worden State Park (FWSP)	National Hist Landmark	674629
78a	Bldg 1: Commanding Officer's Quarters	FWSP	Contributes to FWHD	58723
78b	Bldg 4: Officers' Duplex	FWSP	Contributes to FWHD	58266
78c	Bldg 5: Officers' Duplex	FWSP	Contributes to FWHD	58270
78d	Bldg 6: Officers' Duplex	FWSP	Contributes to FWHD	58267
78e	Bldg 7: Officers' Duplex	FWSP	Contributes to FWHD	58271
78f	Bldg 9: Officers' Duplex	FWSP	Contributes to FWHD	58272
78g	Bldg 10: Officers' Duplex	FWSP	Contributes to FWHD	58268
78h	Bldg 11: Officers' Duplex	FWSP	Contributes to FWHD	58269
78i	Bldg 15: Field Officers' Quarters	FWSP	Contributes to FWHD	58274
78j	Bldg 16: Officers' Quadruplex	FWSP	Contributes to FWHD	58275
78k	Bldg 25: War Department Theatre	FWSP	Contributes to FWHD	62979
78l	Bldg 26: Balloon Hangar	FWSP	Contributes to FWHD	
78m	Bldg 200: Administration Building	FWSP	Contributes to FWHD	58459
78n	Bldg 201: Enlisted Men's Barracks	FWSP	Contributes to FWHD	
78o	Bldg 202: Enlisted Men's Barracks	FWSP	Contributes to FWHD	58463
78p	Bldg 203: Enlisted Men's Barracks	FWSP	Contributes to FWHD	
78q	Bldg 204: Enlisted Men's Barracks	FWSP	Contributes to FWHD	
78r	Bldg 205: Band Barracks	FWSP	Contributes to FWHD	
78s	Bldg 223: Administration Building	FWSP	Contributes to FWHD	58462
78t	Bldg 224A, B, C, & D: Battery Stoddard	FWSP	Contributes to FWHD	
78u	Bldg 225: Enlisted Men's Barracks	FWSP	Contributes to FWHD	
78v	Bldg 229: Alexander's Castel	FWSP	Contributes to FWHD	65199
78w	Bldg 234 A & B: Battery Putnam	FWSP	Contributes to FWHD	
78x	Bldg 270: NCO Hospital Steward Quarters	FWSP	Contributes to FWHD	
78y	Bldg 298: Hospital	FWSP	Contributes to FWHD	58460
78z	Bldg 300: Guard House	FWSP	Contributes to FWHD	
78aa	Bldg 305: Quartermaster Office and Warehouse	FWSP	Contributes to FWHD	
78ab	Bldg 306: Commissary and Office	FWSP	Contributes to FWHD	
78ac	Bldg 308: Storehouse	FWSP	Contributes to FWHD	
78ad	Bldg 310: PX and Gymnasium	FWSP	Contributes to FWHD	58461
78ae	Bldg 313: Corps of Engineers Workshop	FWSP	Contributes to FWHD	
78af	Bldg 315: Power House	FWSP	Contributes to FWHD	
78ag	Bldg 324: Quartermaster Storehouse	FWSP	Contributes to FWHD	
78ah	Bldg 325: NCO Duplex	FWSP	Contributes to FWHD	
78ai	Bldg 331: NCO Duplex	FWSP	Contributes to FWHD	58276
78aj	Bldg 332: NCO Duplex	FWSP	Contributes to FWHD	58278

78ak	Bldg 333: NCO Duplex	FWSP	Contributes to FWHD	
78al	Bldg 334: NCO Duplex	FWSP	Contributes to FWHD	
78am	Bldg 335: NCO Duplex	FWSP	Contributes to FWHD	
78an	Bldg 336: NCO Duplex	FWSP	Contributes to FWHD	
78ao	Bldg 352: NCO Duplex	FWSP	Contributes to FWHD	58277
78ap	Bldg 353: NCO Duplex	FWSP	Contributes to FWHD	
78aq	Bldg 372: Wagon Shed and Teamsters Quarters	FWSP	Contributes to FWHD	
78ar	Bldg 409: Ordnance Storehouse	FWSP	Contributes to FWHD	
78as	Bldg 413: Militia Storehouse	FWSP	Contributes to FWHD	
78at	Bldg 414: District Signal Station	FWSP	Contributes to FWHD	62980
78au	Bldg 426: Primary Dorm, Gun & Observ. Crew	FWSP	Contributes to FWHD	
78av	Bldg 427: Combined Prim Fire Control Station	FWSP	Contributes to FWHD	
78aw	Bldg 433: Switchboard	FWSP	Contributes to FWHD	
78ax	Bldg 484-487: Concrete Storehouses	FWSP	Contributes to FWHD	
78ay	Bldg 490: Battery Commander's Station	FWSP	Contributes to FWHD	
78az	Bldg 492: Searchlight Shelter	FWSP	Contributes to FWHD	
78ba	Bldg 493 A & B: Battery Powell	FWSP	Contributes to FWHD	
78bb	Bldg 493 C & D: Battery Brannan	FWSP	Contributes to FWHD	
78bc	Bldg 493E: Plotting Room	FWSP	Contributes to FWHD	
78bd	Bldg 494A & B: Battery Randol	FWSP	Contributes to FWHD	
78be	Bldg 495A & B and 496C: Battery Quarles	FWSP	Contributes to FWHD	
78bf	Bldg 496A & B: Battery Ash	FWSP	Contributes to FWHD	
78bg	Bldg 497A & B: Battery Benson	FWSP	Contributes to FWHD	
78bh	Bldg 498A, B, C, & D: Battery Tolles	FWSP	Contributes to FWHD	
78bi	Bldg 498E: Searchlight Powerplant	FWSP	Contributes to FWHD	
78bj	Bldg 499: Battery Walker	FWSP	Contributes to FWHD	
78bk	Bldg 501: Artillery Engineer Cable House	FWSP	Contributes to FWHD	
78bl	Bldg 502: Ordnance Machine Shop	FWSP	Contributes to FWHD	
78bm	Bldg 594: Searchlight Powerplant	FWSP	Contributes to FWHD	
78bn	Bldg 596: Searchlight Shelter	FWSP	Contributes to FWHD	
78bo	Bldg 598A & B: Battery Kinzie	FWSP	Contributes to FWHD	132403
78bp	Bldg 599A & B: Battery Vicars	FWSP	Contributes to FWHD	
79	Point Wilson Lighthouse	FWSP	Listed in NRHP	65145
80	Port Townsend Historic District (PTHD)	Port Townsend	National Hist Landmark	674589
80a	Fowler House	Port Townsend	Contributes to PTHD	66631
80b	Rothschild House	Port Townsend	Contributes to PTHD	63226
80c	St. Paul's Episcopal Church	Port Townsend	Contributes to PTHD	66629
80d	Diamond Point Quarantine Station Bldg	Port Townsend	Contributes to PTHD	66128
80e	Downs House	Port Townsend	Contributes to PTHD	674939
80f	DeLeo House	Port Townsend	Contributes to PTHD	66430
80g	Joh Fuge Houses	Port Townsend	Contributes to PTHD	66604
80h	Starrett House	Port Townsend	Contributes to PTHD	66367
80i	James House	Port Townsend	Contributes to PTHD	66506
80j	C.C. Bartlett Building	Port Townsend	Contributes to PTHD	66125
80k	Terry Building	Port Townsend	Contributes to PTHD	66675
80l	Waterman and Katz Department	Port Townsend	Contributes to PTHD	66364

	Store			
80m	Franklin House	Port Townsend	Contributes to PTHD	66248
80n	City Hall	Port Townsend	Contributes to PTHD	66126
80o	F.W. Pettygrove Building	Port Townsend	Contributes to PTHD	2839
80p	Miller and Burkett	Port Townsend	Contributes to PTHD	66210
80q	First United Presbyterian Church	Port Townsend	Contributes to PTHD	64282
80r	Port Townsend Post Office and Customs House	Port Townsend	Contributes to PTHD	66523
80s	Manresa Hall	Port Townsend	Contributes to PTHD	65142
80t	Charles DeVoe House	Port Townsend	Contributes to PTHD	66414
80u	F.W. Hastings Residence	Port Townsend	Contributes to PTHD	66232
80v	First Bell Tower	Port Townsend	Contributes to PTHD	66737
80w	N.D. Hill Building	Port Townsend	Contributes to PTHD	66251
81	Herbert Beecher Foote Home	Port Townsend	WA Heritage Register	66146
82	Old German Consulate	Port Townsend	Listed in NRHP	66138
83	Parrish House	Port Townsend	WA Heritage Register	66200
84	Captain James McIntyre House	Port Townsend	WA Heritage Register	66506
85	Francis Wilcox James House	Port Townsend	Listed in NRHP	66544
86	Tree of Heaven	Port Townsend	WA Heritage Register	66738
87	Old Fort Townsend State Park	Old Fort Townsend State Park	WA Heritage Register	65067
88	Irondale Historic District	Irondale	Listed in NRHP	65047
89	Port Hadlock/Hadlock Bay Cultural Resources	Port Hadlock	WA State Register	65060
90	Washington Co-Op	Port Hadlock	Determined Eligible	377535
91	Portage Canal Bridge	Port Hadlock	WA Heritage Register	662747
92	Grange Store	Port Hadlock	Determined Eligible	106955
93	Bldg 69	Indian Island	Determined Eligible	622437
94	Bldg 70	Indian Island	Determined Eligible	622438
95	Fort Flagler Historic District (FFHD)	Fort Flagler State Park	Listed in NRHP	674955
95a	Bldg 7: NCO Quarters	Fort Flagler State Park	Contributes to FFHD	106568
95b	Battery Grattan	Fort Flagler State Park	Contributes to FFHD	107073
95c	Bldg 111	Fort Flagler State Park	Contributes to FFHD	74728
95d	Bldg 110: Officers' Quarters	Fort Flagler State Park	Contributes to FFHD	74733
95e	Barracks	Fort Flagler State Park	Contributes to FFHD	74735
95f	Bldg 104: Theater	Fort Flagler State Park	Contributes to FFHD	107072
95g	Bldg 8: Warehouse	Fort Flagler State Park	Contributes to FFHD	157039
95h	Bldg 39: Hospital	Fort Flagler State Park	Contributes to FFHD	74738
95i	Battery Bankhead	Fort Flagler State Park	Contributes to FFHD	74721
95j	Bldg 16	Fort Flagler State Park	Contributes to FFHD	74719
95k	Quartermaster's Warehouse	Fort Flagler State Park	Contributes to FFHD	74727
95l	Bldg 5: Hospital Steward's Quarters	Fort Flagler State Park	Contributes to FFHD	74729
95m	Bldg 29: Stables	Fort Flagler State Park	Contributes to FFHD	157048
95n	Bldg 10: Stables	Fort Flagler State Park	Contributes to FFHD	74731
95o	Hospital Admin Building	Fort Flagler State Park	Contributes to FFHD	157051
95p	Battery Wansboro	Fort Flagler State Park	Contributes to FFHD	132620
95q	Bldg 106	Fort Flagler State Park	Contributes to FFHD	671294
95r	Park Office	Fort Flagler State Park	Contributes to FFHD	107086
96	Tollef Sole House	Mystery Bay	Listed in NRHP	674970
97	Johnson House	Mystery Bay	Listed in NRHP	674972
98	624 Olympus Blvd	Southeast Mats Mats Bay	Potentially Eligible	74489
99	Zelatched Point Historic District (ZPHD)	Zelatched Point	Determined Eligible	

99a	Facility 453	Zelatched Point	Contributes to ZPHD	613138
99b	Facility 461	Zelatched Point	Contributes to ZPHD	613139
99c	Facility 469	Zelatched Point	Contributes to ZPHD	613146
99d	Facility 470	Zelatched Point	Contributes to ZPHD	613143
99e	Facility 471	Zelatched Point	Contributes to ZPHD	613141
99f	Facility 472	Zelatched Point	Contributes to ZPHD	613144
99g	Facility 475	Zelatched Point	Contributes to ZPHD	613147
99h	Facility 476	Zelatched Point	Contributes to ZPHD	613148
99i	Facility 477	Zelatched Point	Contributes to ZPHD	613137
99j	Facility 486	Zelatched Point	Contributes to ZPHD	613149
99k	Facility 805	Zelatched Point	Contributes to ZPHD	613140
100	Emel House	Scenic Beach State Park	Potentially Eligible	63229
101	Building 7400	NBK Bangor	Determined Eligible	68179
102	Building 7501	NBK Bangor	Determined Eligible	68183
103	Building 7800	NBK Bangor	Determined Eligible	613827
104	Building 7801	NBK Bangor	Determined Eligible	613828
105	Building 7044	NBK Bangor	Determined Eligible	613824
106	Kitsap Memorial Community Hall	Kitsap Memorial State Park	Potentially Eligible	63224
107	Kitsap Memorial Kitchen Shelter	Kitsap Memorial State Park	Potentially Eligible	63225
108	Agate Pass Bridge	Agate Pass	Listed in NRHP	662562
109	Moran School	East shore Bainbridge Is.	Determined Eligible	5993
110	Keyport Industrial Hist Dist (KIHD)	NBK Keyport	Determined Eligible	No Number
110a	Facility 1	NBK Keyport	Contributes to KIHD	6187
110b	Facility 12	NBK Keyport	Contributes to KIHD	679794
110c	Facility 38	NBK Keyport	Contributes to KIHD	6116
110d	Facility 40	NBK Keyport	Contributes to KIHD	67891
110e	Facility 73	NBK Keyport	Contributes to KIHD	67907
110f	Facility 74	NBK Keyport	Contributes to KIHD	67908
110g	Facility 81	NBK Keyport	Contributes to KIHD	67909
110h	Facility 84	NBK Keyport	Contributes to KIHD	6136
110i	Facility 85	NBK Keyport	Contributes to KIHD	
110j	Facility 97	NBK Keyport	Contributes to KIHD	67929
110k	Facility 98	NBK Keyport	Contributes to KIHD	67910
110l	Facility 101	NBK Keyport	Contributes to KIHD	67930
110m	Facility 105	NBK Keyport	Contributes to KIHD	67933
110n	Facility 186	NBK Keyport	Contributes to KIHD	6180
110o	Facility 233	NBK Keyport	Contributes to KIHD	6194
110p	Facility 234	NBK Keyport	Contributes to KIHD	67946
110q	Facility 440	NBK Keyport	Contributes to KIHD	
110r	Facility 825	NBK Keyport	Contributes to KIHD	67904
110s	Facility 1055	NBK Keyport	Contributes to KIHD	
110t	Facility 1074	NBK Keyport	Contributes to KIHD	
111	Keyport Residential Hist Dist (KRHD)	NBK Keyport	Determined Eligible	
111a	Facility 16	NBK Keyport	Contributes to KRHD	
111b	Facility 35	NBK Keyport	Contributes to KRHD	6113
111c	Facility 149	NBK Keyport	Contributes to KRHD	6169
111d	Facility 150	NBK Keyport	Contributes to KRHD	6170
111e	Facility 159	NBK Keyport	Contributes to KRHD	6172
111f	Facility 160	NBK Keyport	Contributes to KRHD	
111k	Quarters A	NBK Keyport	Contributes to KRHD	6084
111l	Quarters E	NBK Keyport	Contributes to KRHD	6085
111m	Quarters F	NBK Keyport	Contributes to KRHD	6086

111n	Quarters G	NBK Keyport	Contributes to KRHD	6087
111o	Quarters H & I	NBK Keyport	Contributes to KRHD	6088
111p		NBK Keyport	Contributes to KRHD	6089
111q	Quarters K	NBK Keyport	Contributes to KRHD	6090
111r	Quarters L	NBK Keyport	Contributes to KRHD	6091
111s	Quarters O	NBK Keyport	Contributes to KRHD	6092
111t	Quarters P, Q, & R	NBK Keyport	Contributes to KRHD	6093
111u	Quarters S	NBK Keyport	Contributes to KRHD	6094
111v	Quarters T, U, & V	NBK Keyport	Contributes to KRHD	6095
112	Facility 6	NBK Keyport	Determined Eligible	
113	Pappas Apartments	Bremerton	Determined Eligible	45259
114	Schutt House	Bremerton	Determined Eligible	45260
115	Johnson House	Bremerton	Determined Eligible	45262
116	Payne House	Bremerton	Determined Eligible	45269
117	Cox House	Bremerton	Determined Eligible	45289
118	Lazar House	Bremerton	Determined Eligible	45263
119	Gavstad House	Bremerton	Determined Eligible	45264
120	Winsor House	Bremerton	Determined Eligible	45272
121	Boyd House	Bremerton	Determined Eligible	45273
122	Jensen House	Bremerton	Determined Eligible	45265
123	Sprague House	Bremerton	Determined Eligible	45266
124	Weber Apartments	Bremerton	Determined Eligible	45267
125	USHC House Type 204A	Bremerton	Determined Eligible	45286
126	USHC House Type 202	Bremerton	Determined Eligible	45288
127	USHC House Type 201A	Bremerton	Determined Eligible	45295
128	USHC House type 204A	Bremerton	Determined Eligible	45292
129	Morken House	Bremerton	Determined Eligible	45285
130	Bay Theater/Bay Bowl	Bremerton	Determined Eligible	45278
131	Bremerton Gardens	Bremerton	Determined Eligible	45280
132	Sweeney House	Bremerton	Determined Eligible	45284
133	Port Washington Narrows Bridge	Bremerton	Listed in NRHP	675452
134	Dominion Tug Boat	Bremerton	Determined Eligible	671764
135	USS Turner Joy	Bremerton	Determined Eligible	107231
136	Puget Sound Naval Shipyard NHL (PSNS)	Bremerton	Listed in NRHP	674678
136a	Facility 58	Bremerton	Contributes to PSNS	620696
136b	Facility 59	Bremerton	Contributes to PSNS	664571
136c	Facility 78	Bremerton	Contributes to PSNS	5567
136d	Facility 79	Bremerton	Contributes to PSNS	683123
136e	Facility 147	Bremerton	Contributes to PSNS	74372
136f	Facility 290	Bremerton	Contributes to PSNS	
136g	Facility 357	Bremerton	Contributes to PSNS	682980
136h	Facility 408	Bremerton	Contributes to PSNS	682983
136i	Facility 420	Bremerton	Contributes to PSNS	682984
136j	Facility 427	Bremerton	Contributes to PSNS	620278
136k	Facility 431	Bremerton	Contributes to PSNS	622166
136l	Facility 435	Bremerton	Contributes to PSNS	682995
136m	Facility 438	Bremerton	Contributes to PSNS	683011
136n	Facility 448	Bremerton	Contributes to PSNS	683011
136o	Facility 452	Bremerton	Contributes to PSNS	670515
136p	Facility 460	Bremerton	Contributes to PSNS	620277
136q	Facility 469	Bremerton	Contributes to PSNS	74373
136r	Facility 507	Bremerton	Contributes to PSNS	683054
136s	Facility 508	Bremerton	Contributes to PSNS	683055
136t	Facility 539	Bremerton	Contributes to PSNS	683057

136u	Facility 554	Bremerton	Contributes to PSNS	683058
136v	Facility 555	Bremerton	Contributes to PSNS	683061
136w	Facility 693	Bremerton	Contributes to PSNS	683081
136x	Facility 694	Bremerton	Contributes to PSNS	683082
136y	Facility 701	Bremerton	Contributes to PSNS	624324
136z	Facility 702	Bremerton	Contributes to PSNS	664548
136aa	Facility 703	Bremerton	Contributes to PSNS	80019
136ab	Facility 704	Bremerton	Contributes to PSNS	624329
136ac	Facility 705	Bremerton	Contributes to PSNS	624321
136ad	Facility 709	Bremerton	Contributes to PSNS	683011
136ae	Facility 713	Bremerton	Contributes to PSNS	5708
136af	Facility 714	Bremerton	Contributes to PSNS	623981
136ag	Facility 715	Bremerton	Contributes to PSNS	677668
136ah	Facility 716	Bremerton	Contributes to PSNS	621026
136ai	Facility 717	Bremerton	Contributes to PSNS	None
136aj	Facility 753	Bremerton	Contributes to PSNS	683128
136ak	Facility 754	Bremerton	Contributes to PSNS	683129
136al	Facility 755	Bremerton	Contributes to PSNS	683131
136am	Facility 756	Bremerton	Contributes to PSNS	683138
136an	Facility 761	Bremerton	Contributes to PSNS	683141
136ao	Facility 762	Bremerton	Contributes to PSNS	683142
136ap	Facility 787	Bremerton	Contributes to PSNS	683145
136aq	Facility 843	Bremerton	Contributes to PSNS	683155
136ar	Facility CRTKG	Bremerton	Contributes to PSNS	
137	Officers' Row Historic District (ORHD)	Bremerton	Listed in NRHP	674681
137a	Facility 138	Bremerton	Contributes to ORHD	
137b	Facility 615	Bremerton	Contributes to ORHD	
137c	Facility 616	Bremerton	Contributes to ORHD	
137d	Facility 617	Bremerton	Contributes to ORHD	5795
137e	Facility 618	Bremerton	Contributes to ORHD	5795
137f	Facility 619	Bremerton	Contributes to ORHD	5795
137g	Facility 620	Bremerton	Contributes to ORHD	5796
137h	Facility 621	Bremerton	Contributes to ORHD	5796
137i	Facility 622	Bremerton	Contributes to ORHD	5797
137j	Facility 623	Bremerton	Contributes to ORHD	5797
137k	Facility 624	Bremerton	Contributes to ORHD	5798
137l	Facility 625	Bremerton	Contributes to ORHD	5798
137m	Facility 626	Bremerton	Contributes to ORHD	5799
137n	Facility 627	Bremerton	Contributes to ORHD	5799
137o	Facility 628	Bremerton	Contributes to ORHD	5800
137p	Facility 629	Bremerton	Contributes to ORHD	5800
137q	Facility 630	Bremerton	Contributes to ORHD	5801
137r	Facility 631	Bremerton	Contributes to ORHD	5801
137s	Facility 632	Bremerton	Contributes to ORHD	5801
137t	Facility 633	Bremerton	Contributes to ORHD	5802
137u	Facility 634	Bremerton	Contributes to ORHD	5802
137v	Facility 635	Bremerton	Contributes to ORHD	5803
137w	Facility 636	Bremerton	Contributes to ORHD	5803
137x	Facility 637	Bremerton	Contributes to ORHD	5804
137y	Facility 638	Bremerton	Contributes to ORHD	5804
137z	Facility 639	Bremerton	Contributes to ORHD	5805
137aa	Facility 640	Bremerton	Contributes to ORHD	5806
137ab	Facility 641	Bremerton	Contributes to ORHD	5807
137ac	Facility 757	Bremerton	Contributes to ORHD	5806
137ad	Facility 772	Bremerton	Contributes to ORHD	None
138	Puget Sound Radio Station Historic District (PSRSHD)	Bremerton	Listed in NRHP	674681
138a	Facility 51	Bremerton	Contributes to PSRSHD	

138b	Facility 133	Bremerton	Contributes to PSRSHD	
138c	Facility 192	Bremerton	Contributes to PSRSHD	5680
138d	Facility 377	Bremerton	Contributes to PSRSHD	5680
138e	Facility 413	Bremerton	Contributes to PSRSHD	
138f	Facility 466	Bremerton	Contributes to PSRSHD	
138g	Facility 477	Bremerton	Contributes to PSRSHD	
138h	Facility 599	Bremerton	Contributes to PSRSHD	5676
138i	Facility 601	Bremerton	Contributes to PSRSHD	
138j	Facility 604	Bremerton	Contributes to PSRSHD	
138k	Facility 642	Bremerton	Contributes to PSRSHD	5812
138m	Facility 643	Bremerton	Contributes to PSRSHD	5812
138n	Facility 651	Bremerton	Contributes to PSRSHD	5813
138o	Facility 666	Bremerton	Contributes to PSRSHD	5694
138p	Facility 668	Bremerton	Contributes to PSRSHD	5676
139	Old Naval Hospital Historic District (ONHHD)	Bremerton	Listed in NRHP	674679
139a	Facility 443	Bremerton	Contributes to ONHHD	
139b	Facility 491	Bremerton	Contributes to ONHHD	
139c	Facility 644	Bremerton	Contributes to ONHHD	5785
139d	Facility 645	Bremerton	Contributes to ONHHD	5785
139e	Facility 646	Bremerton	Contributes to ONHHD	5786
139f	Facility 647	Bremerton	Contributes to ONHHD	5786
139g	Facility 648	Bremerton	Contributes to ONHHD	5787
139h	Facility 649	Bremerton	Contributes to ONHHD	5788
139i	Facility 650	Bremerton	Contributes to ONHHD	5788
140	Old Marine Reservation Historic District (OMRHD)	Bremerton	Listed in NRHP	674680
140a	Facility 652	Bremerton	Contributes to OMRHD	5789
140b	Facility 653	Bremerton	Contributes to OMRHD	5789
140c	Facility 654	Bremerton	Contributes to OMRHD	5790
140d	Facility 655	Bremerton	Contributes to OMRHD	5790
140e	Facility 656	Bremerton	Contributes to OMRHD	5791
140f	Facility 657	Bremerton	Contributes to OMRHD	5791
140g	Facility 658	Bremerton	Contributes to OMRHD	5792
140h	Facility 659	Bremerton	Contributes to OMRHD	5792
141	Terrace Park Apartments	Sinclair Inlet	Determined Eligible	5776
142	Waterman Barn	Sinclair Inlet east of Port Orchard	WA Heritage Register	675464
143	Fort Ward Historic District Expansion	Manchester State Park	Listed in NRHP	674590
144	Middle Point Command Post	Manchester State Park	Determined Eligible	106877
145	Torpedo Storehouse	Manchester State Park	Determined Eligible	74521
146	Facility 1	NBK Manchester	Determined Eligible	5749
147	Facility 12	NBK Manchester	Determined Eligible	5760
148	Artondale School	Gig Harbor	Listed in NRHP	675745
149	Glein House	Gig Harbor	Listed in NRHP	none
150	Eddon Boatyard Marine Railways	Gig Harbor	Determined Eligible	none
151	Eddon Boathouse	Gig Harbor	Determined Eligible	none
152	Ivanovich Netshed	Gig Harbor	Determined Eligible	617843
153	Commencement	Gig Harbor	Determined Eligible	none
154	Ancich Netshed	Gig Harbor	Determined Eligible	56050
155	Skansie Net Shed and House	Gig Harbor	Listed in NRHP	675940
156	Point Defiance Pagoda	Point Defiance	Listed NRHP	675948
157	Supervisor's Lodge	Point Defiance	WA Heritage Register	24960

158	Fort Nisqually Restoration	Point Defiance	WA Heritage Register	675698
159	Fort Nisqually Granary and Factor's House	Point Defiance	Listed in NRHP	662458
160	Camp Six	Point Defiance	Listed in NRHP	675702
160a	Handcars	Point Defiance	Contributes to Camp 6	24957
160b	Shay No. 7 Logging Locomotive	Point Defiance	Contributes to Camp 6	24956
160c	Dolbeer Donkey Engine	Point Defiance	Contributes to Camp 6	24955
160d	Loaded Log Train	Point Defiance	Contributes to Camp 6	24950
161	Salmon Beach Historic District (SBHD)	Point Defiance	WA Heritage Register	674638
161a	Structure 3	Point Defiance	Contributes to SBHD	
161b	Structure 4	Point Defiance	Contributes to SBHD	
161c	Structure 7	Point Defiance	Contributes to SBHD	
161d	Structure 8	Point Defiance	Contributes to SBHD	
161e	Structure 10	Point Defiance	Contributes to SBHD	
161f	Structure 18	Point Defiance	Contributes to SBHD	
161g	Structure 20	Point Defiance	Contributes to SBHD	
161h	Structure 21	Point Defiance	Contributes to SBHD	
161i	Structure 25	Point Defiance	Contributes to SBHD	
161j	Structure 39	Point Defiance	Contributes to SBHD	
161k	Structure 42	Point Defiance	Contributes to SBHD	
161l	Structure 43	Point Defiance	Contributes to SBHD	
161m	Structure 46	Point Defiance	Contributes to SBHD	
161n	Structure 49	Point Defiance	Contributes to SBHD	
161o	Structure 53	Point Defiance	Contributes to SBHD	
161p	Structure 58	Point Defiance	Contributes to SBHD	
161q	Structure 63	Point Defiance	Contributes to SBHD	
161r	Structure 64	Point Defiance	Contributes to SBHD	
161s	Structure 65	Point Defiance	Contributes to SBHD	
161t	Structure 66	Point Defiance	Contributes to SBHD	
161u	Structure 67	Point Defiance	Contributes to SBHD	
161v	Structure 73	Point Defiance	Contributes to SBHD	
161w	Structure 79	Point Defiance	Contributes to SBHD	
161x	Structure 85	Point Defiance	Contributes to SBHD	
161y	Structure 87	Point Defiance	Contributes to SBHD	
161z	Structure 89	Point Defiance	Contributes to SBHD	
161aa	Structure 95	Point Defiance	Contributes to SBHD	
161ab	Structure 96	Point Defiance	Contributes to SBHD	
161ac	Structure 97	Point Defiance	Contributes to SBHD	
161ad	Structure 100	Point Defiance	Contributes to SBHD	
161ae	Structure 101	Point Defiance	Contributes to SBHD	
161af	Structure 103	Point Defiance	Contributes to SBHD	
161ag	Structure 104	Point Defiance	Contributes to SBHD	
161ah	Structure 111	Point Defiance	Contributes to SBHD	
162	Bowes Building	Port of Tacoma	NRHP	
163	City Waterway Bridge	Port of Tacoma	Listed in NRHP	43054
164	XXX E F St	Port of Tacoma	Determined Eligible	
165	Albers Brothers Mill	Port of Tacoma	Listed in NRHP	24697
166	Fire Station	Port of Tacoma	Listed in NRHP	
167	Fire Station #15	Port of Tacoma	Listed in NRHP	25389

**NRHP LISTED/ELIGIBLE ARCHAEOLOGICAL/ SHIPWRECK PROPERTIES IN REGION 2 TRAINING
AREA**

#	PROPERTY NAME	LOCATION	DATE LISTED NRHP/ DETERMINED ELGIBLE	DAHP RESOURCE ID
168	SK00021	Hope Island State Park	Potentially Eligible	648646
169	SK00007	Deception Pass State Park	Potentially Eligible	648632
170	SK00008	Deception Pass State Park	Potentially Eligible	648633
171	SK00144	Deception Pass State Park	Potentially Eligible	648762
172	SK00209	Deception Pass State Park	Potentially Eligible	639530
173	IS00090	Deception Pass State Park	Potentially Eligible	639490
174	IS00107	Deception Pass State Park	Potentially Eligible	639502
175	IS00031	Deception Pass State Park	Potentially Eligible	639431
176	IS00283	NASWI Ault Field	Potentially Eligible	652905
177	IS00041	NASWI Seaplane Base	Potentially Eligible	639441
178	IS00240	NASWI Seaplane Base	Potentially Eligible	639548
179	IS00241	NASWI Seaplane Base	Potentially Eligible	639549
180	IS00082	NASWI Seaplane Base	Determined Eligible	639482
181	IS00204	NASWI Seaplane Base	Potentially Eligible	639526
182	IS00081	NASWI Seaplane Base	Potentially Eligible	639481
183	IS000237	NASWI Seaplane Base	Potentially Eligible	639546
184	IS00002	Cama Beach	Listed in NRHP	639402
185	IS00210	Seaplane Base	Potentially Eligible	639531
186	IS00285	Seaplane Base	Potentially Eligible	653367
187	IS00323	Seaplane Base	Potentially Eligible	659549
188	IS00324	Ault Field	Potentially Eligible	649550
189	IS00336	Seaplane Base	Potentially Eligible	660728
190	SK00509	Deception Pass	Potentially Eligible	659084

NRHP LISTED/ELIGIBLE ARCHITECTURAL PROPERTIES IN REGION 2 TRAINING AREA

#	PROPERTY NAME	LOCATION	DATE LISTED NRHP/ DETERMINED ELGIBLE	DAHP RESOURCE ID
191	Deception Pass Bridge	Deception Pass	Listed in NRHP	8329
192	Deception Pass State Park Historic District (DPSPHD)	Deception Pass State Park	Determined Eligible	674889
192a	Latrine (Cranberry Lake)	Deception Pass State	Contributes to DPSPHD	

	Bathing)	Park		
192b	Combination Building (Cranberry Lake Bathing)	Deception Pass State Park	Contributes to DPSPHD	
192c	Shelter Kitchen (Cranberry Lake Bathing)	Deception Pass State Park	Contributes to DPSPHD	
192d	Campstove Shelter Bldg (Cranberry Lake Bathing)	Deception Pass State Park	Contributes to DPSPHD	
192e	Pump House (Cranberry Lake Bathing)	Deception Pass State Park	Contributes to DPSPHD	
192f	Comfort Station (Cranberry Lake Bathing)	Deception Pass State Park	Contributes to DPSPHD	
192g	Caretaker's Residence (Cranberry Lake Cartaker's)	Deception Pass State Park	Contributes to DPSPHD	
192h	Caretaker's Shop & Garage (Cranberry Lake Cartaker's)	Deception Pass State Park	Contributes to DPSPHD	
192i	Maintenance Shop (Cranberry Lake Cartaker's)	Deception Pass State Park	Contributes to DPSPHD	
192j	Fire Circle (Cornet Bay Picnic Area)	Deception Pass State Park	Contributes to DPSPHD	
192k	Incinerator (Cornet Bay Picnic Area)	Deception Pass State Park	Contributes to DPSPHD	
192l	Drinking Fountain (Cornet Bay Picnic Area)	Deception Pass State Park	Contributes to DPSPHD	
192m	Community Kitchen (North Beach Picnic Area)	Deception Pass State Park	Contributes to DPSPHD	
192n	Shelter Kitchen (North Beach Picnic Area)	Deception Pass State Park	Contributes to DPSPHD	
192o	Campstove Shelter (North Beach Picnic Area)	Deception Pass State Park	Contributes to DPSPHD	
192p	Latrine (North Beach Picnic Area)	Deception Pass State Park	Contributes to DPSPHD	
192q	Caretaker's Residence (Bowman Bay Bathing)	Deception Pass State Park	Contributes to DPSPHD	
192r	Caretaker's Shop & Garage (Bowman Bay Bathing)	Deception Pass State Park	Contributes to DPSPHD	
192s	Barn (Bowman Bay Bathing)	Deception Pass State Park	Contributes to DPSPHD	
192t	Bath House (Bowman Bay Bathing)	Deception Pass State Park	Contributes to DPSPHD	
192u	Community Kitchen (Bowman Bay Bathing)	Deception Pass State Park	Contributes to DPSPHD	
192v	Combination Building (Bowman Bay Bathing)	Deception Pass State Park	Contributes to DPSPHD	
192w	Latrine (Bowman Bay Bathing)	Deception Pass State Park	Contributes to DPSPHD	
192x	Campstove Shelter (Bowman Bay Bathing)	Deception Pass State Park	Contributes to DPSPHD	
192y	Drinking Fountain (Bowman Bay Bathing)	Deception Pass State Park	Contributes to DPSPHD	
192z	Pump House (Bowman Bay Bathing)	Deception Pass State Park	Contributes to DPSPHD	
192aa	Bath House (Bowman Bay Bathing)	Deception Pass State Park	Contributes to DPSPHD	
192ab	Entrance Piers	Deception Pass State Park	Contributes to DPSPHD	
192ac	Pedestrian Underpass (Highway 20)	Deception Pass State Park	Contributes to DPSPHD	
192ad	Log and Stone Guardrails (Highway 20)	Deception Pass State Park	Contributes to DPSPHD	
192ae	Deception Pass Bridge	Deception Pass State Park	Contributes to DPSPHD	676025

192af	Canoe Pass Bridge	Deception Pass State Park	Contributes to DPSPHD	44335
193	Facility 118	NASWI Ault Field	Determined Eligible	57764
194	Facility 386	NASWI Ault Field	Determined Eligible	41581
195	Facility 410	NASWI Ault Field	Determined Eligible	15-00041
196	Facility 960	NASWI Ault Field	Determined Eligible	57724
197	Facility 2700	NASWI Ault Field	Determined Eligible	67797
198	Seaplane Base Historic District (SBHD)	NASWI Seaplane Base	Determined Eligible	
198a	Facility 12	NASWI Seaplane Base	Contributes to SBHD	57765
198b	Facility 13	NASWI Seaplane Base	Contributes to SBHD	57794
198c	Facility 14	NASWI Seaplane Base	Contributes to SBHD	57766
198d	Facility 16	NASWI Seaplane Base	Contributes to SBHD	57795
198e	Facility 17	NASWI Seaplane Base	Contributes to SBHD	57796
198f	Facility 18	NASWI Seaplane Base	Contributes to SBHD	57797
198g	Facility 20	NASWI Seaplane Base	Contributes to SBHD	57767
198h	Facility 22	NASWI Seaplane Base	Contributes to SBHD	57800
198i	Facility 26	NASWI Seaplane Base	Contributes to SBHD	57768
198j	Facility 27	NASWI Seaplane Base	Contributes to SBHD	57769
198k	Facility 33	NASWI Seaplane Base	Contributes to SBHD	57801
198l	Facility 34	NASWI Seaplane Base	Contributes to SBHD	57802
198m	Facility 49	NASWI Seaplane Base	Contributes to SBHD	57770
198n	Facility 60	NASWI Seaplane Base	Contributes to SBHD	57804
198o	Facility 62	NASWI Seaplane Base	Contributes to SBHD	57805
198p	Facility 81	NASWI Seaplane Base	Contributes to SBHD	57807
198q	Facility 87	NASWI Seaplane Base	Contributes to SBHD	57772
198r	Facility 94	NASWI Seaplane Base	Contributes to SBHD	57811
198s	Facility 98/215	NASWI Seaplane Base	Contributes to SBHD	57812
198t	Facility 613	NASWI Seaplane Base	Contributes to SBHD	57777
198u	Facility 800	NASWI Seaplane Base	Contributes to SBHD	26
198v	Facility 802	NASWI Seaplane Base	Contributes to SBHD	73
198w	Facility 2588-2599	NASWI Seaplane Base	Contributes to SBHD	67863
199	Victory Homes Historic District	NASWI Seaplane Base	Contributes to SBHD	
199a	Facility 613 & 614	NASWI Seaplane Base	Contributes to SBHD	57821
200	Fort Casey	Fort Casey State Park	Listed in NRHP	639500
201	Camano City Schoolhouse	Camano Island	WA Heritage Register	

**NRHP LISTED/ELIGIBLE ARCHEOLOGICAL AND SHIPWRECKS PROPERTIES IN REGION 3
TRAINING AREA**

#	PROPERTY NAME	LOCATION	DATE LISTED NRHP/ DETERMINED ELIGIBLE	DAHP RESOURCE ID
202	PC00118	Cape Disappointment State Park	Potentially Eligible	646757
203	PC00220	Cape Disappointment State Park	Potentially Eligible	659089
204	PC00113	Cape Disappointment State Park	Potentially Eligible	646752
205	PC00114	Cape Disappointment State Park	Potentially Eligible	646753
206	PC00120	Cape Disappointment State Park	Potentially Eligible	646759
207	<i>Rosecrans (Shipwreck)</i>	Cape Disappointment	Unevaluated	No Number
208	<i>Unknown (Shipwreck)</i>	Cape Disappointment	Unevaluated	No Number

209	<i>Unknown</i> (Shipwreck)	Cape Disappointment	Unevaluated	No Number
210	<i>Admiral Benson</i> (Shipwreck)	Cape Disappointment	Unevaluated	No Number
211	<i>Bette M</i> (Shipwreck)	Cape Disappointment	Unevaluated	No Number
212	PC00112	Cape Disappointment	Potentially Eligible	646751
213	PC00131	Grayland	Potentially Eligible	646770

NRHP LISTED/ELIGIBLE ARCHITECTURAL PROPERTIES IN REGION 3 TRAINING AREA

#	PROPERTY NAME	LOCATION	DATE LISTED NRHP/ DETERMINED ELGIBLE	DAHP RESOURCE ID
214	Greys Harbor Light Station	Westport Light State Park	Listed in NRHP	674813
215	Cape Disappointment Historic District (CDHD)	Cape Disappointment State Park	Listed in NRHP	674637
215a	Fort Canby Searchlight 5	Cape Disappointment State Park	Contributes to CDHD	53975
215b	Fort Canby Searchlight 6	Cape Disappointment State Park	Contributes to CDHD	53976
215c	North Head Base End Station Complex	Cape Disappointment State Park	Contributes to CDHD	53977
215d	North Head Base End Station Powerhouse	Cape Disappointment State Park	Contributes to CDHD	53978
215e	North Head Lighthouse Keeper's House	Cape Disappointment State Park	Contributes to CDHD	57982
215f	North Head Lighthouse	Cape Disappointment State Park	Contributes to CDHD	626856
216	Chinook Point (CP)	Fort Columbia State Park (FCSP)	Listed in NRHP	675678
216a	Building 7	FCSP	Contributes to CP	4357909
216b	Building 6: NCO Duplex	FCSP	Contributes to CP	435789
216c	Building 5: Scarborough House	FCSP	Contributes to CP	435787
216d	Building 11: NCO Duplex	FCSP	Contributes to CP	618813
216e	Building 10: Steward's House	FCSP	Contributes to CP	618814
216f	Building 1: Interpretive Center	FCSP	Contributes to CP	613381
216g	Building 2: Admin Building	FCSP	Contributes to CP	613382
216h	Commanding Officer's Quarters	FCSP	Contributes to CP	50191

Enclosure 3: Buildings Proposed for Simulated Building Clearance Training Activities

Installation/ Location	Bldg #	Building Name	NRHP Status	SHPO Concurrence Date	DAHP Project Tracking Code
NBK Keyport	957	Storage Disposal Fac.	Not Eligible	20 March 2018	2018-03- 01684
NBK Keyport	1017	Covered Mat. Storage	Not Eligible	20 March 2018	2018-03- 01684
NBK Keyport	1018	Truck Loading Platform	Not Eligible	20 March 2018	2018-03- 01684
NAVMAG Indian Is.	832	Ammunition Wharf	Not Eligible	27 March 2018	2018-03- 01683
NAVMAG Indian Is.	833	Waterfront Ops Bldg	Not Eligible	27 March 2018	2018-03- 01683
NAVMAG Indian Is.	834	Blockers & Bracers Shop	Not Eligible	27 March 2018	2018-03- 01683
NAVMAG Indian Is.	910	Gasoline Storage Fac	Not Eligible	27 March 2018	2018-03- 01683
NAVMAG Indian Is.	986	Pier Cargo Staging Area	Not Eligible	27 March 2018	2018-03- 01683
NBK Bangor	7070	MSF Storage Shed	Not Eligible	13 March 2013	031313-13- USN
NBK Bangor	7079	Cable Storage Shed	Not Eligible	13 March 2013	031313-13- USN
Chambers	n/a	Warehouse	Not Eligible	5 July 2018	2017-05- 03022
Port Anacortes	n/a	Transit Shed	Not Eligible	5 July 2018	2017-05- 03022
Seabeck	n/a	Seabeck Elementary School	Not Eligible	5 July 2018	2017-05- 03022

NAVFAC
Naval Facilities Engineering Command
NAVFAC Northwest

Naval Special Operations Training in Western Washington

February 2018

- [illegible]

Potential Adverse Effects to Cultural Resources



- **Physical Disturbance to Archaeological Sites and Washington Native Properties of Cultural, Religious, and Traditional Importance (PCRTI)**
 - Increased access to areas during navigation activities resulting in inadvertent or intentional disturbance
 - Disturbance of eroding shell middens during over-the-beach activities
 - Disturbance of burial sites during training activities
 - Collection of an artifact from an archaeological site is a FELONY
- **Physical Disturbance to Architectural Resources**
 - Modification or alteration of existing structures
 - Inadvertent or intentional disturbance of such structures



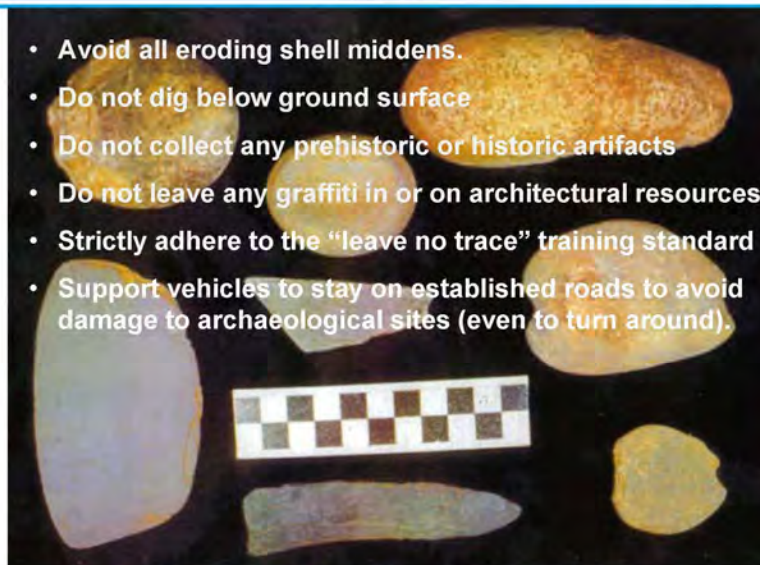
3

READINESS – PERFORMANCE – SUSTAINABILITY

Cultural Resources Best Management Practices



- Avoid all eroding shell middens.
- Do not dig below ground surface
- Do not collect any prehistoric or historic artifacts
- Do not leave any graffiti in or on architectural resources
- Strictly adhere to the "leave no trace" training standard
- Support vehicles to stay on established roads to avoid damage to archaeological sites (even to turn around).



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READINESS – PERFORMANCE – SUSTAINABILITY

What To Do



Strictly adhere to the “leave no trace” training standard

In the event that a culturally significant item or archaeological site is believed to be found, the Safety Supervisor shall be notified, the item shall be left in place, and the site shall be left undisturbed.

The Safety Supervisor will photograph the item or site, record the location, and forward the information to the NAVFAC NW Archaeologist.

- Contact Archeologist Susan S. Hughes (360)396-0083, susan.s.hughes@navy.mil or David Grant (360)396-0919, dave.m.grant@navy.mil in the event that a culturally significant item or archaeological site is believed to be found

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READINESS – PERFORMANCE – SUSTAINABILITY

Naval Special Operations Training Western Washington



BACKUP SLIDES

6

READINESS – PERFORMANCE – SUSTAINABILITY

Archaeological Sites



- Over 260 recorded prehistoric and historic archaeological sites within the Training Areas
- Prehistoric Sites- coastal and riverine areas
 - Prehistoric coastal villages (house pits and depressions)
 - Shell middens
 - Burials
 - Petroglyphs
 - Isolated finds (i.e. projectile points)
- Prehistoric Sites- coastal and inland areas
 - Stone quarries
 - Trails
 - Cave sites
 - Burials
- Historic Sites
 - House depressions and foundations
 - Pilings
 - Cemeteries and burials
 - Shipwrecks
 - Concrete pads and piers



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READINESS – PERFORMANCE – SUSTAINABILITY

Architectural Resources



- Over 3,100 architectural resources in the Training Areas
- Three (3) National Historic Landmark (NHL) composed of multiple properties
- 22 Officially Listed in National Register of Historic Places, many composed of multiple properties
- Military facilities
 - Pre-World War II Era Properties such as coastal defense
 - World War II Era Properties such as Seaplane Base, NASWI
 - Cold War Era Properties such as Delta Pier on NBK Bangor
- Non-military resources such as
 - Residential buildings
 - Churches
 - School complexes
 - Barns
 - Docks



8

READINESS – PERFORMANCE – SUSTAINABILITY

Native Resources



- Properties of Traditional, Religious or Cultural Importance (PTRCI)
 - Archaeological sites and artifacts
 - Locations of historic and contemporary events
 - Native sacred areas
 - Landscapes
 - Sources of raw materials used to produce tools and sacred objects
 - Traditional use areas (e.g., fishing areas, Native plant gathering areas, or wildlife habitat)

Enclosure 5: Inadvertent Discovery Plan

NAVAL SPECIAL OPERATIONS TRAINING IN WESTERN WASHINGTON INADVERTENT DISCOVERY OF POTENTIALLY ELIGIBLE CULTURAL RESOURCES AND HUMAN REMAINS

In the event of an inadvertent discovery of potentially National Register of Historic Properties (NRHP) eligible cultural resources or Native American human remains during training exercises, training will be re-directed to avoid the discovery. The Navy's on-site Safety Supervisor will ensure that the discovery area is secured in such a way as to prevent trainees or other persons from trespassing on, removing, or otherwise disturbing such remains, and will immediately notify the NAVFAC NW cultural resource staff in the event of the discovery. Training at the site will be discontinued until a professional archaeologist can thoroughly document and sample the discovered cultural material, upon receiving property owner's permission if discovery is off military lands, for the purposes of evaluating its significance. If further impacts to the NRHP eligible site cannot be avoided, then NAVFAC NW cultural resources staff will consult with the DAHP, affected Tribes, the property owner, and interested parties regarding the disposition and treatment of the site. NAVFAC NW cultural resource staff will coordinate the final disposition of the discovery, and training will not resume on that location until NAVFAC NW cultural resources staff have determined that compliance with federal laws is complete.

In the event that human remains are inadvertently discovered, the Navy on-site Safety Supervisor will immediately redirect training to another location. The discovery area shall be secured from further disturbance and the remains shielded from public view. The on-site Safety Supervisor will immediately notify local law enforcement professionals and NAVFAC NW cultural resources staff of the discovery. Law enforcement officials will determine if the remains represent those of a crime scene. Training will not continue until the crime scene investigation is complete and officials approve the resumption of

training activities. If the discovery is determined not to be a crime scene, Navy cultural resources staff will immediately contact the DAHP, the affected Tribes, Agency Official, and the appropriate property owner pursuant to the Native Graves Protection and Repatriation Act (NAGPRA; 45 CFR 10.3). No remains will be removed from their place of discovery until appropriate disposition and treatment procedures are developed in consultation with all concerned parties pursuant to the NAGPRA and OPNAV 11170.2A. Throughout the process, the remains will be treated with care and respect at all times, and will not be photographed. Training may resume at this location 30 days from the date that the Navy agency official was contacted, and only after compliance with all federal laws is complete. If the human remains are to remain on site, the site will no longer be available for future training exercises.

CONTACT LIST

Training Region 1

Dr. Susan Hughes	NAVFAC NW Staff Archaeologist	360-396-0083
David Grant	NAVFAC NW Staff Archaeologist	360-396-0919
Katherine Pollock	NBK Cultural Program Archaeologist	360-315-1162
Dr. Rob Whitlam	WA State Archaeologist (DAHP)	360-586-3080
Dr. Guy Tasa	WA State Physical Anthropologist	360-586-3534

Training Region 2

Kendall Campbell	NAS Whidbey Island Cultural Program Archaeologist	360-257-6780
Dr. Susan Hughes	NAVFAC NW Staff Archaeologist	360-396-0083
David Grant	NAVFAC NW Staff Archaeologist	360-396-0919
Katherine Pollock	NBK Cultural Program Archaeologist	360-315-1162
Dr. Rob Whitlam	WA State Archaeologist (DAHP)	360-586-3080
Dr. Guy Tasa	WA State Physical Anthropologist	360-586-3534

Training Region 3

Dr. Susan Hughes	NAVFAC NW Staff Archaeologist	360-396-0083
David Grant	NAVFAC NW Staff Archaeologist	360-396-0919
Dr. Rob Whitlam	WA State Archaeologist (DAHP)	360-586-3080
Dr. Guy Tasa	WA State Physical Anthropologist	360-586-3534

October 2019



Allyson Brooks Ph.D., Director
State Historic Preservation Officer

November 20, 2018

Mr. T.H. Lazo, P.E., Director
Navy Environmental Programs
US Dept. of the Navy
NAVFAC Northwest
1101 Tautog Circle
Silverdale, WA 98315-1101

In future correspondence please refer to:
Project Tracking Code: 2017-05-03022
Property: Multiple Publicly-Owned Locations in the Puget Sound Basin
Re: Navy Special Operations Training (Navy SEALs)

Dear Mr. Lazo:

Thank you for contacting the State Historic Preservation Officer (SHPO) and Department of Archaeology and Historic Preservation (DAHP) regarding the above referenced proposal. This action has been reviewed on behalf of the SHPO under provisions of Section 106 of the National Historic Preservation Act of 1966 (as amended) and 36 CFR Part 800. Our review is based upon documentation contained in your communication.

In response, at this time we are not able to concur with your determination that No Historic Properties will be Adversely Effected by the proposed Naval Special Operations Training in Western Washington and instead request additional information about the training program. The additional information is requested in order to address the following concerns and comments:

- 1) In order to address our concerns that archaeological sites in the proposal's area of potential effect (APE) have been identified and will be avoided, please provide maps of the proposed training areas so that DAHP can research known archaeological sites within or in proximity to these areas where the training will be conducted.
- 2) Your letter states that "Naval Special Training will avoid eroding archaeological sites and known burials." There is concern about possible affects from training exercises to other archaeological resources. Therefore, please provide us with protocols for avoidance of damaging all cultural resource types during training activities.
- 3) Your letter states that "Prior to training activities, NAVFAC NW cultural resources staff will be consulted to determine whether there may be archaeological sites or burials within the proposed training event area." Please provide the SHPO with documentation that the "NAVFAC NW cultural resources staff" making these determinations are qualified professional archaeologists.



October 2019

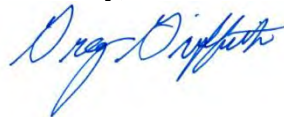
Mr. T.H. Lazo
November 20, 2018
Page Two

- 4) Your letter also states that "Cultural Resources Sensitivity Training will be made part of the in-class portion of all training." Please provide the SHPO with the in-class training material in order for DAHP to review and provide comments.
- 5) Our review of the IDP (Enclosure 5 to your letter of 10/18/18) reveals that the plan does not take into account state law as it applies to non-federal and non-tribal lands (State, local, or private) but only assumes that all inadvertent human skeletal remains will be handled under the Native American Graves Protection and Repatriation Act (NAGPRA). Therefore, the IDP should be revised to address human skeletal remains found on non-federal and non-reservation lands following the process outlined in RCWs 68.50.644, 68.60.055, and 27.44.055. Also, State law requires notification to the respective county coroner/medical examiner. Our recommended language for the IDP for finds on non-federal and non-reservation lands in Washington state can be found on our website at the following link: <https://dahp.wa.gov/archaeology/human-remains/recommended-inadvertent-human-remains-discovery-language>. Once the IDP is revised according to our recommendations, please re-submit to the SHPO for review.

Finally, please note that in order to streamline our responses, DAHP requires that Resource documentation (HPI, Archaeology sites, TCP) and reports be submitted electronically. Correspondence must be emailed in PDF format to the appropriate compliance email address. For more information about how to submit documents to DAHP please visit: <https://dahp.wa.gov/project-review>. To assist you in conducting a cultural resource survey and inventory effort, DAHP has developed Guidelines for Cultural Resources Reporting. You can view or download a copy from our website.

Thank you for the opportunity to review and comment. Please ensure that the DAHP Project Number (a.k.a. Project Tracking Code) is shared with any hired cultural resource consultants and is attached to any communications or submitted reports. If you have any questions, please feel free to contact me at 360-586-3073 or greg.griffith@dahp.wa.gov.

Sincerely,



Gregory Griffith
Deputy State Historic Preservation Officer

C: Jim Baumgart, Governor's Office



October 2019



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUTOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

5090
Ser N45/18-686
19 Dec 2018

Allyson Brooks, PhD
State Historic Preservation Officer
Washington Department of Archaeology and Historic Preservation
P.O. Box 48343
Olympia, WA 98504-8343

SUBJECT: LOG NO. 2017-05-03022-USN: CONTINUING SECTION 106
CONSULTATION ON FINDING OF NO ADVERSE EFFECTS TO
HISTORIC PROPERTIES, NAVAL SPECIAL OPERATIONS TRAINING
IN WESTERN WASHINGTON

Dear Dr. Brooks:

Thank you for your letter dated November 20, 2018 requesting further information on Naval Special Operations Training in Western Washington. The Navy is continuing consultation on the proposed training and requests your concurrence on the finding of No Historic Properties Adversely Effected. Per your request for additional information about the training program, we offer the following for your consideration.

1) You requested maps of the proposed training areas to research known archaeological sites within or in proximity to the areas where training will be conducted. Enclosure 1 provides maps of proposed training areas with sites indicated. If you require further clarification, please refer to DAHP Project No.: 2017-05-03022 in WISAARD. This illustrates the APE as concurred on by the Washington State Historic Preservation Officer (SHPO) (February 8, 2018) along with a tabulation of sites that fall within the APE.

2) You requested protocols for avoidance of damaging all cultural resources types during training activities. The Navy determined that the only training activities that have the potential to affect historic properties are the Simulated Building Clearance Training Activities, Special Reconnaissance Training Activities, and Over-The-Beach Training Activities as discussed with the Deputy SHPO during a telephone conversation of November 9, 2015. Since that conversation, High-Angle

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19 Dec 2018

Climbing Training Activities was added to the list of training activities. A description of each type of training activity that has the potential to affect historic properties follows.

a) Simulated Building Clearance Training Activities will only occur in the buildings identified in Enclosure 3 of the Navy's October 18, 2018 Finding of Effects letter. All of these buildings were previously determined not eligible for listing in the National Register of Historic Places (NRHP) with SHPO concurrence (July 5, 2018).

b) High-Angle Climbing Training Activities will only occur at designated climbing areas within Deception Pass State Park. This is an established climbing area designated by Washington State Parks and existing climbing aids will be used. There are no known historic properties associated with this climbing area. In the event that unknown historic properties are encountered during training exercises, training will stop and the enclosed Inadvertent Discovery Plan (IDP) will be implemented (Enclosure 3). Training activities within state parks are authorized under state park issued use permits.

c) Special Reconnaissance Training Activities, and Over-The-Beach Training Activities have the potential to effect eroding archaeological sites and burials. Based on pre-training exercise review by NAVFAC NW Secretary of the Interior qualified archaeologists, any known archaeological sites and burials will be avoided. In the event that unknown archaeological sites or burials are encountered during the training exercises, training will stop and the enclosed IDP will be implemented (Enclosure 3).

3) You requested documentation that the NAVFAC NW cultural resources staff making determinations of archaeological sites are qualified professional archaeologists. The cultural resources staff that meet the Secretary of the Interior's qualifications as archaeologists will review proposed training activities to assist in avoiding archaeological sites. At present, NAVFAC NW archaeologists that may perform this task include: Kendall Campbell (for NASWI managed properties), David Grant, and Susan Hughes, PhD.

October 2019

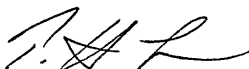
5090
Ser N45/18-686
19 Dec 2018

4) At your request, the in-class training material that will be used for "Cultural Resources Sensitivity Training" is included as Enclosure 2 of this letter. The material was also provided as Enclosure 4 of the Navy's Finding of Effect letter dated October 18, 2018.

5) Upon your recommendation to revise the Inadvertent Discovery Plan (IDP) to address human skeletal remains found on non-federal and non-reservation lands following the process outlined in RCWs 68.50.644, 68.60.055, and 27.44.055, as well as the state requirement to notify the respective county coroner/medical examiner, the IDP has been amended to address these concerns (see Enclosure 3).

Again thank you for the information and review you have provided. The Navy requests your concurrence with the finding of No Historic Properties Adversely Effected by the proposed Naval Special Operations Training in Western Washington. If you require additional information, please contact Mr. Russell Sackett, NAVFAC NW Historical Architect at (360) 396-0927 or russell.h.sackett1@navy.mil.

Sincerely,



T. H. LAZO, P.E.
Navy Environmental Program Director,
Northwest Region
By Direction of the Commanding Officer

Enclosures: 1. Sites in Area of Potential Effects
2. Inadvertent Discovery Plan
3. Cultural Resources Sensitivity Training material

October 2019



Allyson Brooks Ph.D., Director
State Historic Preservation Officer

January 15, 2019

Mr. T. H. Lazo, P.E.
Navy Environmental Program Director
NAVFAC NW
1101 Tautog Circle
Silverdale, WA 98315

In future correspondence please refer to:
Project Tracking Code: 111215-15-USN/2017-05-03022
Re: Navy Special Operations Training (Navy SEALs)

Dear Mr. Lazo:

Thank you for your letter of December 19, 2018 to the Washington State Historic Preservation Officer (SHPO). Your letter is in response to the Department of Archaeology and Historic Preservation (DAHP) communication of November 20, 2018 with questions and request for additional information about potential effects on historic properties of the Navy Special Operations Training (Navy SEALs) at selected shoreline locations in the Puget Sound basin.

In response, our opinion is that the information provided in your letter in paragraphs 1 through 5 answers our questions and responds to our concerns and recommendations. However, before concurring with your "no adverse effect" on historic properties determination for the training operation, we request execution of a programmatic agreement (PA) with the SHPO regarding implementation of the training activities and the review and clearance of proposed training areas to avoid archaeological resources. The PA should be a concise document that includes the following elements:

- 1) Definition of the Navy SEALs training activities covered in the PA (reference paragraphs 2 (a)-(c) in your letter of 12/19/18). Note: in regard to 2(a) (Simulated Building Clearance Training Activities) we understand that all of the buildings identified as being used for this training activity have been determined not eligible for listing in the National Register of Historic Places. However, we recommend that the PA includes a process for notification, review, and evaluation of buildings, structures, sites, objects, districts, and landscapes that may be added as the training program is implemented.
- 2) States that qualified cultural professionals meeting Secretary of the Interior's Professional Qualifications standards will review all proposed training activities and areas in order to avoid affecting archaeological sites.
- 3) Details a process for notifying the SHPO when the review and clearance of training activity areas takes place by qualified professionals and the results of the review.



October 2019

Mr. T.H. Lazo
January 15, 2019
Page Two

We look forward to receiving a draft PA to review and provide comments.

The above comments are based on the information available at the time of this review and on behalf of the State Historic Preservation Officer (SHPO) in conformance with Section 106 of the National Historic Preservation Act and its implementing regulations 36 CFR 800. Also, we appreciate receiving copies of any correspondence or comments from concerned tribes and other parties that you receive as you consult under the requirements of 36 CFR 800.4(a)(4). Should additional information become available, our assessment may be revised.

Thank you for the opportunity to review and comment. Please ensure that the DAHP Project Number (a.k.a. Project Tracking Code) is shared with any hired cultural resource consultants and is attached to any communications or submitted reports. If you have any questions, please feel free to contact me.

Sincerely,



Gregory Griffith
Deputy State Historic Preservation Officer
(360) 586-3073
greg.griffith@dahp.wa.gov



October 2019



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUTOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

5090
Ser N45/19-0062
26 Feb 2019

Allyson Brooks, PhD
State Historic Preservation Officer
Washington Department of Archaeology and Historic Preservation
P.O. Box 48343
Olympia, WA 98504-8343

SUBJECT: LOG NO. 2017-05-03022-USN: CONTINUING SECTION 106
CONSULTATION ON FINDING OF NO ADVERSE EFFECTS TO
HISTORIC PROPERTIES, NAVAL SPECIAL OPERATIONS TRAINING
IN WESTERN WASHINGTON

Dear Dr. Brooks:

Thank you for your letter dated January 15, 2019 providing conditional concurrence with the Navy's determination that no historic properties will be adversely affected by proposed Naval Special Operations Training in Western Washington. This letter provides additional discussion of the undertaking to address the three elements discussed in your letter and further clarification of the proposed undertaking. In summary, the Navy has applied the criteria of adverse effect, considered reasonably foreseeable effects, and found that the undertaking as defined fully qualifies for a determination of no adverse effect with conditions, consistent with 36 CFR 800.5(b), and does not require a programmatic agreement (PA).

Your letter dated January 15, 2019 identifies three elements warranting further discussion. Although a PA is not required, we have addressed the three elements from your January 15, 2019 letter as follows. The first pertains to the possibility that additional historic properties may be added to the training program. The training is strictly constrained to only the undertaking that the Navy has proposed. The Navy recognizes and agrees that if the area of potential effect (APE) changes, additional consultation will be necessary per 36 CFR 800.5(d)(1). Similarly, the Navy remains cognizant of the possibility that new information could introduce new historic properties into the APE or could become available about recorded historic properties, and we remain committed to addressing this

October 2019

information consistent with our standing responsibilities under the statute and regulations. In order to ensure the Navy has the most current information, the Navy commits to conducting a historic property review of all candidate properties at the pursuit and renewal of the real estate agreements required for access to non-Navy land such as state, county, or municipal parks and private properties. These agreements typically cover a period of five years, and each renewal will include a historic property review. The specifics of this review will also address the second element of your letter and are provided below.

The second element requests the Navy's commitment that the undertaking will be reviewed by qualified professionals. Navy Region Northwest employs several qualified professional archaeologists, who have worked with your office for many years. The Navy continually ensures that all Navy Region Northwest undertakings, including actions associated with the subject undertaking, are reviewed by qualified professionals. Specifically, for this undertaking, a Secretary-of-Interior qualified archaeologist will review the archaeological database of the Washington Information System for Architectural and Archaeological Records Data (WISAARD) for the presence of recorded archaeological sites in or near properties that are subject of proposed or renewed real estate agreements. If identified, the archaeologist will review the site form to determine if the site could reasonably be adversely affected by the training. The proposed Navy undertaking involves trainees learning the skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. This requires creating no trails and avoiding all incidental surface disturbance. For example, trainees would need to avoid an eroding bank, because it would leave physical evidence of the training activity. As a result, leaving archaeological sites undisturbed is in alignment with the proposed undertaking.

The third element in your letter requests a process by which your office will be notified of the review and clearance of training areas, for purposes of historic preservation. In light of operational security requirements and related concerns about sensitive information such as confidential property owner participation, the Navy is confident it can work with you and your staff to develop appropriate means to convey the results of its professional oversight of the undertaking.

October 2019

Notably, 36 CFR 800.5(b) defines the basis of a finding of no adverse effects with conditions. The Navy recognizes and commits to the following conditions: 1) reopening consultation per 36 CFR 800.5(d)(1) if necessitated by a change in the undertaking; 2) qualified review of new and renewed real estate agreements for new information such as the presence of eroding archaeological deposits or features; 3) implementation of the Inadvertent Discovery Plan; 4) providing sensitivity training; and 5) periodically confirming to your staff adverse effects are being avoided.

The Navy has consulted to define the APE and to consider all historic properties potentially affected. Based on feedback received in consultation, we have refined the undertaking so as to avoid effects to known historic properties. We are committed to ensuring that any post-review discoveries are addressed in compliance with 36 CFR 800.13.

Again thank you and your staff for your thorough consideration. The Navy requests your concurrence with our determination that no historic properties will be adversely affected by the Naval Special Operations Training in Western Washington. If you require additional information, please contact Mr. David Grant, NAVFAC NW Archaeologist at (360) 396-0919 or dave.m.grant@navy.mil.

Sincerely,



T. H. LAZO, P.E.
Navy Environmental Program Director,
Northwest Region
By Direction of the Commanding Officer

October 2019

March 28, 2019

Ms. T.H. Lazo, P.E., Director
Navy Environmental Program
US Dept. of the Navy
NAVFAC NW
1101 Tautog Circle
Silverdale, WA 98315-1101

In future correspondence please refer to:
Project Tracking Code: 2017-05-03022
Re: Naval Special Operations Training in Western Washington State

Dear Ms. Lazo:

Thank you for your letter of 2/26/19 to the State Historic Preservation Officer regarding the above referenced proposal and responding to our comment letter of 1/15/19 of your finding of No Adverse Effect to historic properties by the Naval Special Operations Training in western Washington program.

As a result of our review, we acknowledge and concur with the five conditions described on page 3 of your letter. However, we request that these conditions be incorporated into a brief and succinct memorandum of agreement (MOA) to be executed by the SHPO and the Navy to ensure that these precautionary steps are taken if and when needed over the timespan of the training programs. As stated in your letter, the conditions to be incorporated in the MOA shall include the Navy committing to the following actions:

1. Reopening of consultation per 36 CFR 800.5(d)(1) if necessitated by a change in the undertaking;
2. A review by a qualified Cultural Resource professional as defined in 36 CFR Part 61 of new and renewed real estate agreements for new information;
3. Implementation of the Inadvertent Discovery Plan (IDP), to be attached to the MOA as an appendix;
4. Providing sensitivity to cultural resources training to all participants in the program, and;
5. Submittal of an annual report to the SHPO confirming that adverse effects by the program are being avoided.

We look forward to receiving a draft MOA for our review and comment. Also, we appreciate receiving copies of any correspondence or comments from concerned tribes and other parties that you receive as you consult under the requirements of 36 CFR 800.4(a)(4).



October 2019

Ms. T.H. Lazo
March 28, 2019
Page Two

Thank you for the opportunity to review and comment. Please ensure that the DAHP Project Number (a.k.a. Project Tracking Code) is shared with any hired cultural resource consultants and is attached to any communications or submitted reports. If you have any questions, please feel free to contact me at greg.griffith@dahp.wa.gov.

Sincerely,



Gregory Griffith
Deputy State Historic Preservation Officer

c: Danielle Page-Pattison



October 2019



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUTOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

5090
Ser N45/19-0154
15 Apr 2019

Allyson Brooks, PhD
State Historic Preservation Officer
Washington Department of Archaeology and Historic Preservation
P.O. Box 48343
Olympia, WA 98504-8343

SUBJECT: LOG NO. 2017-05-03022-USN: REQUEST AGREEMENT ON FINDING
OF NO ADVERSE EFFECTS TO HISTORIC PROPERTIES, NAVAL
SPECIAL OPERATIONS TRAINING IN WESTERN WASHINGTON

Dear Dr. Brooks:

We received your letter dated March 28, 2019 requesting the Navy enter into a Memorandum of Agreement (MOA) to substantiate a finding of no adverse effect for the subject undertaking. The Navy does not agree that an MOA is required.

As noted in prior correspondence, the Navy is committed to the mutually agreed measures, identified in our February 26, 2019 letter, in order to ensure no historic properties are adversely affected. Commitments are as follows: 1) reopen consultation per 36 CFR 800.5(d) if necessitated by a change in the undertaking; 2) ensure qualified review of new and renewed real estate agreements for new information such as the presence of eroding archaeological deposits or features; 3) implement the Inadvertent Discovery Plan; 4) provide sensitivity training; and 5) periodically confirm to your staff that adverse effects are being avoided.

Consistent with 36 CFR 800, the Navy has made a reasonable and good faith effort to identify historic properties, applied the criteria of adverse effect including consideration of reasonably foreseeable effects, and made its finding of no adverse effect with conditions imposed that are fully consistent with the requirements of 36 CFR 800.5(b). An additional agreement document is not required, because 36 CFR 800.5(d)(1) requires the agency to implement the undertaking in accordance with the documented finding.

In accordance with 36 CFR 800.5(c), the Navy requests your written agreement or disagreement with our finding of no adverse effect for the subject undertaking as defined.

October 2019

Thank you for your continued correspondence on this undertaking. If you require additional information, please contact Mr. David Grant, NAVFAC NW Archaeologist at (360) 396-0919 or dave.m.grant@navy.mil.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. H. LAZO', with a long horizontal stroke extending to the right.

T. H. LAZO, P.E.
Navy Environmental Program Director,
Northwest Region
By Direction of the Commanding
Officer

October 2019



Allyson Brooks Ph.D., Director
State Historic Preservation Officer

April 25, 2019

Ms. T.H. Lazo, P.E.
Navy Environmental Program Director
NAVFAC NW
1101 Tautog Circle
Silverdale, WA 98315-1101

In future correspondence please refer to:
Project Tracking Code: 2017-05-03022
Re: Naval Special Operations Training in Western Washington State

Dear Ms. Lazo:

Thank you for your letter of April 15, 2019 to the Washington State Historic Preservation Officer (SHPO) regarding the above referenced proposal and in response to the Department of Archaeology and Historic Preservation (DAHP) letter of March 28, 2019. Your letter has been reviewed on behalf of the State Historic Preservation Officer (SHPO) under provisions of Section 106 of the National Historic Preservation Act of 1966 (as amended) and 36 CFR Part 800. Our review is based upon documentation contained in your communication.

In response and as stated in previous correspondence, we concur with and support the five stipulations identified in your letter. However, we need to have the stipulations placed into a Memorandum of Agreement (MOA) in the event that an adverse effect occurs. The MOA will codify the agreements and stipulations in place to detail the operations of the Section 106 process during the course of the undertaking. The intent would serve the purposes of a brief programmatic agreement for the Navy to meet its responsibilities under the Section 106 process for this particular undertaking. We look forward to receiving and reviewing a draft document at your earliest convenience.

In addition, we also request copies of all correspondence concerning the training program that the Navy has received from interested and affected Tribes.

These comments are based on the information available at the time of this review and on behalf of the State Historic Preservation Officer (SHPO) in conformance with Section 106 of the National Historic Preservation Act and its implementing regulations 36 CFR 800.

Thank you for the opportunity to review and comment. Please ensure that the DAHP Project Number (a.k.a. Project Tracking Code) is shared with any hired cultural resource consultants and is attached to any communications or submitted reports. If you have any questions, please feel free to contact me at 360-586-3073 or greg.griffith@dahp.wa.gov.

Sincerely,

Gregory Griffith
Deputy State Historic Preservation Officer

C: David Grant
Danielle Page-Pattison



October 2019



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

5090
Ser N45/19-00336
02 July 2019

Reid Nelson
Director, Federal Agency Programs
Advisory Council on Historic Preservation
1100 Pennsylvania Avenue
Suite 803
Old Post Office Building Washington, DC 20004

SUBJECT: REQUEST FOR REVIEW OF THE FINDING OF NO ADVERSE EFFECTS
TO HISTORIC PROPERTIES, NAVAL SPECIAL OPERATIONS TRAINING IN
WESTERN WASHINGTON (DAHP Log. No. 2017-05-03022-USN and ACHP Log.
No. 0011669)

Dear Mr. Nelson:

In accordance with 36 CFR 800.5(c)(2)(i), the Navy requests review of its finding of No Adverse Effect by the proposed Naval Special Operations Training in Western Washington. There are five conditions to support the finding of No Adverse Effect. The conditions were developed and agreed upon during consultation with the Washington State Historic Preservation Officer (SHPO) and consulting tribes. The SHPO is requesting the agreed upon conditions be stipulated in a two-party memorandum of agreement (MOA) as a prerequisite to her concurrence with the finding of effect. Under the Navy's interpretation of the regulations, the Navy has met all the requirements imposed by 36 CFR 800.5(b) and has no obligation to enter into a MOA stipulating to the five conditions.

As reflected in the enclosed correspondence, after six months of discussions, SHPO failed to formally agree or disagree with the Navy's finding of No Adverse Effect with conditions. As a result, the Navy is proceeding forward by considering SHPO's lack of response as a disagreement with the finding per 36 CFR 800.5(c)(2), and requests ACHP review.

Enclosed is a chronology of our Section 106 consultation (enclosure 1). The Navy began discussing the subject undertaking with SHPO's staff in late 2015 and formally initiated

October 2019

consultation in April 2017. Enclosure 2 is correspondence evidencing the Section 106 process including letters relating to SHPO's request for a MOA. Although enclosure 2 provides key correspondence between the Navy, SHPO, and ACHP, additional documentation specified in 36 CFR 800.11(e) is available upon request. In accordance with 36 CFR 800.5(c)(2)(i), this letter and enclosures have been made available to the public via <https://navfac.navy.mil/NSOEA>

If you require additional information, please contact Mr. David Grant, NAVFAC NW Archaeologist at (360) 396-0919 or at dave.m.grant@navy.mil.

Sincerely,



T. H. LAZO, P.E.
Navy Environmental Program
Director, Northwest Region
By Direction of the Commanding
Officer

Enclosures: 1. Chronology of Consultation
2. Consultation Record of Key Correspondence

Copy to:

WA SHPO

Confederate Tribes of the Grand Ronde Community of Oregon (Ms. Cheryl K. Pouley, Archaeologist, on behalf of Briece Edwards, Historic Preservation Office Manager)

Jamestown S'Klallam Tribe (Mr. David Brownell, THPO)

Lower Elwha Klallam Tribe (Mr. Bill White, Cultural Resources Archaeologist)

Muckleshoot Tribe (Ms. Laura Murphy, Archaeologist)

Nisqually Tribe THPO (Ms. Jackie Wall, THPO)

Port Gamble S'Klallam Tribe (Ms. Stormy Purser, THPO)

Shoalwater Tribe of Shoalwater Bay Tribe of the Shoalwater Bay CR (Mr. Earl Davis, CR Specialist)

Skokomish Tribe (Ms. Kris Miller, THPO)

Squaxin Tribe (Ms. Stephanie Neil, Archaeologist, on behalf of THPO Rhonda Foster)

Suquamish Tribe (Mr. Dennis Lewarch, THPO)

Upper Skagit Tribe (Mr. Scott Shuyler, Cultural Resources Manager)

October 2019

From: [e106](#)
To: [Grant, David M CIV USN \(USA\)](#)
Subject: [Non-DoD Source] RE: Review request for Naval Special Operations Training in Western Washington (Log. No. 0011669)
Date: Monday, July 8, 2019 6:29:55 AM

The ACHP has received your submission to e106@achp.gov. If your submission is to:

- notify the ACHP of a finding that an undertaking may adversely affect historic properties, and/or
- invite the ACHP to participate in a section 106 consultation, and/or
- propose to develop a project Programmatic Agreement (project PA) for complex or multiple undertakings,

and you are enclosing the completed e106 form, this is your official dated receipt of your submission (in accordance with 36 CFR Part 800.6(1)). The ACHP has 15 days to determine if it will participate in consultation to resolve adverse effects to historic properties. If the ACHP does not participate in consultation, the agency will still need to file the final agreement document and related documentation with the ACHP at the conclusion of the consultation process. This filing is required in order for the agency to complete its compliance responsibilities under Section 106 of the National Historic Preservation Act.

From: Grant, David M CIV USN (USA) [REDACTED]
Sent: Wednesday, July 03, 2019 2:53 PM
To: e106
Subject: Review request for Naval Special Operations Training in Western Washington (Log. No. 0011669)

To Whom It May Concern

Please see attachments.

Thank you.

David Grant
Archaeologist
NAVFAC NW EV-9
[REDACTED]

October 2019

CIV USN NAVFAC NW SVD WA (USA)

From: Brooks, Allyson (DAHP) <Allyson.Brooks@DAHP.WA.GOV>
Sent: Friday, July 19, 2019 9:22 AM
To: David Brownell; Grant, David M CIV USN (USA); 106 (DAHP); Griffith, Greg (DAHP); Cheryl.Pouley@grandronde.org; THPO@grandronde.org; Bill White; laura.murphy@muckleshoot.nsn.us; wall.jackie@nisqually-nsn.gov; Bullchild.annette@nisqually-nsn.gov; bullchild.kurtis@nisqually-nsn.gov; stormyp@pgst.nsn.us; thpo@pgst.nsn.us; edavis@shoalwaterbay-nsn.gov; Kris Miller; rfooster@squaxin.us; sneil@squaxin.us; dlewarch@suquamish.nsn.us; Scott Schuyler Baumgart, Jim (GOV); John Fowler; tmcculloch@achp.gov
Cc:
Subject: [Non-DoD Source] RE: Naval Special Operations Training in Western Washington (DAHP Log. No. 2017-05-03022-USN and ACHP Log. No. 001169)

Dave - The attachment did not come through to me. In any case, it appears that tribal consultation is not complete. Therefore, we cannot concur with your finding of NAE as you have not yet completed the consultation portion of the 106 process.

All the best

Allyson

Allyson Brooks Ph.D.
State Historic Preservation Officer/Executive Director
Department of Archaeology and Historic Preservation
(360) 586-3066
Allyson.brooks@dahp.wa.gov

From: David Brownell <dbrownell@jamestowntribe.org>
Sent: Friday, July 19, 2019 8:30 AM
To: Grant, David M CIV USN (USA) <[REDACTED]>; 106 (DAHP) <106@dahp.wa.gov>; Brooks, Allyson (DAHP) <Allyson.Brooks@DAHP.WA.GOV>; Griffith, Greg (DAHP) <Greg.Griffith@DAHP.WA.GOV>; Cheryl.Pouley@grandronde.org; THPO@grandronde.org; Bill White (Bill.White@elwha.nsn.us) <Bill.White@elwha.nsn.us>; laura.murphy@muckleshoot.nsn.us; wall.jackie@nisqually-nsn.gov; Bullchild.annette@nisqually-nsn.gov; bullchild.kurtis@nisqually-nsn.gov; stormyp@pgst.nsn.us; thpo@pgst.nsn.us; edavis@shoalwaterbay-nsn.gov; Kris Miller (shlanay1@skokomish.org) <shlanay1@skokomish.org>; rfooster@squaxin.us; sneil@squaxin.us; dlewarch@suquamish.nsn.us; Scott Schuyler <ScottS@UPPERSKAGIT.com>
Subject: RE: Naval Special Operations Training in Western Washington (DAHP Log. No. 2017-05-03022-USN and ACHP Log. No. 001169)

Good Morning Dave,

Where in the pre-training event review process will Tribes be consulted, re: the areas that I identified as sensitive to Russ Sackett back in 2018. Will the Navy be engaging in a case-by-case consultation with Tribes prior to training activities? I understand from the October 2019 NAE letter from the Navy that NAVFAC NW *cultural resourecs staff will be consulted to determine whether there may be archaeological sites or burials within the proposed training event area*, but there is no mention of traditional knowledge and tribal consultation at that point, which I think is a very important factor. There are many coastal sites within this region that the Tribe is aware of, but are not recorded in any database or WISAARD.

October 2019

Thank you for any additional information in this regard,

David Brownell, Tribal Historic Preservation Officer

Jamestown S'Klallam Tribe

Office: (360) 681-4638

Email: dbrownell@jamestowntribe.org

From: Grant, David M CIV USN (USA) <[REDACTED]>

Sent: Wednesday, July 3, 2019 12:58 PM

To: 106 (DAHP) <106@dahp.wa.gov>; Brooks, Allyson (DAHP) (Allyson.Brooks@DAH.P.WA.GOV)

<Allyson.Brooks@DAH.P.WA.GOV>; Greg.Griffith@dahp.wa.gov; Cheryl.Pouley@grandronde.org;

THPO@grandronde.org; David Brownell <dbrownell@jamestowntribe.org>; Bill White (Bill.White@elwha.nsn.us)

<Bill.White@elwha.nsn.us>; laura.murphy@muckleshoot.nsn.us; wall.jackie@nisqually-nsn.gov;

Bullchild.annette@nisqually-nsn.gov; bullchild.kurtis@nisqually-nsn.gov; stormyp@pgst.nsn.us; thpo@pgst.nsn.us;

edavis@shoalwaterbay-nsn.gov; Kris Miller (shlanay1@skokomish.org) <shlanay1@skokomish.org>; rfoster@squaxin.us;

sneil@squaxin.us; dlewarch@suquamish.nsn.us; Scott Schuyler <ScottS@UPPERSKAGIT.com>

Subject: Naval Special Operations Training in Western Washington (DAHP Log. No. 2017-05-03022-USN and ACHP Log. No. 001169)

All

Please see attached letter (with enclosures) submitted to ACHP today requesting review of Navy's finding of No Adverse Effects with conditions for subject undertaking.

If you have any questions or wish to receive this material in hard copy please contact me. This material will also be made available at <https://navfac.namy.mil/NSOEA>.

Thank you.

Dave

David Grant

Archaeologist

NAVFAC NW EV-9

October 2019

CIV USN NAVFAC NW SVD WA (USA)

From: Griffith, Greg (DAHP) <Greg.Griffith@DAHP.WA.GOV>
Sent: Friday, July 19, 2019 10:58 AM
To: Grant, David M CIV USN (USA)
Cc: Brooks, Allyson (DAHP); jfowler@achp.gov; rnelson@achp.gov; Cheryl.Pouley@grandronde.org; THPO@grandronde.org; dbrownell@jamestowntribe.org; Bill White; laura.murphy@muckleshoot.nsn.us; wall.jackie@nisqually-nsn.gov; Bullchild.annette@nisqually-nsn.gov; bullchild.kurtis@nisqually-nsn.gov; stormyp@pgst.nsn.us; thpo@pgst.nsn.us; edavis@shoalwaterbay-nsn.gov; Kris Miller; rfoster@squaxin.us; Griffith, Greg (DAHP); sneil@squaxin.us; dlewarch@suquamish.nsn.us; Scott Schuyler; Whitlam, Rob (DAHP); Borth, Holly (DAHP)
Subject: [Non-DoD Source] RE: Naval Special Operations Training in Western Washington (DAHP Log. No. 2017-05-03022-USN and ACHP Log. No. 001169)
Attachments: 2017-05-03022_071919.pdf

Dave and all, attached, please find a pdf of our comment letter (addressed to T.H. Lazo) expressing our concerns about the completeness of the Navy's 106 Tribal consultation and determination of No Adverse Effect on cultural resources of the proposed training program.

Greg Griffith
Deputy State Historic Preservation Officer
360-586-3073 (desk)

Greg.griffith@dahp.wa.gov

Help us develop the State Historic Preservation Plan in 2019:

Please complete our planning survey at: www.dahp.wa.gov/preservationplan

From: Grant, David M CIV USN (USA) [mailto:]
Sent: Wednesday, July 3, 2019 12:58 PM
To: 106 (DAHP); Brooks, Allyson (DAHP); Griffith, Greg (DAHP); Cheryl.Pouley@grandronde.org; THPO@grandronde.org; dbrownell@jamestowntribe.org; Bill White (Bill.White@elwha.nsn.us); laura.murphy@muckleshoot.nsn.us; wall.jackie@nisqually-nsn.gov; Bullchild.annette@nisqually-nsn.gov; bullchild.kurtis@nisqually-nsn.gov; stormyp@pgst.nsn.us; thpo@pgst.nsn.us; edavis@shoalwaterbay-nsn.gov; Kris Miller (shlanay1@skokomish.org); rfoster@squaxin.us; sneil@squaxin.us; dlewarch@suquamish.nsn.us; Scott Schuyler
Subject: Naval Special Operations Training in Western Washington (DAHP Log. No. 2017-05-03022-USN and ACHP Log. No. 001169)

All

Please see attached letter (with enclosures) submitted to ACHP today requesting review of Navy's finding of No Adverse Effects with conditions for subject undertaking.

If you have any questions or wish to receive this material in hard copy please contact me. This material will also be made available at <https://navfac.navy.mil/NSOEA>.

Thank you.

Dave

David Grant
Archaeologist
NAVFAC NW EV-9
[REDACTED]

October 2019



Allyson Brooks Ph.D., Director
State Historic Preservation Officer

July 19, 2019

T. H. Lazo, P.E.
Director, Navy Environmental Program Northwest Region
US Dept. of the Navy
NAVFAC NW EV-1
Silverdale, WA 98315

In future correspondence please refer to:
Project Tracking Code: 2017-05-03022 and ACHP Log 0011669
Re: Naval Special Operations Training in Western Washington State

Dear Ms. Lazo:

The Washington State Historic Preservation Officer (SHPO) and the Washington State Department of Archaeology and Historic Preservation (DAHP) are in receipt of a July 19, 2019 email from Jamestown S'Klallam Tribal Historic Preservation Officer (THPO) David Brownell regarding the above referenced program. In a separate email to the SHPO, he stated that the Tribe has not received the Navy's effect determination of October 2018 in addition to not having received any follow-up from the Navy over expressed concerns about unrecorded coastal sites, the draft Inadvertent Discovery Plan (IDP), and the 106 consultation process overall for this proposal.

Based upon the THPO's question and concerns expressed in the emails, it is apparent to us that the Section 106 consultation on the Naval Special Operations Training program is incomplete and that the Navy's "no adverse effect" of the program is premature. Further, it is recommended that the Navy resume 106 consultation with the Jamestown S'Klallam Tribe and other Tribes with cultural resource interest and concerns in the region.

Therefore, the DAHP does NOT concur with the determination of No Adverse Effect and contends that tribal consultation remains incomplete.

These comments are based on the information available at the time of this review and on behalf of the State Historic Preservation Officer (SHPO) in conformance with Section 106 of the National Historic Preservation Act and its implementing regulations 36 CFR 800. Also, we appreciate receiving copies of any correspondence or comments from concerned tribes and other parties that you receive as you consult under the requirements of 36 CFR 800.4(a)(4). Should additional information become available, our assessment may be revised.

Thank you for the opportunity to review and comment. Please ensure that the DAHP Project Number (a.k.a. Project Tracking Code) is shared with any hired cultural resource consultants and is attached to any communications or submitted reports. If you have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Greg Griffith', is written over a light blue circular background.

Gregory Griffith
Deputy State Historic Preservation Officer

C: David Brownell, Jamestown S'Klallam Tribe, THPO
John Fowler, Advisory Council on Historic Preservation
Dave Grant, US Navy
Reid Nelson, ACHP



October 2019

CIV USN NAVFAC NW SVD WA (USA)

From: Rhonda Foster <rfoster@squaxin.us>
Sent: Friday, July 19, 2019 11:18 AM
To: Grant, David M CIV USN (USA)
Subject: [Non-DoD Source] FW: Naval Special Operations Training in Western Washington (DAHP Log. No. 2017-05-03022-USN and ACHP Log. No. 001169)

From: Rhonda Foster
Sent: Friday, July 19, 2019 11:17 AM
To: Brooks, Allyson (DAHP) <Allyson.Brooks@DAHP.WA.GOV>
Cc: Rhonda Foster <rfoster@squaxin.us>
Subject: RE: Naval Special Operations Training in Western Washington (DAHP Log. No. 2017-05-03022-USN and ACHP Log. No. 001169)

Thank you for contacting the Squaxin Island Tribe Cultural Resources Department regarding the above listed project for our review and comment. We concur with DAHP and Jamestown Tribes THPO, we request that we be involved in future consultation.

Thank you



Rhonda Foster
CR Director, THPO
CR Department
Squaxin Island Tribe
200 S.E. Billy Frank Jr. Way
Shelton, WA 98584
D 360-426-9781
rfoster@squaxin.us

Email is my preferred method of communication

From: Brooks, Allyson (DAHP) [<mailto:Allyson.Brooks@DAHP.WA.GOV>]
Sent: Friday, July 19, 2019 9:22 AM
To: David Brownell <dbrownell@jamestowntribe.org>; Grant, David M CIV USN (USA) [REDACTED]; 106 (DAHP) <106@dahp.wa.gov>; Griffith, Greg (DAHP) <Greg.Griffith@DAHP.WA.GOV>; Cheryl.Pouley@grandronde.org; THPO@grandronde.org; Bill White (Bill.White@elwha.nsn.us) <Bill.White@elwha.nsn.us>; laura.murphy@muckleshoot.nsn.us; wall.jackie@nisqually-nsn.gov; Bullchild.annette@nisqually-nsn.gov; bullchild.kurtis@nisqually-nsn.gov; stormyp@pgst.nsn.us; thpo@pgst.nsn.us; edavis@shoalwaterbay-nsn.gov; Kris Miller (shlanay1@skokomish.org) <shlanay1@skokomish.org>; Rhonda Foster <rfoster@squaxin.us>; Stephanie Neil

October 2019

<sneil@squaxin.us>; dlewarch@suquamish.nsn.us; Scott Schuyler <ScottS@UPPERSKAGIT.com>

Cc: Baumgart, Jim (GOV) <jim.baumgart@gov.wa.gov>; John Fowler <jfowler@achp.gov>; tmcculloch@achp.gov

Subject: RE: Naval Special Operations Training in Western Washington (DAHP Log. No. 2017-05-03022-USN and ACHP Log. No. 001169)

Dave - The attachment did not come through to me. In any case, it appears that tribal consultation is not complete. Therefore, we cannot concur with your finding of NAE as you have not yet completed the consultation portion of the 106 process.

All the best

Allyson

Allyson Brooks Ph.D.
State Historic Preservation Officer/Executive Director
Department of Archaeology and Historic Preservation
(360) 586-3066
Allyson.brooks@dahp.wa.gov

From: David Brownell <dbrownell@jamestowntribe.org>

Sent: Friday, July 19, 2019 8:30 AM

To: Grant, David M CIV USN (USA) <[REDACTED]>; 106 (DAHP) <106@dahp.wa.gov>; Brooks, Allyson (DAHP) <Allyson.Brooks@DAHP.WA.GOV>; Griffith, Greg (DAHP) <Greg.Griffith@DAHP.WA.GOV>; Cheryl.Pouley@grandronde.org; THPO@grandronde.org; Bill White (Bill.White@elwha.nsn.us) <Bill.White@elwha.nsn.us>; laura.murphy@muckleshoot.nsn.us; wall.jackie@nisqually-nsn.gov; Bullchild.annette@nisqually-nsn.gov; bullchild.kurtis@nisqually-nsn.gov; stormyp@pgst.nsn.us; thpo@pgst.nsn.us; edavis@shoalwaterbay-nsn.gov; Kris Miller (shlanay1@skokomish.org) <shlanay1@skokomish.org>; rfoster@squaxin.us; sneil@squaxin.us; dlewarch@suquamish.nsn.us; Scott Schuyler <ScottS@UPPERSKAGIT.com>

Subject: RE: Naval Special Operations Training in Western Washington (DAHP Log. No. 2017-05-03022-USN and ACHP Log. No. 001169)

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David Brownell, Tribal Historic Preservation Officer
Jamestown S'Klallam Tribe
Office: (360) 681-4638
[REDACTED]
Email: dbrownell@jamestowntribe.org

From: Grant, David M CIV USN (USA) <[REDACTED]>

Sent: Wednesday, July 3, 2019 12:58 PM

October 2019

To: 106 (DAHP) <106@dahp.wa.gov>; Brooks, Allyson (DAHP) (Allyson.Brooks@DAHP.WA.GOV)
<Allyson.Brooks@DAHP.WA.GOV>; Greg.Griffith@dahp.wa.gov; Cheryl.Pouley@grandronde.org;
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edavis@shoalwaterbay-nsn.gov; Kris Miller (shlanay1@skokomish.org) <shlanay1@skokomish.org>; rfoster@squaxin.us;
sneil@squaxin.us; dlewarch@suquamish.nsn.us; Scott Schuyler <ScottS@UPPERSKAGIT.com>

Subject: Naval Special Operations Training in Western Washington (DAHP Log. No. 2017-05-03022-USN and ACHP Log. No. 001169)

All

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If you have any questions or wish to receive this material in hard copy please contact me. This material will also be made available at <https://navfac.navy.mil/NSOEA>.

Thank you.

Dave

David Grant
Archaeologist
NAVFAC NW EV-9


October 2019

B.3 Navy Natural Resource Agencies Correspondence



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUTOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

5090
Ser N45/18-00289
MAY 11 2018

Mr. Barry Thom
West Coast Regional Administrator
National Marine Fisheries Service
7600 Sand Point Way N.E., Bldg. 1
Seattle, Washington 98115

Dear Mr. Thom:

SUBJECT: BIOLOGICAL ASSESSMENT FOR NAVAL SPECIAL OPERATIONS
TRAINING IN WESTERN WASHINGTON STATE

The United States Naval Special Warfare Command is proposing to conduct special operations training at multiple locations throughout western Washington. The Proposed Action supports small-unit, intermediate, and advanced cold-water maritime and land-based training activities for naval special operations personnel on selected nearshore lands and in the inland waters of Puget Sound, including Hood Canal, as well as the southwestern Washington coast. The Action Area consists of both Navy-administered lands, as well as lands that would be used for training pursuant to agreements between the Navy and land owners. These non-federal lands include properties owned by the State of Washington, counties and municipalities, as well as lands under private ownership. Training would start in 2018 and occur into the foreseeable future.

Pursuant to Section 7 of the Endangered Species Act (ESA) of 1973, as amended, the Naval Facilities Engineering Command, Northwest (Navy), on behalf of Naval Special Warfare Command, has completed an analysis of potential impacts to ESA listed species within the Action Area. The Navy concludes that the proposed action "may affect, but is not likely to adversely affect," the following species: leatherback sea turtle (*Dermochelys coriacea*), humpback whale Mexico DPS and Central America DPS (*Megaptera novaeangliae*), southern resident killer whale (*Orcinus orca*), Puget Sound chinook salmon (*Oncorhynchus tshawytscha*), Columbia River chum salmon (*Oncorhynchus keta*), Hood Canal summer-run chum salmon (*Oncorhynchus keta*), Puget Sound steelhead (*Oncorhynchus*

October 2019

5090

Ser N45/18-00289

mykiss), Puget Sound/Georgia Basin DPS bocaccio (*Sebastes paucispinis*), North American green sturgeon southern DPS (*Acipenser medirostris*), and Pacific eulachon southern DPS (*Thaleichthys pacificus*).

Enclosed is the Navy's Biological Assessment for your review. In compliance with the ESA, we are requesting your concurrence with our effect determinations of "not likely to adversely affect" for listed species under NMFS jurisdiction. Designated critical habitat for some ESA listed species above is present within the Action Area. However, the Navy determined the primary constituent elements and essential physical and biological features would not be modified, either temporarily or permanently, as a result of the minimally invasive proposed training activities. Therefore, the Navy concludes the proposed action would have no effect to designated critical habitat. Additionally, the Navy has determined that the proposed action would have no effect to Essential Fish Habitat and is not requesting consultation under the Magnuson-Stevens Fishery Conservation and Management Act.

If you have any questions regarding the proposed project, please contact Ms. Tiffany Selbig. She can be reached by telephone at (360) 315-2531 or by e-mail at tiffany.selbig@navy.mil.

Sincerely,



T. H. Lazo, P.E.
Environmental Business Line Director
By Direction of the Commanding Officer

Enclosures: 1. Biological Assessment

Copy to: Naval Special Warfare Command

October 2019



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration

NATIONAL MARINE FISHERIES SERVICE

West Coast Region
1201 NE Lloyd Blvd, Suite 1100
Portland OR, 97232

NMFS Tracking No:
WCR-2018-9799

October 2, 2018

T.H. Lazo
Environmental Business Line Director
Naval Facilities Engineering Command Northwest
Department of the Navy
Silverdale, Washington 98315-1101

Re: Endangered Species Act Section 7 Concurrence Letter for Naval Operations Training in Western Washington State, Washington (6th Field HUC: Several).

Dear Mr. Lazo:

On May 16, 2018, the National Marine Fisheries Service (NMFS) received a U.S. Navy (USN) request for informal consultation and final concurrence that Naval special operations in-water training at several locations in Western Washington is not likely to adversely affect (NLAA) species listed as threatened or endangered or critical habitat designated under the Endangered Species Act (ESA). This response to your request was prepared by NMFS pursuant to section 7(a)(2) of the ESA, implementing regulations at 50 CFR 402, and agency guidance for preparation of letters of concurrence.

We also reviewed the proposed action for potential effects on essential fish habitat (EFH) designated under the Magnuson-Stevens Act (MSA), including conservation measures and any determination that you made regarding the potential effects of the action. This review was pursuant to section 305(b) of the MSA, implementing regulations at 50 CFR 600.920, and agency guidance for use of the ESA consultation process to complete EFH consultation. We determined that the action would not adversely affect EFH. Thus, consultation under the MSA is not required for this action.

This letter is in compliance with section 515 of the Treasury and General Government Appropriations Act of 2001 (Data Quality Act) (44 U.S.C. 3504 (d) (1) and 3516), and underwent pre-dissemination review using standards for utility, integrity and objectivity.



Proposed Action

The U.S. Navy (USN) proposes to conduct small-unit, intermediate, and advanced cold-water maritime and land-based training activities for naval special operations personnel on selected nearshore lands of Puget Sound, including Hood Canal, as well as the southwestern Washington coast. Actions will include:

- (1) Diver/Swimmer Training Activities: Trainees swim or dive to an objective area (e.g., harbor, beach, and/or moored vessel) for up to 6 hours. Training includes limited water-based activities, vessel movement, vessel strikes, and in-water services.
- (2) Insertion and Extraction Training Activities: Trainees may approach or depart an objective area using submersible craft, to include unmanned underwater vehicles (UUVs), remote operated vehicles (ROVs), or other personal underwater propulsion devices (jet skis or small boats). Training includes limited water-based activities, vessel movement, vessel strikes, and in-water services.
- (3) Launch and Recovery Training Activities: Training would be conducted in water areas and consist of launching and recovering submersibles or surface craft, or a combination of both, from a boat ramp, water platform, or via a crane located on a ship or a barge. Training includes limited water-based activities, vessel movement, vessel strikes, and in-water services.
- (4) Unmanned Underwater Vehicle (UUV) Activities: A subset of water-based activities, which includes the use of ROVs, these battery-powered vehicles are hand-launched from a host vessel and used to assist with swimmer navigation. They would operate within the water column and would not be set on the floor of the ocean or Puget Sound. Launching and recovery of UUVs would be conducted strictly in-water and would utilize a fish finder type of device for navigation. Diving personnel may be in the water in the near vicinity of the host vessel for the launch or retrieval portions of the activity.
- (5) Over-The-Beach Training Activities: Trainees would exit water, cross the beach, and quietly transition to land-based activities. Trainees would remain out of sight for several hours before moving towards a pre-determined objective. The training in its entirety will typically involve crossing the beach twice (several times if conducted at Naval Base Kitsap).
- (6) Unmanned Aircraft Systems (UASs) Training Activities: Utilized concurrently with other water-based or land-based training activities, UASs consists of a hand-launched or catapult system, a control system, and a remotely piloted or self-piloted (i.e., preprogrammed flight pattern) air vehicle that may be fixed-wing or rotary-wing. They would carry only non-hazardous payloads such as cameras, sensors, and communications equipment. Smaller UASs will be powered electrically with rechargeable batteries, while larger UASs will be gas-powered. They will vary in size up to 2 meters in length, weigh up to 55 pounds, will operate below 2,000 feet above ground level, and would utilize ground observers.

- (7) Vessel Traffic and BMPs to Mitigate against Marine Mammal and Sea Turtle Encounters: Waterborne transportation would include the movement of training vessels (such as small surface support vessels or small boats from Naval Base Kitsap Keyport/Bangor/Bremerton), safety equipment, and military personnel from the staging base to the event location. Typically, submersibles are launched from boat ramps near the site where training activity is scheduled. Boats to transport trainees in the aforementioned activities will include surface support crafts (commercial and military boats, ranging from 20 to 30 feet, and jet skis) and small inflatable boats (rubber boats no greater than 30 feet). The Biological Assessment (BA) for the training event incorporates extensive BMPs to avoid and minimize encounters with marine mammals and sea turtles (see Section 2.2.1 of the BA, pp. 2-6 to 2-9).

Oceangoing ships and barges involved in launch and recovery activities noted above are involved in already authorized actions; the actions described in this consultation are incidental to those larger ships' objectives. Those ships and barges are either contracted or military vessels already en route to other destinations. The smaller action-oriented vessels will be deployed at undisclosed distances from the shoreline, up to 15 nautical miles offshore from their objectives.

Activities occur at infrequent intervals and for a brief duration of time, covering 2- to 8-week periods. Maximum personnel at any time would be 84, consisting of 24 trainees and 60 support personnel. A training block consists of single or multiple simultaneous training events on land and in the water (e.g., launch and recovery, diver/swimmer, over the beach) dispersed throughout the action area. During a typical training event, there would be up to 8 trainees transitioning from water to land. Up to 26 support personnel would be divided between the land and water areas to monitor trainees at both water and land training sites. A training event transitioning from water to land would not exceed a total of 34 personnel. In a few instances, there could be up to 14 trainees with up to 20 support personnel. Support personnel would again be divided between the land and water areas to monitor the trainees, however total personnel would not exceed 34 and not all 34 personnel would be in the water or on land at any given time. Training events are progressive in nature and would range between 2 and 72 hours depending on the activity.

The training in and around existing military facilities or other facilities designated for simulated building clearance training activities would include the use of simulated weapons that use water-soluble paint pellets.

The proposed action is a long-term training plan. No in-water work window is provided. Not all sites within the action area would be utilized over a one-year period. Under the proposed action, a site would be used no more than 36 times a year. Additionally, some locations would not be used for training during certain times of the year when weather, currents, scheduled public events or protected species concerns are present. Other sites may not be used at all during a given year, and other sites may be used intermittently throughout a year, thus helping to prevent overuse of any particular area.

Action Area

The action area is determined by the greatest extent of effects stemming from the project, to include direct and indirect effects. The training is divided into three geographic regions within

Western Washington. (See Figure 1.) The action area includes transportation by sea from both Puget Sound and the open sea to Region 3.

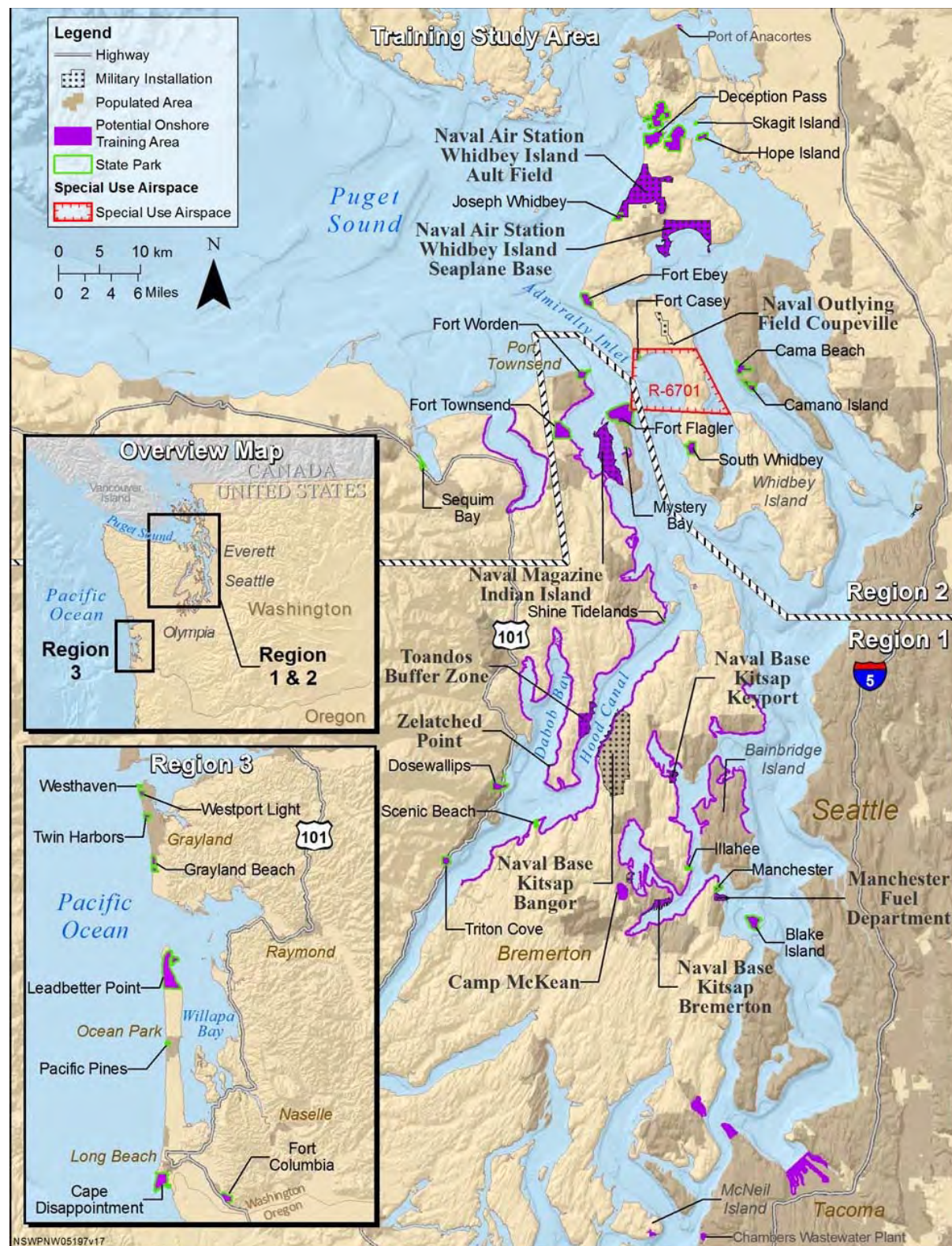


Figure 1. Action Area for Naval Special Operations Activities. Extracted from USN Biological Assessment

Action Agency's Effects Determination

The USN made determinations of “may affect, not likely to adversely affect” (NLAA) for Puget Sound (PS) Chinook salmon (*Oncorhynchus tshawytscha*), PS steelhead (*O. mykiss*), Hood Canal summer-run (HCSR) chum salmon, Puget Sound/Georgia Basin (PS/GB) bocaccio, Columbia River chum salmon, North American green sturgeon, Southern DPS Pacific Eulachon, Southern Resident killer whale (SRKW), and humpback whale (Mexico and Central American DPS).

The Federal Register Notice dates for the evolutionarily significant units (ESUs) and critical habitats pertaining to NMFS-listed ESA species affected by this project are shown in Table 1.

Table 1. Federal Register notices for final rules that list threatened and endangered species, designate critical habitats, or apply protective regulations to listed species considered in this consultation.

Species	ESU or DPS	Original Listing Notice	Listing Status Reaffirmed	Critical Habitat	Protective Regulations
Chinook salmon (<i>Oncorhynchus tshawytscha</i>)	Lower Columbia River	3/24/1999 64 FR 14308 Threatened	8/15/2011 76 FR 50448 Threatened	9/2/2005 70 FR 52630	06//28/05 70 FR 37160
	Upper Willamette River spring-run	3/24/1999 64 FR 14308 Threatened	8/15/2011 76 FR 50448 Threatened	9/2/2005 70 FR 52630	06//28/05 70 FR 37160
	Upper Columbia River spring-run	3/24/1999 64 FR 14308 Endangered	8/15/2011 76 FR 50448 Endangered	9/2/2005 70 FR 52630	ESA section 9 applies
	Snake River spring/summer run	4/22/1992 57 FR 14653 Threatened ----- 6/3/1992 57 FR 23458 Correction	8/15/2011 76 FR 50448 Threatened	10/25/1999 64 FR 57399	6/28/2005 70 FR 37160
	Snake River fall-run	4/22/1992 57 FR 14653 Threatened	8/15/2011 76 FR 50448 Threatened	12/28/1993 58 FR 68543	6/28/2005 70 FR 37160
	Puget Sound	3/24/1999 64 FR 14308 Threatened	5/26/2016 81 FR 33468 Threatened	9/02/2005 70 FR 52360	6/28/2005 70 FR 37160
Chum salmon (<i>O. keta</i>)	Columbia River	3/25/1999 64 FR 14507 Threatened	8/15/2011 76 FR 50448 Threatened	9/2/2005 70 FR 52630	6/28/2005 70 FR 37160
	Hood Canal summer-run	6/28/2005 70 FR 37160 Threatened	5/4/2014 71 FR 20802 Threatened	9/2/2005 70 FR 52630 Threatened	6/28/2005 70 FR 37160
Coho salmon (<i>O. kisutch</i>)	Lower Columbia River	6/28/2005 70 FR 37160 Threatened	8/15/2011 76 FR 50448 Threatened	1/14/2013 78 FR 2726 Proposed	6/28/2005 70 FR 37160
Sockeye salmon (<i>O. nerka</i>)	Snake River	11/20/1991 56 FR 58619 Endangered	8/15/2011 76 FR 50448 Endangered	12/28/1993 58 FR 68543	ESA section 9 applies

Table 1 (continued). Federal Register notices for final rules that list threatened and endangered species, designate critical habitats, or apply protective regulations to listed species considered in this consultation.

Species	ESU or DPS	Original Listing Notice	Listing Status Reaffirmed	Critical Habitat	Protective Regulations
Steelhead (<i>O. mykiss</i>)	Lower Columbia River	3/19/1998 63 FR 13347 Threatened	1/5/2006 71 FR 834 Threatened	9/2/2005 70 FR 52630	6/28/2005 70 FR 37160
	Upper Willamette River	3/25/1999 64 FR 14517 Threatened	1/5/2006 71 FR 834 Threatened	9/2/2005 70 FR 52630	6/28/2005 70 FR 37160
	Middle Columbia River	3/25/1999 64 FR 14517 Threatened	1/5/2006 71 FR 834 Threatened	9/2/2005 70 FR 52630	6/28/2005 70 FR 37160
	Upper Columbia River	8/18/1997 62 FR 43937 Endangered	1/5/2006 71 FR 834 Threatened	9/2/2005 70 FR 52630	2/1/2006 71 FR 5178
	SNAKE RIVER BASIN	8/18/1997 62 FR 43937 Threatened	1/5/2006 71 FR 834 Threatened	9/2/2005 70 FR 52630	6/28/2005 70 FR 37160
	Puget Sound	5/11/2007 72 FR 26722 Threatened	5/26/2016 81 FR 33468 Threatened	2/24/2016 81 FR 9251	9/25/2008 73 FR 55451
North American green sturgeon (<i>Acipenser medirostris</i>)	Southern DPS	4/7/2006 71 FR 17757 Threatened	Not applicable	10/9/2009 74 FR 52300	6/2/2010 74 FR 30714 Proposed
Pacific eulachon (<i>Thaleichthys pacificus</i>)	Southern DPS	3/18/2010 75 FR 13012 Threatened	Not applicable	10/20/2011 76 FR 65324	10/20/2011 76 FR 65324
Killer whale (<i>Orcinus orca</i>)	Southern Resident	11/18/2005 70 FR 69903 Endangered	Reaffirmed 3/16/2011 76 FR 14299; 2016 update in process 1/26/2016 81 FR 4264	11/29/2006 71 FR 69054	ESA section 9 applies
Humpback whale (<i>Megaptera novaeangliae</i>)	Mexico DPS; Central American DPS	12/2/1970 35 FR 18319 Endangered; Threatened	81 FR 62260 9/8/2016	NA	ESA section 9 applies
Yelloweye rockfish (<i>Sebastes ruberrimis</i>)	Puget Sound/ Georgia Basin	4/28/2010 75 FR 22276 Threatened	1/23/2017 82 FR 7711	11/13/2014 79 FR 68042	ESA section 9 applies
Bocaccio (<i>S. paucispinis</i>)	Puget Sound/ Georgia Basin	4/28/2010 75 FR 22276 Endangered	1/23/2017 82 FR 7711	11/13/2014 79 FR 68042	ESA section 9 applies
Leatherback (<i>Dermochelys coriacea</i>)	Pacific	6/02/1970 35 FR 8491 Endangered	Update in process 10/10/2012 77 FR 61573	3/23/1979 44 FR 17710; 1/26/2012; 77 FR 4170 Further refined	ESA section 9 applies

Consultation History

- On May 16, 2018, the USN requested to initiate consultation with NMFS on the proposed project. The USN provided a request for consultation (dated May 11, 2018) and a biological assessment (BA). We determined that the materials provided were sufficient for a consultation.
- On July 6, 2018, we requested more information on the action area of the project.
- On August 8, 2018, the USN provided us the requested information, whereupon we resumed consultation.

A complete record of this consultation is on file electronically at the Oregon – Washington Coastal Area Office.

ENDANGERED SPECIES ACT

Effects of the Action

Under the ESA, “effects of the action” means the direct and indirect effects of an action on the listed species or critical habitat, together with the effects of other activities that are interrelated or interdependent with that action (50 CFR 402.02). The applicable standard to find that a proposed action is not likely to adversely affect listed species or critical habitat is that all of the effects of the action are expected to be discountable, insignificant, or completely beneficial. Beneficial effects are contemporaneous positive effects without any adverse effects to the species or critical habitat. Insignificant effects relate to the size of the impact and should never reach the scale where take occurs. Discountable effects are those extremely unlikely to occur.

The effects of the proposed action are reasonably likely to include: (1) strikes of marine mammals and listed fish from deployed vessels moving between the offshore vessels and the training areas; and (2) temporary and localized increases in turbidity and suspended sediments within the intertidal of the action area, due to vessel beaching and return activities.

Effects to Species

1) The disturbance of marine mammals and listed fish from intermittent small vessel trips to and from larger offshore vessels is insignificant rather than discountable. While marine mammals and listed fish will be exposed to these vessel trips, the trips represent an extremely small increase in the normal vessel traffic within Puget Sound and along the Washington Coast. The vessels are comparatively small (20 to 30 feet long). Furthermore, during the training the applicant will implement an established extensive mitigation plan to identify and avoid marine mammals (as well as leatherback sea turtles) (see Section 2.2.1 of the BA, pp. 2-6 to 2-9).

2) Areas where turbidity and suspended sediments occur will return to their natural state within several tidal cycles following cessation of each action (within 72 hours). Given the wide range of training areas, limited number of in-water participants at any given time, and short duration of each beaching activity (pursuant to the full scope of the training event), we anticipate insignificant effects from turbidity and suspended sediments.

Effects to Critical Habitat

The NMFS analyzed the potential impacts of the project on the designated PBFs and essential features of critical habitat potentially found in the action area. The impacts to these PBFs and essential features will be insignificant for the following reasons:

The proposed project has the potential to slightly alter the water quality PBF during beaching and return-to-sea of vessels through mobilization of sediment into the water column. However, any increase in suspended sediments related to these activities will be minimal, localized, and temporary. Thus, effects on the water quality PBF of critical habitat in the action area are insignificant. The action will not significantly alter critical habitat function in a manner that affects the ability of the habitat to support the ESA-listed species identified in Table 1.

Potential effects to prey base (benthic invertebrates) will be small, temporary, and localized. Due to ability of invertebrates to recolonize disturbed locations relatively rapidly, and the lack of any evidence to indicate benthic food resources for ESA-listed fish are limited in the entirety of the action area, the temporary and highly localized loss of benthic food items is expected to be insignificant to the species. Changes in prey availability are unlikely to be of a magnitude or extent that would appreciably diminish forage resources in the action area. Thus, effects on prey base in the action area are insignificant.

Given the short-term, temporary, intermittent, and localized nature of the proposed activities, it is extremely unlikely that this project will adversely affect critical habitat function. Therefore, the NMFS concurs with the USN's determination of "may affect, not likely to adversely affect" designated critical habitat of the subject ESA-listed species.

Conclusion

Based on this analysis, the NMFS concurs with USN that the proposed action is not likely to adversely affect the subject ESA-listed species and designated critical habitats.

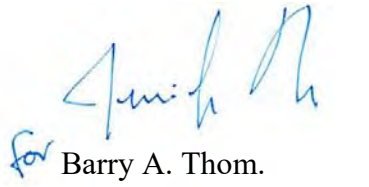
Reinitiation of Consultation

Reinitiation of consultation is required and shall be requested by the NMFS, where discretionary Federal involvement or control over the action has been retained or is authorized by law and (1) new information reveals effects of the action that may affect listed species or critical habitat in a manner or to an extent not previously considered; (2) the identified action is subsequently modified in a manner that causes an effect on the listed species or critical habitat that was not considered in this concurrence letter; or if (3) a new species is listed or critical habitat designated that may be affected by the identified action (50 CFR 402.16). This concludes the ESA portion of this consultation.

October 2019

Please direct questions regarding this letter to Curtis McFeron of the Oregon and Washington Coastal Area Office, Lacey, Washington, (360) 534-9309, curtis.mcferon@noaa.gov.

Sincerely,


for Barry A. Thom.
Regional Administrator

cc: Tiffany Selbig, USN

October 2019

CIV USN NAVFAC NW SVD WA (USA)

From: Selbig, Tiffany L CIV USN NAVFAC NW SVD WA (USA)
Sent: Wednesday, October 16, 2019 9:00 AM
To: Whalen, Anna M CIV USN NAVFAC NW SVD WA (USA)
Cc: Kler, Kimberly H CIV USN (US); Stoner, Jacquelyn L CIV USN NAVFAC NW SVD WA (USA)
Subject: FW: [Non-DoD Source] Re: Naval Special Operations training WCR-2018-9799
Signed By: [REDACTED]

Hi Anna,

Please see the email below for confirmation from NMFS that yelloweye rockfish were included in the NMFS LOC for NSW training.

v/r,
Tiffany

From: Curtis McFeron - NOAA Federal <curtis.mcferon@noaa.gov>
Sent: Wednesday, October 16, 2019 8:43 AM
To: Selbig, Tiffany L CIV USN NAVFAC NW SVD WA (USA) <[REDACTED]>
Cc: Frankie Johnson - NOAA Federal <Frankie.Johnson@noaa.gov>
Subject: [Non-DoD Source] Re: Naval Special Operations training WCR-2018-9799

Tiffany,

NMFS# WCR-2018-9799 (USN# 5090_N45/18-00289), Naval Special Operations Training LOC.

You are correct that those two rockfish species were left out of the narrative description of affected species. Notwithstanding, the table showing on our consultation does include those species and respective critical habitats, and addresses any potential effects. Therefore, we did determine that the actions may affect but are not likely to adversely affect (NLAA) bocaccio or yelloweye rockfish, or their designated critical habitats.

You have a keen eye. Good catch. We will document this email and include it within this consultation, for records keeping.

Sincerely,
Curtis McFeron
Fish Biologist, Central Puget Sound Branch
NOAA Fisheries West Coast Region
US Department of Commerce
Office: [360-534-9309](tel:360-534-9309)
[REDACTED]

On Tue, Oct 15, 2019 at 1:59 PM Selbig, Tiffany L CIV USN NAVFAC NW SVD WA (USA) <[REDACTED]> wrote:

October 2019

Hi Curtis,

Last year, the Navy received a Letter of Concurrence for Naval special operations training in western Washington. During review of the project files, we noticed that we inadvertently left yelloweye rockfish off the species list in the cover letter requesting NMFS concurrence. The Navy's BA included an analysis and a NLAA effect determination for yelloweye. The NMFS LOC does list yelloweye on table 1, and a rockfish analysis and a concurrence is provided for Bocaccio. However, in the paragraph listing the species, it seems that NMFS may have copied the list from the Navy cover letter as yelloweye is absent. Since the omission appears to be an error, will you please provide confirmation that we have concurrence for yelloweye? We want to make sure our project files are complete. I've attached the BA, Navy cover letter, and the NMFS LOC for your review. Please let me know if you have any questions or would like to discuss this further. Thanks Curtis!

Sincerely,

Tiffany Selbig
Biologist
NAVFAC NW
1101 Tautog Circle
Silverdale, WA 98315-1101



October 2019



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUTOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

5090
Ser N45/18-00290
MAY 11 2018

Mr. Eric Rickerson
Washington Fish and Wildlife Office Supervisor
U.S. Fish and Wildlife Service
510 Desmond Dr. SE, Suite 102
Lacey, WA 98503

Dear Mr. Rickerson:

SUBJECT: BIOLOGICAL ASSESSMENT FOR NAVAL SPECIAL OPERATIONS
TRAINING IN WESTERN WASHINGTON STATE

The United States Naval Special Warfare Command is proposing to conduct special operations training at multiple locations throughout western Washington. The Proposed Action supports small-unit, intermediate, and advanced cold-water maritime and land-based training activities for naval special operations personnel on selected nearshore lands and in the inland waters of Puget Sound, including Hood Canal, as well as the southwestern Washington coast. The Action Area consists of both Navy-administered lands, as well as lands that would be used for training pursuant to agreements between the Navy and land owners. These non-federal lands include properties owned by the State of Washington, counties and municipalities, as well as lands under private ownership. Training would start in 2018 and occur into the foreseeable future.

Pursuant to Section 7 of the Endangered Species Act (ESA) of 1973, as amended, the Naval Facilities Engineering Command, Northwest (Navy), on behalf of Naval Special Warfare Command, has completed an analysis of potential impacts to ESA listed species within the Action Area. The Navy concludes that the proposed action "may affect, but is not likely to adversely affect," the following species: marbled murrelet (*Brachyramphus marmoratus*), western snowy plover (*Charadrius lexandrinus nivosus*), streaked horned lark (*Eremophila alpestris strigata*), and bull trout (*Salvelinus confluentus*).

October 2019

5090

Ser N45/18-00290

Enclosed is the Navy's Biological Assessment for your review. In compliance with the ESA, we are requesting your concurrence with our effect determinations of "not likely to adversely affect" for listed species under USFWS jurisdiction. Designated critical habitat for some ESA listed species above is present within the Action Area. However, the Navy determined the primary constituent elements and essential physical and biological features would not be modified, either temporarily or permanently, as a result of the minimally invasive proposed training activities. Therefore, the Navy concludes the proposed action would have no effect to designated critical habitat.

If you have any questions regarding the proposed project, please contact Ms. Tiffany Selbig. She can be reached by telephone at (360) 315-2531 or by e-mail at tiffany.selbig@navy.mil.

Sincerely,



T. H. Lazo, P.E.
Environmental Business Line Director
By Direction of the Commanding Officer

Enclosures: 1. Biological Assessment

Copy to: Naval Special Warfare Command



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Washington Fish and Wildlife Office
510 Desmond Dr. SE, Suite 102
Lacey, Washington 98503

October 2019



NOV 28 2018

In Reply Refer To:
01EWF00-2018-I-1113

T.H. Lazo
Environmental Business Line Director
Naval Facilities Engineering Command Northwest
1101 Tautog Circle
Silverdale, Washington 98315-1101

Dear: Ms. Lazo

Subject: Naval Special Operations Training in Western Washington State

This letter is in response to your May 11, 2018, request for informal consultation on the above-named project in the marine waters off the coast of Washington and in Puget Sound. The U.S. Fish and Wildlife Service (Service) received your letter with a Biological Assessment on May 17, 2018. Your letter requested our concurrence with “may affect, not likely to adversely affect” determinations for the marbled murrelet (*Brachyramphus marmoratus*), western snowy plover (*Charadrius nivosus nivosus*), streaked horned lark (*Eremophila alpestris strigata*), and bull trout (*Salvelinus confluentus*). This informal consultation has been completed in accordance with section 7(a)(2) of the Endangered Species Act of 1973, as amended (16 U.S.C. 1531 *et seq.*).

The U.S. Navy (Navy) proposes to perform special operations training at sites throughout Puget Sound, at Fort Columbia on the Columbia River, and along the southern Pacific coast of Washington. Training at Puget Sound and Fort Columbia sites will occur year-round. Training on the Pacific coast will occur year-round at the Cape Disappointment, Pacific Pines, Twin Harbors, Westport Light, and Westhaven sites, and between September 15 and March 15 at the Leadbetter Point and Grayland Beach sites. A training event will consist of one or multiple training activities (e.g., launch and recovery, diver/swimmer, over the beach). During a typical training event, there will be up to fourteen trainees transitioning from water to land, monitored by support personnel in the water and on the land. No more than thirty-four personnel (trainees

and support) will be in the water or on land at any given time during training events. Training will consist of trainees and support personnel moving through the water, over beaches, through vegetation, as well as in and among buildings. Not all sites will be used each year, and no site will be used more than 36 times in a year. More details on the proposed action are included in the Navy's Biological Assessment for Naval Special Operations Training in Western Washington State which is on file at the Washington Fish and Wildlife Office in Lacey.

The Navy has determined that the proposed action will have "no effect" on additional listed species and critical habitat that are known to occur in these portions of western Washington. The Service has no regulatory or statutory authority for concurring with "no effect" determinations, and no consultation with the Service is required. We recommend that the Navy document their analyses and maintain that documentation as part of their project file.

Bull trout, marbled murrelet, western snowy plover, and streaked horned lark may be present in training areas (action area) during the training events.

We do not expect that the proposed action will result in injury to bull trout or marbled murrelets because individuals will be able to avoid vessels and trainees. Boat, submarine, and unmanned underwater vehicle traffic, as well as swimming trainees, do have the potential to disturb bull trout and/or marbled murrelets. However, training events will be intermittent, with brief periods in the water. Furthermore, the identified training sites are at military installations, state parks, and throughout high-traffic portions of Puget Sound. We do not expect that this intermittent training will significantly disrupt normal bull trout or marbled murrelet behaviors. Based on these rationale, we conclude that the effects of the proposed action will be insignificant to the bull trout and marbled murrelet, and we concur with the Navy's "may affect, not likely to adversely affect" determinations for these species.

We expect that fledged/adult western snowy plovers and streaked horned larks will be able to avoid the proposed intermittent training during the short periods of increased onshore activity. Training on the Pacific coast is restricted to state parks, and the Navy will not train in suitable nesting habitats at Leadbetter Point and/or Grayland Beach State Parks during the nesting seasons. The Navy will therefore avoid potential exposures and effects to nesting adults, nests, eggs, and unfledged western snowy plovers and streaked horned larks. We do not expect that this intermittent training will significantly disrupt normal western snowy plover or streaked horned lark behaviors. Based on these rationale, we conclude that the effects of the proposed action will be insignificant to the western snowy plover and streaked horned lark, and we concur with the Navy's "may affect, not likely to adversely affect" determinations for these species.

This action should be reanalyzed if new information reveals effects of the action that may affect listed species or critical habitat in a manner, or to an extent, not considered in this consultation. This action should also be reanalyzed if subsequently modified in a manner that causes an effect to a listed species or critical habitat that was not considered in this consultation, and/or a new species is listed or critical habitat is designated that may be affected by the action.

T.H. Lazo

October 2019
3

If you have any questions about this letter or our shared responsibilities under the Endangered Species Act, please contact Lee Corum (lee_corum@fws.gov; 360-753-5835), or Emily Teachout (emily_teachout@fws.gov; 360-753-9583).

Sincerely,



Brad Thompson, Acting State Supervisor
Washington Fish and Wildlife Office

October 2019



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND NORTHWEST
1101 TAUTOG CIRCLE
SILVERDALE, WASHINGTON 98315-1101

5090
Ser N45/18-00478
13 Aug 2018

Ms. Rebekah Padgett
Federal Permit Manager
Shorelands and Environmental Assistance Program
Washington State Department of Ecology
3190 160th Avenue SE
Bellevue, WA 98008-5452

Dear Ms. Padgett:

Subject: COASTAL ZONE MANAGEMENT ACT CONSISTENCY DETERMINATION
FOR NAVAL SPECIAL OPERATIONS TRAINING IN WESTERN
WASHINGTON STATE ENVIRONMENTAL ASSESSMENT

Enclosed please find the Department of the Navy's Consistency Determination submitted on behalf of Naval Special Warfare Command (NSWC) per the Coastal Zone Management Act (CZMA) and 15 C.F.R. § 930. In accordance with the National Environmental Policy Act (NEPA), the NSWC prepared a Draft Environmental Assessment (EA) for small-unit, intermediate and advanced land and cold-water maritime training activities within selected nearshore lands and inland waters of Puget Sound, including Hood Canal, as well as the southwestern Washington coast (Study Area). The Navy submitted an early outreach letter to the Washington Department of Ecology (Ecology) dated April 12, 2017. The Draft EA was submitted to Ecology in a letter dated January 11, 2018. The Draft EA is also available at <https://navfac.navy.mil/NSOEA>.

Pursuant to Section 307(c)(1) of the federal CZMA, the Navy has determined that the Proposed Action is consistent to the maximum extent practicable with the enforceable policies of the Washington Coastal Zone Management (CZM) Program and associated counties' Shoreline Management Master Programs. Similar activities were included in the Northwest Training and Testing Environmental Impact Statement/Overseas Environmental Impact Statement (NWTTS EIS/OEIS) as training or testing activities. Activities included were Naval Special Warfare Personnel Insertion/Extraction-Submersible, Unmanned Underwater Vehicle Testing, Unmanned Aircraft System, Cold Water Training, and

October 2019

Unmanned Vehicle Development and Payload Testing. In September 2015, the Navy submitted a revised Consistency Determination to the Department of Ecology for NWTT EIS/OEIS. The Washington Department of Ecology conditionally concurred with the Navy's determination on September 11, 2015 "that the proposed action is consistent to the maximum extent practicable with the enforceable policies of Washington's Coastal Zone Management Program and will not result in any significant impacts to the State's coast resources."

The Navy reviewed the Washington CZM Program to determine which enforceable policies are applicable to the Proposed Action and conducted an effects test (Enclosure 1) to determine whether the Proposed Action would have reasonably foreseeable effects on a coastal use or resource. Only the Shoreline Management Act and Ocean Resources Management Act are applicable to the Proposed Action. Some elements of the Proposed Action could have reasonably foreseeable coastal effects.

CONSISTENCY OF THE PROPOSED ACTION WITH ENFORCEABLE POLICIES OF THE WASHINGTON COASTAL ZONE MANAGEMENT PROGRAM

Enforceable Policy	Determination
Shoreline Management Act	Consistent
State Environmental Policy Act	Not Applicable
Ocean Resources Management Act	Consistent
Clean Water Act	Not Applicable
Clean Air Act	Not Applicable
Energy Facility Site Evaluation Council Law	Not Applicable

The Navy point of contact for this information is Ms. Anna Whalen at 360-396-0024, e-mail: anna.whalen@navy.mil.

Sincerely,



T. H. Lazo, P.E.
Navy Environmental Program Director,
Northwest Region
By Direction of the Commanding Officer

Enclosures: 1. Coastal Zone Consistency Determination for
Federal Activities Form

Copy to: Naval Special Warfare Command

WASHINGTON COASTAL CONSISTENCY DETERMINATION - ENCLOSURE 1

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**NAVAL SPECIAL OPERATIONS TRAINING IN WESTERN WASHINGTON STATE
ENVIRONMENTAL ASSESSMENT**

**COASTAL ZONE MANAGEMENT ACT
CONSISTENCY DETERMINATION**

1 INTRODUCTION

The United State Naval Special Warfare Command (NSWC) proposes to conduct small-unit intermediate and advanced land and cold-water maritime training activities for naval special operations personnel in western Washington State. The proposed training would occur on selected nearshore lands and in the inland waters of Puget Sound, including Hood Canal, as well as the southwestern Washington coast (Figure 1-1). This document provides the State of Washington with NSWC's Federal Consistency Determination under Coastal Zone Management Act (CZMA) Section 307(c)(1) and its implementing regulations (15 C.F.R. Part 930 Subpart C). NSWC has evaluated the Proposed Action and has determined that it is consistent to the maximum extent practicable with the enforceable policies of the Washington Coastal Zone Management Program (CZMP).

1.1 THE WASHINGTON COASTAL ZONE

Washington's coastal zone is comprised of 15 counties that border saltwater: Clallam, Grays Harbor, Island, Jefferson, King, Kitsap, Mason, Pacific, Pierce, San Juan, Skagit, Snohomish, Thurston, Wahkiakum, and Whatcom. The coastal zone includes all lands and waters from the coastline seaward for three nautical miles. For the areas that abut the ocean, the coastline is defined as the position of ordinary low water. The coastline along the inland marine waters is located at the seaward limit of rivers, bays, estuaries, or sounds.

The CZMA specifically excludes from the coastal zone those lands that are, by law, subject solely to the discretion of, or held in trust by, the federal government. However, actions on excluded federal lands outside of the coastal zone must be reviewed to determine whether they have effects on coastal uses or resources within the coastal zone that are subject to state management program consistency review. The CZMA's regulations provide that states must exclude from their coastal zone designations the lands that the federal government owns, leases, holds in trust, or otherwise has sole discretion to determine their use. These "excluded federal lands" within the Washington State portion of the Study Area and the boundaries of Washington's coastal zone are:

- Military reservations and other defense installations (e.g. Joint Base Lewis McChord, Manchester Fuel Department, Naval Base Kitsap, Naval Air Station Whidbey Island, Naval Magazine Indian Island, Toandos Buffer Zone, Zelatched Point);
- All lands within National Parks, including private inholdings (e.g. Olympic National Park, Mt. Rainier National Park);
- Indian lands held in trust by the federal government;
- National Forest lands (e.g., Olympic National Forest) and National Recreation Areas (e.g., Olympic National Park), owned or leased by the federal government

Since the training activities could have effects on coastal uses or resources within the coastal zone, this Consistency Determination evaluates the potential effects of the Proposed Action in those areas.

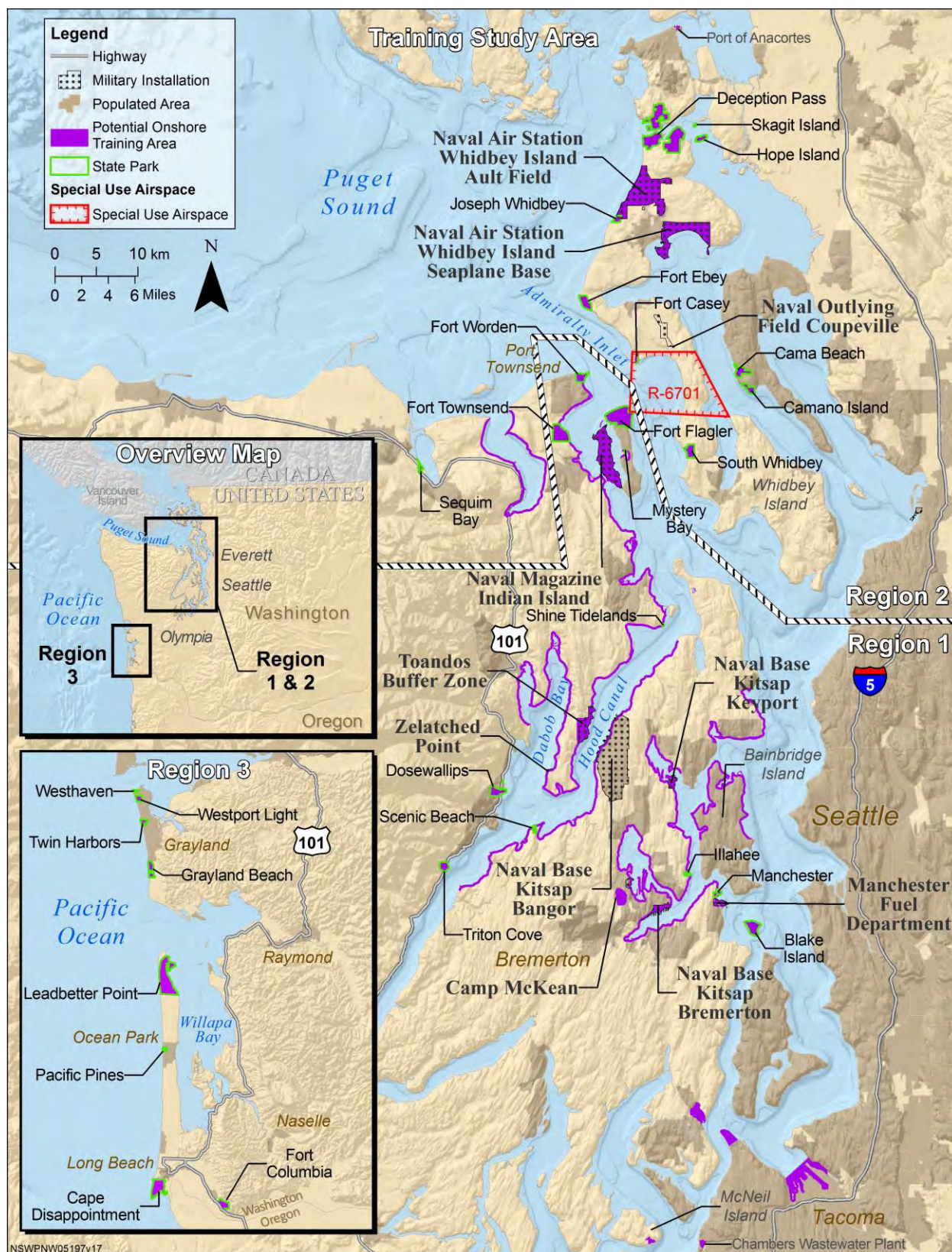


Figure 1-1: Training Study Area

1.2 TRAINING AREAS IN RELATION TO THE STATE'S COASTAL ZONE

Three general regions are contained within the training study area: Region 1, an area within one hour of Keyport; Region 2, an area around Whidbey Island, Port of Anacortes, Discovery Bay, and Sequim; and Region 3, an area along the southwestern Washington Coast (Figure 1-1). Training activities would occur on Navy installations, state parks, public properties, and private properties if appropriate approvals are granted. Training locations would vary due to seasonal weather conditions, public presence at sites, protected species considerations, training qualifications to be satisfied, and training requirements.

NSWC has prepared a Draft Environmental Assessment (Draft EA) for the Proposed Action within the Naval Special Operations Training Study Area in accordance with the National Environmental Policy Act (NEPA) and Executive Order 12114 (*Environmental Effects Abroad of Major Federal Actions*). The Draft EA includes comprehensive descriptions of the Proposed Action, resources that could be affected by the action, and a detailed analysis of the potential environmental consequences of the Proposed Action.

The Draft EA was submitted to the Washington State Department of Ecology in a letter dated January 11, 2018 and it is available at <https://navfac.navy.mil/NSOEA>. Descriptions of training activities are provided below and additional details are provided in the Draft EA Section 2.1.1 Training Activities.

1.3 PROPOSED TRAINING ACTIVITIES

The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, land, and cold-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities.

The proposed training is divided into training blocks, training events, and training activities. A training block is defined as a two- to eight-week period of time where naval special operations trainees and support personnel (safety observers, medical support, boat drivers, vehicle drivers, evaluators, and equipment repair/maintenance support) arrive in western Washington State to participate in cold-water maritime and land-based training and ends when they leave. The maximum number of personnel travelling to the area for each training block would be 84, and would consist of up to 24 trainees and 60 support personnel.

A training block consists of single or multiple simultaneous training events on land and in the water. A training event may consist of one or multiple training activities (e.g., launch and recovery, diver/swimmer, over the beach) dispersed throughout the Training Study Area. During a typical training event, there would be up to eight trainees transitioning from water to land. Occasionally up to 14 trainees could participate in a training event. Support staff would monitor the trainees both on land and in small boats on the water. Training events are progressive in nature and would range between 2-72 hours depending on the activity.

Proposed training activities broadly fit into two categories: water-based training and land-based training. Water-based training would include:

- Launching and returning a watercraft from a boat launch or using a crane on a ship to place watercraft into the water (launch/recovery)
- Driving watercraft, which could include small boats or submersible craft, and dropping off trainees and/or equipment in the water (insertion/extraction)

- Diving and swimming (diver/swimmer)
- Using unmanned underwater vehicles or remotely operated watercraft (UUV)

Land-based training would include:

- Moving on foot over the beach (over the beach)
- Hiking to an observation point and using observation techniques on military role players while remaining hidden (special reconnaissance)
- Walking through areas and structures looking for military role players and using paint pellets as simulated munitions. Simulated munitions are paint pellets, which emit a splash of water soluble paint approximately the circumference of a dime (simulated building clearance)
- Climbing on rock faces at Deception Pass State Park (high-angle climbing)
- Using small unmanned aircraft systems (UAS) on three Navy properties (Naval Base Kitsap Keyport, Naval Magazine Indian Island, and Toandos Buffer Zone) and Federal Aviation Administration (FAA) restricted airspace R-6701, see Figure 1-1

The proposed training would not include the use of live-fire ammunition, explosive demolitions, off-road driving, manned air operations, construction, digging, vegetation cutting or removal, tree climbing, or the building of campfires or infrastructure. There is no requirement to assemble training devices or structures at any training site.

Training would occur on both federal and non-federal properties within western Washington State with permission of willing property owners or managers. Some locations would not be used for training during certain times of the year when weather, currents, scheduled public events, or protected species or cultural resources concerns are present. Other sites may not be used at all during a given year and still yet, other sites may be used intermittently throughout a year. The size of the study area allows for this flexibility, which also helps to prevent overuse. Site selection is also based on the availability of a site at the time the training would be scheduled to occur.

Proposed training would not close Washington State Parks or other public locations and waterways; the facilities would operate normally during naval special operations training. Support staff would visit a site prior to the training event to ensure there would be minimal public in the area. If the public were present, the safety support personnel would assess the situation. Based upon safety considerations of all, they would not start the training, continue the training, temporarily suspend the training, completely stop the training, or relocate the training to another approved training site. Public places would operate normally during training and public access would not be affected.

2 PROJECT DESCRIPTION

2.1 OVERVIEW OF THE PROPOSED ACTION

A detailed Description of the Proposed Action and Alternatives is provided in Chapter 2 of the Draft EA and it is briefly summarized below. The Draft EA analyzes the potential effects of the following alternatives:

- The No Action Alternative would continue with the baseline of current training activities conducted in a subset of Region 1 (Figure 1-1). Training would continue at two training blocks per year in limited areas as approved under the 2015 Northwest Training and Testing Final Environmental Impact Statement/Overseas Environmental Impact Statement (EIS/OEIS) (“Personnel Insertion/Extraction – Submersible”), 2010 Northwest Training Range Complex EIS/OEIS (“Naval Special Warfare Training”), and application of event-based Categorical Exclusions, as applicable. Under the No Action Alternative, an individual site would be used no more than 10 times a year. The total number of trainees and support personnel would be up to 70 per training block. Training activities would include launch and recovery of the submersible or small boats, insertion and extraction of these vessels, diver/swimmer training, over-the-beach, special reconnaissance, and the use of UUVs. Small recall devices would be used to alert the diver/swimmers to return to the surface of the water.
- Alternative 1 consists of the No Action Alternative, plus two additional training blocks for a total of four training blocks per year. Alternative 1 adds simulated building clearance and training with UASs at the three Navy properties. Training with remote operated vehicles would be included with UUVs. Under Alternative 1, an individual site would be used no more 20 times a year.
- Alternative 2 consists of all locations identified for training activities, number of training blocks per year, and site usage per year identified in Alternative 1 for Region 1. However, Alternative 2 adds two new regions, Region 2 and Region 3. Regions 2 and 3 would have one training block every other year and an individual site would be used no more than three times every other year. The same training activities as identified in Alternative 1 would occur under Alternative 2, with the exception that UAS and simulated building clearance training activities would not occur in Region 3. Additional UAS training would occur in Region 2 at R-6701. In addition, one new proposed training activity, high-angle climbing, would occur at Deception Pass State Park in Region 2.
- Alternative 3 (Preferred Alternative) consists of the same proposed training activities within Regions 1, 2, and 3 as described in Alternative 2. Alternative 3 would increase the total number personnel up to 84 per training block. In addition, the number of training blocks in Region 1 would increase to six times per year and an individual site would be used no more than 36 times.

This Consistency Determination evaluates the potential effects of activities within Alternative 3, the Preferred Alternative, that occur within the Washington Coastal zone or occur outside the coastal zone but have potential to effect coastal uses or resources within the Washington Coastal zone.

2.2 RELEVANT PAST CONSISTENCY DETERMINATIONS

Similar activities were included in the Northwest Training and Testing Environmental Impact Statement/Overseas Environmental Impact Statement (NWTT EIS/OEIS) as training or testing activities. In September 2015, the Navy submitted a revised Consistency Determination to the Department of

Ecology for NWTT EIS/OEIS. The Washington Department of Ecology conditionally concurred with the Navy's determination on September 11, 2015.

Activities covered in the NWTT EIS/OEIS determination are Naval Special Warfare Personnel Insertion/Extraction-Submersible, Unmanned Underwater Vehicle Testing, Unmanned Aircraft System, Cold Water Training, and Unmanned Vehicle Development and Payload Testing.

3 ENFORCEABLE POLICIES AND CONSISTENCY REVIEW

The Navy reviewed the Washington CZMP enforceable policies to determine their applicability to the Proposed Action. Table 3-1 summarizes the reasonably foreseeable coastal effects. Table 3-2 provides the NSWC's consistency determination evaluation pertaining to policies and regulations of the SMA applicable or relevant to the Proposed Action; policies not applicable or relevant to the Proposed Action are not included in this determination. Table 3-3 provides the NSWC's consistency determination evaluation pertaining to applicable enforceable policies of the Ocean Resources Management Act. The findings of this review are summarized as follows:

- **Shoreline Management Act (SMA) (Chapter 90.58 Revised Code of Washington [RCW])** - The Study Area is located in Washington's coastal zone or were assessed to have the potential to affect coastal uses or resources within Washington's coastal zone. Therefore, the Navy reviewed the SMA as an enforceable policy of Washington's Coastal Zone Management Program (CZMP), see Table 3-2 for discussion.
- **Shoreline Master Program Guidelines (Washington Administrative Code 173-26)** – The Navy also reviewed the enforceable policies of Washington's Shoreline Master Program Guidelines (WAC 173-26-171 through WAC 173-26-251) to identify provisions applicable to the Proposed Action to determine consistency with Washington's CZMP. Notably, provisions pertaining to development do not apply, because the Proposed Action: (1) does not involve construction or exterior alteration of structures; dredging; drilling; dumping; filling; removal of any sand, gravel, or minerals; bulkheading; driving of piling; placing of obstructions; and (2) would not interfere with the normal public use of the surface of waters overlying lands subject to the SMA at any stage of water level. However, other enforceable policies apply and they are discussed in Table 3-2.
- **State Environmental Policy Act (SEPA) (Chapter 43.21C RCW)** - While the SEPA process is not applicable to federal actions, the Navy has prepared the Draft EA for the Proposed Action, including activities within or affecting the coastal zone, in accordance with the National Environmental Policy Act (NEPA) and Executive Order 12114. The Draft EA is functionally equivalent to a SEPA EA and it has been submitted to the Department of Ecology as a supporting document for this Consistency Determination.
- **Ocean Resources Management Act (ORMA) (Chapter 43.143 RCW)** - Navy training is considered an ocean use involving renewable resources. Therefore, some of the provisions of the ORMA are applicable to some elements of the Proposed Action. Specifically, seven of the 25 General Ocean Use Guidelines (WAC 173-26-360 (7)) are applicable to portions of the Proposed Action that take place in the Pacific Ocean. See Table 3-3 for discussion.
- **Clean Water Act/Washington Water Pollution Control Act (Chapter 90.48 RCW)** - Discharge permits are not required for the Proposed Action. Therefore, this enforceable policy, as it relates to Federal Consistency with the Washington CZMP, is not applicable to the Proposed Action. The Proposed Action complies with the federal Clean Water Act.
- **Clean Air Act/Washington Clean Air Act (Chapter 70.94 RCW)** – Air emissions permits are not required for the Proposed Action. Therefore, this enforceable policy, as it relates to Federal Consistency with the Washington CZMP, is not applicable to the Proposed Action. The Proposed Action complies with the federal Clean Air Act.
- **Energy Facility Site Evaluation Council Law (Chapter 80.50 RCW)** – This enforceable policy is a state-local permitting system for large thermal energy facilities, oil refineries which process petroleum transported over marine waters, and petroleum and natural gas pipelines. Consequently, it is not applicable to the Proposed Action.

3.1 EFFECTS TEST

NSWC conducted an Effects Test to determine if activities included in the Preferred Alternative (Alternative 3 in the Draft EA) would have reasonably foreseeable direct or indirect effects on a Washington coastal use or resource. Table 3-1 provides the summary of the findings. The Effects Test was used to determine the need to prepare a Consistency Determination or a Negative Determination in accordance with CZMA and Washington CZMP. NSWC's Effects Test relied upon the detailed analyses provided in the Draft EA and considered the following factors:

- The spatial relationship of the proposed training to Washington's coastal zone (See Figure 1-1)
- The definitions of coastal uses and resources within the Washington State coastal zone under the SMA and Shoreline Master Program Guidelines
- Relevant enforceable policies of the Washington CZMP (Table 3-2)
- The nature of the proposed training activities and their potential to affect Washington's coastal uses and resources

3.2 CONCLUSION

Based on the analyses summarized in Table 3-1 and presented in detail in the Draft EA, the NSWC has determined that the Proposed Action requires a Consistency Determination, because some activities would have reasonably foreseeable direct or indirect effects on a coastal use or resource. Based on this evaluation, as expressed in the information in Tables 3-2 and 3-3, the NSWC has determined that the Proposed Action is consistent to the maximum extent practicable with the enforceable policies of the Washington CZMP.

Table 3-1: Summary of Navy Effects Test To Identify Elements of the Proposed Action (Training Activities) with Reasonably Foreseeable Coastal Effects

Training Type	Activities	Reasonably Foreseeable Coastal Effects
In-Water Training	Launch/Recovery Insertion/Extraction Diver/Swimmer	Yes. These activities would take place inside the coastal zone. During these training activities, military personnel drive small submersibles or watercraft (insertion and extraction) into training areas and dive and swim in cold waters. Small submersibles use a fish finder type of active acoustics for navigation, but it is not a source that would impact species because output from these sound sources would attenuate to below any current threshold for marine species at a very short range (Draft EA Section 3.3.3.2.2). Small support vessels, similar to recreational vessels, may temporarily disturb marine mammals in the vicinity. The Navy implements best management practices and standard operating procedures (Draft EA Section 2.3.5) for this activity to reduce the potential impacts to marine life. One example is completing Marine Species Awareness Training and maneuvering Navy vessels to keep at least 1500 feet away from any observed whale. Minor temporary coastal effects are reasonably foreseeable.
	UUVs/ROVs	Yes. These activities would take place inside the coastal zone. These activities involve the use of active acoustics, but are not a source that would impact species because output from these sound sources would attenuate to below any current threshold for marine species at a very short range (Draft EA Section 3.3.3.2.2). The in-water presence of UUVs/ROVs and small support vessels, similar to recreational vessels, may temporarily disturb marine mammals in the vicinity. The Navy implements best management practices and standard operating procedures for this activity to reduce the potential impacts to marine life (See Draft EA Section 2.3.5). One example is completing Marine Species Awareness Training and maneuvering Navy vessels to keep at least 1500 feet away from any observed whale. Minor temporary coastal effects are reasonably foreseeable.
On-Land Training	Over the Beach Special Reconnaissance High-Angle Climbing	Yes. These activities would take place inside the coastal zone. Military personnel may temporarily disturb wildlife in the vicinity while crossing the beach or walking in the woods. Minor temporary coastal effects are reasonably foreseeable.
	Simulated Building Clearance	Yes. This activity would take place inside the coastal zone. Military personnel would use simulated munitions during role-playing. Simulated munition casings would be picked-up after training event. Minor temporary coastal effects are reasonably foreseeable.
In-Water and On-Land Training	UASs	Yes. This activity would occur inside the coastal zone at altitudes less than 2,000 ft. above mean sea level in accordance with FAA regulations. As stated in the Draft EA, any airborne noise associated with this activity would be short-term and localized to the area of the training. Minor temporary coastal effects are reasonably foreseeable.

The Navy reviewed the Washington Shoreline Master Program Guidelines (Washington Administrative Code (WAC) 173-26-171 through 251), adopted in accordance with the Washington SMA of 1971 (Revised Code of Washington (RCW) 90.58). Table 3-2 lists applicable and relevant enforceable policies and regulations and summarizes consistency in relation to each; policies and regulations not applicable to the Proposed Action are not included in this determination. The Navy also reviewed Ocean Resources Management Act (ORMA) (Chapter 43.143 RCW) and has included a list of applicable and relevant enforceable policies in Table 3.3. The Navy has determined that the Proposed Action is consistent to the maximum extent practicable with the enforceable policies of the Washington CZMP. Due to the low impact nature of the training, no permits under the Marine Mammal Protection Act and Endangered Species Act are required.

Table 3-2: Consistency with Applicable Enforceable Policies of the Shoreline Management Act and Shoreline Master Program Guidelines

Policy or Regulation	Discussion
Washington State Shoreline Master Program Guidelines	
General policy goals of the Act and guidelines for shorelines of the state (WAC 173-26-176)	The act's policy of protecting ecological functions, fostering reasonable utilization and maintaining the public right of navigation and corollary uses encompasses the following general policy goals for shorelines of the state.
3a. The utilization of shorelines for economically productive uses that is particularly dependent on shoreline location or use	Nearshore training activities conducted on shorelines or in proximity to shorelines or shoreline resources would not alter the natural condition of shorelines of the state. Nearshore activities may have intermittent and short-term impacts (e.g. walking across beach and unmanned aircraft systems). However, these impacts are not expected to have significant or long-term negative consequences on economically productive uses. Furthermore, the proposed NSWC training activities are national security activities dependent on shorelines or in proximity to the shorelines, and the use of shoreline locations by the Navy contributes significantly to the state and local economy in a number of ways. Water areas and shoreline accessibility would not be restricted due to training within the Study Area.
3b. The utilization of shorelines and the waters they encompass for public access and recreation	The proposed training activities would not limit public access or recreation on land or in the water. Nearshore activities conducted on shorelines or in proximity to shorelines or shoreline resources do not alter the natural condition of any shorelines of the state. As described in the Draft EA Section 3.1 (Socioeconomics), there are no anticipated impacts on transportation and shipping, commercial and recreational fishing, fishing communities, recreation, or tourism, because the proposed training would not restrict these activities and the training would be infrequent and of short duration. Based on the NSWC's best management practices and standard operating procedures (Draft EA Section 2.3.5) and the use of different sites at any given time, accessibility impacts are expected to remain negligible. Shorelines and the waters they encompass would not be restricted due to training within the Study Area.
3c. Protection and restoration of the ecological functions of shoreline natural resources	The proposed training activities would not adversely affect or change the ecological functions of shoreline natural resources. The Proposed Action does not include shoreline modification or development and it would not alter the natural condition of any shorelines of the state. Analyses in the Draft EA (see Section 3.3 Biological Resources) indicate that the Proposed Action would not significantly impact natural resources or the ecology of nearshore and shoreline areas. Furthermore, as described in Draft EA Chapter 4 (Cumulative Impacts), the Navy continues to be involved in protection projects within the Study Area, including the Encroachment Protection Partnering Agreement Transactions in the Hood Canal and the Hood Canal Bedlands Encroachment Protection Easement. These projects not associated with the Proposed Action provide beneficial coastal effects.

**Table 3-2: Consistency with Applicable Enforceable Policies of the Shoreline Management Act and Shoreline Master Program Guidelines
(Continued)**

Policy or Regulation	Discussion
Washington State Shoreline Master Program Guidelines	
3d. Protection of the public right of navigation and corollary uses of waters of the state	The proposed training would not limit public navigation and corollary uses. Nearshore activities conducted in proximity to shorelines or shoreline resources do not alter the natural condition of any shorelines of the state. As described in the Draft EA Section 3.1 (Socioeconomics), there are no anticipated impacts on transportation and shipping, commercial and recreational fishing, fishing communities, recreation, or tourism, because the proposed training would not restrict these activities and the training would be infrequent and of short duration. Based on the NSWC's best management practices and standard operating procedures (Draft EA Section 2.3.5) and the use of different sites at any given time, accessibility impacts are expected to remain negligible.
3e. The protection and restoration of buildings and sites having historic, cultural and educational value	The proposed training would avoid known burial sites, eroding shell middens, shipwrecks, and sunken resources present within the training study area. The non-invasive nature of the training avoids potential adverse effects to architectural resources. No doors or windows would be broken when entering or leaving a building used for training. Paint pellets used during training would bounce off hard surfaces, and paint markings are water-soluble and would be cleaned off with water once training is completed. Brass from the paint pellets would also be picked up once training is completed.
3f. Planning for public facilities and utilities correlated with other shorelines uses	Nearshore activities conducted in proximity to shorelines or shoreline resources do not alter the natural condition of any shorelines of the state. As described in the Draft EA Section 3.1 (Socioeconomics), there are no anticipated impacts on transportation and shipping, commercial and recreational fishing, fishing communities, recreation, or tourism, because the proposed training would not restrict these activities and the training would be infrequent and of short duration. Based on the NSWC's best management practices and standard operating procedures (Draft EA Section 2.3.5) and the use of different sites at any given time, accessibility impacts are expected to remain negligible. Public facilities would continue to operate normally during training activities. Water areas and shoreline accessibility would not be restricted due to training within the Study Area.

**Table 3-2: Consistency with Applicable Enforceable Policies of the Shoreline Management Act and Shoreline Master Program Guidelines
(Continued)**

Policy or Regulation	Discussion
Special policy goals of the Act and Guidelines for Shorelines of State-wide Significance (WAC 173-26-181)	In accordance with RCW 90.58.020 . . . give preference to uses in the following order of preference, which:
1. Recognize and protect the statewide interest over local interest	NSWC carries out training activities in support of national security so it can protect the United States from its enemies, protect and defend the rights of the United States and its allies to move freely on the oceans, and provide humanitarian assistance and disaster relief to failed states. The proposed training activities would not limit public access or recreation on land or in the water. Nearshore activities conducted on shorelines or in proximity to shorelines or shoreline resources do not alter the natural condition of any shorelines of the state. As described in the Draft EA Section 3.1 (Socioeconomics), there are no anticipated impacts on transportation and shipping, commercial and recreational fishing, fishing communities, recreation, or tourism, because the proposed training would not restrict these activities and the training would be infrequent and of short duration. The Proposed Action is, therefore, of statewide and national interest.
2. Preserve the natural character of the shoreline	The Proposed Action does not include shoreline modification or development and it would not alter the natural condition of any shorelines of the state. Nearshore activities conducted in proximity to shorelines or shoreline resources do not alter the natural condition of any shorelines of the state.
3. Result in long term over short term benefit	NSWC carries out training activities in support of national security so it can protect the United States from its enemies, protect and defend the rights of the United States and its allies to move freely on the oceans, and provide humanitarian assistance and disaster relief to failed states. This is of significant long-term benefit on a local, state, and national scale.

**Table 3-2: Consistency with Applicable Enforceable Policies of the Shoreline Management Act and Shoreline Master Program Guidelines
(Continued)**

Policy or Regulation	Discussion
4. Protect the resources and ecology of the shoreline	The proposed training activities would not adversely affect or change the ecological functions of shoreline natural resources. The Proposed Action does not include shoreline modification or development and it would not alter the natural condition of any shorelines of the state. Analyses in the Draft EA (see Section 3.3 Biological Resources) indicate that the Proposed Action would not significantly impact natural resources or the ecology of nearshore and shoreline areas. Furthermore, as described in Draft EA Chapter 4 (Cumulative Impacts), the Navy continues to be involved in protection projects within the Study Area, including the Encroachment Protection Partnering Agreement Transactions in the Hood Canal and the Hood Canal Bedlands Encroachment Protection Easement. These projects not associated with the Proposed Action provide beneficial coastal effects.
5. Increase public access to publicly owned areas of shorelines	The proposed training activities would not limit public access or recreation on land or in the water. Nearshore activities conducted in proximity to shorelines or shoreline resources do not alter the natural condition of any shorelines of the state. As described in the Draft EA Section 3.1 (Socioeconomics), there are no anticipated impacts on transportation and shipping, commercial and recreational fishing, fishing communities, recreation, or tourism, because the proposed training would not restrict these activities and the training would be infrequent and of short duration. Based on the NSWC's best management practices and standard operating procedures (Draft EA Section 2.3.5) and the use of different sites at any given time, accessibility impacts are expected to remain negligible.
6. Increase recreational opportunities for the public on the shorelines	NSWC's training activities would not limit recreational opportunities. In-water and on-land activities conducted in proximity to shorelines or shoreline resources do not alter the natural condition of any shorelines of the state. Training would be localized, infrequent, and brief in duration. As described in the Draft EA Section 3.1.3 (Socioeconomics Environmental Consequences), there are no anticipated impacts on transportation and shipping, commercial and recreational fishing, or tourism, because accessibility impacts in areas of co-use would be infrequent and brief in duration. Based on the NSWC's best management practices and standard operating procedures (Draft EA Section 2.3.5) and the use of different sites at any given time, recreational impacts are expected to remain negligible. Minimization measures employed during training activities limit encounters with the public during training events. Minimization may include temporarily ceasing training if the public enters the immediate training area or delaying the start of training until the public is done using or transiting the area. Public locations including recreational areas would operate normally during training to minimize impacts on public access.

Table 3-3: Consistency with Applicable Enforceable Policies of the Ocean Resources Management Act

Policy or Regulation	Discussion
WA Ocean Resource Management Act and Ocean Use Guidelines	
(1) WA ORMA - RCW 43.143.030(2): Provides that, "Uses or activities that require federal, state, or local government permits or other approvals and that will adversely impact renewable resources, marine life, fishing, aquaculture, recreation, navigation, air or water quality, or other existing ocean or coastal uses, may be permitted only if the criteria below are met or exceeded:	
(a) There is a demonstrated significant local, state, or national need for the proposed use or activity	NSWC carries out training activities in support of national security so it can protect the United States from its enemies, protect and defend the rights of the United States and its allies to move freely on the oceans, and provide humanitarian assistance and disaster relief to failed states. The Proposed Action is, therefore, of statewide and national necessity.
(b) There is no reasonable alternative to meet the public need for the proposed use or activity	NSWC carries out training activities in support of national security so it can protect the United States from its enemies, protect and defend the rights of the United States and its allies to move freely on the oceans, and provide humanitarian assistance and disaster relief to failed states. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, land, and cold-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. The Draft EA analyzed a reasonable range of alternatives to meet the purpose and need for the Proposed Action.
(c) There will be no likely long-term significant adverse impacts to coastal or marine resources or uses	The proposed NSWC training activities would have minimal impact on marine life or existing ocean or coastal uses. Analyses in the Draft EA (see Chapter 3) indicate that the Proposed Action would not significantly impact marine habitats nor would it impact the ability of marine substrates to serve their function as habitat. The Proposed Action is also not expected to decrease the overall fitness of any marine mammal, sea turtle, marine invertebrate, fish, or marine vegetation population.
(d) All reasonable steps are taken to avoid and minimize adverse environmental impacts, with special protection provided for the marine life and resources of the Columbia River, Willapa Bay and Grays Harbor estuaries, and Olympic National Park	Within the Study Area, NSWC implements best management practices and standard operating procedures (Draft EA 2.3.5) to reduce impacts on marine life and resources, fishing, and recreational uses. NSWC best management practices and standard operating procedures have the indirect benefit of reducing potential impacts on marine resources and they are designed to reduce or avoid potential impacts on marine resources. Training would not occur in the Olympic National Park. Analyses in the Draft EA (see Chapter 3) provides avoidance and minimization measures that would be applied during training, which would avoid and minimize adverse environmental impacts.

Table 3-3: Consistency with Applicable Enforceable Policies of the Ocean Resources Management Act (Continued)

Policy or Regulation	Discussion
(h) The use or activity complies with all applicable local, state, and federal laws and regulations	Yes; as described throughout the Draft EA, NSWC complies with all applicable laws and regulations. Due to the low impact nature of the training, no permits under the Marine Mammal Protection Act and Endangered Species Act are required. NSWC would work with local jurisdictions and Washington state for right-of-entry agreements prior to any training occurring at their respective locations.
WAC 173-26-360	
(7) General ocean uses guidelines: The following guidelines apply to all ocean uses, their service, distribution, and supply activities and their associated facilities that require shoreline permits.	
(a) Ocean uses and activities that will not adversely impact renewable resources shall be given priority over those that will. Correspondingly, ocean uses that will have less adverse impacts on renewable resources shall be given priority over uses that will have greater adverse impacts	NSWC's proposed training activities would not significantly impact marine life or renewable resources. Analyses in the Draft EA (see Chapter 3) indicate that the Proposed Action would not significantly impact marine habitats nor would it impact the ability of marine substrates to serve their function as habitat. The Proposed Action is also not expected to decrease the overall fitness of any marine mammal, sea turtle, marine invertebrate, fish, or marine vegetation population.
(d) The alternatives considered to meet a public need for a proposed use should be commensurate with the need for the proposed use. For example, if there is a demonstrated national need for a proposed use, then national alternatives should be considered	NSWC carries out training activities in support of national security so it can protect the United States from its enemies, protect and defend the rights of the United States and its allies to move freely on the oceans, and provide humanitarian assistance and disaster relief to failed states. The Proposed Action is, therefore, of statewide and national necessity.

Table 3-3: Consistency with Applicable Enforceable Policies of the Ocean Resources Management Act (Continued)

Policy or Regulation	Discussion
(j) Ocean uses and their associated coastal or upland facilities should be located, designed and operated to prevent, avoid, and minimize adverse impacts on migration routes and habitat areas of species listed as endangered or threatened, environmentally critical and sensitive habitats such as breeding, spawning, nursery, foraging areas and wetlands, and areas of high productivity for marine biota such as upwelling and estuaries	NSWC's proposed training activities would occur on selected nearshore lands and in the inland waters of Puget Sound, including Hood Canal, as well as the southwestern Washington coast. Analyses in the Draft EA (see Chapter 3) indicate that the Proposed Action would not significantly impact marine and nearshore habitats and nor would it impact the ability of marine substrates and lands to serve their function as habitat. The Proposed Action is also not expected to decrease the overall fitness of any species or habitat. Within the Study Area, NSWC implements best management practices and standard operating procedures (See Draft EA Section 2.3.5). NSWC best management practices and standard operating procedures have the indirect benefit of reducing potential impacts on marine resources and are designed to reduce or avoid potential impacts on marine and land resources. NSWC would coordinate with local Navy biologists and individual land managers prior to commencement of a training block to identify any areas that would need to be avoided for marine resource or habitat concerns.
(k) Ocean uses should be located to avoid adverse impacts on proposed or existing environmental and scientific preserves and sanctuaries, parks, and designated recreation areas	The Proposed Action is not expected to significantly impact any scientific preserves, sanctuaries, parks, or designated recreation areas. The training activities are low impact. NSWC would coordinate with local Navy biologists and individual land managers prior to commencement of a training block to identify any areas that would need to be avoided for marine resource or habitat concerns. Within the Study Area, NSWC implements best management practices and standard operating procedures (See Draft EA Section 2.3.5). NSWC best management practices and standard operating procedures have the indirect benefit of reducing potential impacts on marine resources and are designed to reduce or avoid potential impacts on marine resources. Some training activities included in the Proposed Action would be conducted in the parks and designated recreation areas. NSWC would work with Washington State Parks and Recreation Commission and other land managers to avoid sensitive areas during training activities.

Table 3-3: Consistency with Applicable Enforceable Policies of the Ocean Resources Management Act (Continued)

Policy or Regulation	Discussion
(m) Ocean uses and their distribution, service, and supply vessels and aircraft should be located, designed, and operated in a manner that minimizes adverse impacts on fishing grounds, aquatic lands, or other renewable resource ocean use areas during the established, traditional, and recognized times they are used or when the resource could be adversely impacted	NSWC's training activities would not significantly impact marine life, including habitat, or renewable resources. The analysis in the Draft EA addressed the potential impacts of the activities on accessibility to the fishing and recreational areas and other uses of the ocean. The Draft EA concluded no significant impact on accessibility for other users of the ocean resources. On the occasions when the NSWC plans unmanned aircraft activities over military property and in R-6701, NSWC would provide advance notice of these temporary activities through the FAA Notices to Airmen. These advance notifications allow for planning and help to ensure safety.
(n) Ocean use service, supply, and distribution vessels and aircraft should be routed to avoid environmentally critical and sensitive habitats such as sea stacks and wetlands, preserves, sanctuaries, bird colonies, and migration routes, during critical times those areas or species could be affected	NSWC's proposed training activities would not significantly impact marine life or renewable resources. Analyses in the Draft EA (see Chapter 3) indicate that the Proposed Action would not significantly impact marine habitats nor would it impact the ability of marine substrates and lands to serve their function as habitat. The Proposed Action is also not expected to decrease the overall fitness of any species or habitat. Within the Study Area, NSWC implements best management practices and standard operating procedures. NSWC best management practices and standard operating procedures have the indirect benefit of reducing potential impacts on marine resources and are designed to reduce or avoid potential impacts on marine resources. Some training activities included in the Proposed Action would be conducted in the parks and designated recreation areas. NSWC would work with Washington State Parks and Recreation Commission and other land managers to avoid sensitive areas during training activities.

Table 3-3: Consistency with Applicable Enforceable Policies of the Ocean Resources Management Act (Continued)

Policy or Regulation	Discussion
(u) Special attention should be given to designs and methods that prevent, avoid, and minimize adverse impacts such as noise, light, temperature changes, turbidity, water pollution and contaminated sediments on the marine, estuarine or upland environment. Such attention should be given particularly during critical migration periods and life stages of marine species and critical oceanographic processes	NSWC’s proposed training activities do not include any in-water or upland development/construction. The proposed training activities analyzed in the Draft EA would not result in light or temperature change impacts to the marine environment. Analyses in the Draft EA (see Chapter 3) indicate that the Proposed Action would not significantly impact marine and upland habitats nor would it impact the ability of marine substrates and uplands to serve their function as habitat from stressors such as noise, turbidity, water pollution or contaminated sediments. The Proposed Action is also not expected to decrease the overall fitness of any species or habitat. Within the Study Area, NSWC implements best management practices and standard operating procedures. NSWC best management practices and standard operating procedures have the indirect benefit of reducing potential impacts on marine resources and are designed to reduce or avoid potential impacts on marine resources.



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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September 28, 2018

T. H. Lazo
Navy Environmental Program Director, Northwest Region
Naval Facilities Engineering Command Northwest
Department of the Navy
1101 Tautog Circle
Silverdale, WA 98315

RE: Coastal Zone Consistency for Naval Special Operations Training in Western Washington State Environmental Assessment, Puget Sound and Pacific Ocean, Washington

Dear Mr. Lazo:

On August 27, 2018, you submitted a Certification of Consistency with the Washington State Coastal Zone Management Program (CZMP) for the Naval Special Operations Training in Western Washington State Environmental Assessment.

The proposed project entails small-unit, intermediate, and advanced land and cold-water maritime training activities within selected nearshore lands and inland waters of Puget Sound, including Hood Canal, as well as the southwestern Washington coast.

Pursuant to Section 307(c)(3) of the Coastal Zone Management Act of 1972 as amended, Ecology concurs with your determination that the proposed work is consistent with Washington's CZMP.

If you have any questions regarding Ecology's consistency determination please contact Rebekah Padgett at (425) 649-7129.

YOUR RIGHT TO APPEAL

You have a right to appeal this consistency determination to the Pollution Control Hearing Board (PCHB) within 30 days of the date of receipt of this consistency determination. The appeal process is governed by Chapter 43.21B RCW and Chapter 371-08 WAC. "Date of receipt" is defined in RCW 43.21B.001(2).

To appeal you must do all of the following within 30 days of the date of receipt of this consistency determination:



October 2019

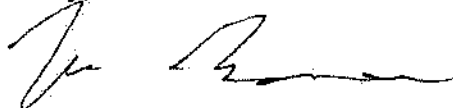
- File your appeal and a copy of this consistency determination with the PCHB (see addresses below). Filing means actual receipt by the PCHB during regular business hours.
- Serve a copy of your appeal and this consistency determination on Ecology in paper form - by mail or in person. (See addresses below.) E-mail is not accepted.

You must also comply with other applicable requirements in Chapter 43.21B RCW and Chapter 371-08 WAC.

ADDRESS AND LOCATION INFORMATION

Street Addresses	Mailing Addresses
Department of Ecology Attn: Appeals Processing Desk 300 Desmond Drive SE Lacey, WA 98503	Department of Ecology Attn: Appeals Processing Desk PO Box 47608 Olympia, WA 98504-7608
Pollution Control Hearings Board 1111 Israel RD SW STE 301 Tumwater, WA 98501	Pollution Control Hearings Board PO Box 40903 Olympia, WA 98504-0903

Sincerely,



Joe Burcar, Section Manager
Shorelands and Environmental Assistance Program
Northwest Regional Office

JB:rrp:ap

By certified mail 9171 9690 0935 0164 4591 23

cc: Anna Whalen, Naval Facilities Engineering Command Northwest

e-cc: Rick Mraz, Ecology
Perry Lund, Ecology
Sally Toteff, Ecology
Tom Buroker, Ecology
Lori Kingsbury, Ecology
Loree' Randall, Ecology
ecyrefedpermits@ecy.wa.gov

October 2019



State of Washington
DEPARTMENT OF ECOLOGY
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Bellevue, WA 98008-5452

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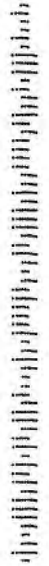


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LAZO

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Appendix C: Responses to Public Comments on the Draft EA for Naval Special Operations Training in Western Washington State

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APPENDIX C RESPONSES TO PUBLIC COMMENTS

The 30-day public comment period was extended to 60 days based on requests received during the comment period. During the January 21, 2018 to March 23, 2018 comment period, the Navy received 550 emails, 42 letters, and 85 written and oral commenters from the open house meetings in February 2018, for a total of 677 pieces of correspondence. Nine additional emails were received after the comment period ended, for a grand total of 686. The actual numbers of commenters may be less since some individuals sent multiple emails and letters or provided both written and oral comments. One petition and several form letters were also received.

Some commenters offered properties to train and others provided comments supporting the project and stating that, for example, the information contained within the document was “clear, concise, and transparent.” The majority of the comments were opposed to the proposed training. Individual commenters usually provided several comments. Several comments addressed overseas military activities, the *Northwest Training and Testing Environmental Impact Statement/Overseas Environmental Impact Statement*, TPS PA and Naval Magazine Indian Island, which are not part of this Proposed Action. Some comments were related to military spending, which is also out-of-scope for this project. These topics are not discussed in the Final EA.

Comments were divided into the following resource sections: Socioeconomics, Cultural, Biological, Public Health and Safety, Air Quality, Noise, and Cumulative. The comments also fell into the following themes: Access, Parks, Encroachment, Militarization, NEPA, Training, Hazmat, Consultations, Treaty Rights, Public Involvement, Politics, Support, and the Federal Aviation Administration (FAA). Summarized comments and responses are provided in Table C-1.

Table C-1: Summarized Public Comments on Draft EA and Navy Responses

COMMENTS BY RESOURCE SECTION	
Socioeconomics	
General Comment	Response
Concerned for amount of money and resources expended on militarization of Olympic Peninsula.	The Navy is not proposing to militarize the Olympic Peninsula. The proposed Naval Special Warfare Command (NSWC) activities are similar to hiking, overnight camping, swimming, and diving, just with the goal of not being seen.
Draft EA fails to assess impacts to local communities, environment, and local economy.	NSWC does not anticipate disruptions to the community or the environment. The intent of the proposed training is to build trainees’ skills, experience, and confidence by challenging them in a location with dynamic weather and land/cold-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur on sites with the permission of land owners or managers (e.g., State of Washington Parks and Recreation Commission, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities. All training activities would be non-invasive. NSWC would not build training devices or structures (e.g., a target, door) at any site during the proposed training activities. The proposed training does <u>not</u> include the use of live-fire ammunition, explosive demolitions, off-road driving, manned air operations, digging, vegetation cutting or removal, tree climbing, construction, building camp fires or infrastructure, or leaving human waste at any training site.

COMMENTS BY RESOURCE SECTION	
Concerned about drops in property values due to public knowledge of trainings.	The information reviewed by the Navy does not suggest impacts on property values. There will be no public notification process prior to individual training events. As stated previously, proposed training would occur on sites with the permission of land owners or managers (e.g., State of Washington Parks and Recreation Commission, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities. The goal of the training is to leave no trace, which is consistent with not affecting property values.
Concerned about the depression of the Kitsap Peninsula and Whidbey Island tourism industry associated with the water, shoreline, and public parks on which many residents depend, and that the value of State parks has not been properly evaluated in the current EA.	As stated above, proposed training would occur on sites with the permission of land owners or managers (e.g., State of Washington Parks and Recreation Commission, private property owners, etc.). All training activities would be non-invasive. NSWC would not build training devices or structures (e.g., a target, door) at any site during the proposed training activities. The proposed training does <u>not</u> include the use of live-fire ammunition, explosive demolitions, off-road driving, manned air operations, digging, vegetation cutting or removal, tree climbing, construction, building camp fires or infrastructure, or leaving human waste at any training site. Overall, there should be no impact to tourism, as the training occurs on a not to interfere basis and there would be no trace of the training. Subsequently, there should be no impact to the State parks or to the members of the public visiting the State parks.
Cultural	
Navy has not consulted with Tribes or local governments about historic and cultural sites.	At the time of the Draft EA, consultations had begun. The Navy, on behalf of NSWC, initiated consultations on April 24, 2017 with the Advisory Council on Historic Preservation, the Washington State Historic Preservation Officer, 23 Tribes, and 33 interested parties. Consultations have concluded. Please see Section 3.2 (Cultural Resources) and Appendix B (Correspondence for Naval Special Operations Training in Western Washington State) of the Final EA. Tribal letters were sent in 2017 and then again to tribes in January of 2018. Hard copy letters, which included a copy of the Draft EA on CD-ROM, were mailed on January 24, 2018 to 16 tribal chairpersons of federally recognized tribes who have usual and accustomed hunting and fishing grounds in the Study Area. Two tribes requested additional information, which was provided. One tribe requested formal government to government consultation. That consultation concluded in March 2018. Currently, all consultations are concluded.
Biological	
Concerned about urination and defecation, that it would destroy plants and adversely affect wildlife.	As described in the EA (Section 2.1.1.2, Land-Based Training Activities), as part of the training intent that the activities be undetected, the support personnel teach trainees that no expended equipment, human waste, or transported liquids remain on site after the training activity is completed. As such, no human waste will come into contact with the environment.
Dragging equipment would destroy eelgrass.	As described in the EA in Section 3.3.3.2.2 (Marine Species and Habitats), the training would have minimal impacts on marine vegetation, to include eelgrass. Boats would not be anchored or beached in eelgrass, and floating vegetation, such as algae and kelp, would be avoided. The low numbers of trainees walking within intertidal areas would not generate any more turbidity (cloudiness or haziness) than wave action would generate.

COMMENTS BY RESOURCE SECTION	
Trampling would affect eelgrass, seaweeds, marine invertebrates, and juvenile fish, and pollute water.	As stated in the EA in Section 3.3.3.2.2 (Marine Species and Habitats), additional measures are in place to avoid and minimize potential impacts to marine vegetation, to include eelgrass and seaweeds, as well as marine invertebrates and juvenile fish. For example, trainees would avoid animals in the water, such as seals and sea lions, and would not approach haul outs or move close enough to cause an animal to jump into the water. When in the presence of whales, personnel would shut down boat engines in accordance with boating regulations and Navy procedural instruction. Boats would not bottom out or come ashore in sensitive habitats, such as eelgrass. Additionally, training would not occur in salmon streams. When training on land, sensitive habitats would be avoided, such as known bird nesting areas. All training would be conducted in accordance with natural resource management plans applicable to the land ownership: for the Navy-owned lands, Integrated Natural Resource Management Plans would be followed; for State park lands, State park management plans would be followed; and private lands would be subject to real estate agreements that may specify areas to be avoided.
Sonar not analyzed.	As stated in the Draft EA Section 3.3 (Biological Resources), submersibles use a sonar device to report depths to aid in navigation during a training activity. These devices have similar specifications to commercially available “fish finders” and other hand-held sonar devices, which typically generate frequencies over 200 kilohertz (kHz) and source levels less than 160 decibels referenced to 1 micropascal (dB re 1 µPa). In the NMFS’ 2014 Biological Opinion of U.S. Navy’s Training Exercises and Testing Activities in the Northwest Training and Testing Area (National Marine Fisheries Service, 2014a, 2015b), devices with these specifications are considered <i>de minimis</i> sources of sound in the water. No other types of sonar are proposed.
Looking for a checklist or procedure for sites chosen.	As described in Chapter 2 of the EA, each individual site was specifically researched and evaluated for numerous factors, to include suitability to meet training requirements, diversity, complexity and challenge, flexibility, potential impacts to the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts to any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites. As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and be responsive to training needs. Not all sites within the training study area would be utilized over a one-year period. Depending on the selected alternative, a site would be used no more than 3 to 36 times a year (see Table 2-3 in the EA).
Bluffs and cliffs would be eroded, need geotechnical reports.	High-Angle climbing activities would only occur on rock faces at Deception Pass State Park. There would be no activities on bluffs to cause erosion and no new placements of drilled anchoring systems.

COMMENTS BY RESOURCE SECTION	
No scientific evidence that jets skis and unmanned vehicles and surface vehicles will not impact wildlife (juvenile and adult salmon).	The jet skis that would be used in the proposed training would only be operated by the instructor staff. Unlike recreational jet ski users who operate the jet ski at full throttle, zooming across the water, the instructors utilizing the jet skis would most often be sitting in a single location, with the throttle (engine) at idle, as their primary objective is to monitor the training as it unfolds. Additionally, the jet skis would not typically be operated in the nearshore waters, so gravel and other habitat necessary for spawning would not be disturbed. Should a situation arise that requires their attention, the jet skis offer the speed, maneuverability, and capability for the instructor to arrive at the scene expeditiously. Other than during these unplanned situations, and during transits, generally in conjunction with the main boat, the jet skis would be idling. This is the case regardless of the alternative. Additionally, although there is no scientific evidence that jet skis don't impact juvenile and adult salmon, Whitfield and Baker (2014) stated that there is very limited work conducted on the environmental effects of powered watercraft (PWC) and this is certainly an area for future research. Most of the existing data from jet skis address noise and impacts of wakes from high-speed jet skis. Reid (2007) found boat wakes in the Rogue River (Oregon) did not appear to change the thermal properties of thermal refuges of juvenile Chinook salmon (<i>Oncorhynchus tshawytscha</i>) nor did these fish exhibit startle responses, provided the boat was more than 3 m from the individual salmon.
Looking for mitigations (1) should vessel contact or injure marine mammal and (2) undisturbed areas used.	As stated in the EA, trainees would avoid animals in the water, such as seals and sea lions, and would not approach haul outs or move close enough to cause an animal to jump into the water. When in the presence of whales, personnel would shut down boat engines in accordance with boating regulations and Navy procedural instruction. Boats would not bottom out or come ashore in sensitive habitats, such as eelgrass. Additionally, training would not occur in salmon streams. When training on land, sensitive habitats would be avoided, such as known bird nesting areas.
Chemical stressors (i.e. oil, gas, and other hydrocarbons released into the water) need to be addressed.	The proposed submersible and UUV's are battery operated. As stated in the Draft EA Section 3.4 (Public Health and Safety), during training events, NSWC dedicates a vehicle for emergency response. Navy Region Northwest would be contacted if there is a spill of any hazardous substance or oil into state waters, ground, or air in accordance with the Navy's Oil and Hazardous Substance Integrated Contingency Plan (U.S. Department of the Navy, 2016). Navy Region Northwest would also be contacted if there is a spill of oil that would violate water quality standards, cause a film or sheen or discoloration on the water surface or shoreline, or cause sludge or emulsion to be deposited beneath the surface of the water. Should any spill pose a threat to human health, 911 would be called first. Any petroleum-contaminated soil from an accidental spill would be treated, stored, transported, handled, labeled, and disposed of in accordance with federal, state, and local regulations. This ensures safety for the trainees and the training vessels as well as for any commercial and civilian craft that may transit adjacent to the event location.
Looking for consultations with USFWS and NMFS.	At the time of the Draft EA, consultations were planned but had not yet occurred. Consultations have since occurred with the U.S. Fish and Wildlife Service and the National Marine Fisheries Service. Please Appendix B (Correspondence for Naval Special Operations Training in Western Washington State) of the Final EA.

COMMENTS BY RESOURCE SECTION	
Draft EA dismissed impacts on nesting or migrating birds.	When training on land, sensitive habitats would be avoided, such as known bird nesting areas. UAS's would not be operated within 1,000 feet of known eagle's nests.
The public has a general disbelief that training would have no effect on marine and terrestrial wildlife and plant life.	The Navy has stated, and the analysis in the EA shows, that there would be no significant impacts to these resources. Please refer to Section 3.1 (Biological Resources) for a full analysis of the Navy's impacts to biological resources.
Avoid yellow sand verbena stands and the yellow sand verbena moth (which is dependent on plant at Fort Worden) – please eliminate this park due to these species.	The sand verbena moth was petitioned for listing in 2010 and is currently under review by USFWS (2011, 76 FR 9309). Currently, the species has no regulatory status. A recent check of the Washington Fish and Wildlife office does not provide any additional news on the review of the species.
Training could hurt dogs/pets.	The intent of the training is to remain undetected. If a trainee is found by a dog or other animal that is off leash, experience has shown that the dog will quickly lose interest and return to its owner. If, however, the dog persists, the instructor (safety observer) will call a training time out, inform the owner as to what has piqued the dog's interest, and patiently wait till the individual and their pet have freely decided to move on, before resuming training. No harm would come to dogs or pets.
Concerned trainees would not stay on trails at Leadbetter Point, Willapa National Wildlife Refuge, and Cape Disappointment areas.	When training on land, sensitive habitats would be avoided, such as known bird nesting areas. All training would be conducted in accordance with natural resource management plans applicable to the land ownership: for the Navy-owned lands, Integrated Natural Resource Management Plans would be followed; for State park lands, State park management plans would be followed. Additionally, instructors would coordinate with park rangers for any updates to restricted areas or sensitive habitats.
Anchor exclusion zones off Port Townsend to avoid eel grass.	As stated in the EA, additional measures are in place to avoid and minimize potential impacts. For example, boats would not bottom out or come ashore in sensitive habitats, such as eelgrass. The training would have minimal impacts on eelgrass. Boats would not be anchored or beached in eelgrass, and floating vegetation, such as algae and kelp, would be avoided. The low numbers of trainees walking within intertidal areas would not generate any more turbidity (cloudiness or haziness) than wave action would generate. All training would be conducted in accordance with natural resource management plans applicable to the land ownership: for the Navy-owned lands, Integrated Natural Resource Management Plans would be followed; for State park lands, State park management plans would be followed; and private lands would be subject to real estate agreements that may specify areas to be avoided.
Ensure SEALs won't be ascending bluffs with ropes which would cause erosion.	High-Angle climbing activities would only occur on rock faces at Deception Pass State Park. There would be no activities on bluffs to cause erosion.
Public Health and Safety	
Looking for a checklist or procedure for sites chosen and how officials are notified.	As described in Chapter 2 (Description of Proposed Action and Alternatives) of the EA, each individual site was specifically researched and evaluated for numerous factors, to include suitability to meet training requirements, diversity, complexity and challenge, flexibility, potential impacts to the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations) as well as availability of a site

COMMENTS BY RESOURCE SECTION	
	at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts to any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites. As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and be responsive to training needs. Not all sites within the training study area would be utilized over a one-year period. Depending on the selected alternative, a site would be used no more than 3–36 times a year (see Table 2-3 in the EA).
Concerned about public becoming unwitting enemy combatants and, as a result, being accidentally injured, traumatized, or aggravating PTSD symptoms and other mental health issues.	There is no active on-land training operation for the public to see. In areas where surveillance and reconnaissance is conducted only military role players will be used. The Navy has no interest in utilizing the public for any type of training activity. The trainees learn skills needed to avoid detection and enter a site at night. Support staff would be dressed as a member of the public and the support staff would only interact with the public if there was a chance the public may unintentionally discover trainees. Support staff would also visit a training site prior to a training event commencing to ensure there is minimal public in the area.
Concerned about the possibility of an armed stand-off with armed citizens who mistake the SEALs as intruders or criminals.	Proposed training would occur on sites with the permission of land owners or managers (e.g., State of Washington Parks and Recreation Commission, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities. Additionally, all training activities would be non-invasive in nature. The intent of training is not to be seen; as such, the trainees would be hiding and purposely avoiding people. However, for safety reasons, instructor staff, dressed in civilian clothes, would be observing the trainees and would intervene should any potential meeting occur between citizens and the trainees.
Violation of EO 13045, "Protection of Children from Environmental Health and Safety Risks."	As stated previously, all training activities would be non-invasive. NSWC would not build training devices or structures (e.g., a target, door) at any site during the proposed training activities. The proposed training does <u>not</u> include the use of live-fire ammunition, explosive demolitions, off-road driving, manned air operations, digging, vegetation cutting or removal, tree climbing, construction, building camp fires or infrastructure, or leaving human waste at any training site. The intent of the training is not to be seen and to leave no trace of their presence. Nothing would be disposed of and nothing left behind.
Due to the frequency of mass shootings, some civilians believe having Navy personnel with mock weapons in public places and private land is inappropriate.	The Navy understands your concerns. For this reason, the training is non-invasive in nature. No actual guns would be carried by the trainees or instructors. For some training activities, trainees would carry rubber gun substitutions, but this is only to simulate the actual weight of a real weapon and the logistical challenges of carrying a weapon in a real mission. It is for training purposes only. Because the goal is to remain undetected, it is extremely unlikely that any trainee would be seen. If they are noticed, the instructor staff would intervene and the training would stop.
Guns do not belong in State and public parks.	No actual guns would be carried by the trainees or instructors. For some training activities, trainees would carry rubber gun substitutions, but this is only to simulate the actual weight of a real weapon and the logistical challenges of

COMMENTS BY RESOURCE SECTION	
	carrying a weapon in a real mission. It is for training purposes only, and as mentioned, no actual guns would be in the parks.
Worry that unwanted electronic surveillance of public citizens and the harvesting of cell phone data would be carried out as a part of training.	Please note that collecting information from cell phone data is not part of the training objectives. The training does involve surveillance of certain military areas as part of the UAS training; however, per Department of Defense policy, NSWOC does not collect, retain, or disseminate information associated with its domestic UAS use.
Air Quality	
Concerned about air quality impacts from weapons, landing craft, and other vehicles.	Chapter 2 (Description of Proposed Action and Alternatives) in the Draft EA identified the equipment to be used during training and it noted that trainees would not carry loaded weapons or explosives during a training event. Wheeled vehicles are not part of a training activity. Pickup trucks and/or a van would be driven on roadways to the training site by support staff and parked in designated parking locations. After the Draft EA was published, further analysis and research found that the maintenance areas were removed around Tacoma for PM ₁₀ and PM _{2.5} . The attainment status designation for Washington State also shows attainment for these areas as of October 10, 2019 (40 CFR 81.348). The impacts to air quality are considered negligible due to the proposed emission sources would be primarily from mobile equipment (i.e., small boats, motor vehicles, etc.) and would have a negligible contribution to current air pollutants. There are no landing craft in this project. Air quality impacts from the simulated weapons usage is negligible.
Protect citizens by keeping the air clean.	As stated above, emissions of potential criteria pollutants would be below <i>de minimis</i> levels in the project's one maintenance area (found in Region 1 at Pierce County). Training events would also be widely dispersed throughout the training areas to prevent potential criteria pollutants from concentrating in a single location.
Noise	
Reduce noise around where people live.	As stated in the Draft EA, Section 3.6 (Noise), the analysis shows that the amount of noise created would be similar to ambient (background) noise levels and that, if noise from training rose above ambient levels, it would be similar to a public area user and is not expected to affect the surrounding community.
Cumulative	
The cumulative section is inadequate and doesn't account for other projects, such as the Electronic Warfare Range EA.	The cumulative section addresses other Navy and non-Navy projects in the Study Area including the Growler EIS, NWTT EIS/OEIS, and Naval Magazine Indian Island missile magazine project as they relate to the proposed training. The TPS Port Angeles project and Electronic Warfare Range EA are outside the Study Area and are not considered in the Final EA.
Cumulative impacts to tribal, cultural, and historic sites is inadequate.	Stakeholder letters were mailed on January 19, 2018 to 143 federal, state, and local elected officials and government agencies. A hard copy of the Draft EA was sent to eight stakeholder letter recipients. Tribal letters were emailed to select tribes on January 22, 2018. Hard copy letters, which included a copy of the Draft EA on CD-ROM, were mailed on January 24, 2018 to 16 tribal chairpersons of federally recognized tribes who have usual and accustomed hunting and fishing grounds in the Study Area. See Appendix B (Correspondence for Naval Special Operations Training in Western Washington State) for correspondence with Tribes and other stakeholders. As stated throughout the Draft EA, training would be non-invasive, and would follow protocols to minimize the potential for impacts on archaeological resources, architectural resources, and traditional cultural properties

COMMENTS BY RESOURCE SECTION	
Erosion of quality of life and health due to testing sonar, Growlers, EW, and training of thousands of soldiers on shorelines.	As stated in the Draft EA, Section 3.3 (Biological Resources), submersibles use a sonar device to report depths to aid in navigation during a training activity. These devices have similar specifications to commercially available “fish finders” and other hand-held sonar devices, which typically generate frequencies over 200 kilohertz (kHz) and source levels less than 160 decibels referenced to 1 micropascal (dB re 1 µPa). In the NMFS’ 2014 Biological Opinion of U.S. Navy’s Training Exercises and Testing Activities in the Northwest Training and Testing Area (National Marine Fisheries Service, 2014a, 2015b), devices with these specifications are considered <i>de minimis</i> sources of sound in the water. The Growler home basing and the Electronic Warfare Range EA are outside the scope of this analysis, as Growler aircraft and Electronic Warfare training are not part of the Proposed Action. However, the cumulative effects analysis discusses how other Navy projects relate to the proposed training and considers any potential cumulative effects. For the preferred alternative, which contains six training blocks per year, the total number of military personnel per year would be 504 (trainees and support staff). Of that number, 144 would be trainees. A training block would have up to 24 trainees, but a single training event typically only has up to 8. While other special operations units may train with Naval Special Warfare Command, they would replace one or two trainees and the total number would not increase. Table 2-3 in the Final EA has been expanded to further clarify the breakdown of personnel by alternative.
Training serves to detract from all national, regional, and local efforts to turn around salmon decline by not examining your immediate and long-term impacts in exquisite detail.	As stated in the EA, training would not occur in salmon streams. In past consultations with NMFS, NMFS has determined that training activities would not jeopardize the continued existence of chinook salmon, chum salmon and steelhead. The Navy has consulted with NMFS for the Proposed Action, and the same conclusion was reached. Please see Appendix B (Correspondence for Naval Special Operations Training in Western Washington State) Section B.4 (Navy NMFS Correspondence) of the Final EA.
There is no assurance that dispersed in time and place training activities will not impact underway restoration efforts.	As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft EA, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts to any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites. As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. All training events would be conducted in accordance with military training procedures, approved standard operating procedures, best management procedures, and protective measures, including Chief of Naval Operations Instruction 5100.23G, <i>Navy Safety and Occupational Health Program Manual</i> (2011). See Chapter 2, Section 2.3.5 (Best Management Practices and Standard Operating Procedures). Training activities would be consistent with management objectives of individual parks, including prohibiting training in sensitive areas containing important natural and cultural resources. For example, if a site has been revegetated with native plants and the public is prohibited from entering that area, NSWV would also observe this restriction and not enter the area.
Cumulative effects assessment is piecemeal and does not address social costs.	Socioeconomics was addressed in the Draft EA, please see Section 3.1 (Socioeconomics). The analysis shows that the Proposed Action would have no significant impacts on socioeconomic resources.

COMMENTS BY RESOURCE SECTION	
Specific long-term environmental consequences of innumerable military assault exercises is not addressed.	The Draft EA covers each resource section in Chapter 3 (Affected Environment and Environmental Consequences), including in depth discussions of the affected environment. The analysis in the Draft EA shows that there would be no long-term environmental consequences from the Proposed Action.
COMMENTS BY THEME	
Access	
The Navy has enough Navy and military land to train on.	Military properties do not provide sufficient varied and diverse locations or environmental features to adequately prepare special operations personnel for the types of environments they may encounter on deployment. The infrastructure at a pier on a military installation is different than that found at a public marina or pier. The infrastructure at a public facility is more like the type of environment personnel would experience on a mission. A critical factor of this type of training is navigating the “unknown” when completing a training objective. A variety of sites are therefore needed to ensure that students can experience site diversity; having multiple site choices also ensures less frequent use of each site.
Train at existing bases including Kodiak; Alaska has thousands of uninhabited isolated islands.	Kodiak, Alaska was an Alternative considered, but not carried forward for detailed analysis (see Section 2.4.1 of the Draft EA) because, although it can offer a similar complexity in a few training areas, as well as a diverse environment similar to western Washington, with the requisite complex hydrography and high-volume commercial and personal shipping traffic, the lack of logistics support for the proposed type of training, along with safety compromises and extreme weather conditions, it is an unacceptable location to conduct the advanced level of training intended to be accomplished in western Washington State.
Belief that Navy properties on Whidbey Island, Indian Island, and others are not being used.	The majority of the proposed training at military installations would actually occur at Naval Base Kitsap, which includes Naval Base Kitsap Bangor, Naval Base Kitsap Bremerton, Naval Base Kitsap Keyport, Zelatched Point, Toandos Buffer Zone, Manchester Fuel Department, Camp McKean, and Naval Magazine Indian Island. Training locations at Naval Air Station Whidbey Island include Ault Field and Seaplane Base, which would occur every other year.
The use of state-owned harbors such as Port Townsend and Port Hadlock is not explained.	Port Townsend and Port Hadlock harbors are open public harbors. The water-based training described in the EA could occur in those harbors, as well as any other potential waterway within the study area. Where necessary, an agreement with local authorities would be secured prior to conducting any training.
Public wants to know the length of real estate agreements and if it is attached to the land or the land owner.	The length of real estate agreements is 5 years or less. This is a Navy requirement as specified at the Region level. Real estate agreements are tied to the land owner.
If the Navy uses public lands then the Navy must give access to the public some of the waters, beaches, and equipment (boats) that are reserved for Navy uses only.	Areas restricted for Navy use only are for the security of the public and the security of the installations. The Navy does allow some limited public access to reserved areas, but on a case-by-case basis.
Some suggest to avoid areas with less of a Navy influence and population where the	Training activities are proposed for locations that have willing property owners, and some State parks, in accordance with all rules and regulations. Activities are coordinated with local and tribal law enforcement, park rangers, and property

COMMENTS BY RESOURCE SECTION	
population would be more accepting instead of towns like Port Townsend which has less of a connection to the Navy.	owners. All training events would be conducted in accordance with military training procedures, approved standard operating procedures, and protective measures, including Chief of Naval Operations Instruction 5100.23G, <i>Navy Safety and Occupational Health Program Manual</i> (2011). Training activities would be consistent with management objectives of individual parks, including prohibiting training in sensitive areas containing important natural and cultural resources. For example, if a site has been revegetated with native plants and the public is prohibited from entering that area, NSWC would also observe this restriction and not enter the area.
Encroachment	
Drone and robotic surveillance technology not disclosed/privacy concerns – violating 4 th Amendment.	The unmanned aircraft systems used during naval special operations training are categorized as Federal Aviation Administration Group 1 or 2 systems. These systems weigh up to 55 pounds, normally operate below 2,000 feet above ground level, would use on-the-ground observers (no manned aircraft observers), and fly in accordance with Federal Aviation Administration authorizations. Unmanned aircraft systems would be used on military installations and Federal Aviation Administration approved airspace (R6701). For training outside of R6701, the unmanned aircraft systems would be flown in accordance with a valid Federal Aviation Administration Certificate of Authorization. For the proposed training in western Washington, trainees would launch and recover battery-powered systems concurrent with other water-based or land-based training activities. Please note that, per Department of Defense policy, NSWC does not collect, retain, or disseminate information associated with its domestic UAS use.
Training not compatible with leisure activities.	The essence of the proposed training is similar to hiking, overnight camping, swimming, and diving, just with the goal of not being seen.
Navy should not train in non-consenting communities.	Training activities are proposed for locations that have willing property owners, and some State parks, in accordance with all rules and regulations. Activities are coordinated with local and tribal law enforcement, park rangers, and property owners. All training events would be conducted in accordance with military training procedures, approved standard operating procedures, and protective measures, including Chief of Naval Operations Instruction 5100.23G, <i>Navy Safety and Occupational Health Program Manual</i> (2011). Training activities would be consistent with management objectives of individual parks, including prohibiting training in sensitive areas containing important natural and cultural resources. For example, if a site has been revegetated with native plants and the public is prohibited from entering that area, NSWC would also observe this restriction and not enter the area.
Opposes increasing Navy presence in Puget Sound.	This concern is duly noted. Please note that the increased training requirement is in accordance with the NSWC meeting its Title 10 U.S.C. Section 167 mandate.
Quit buying up lands.	Buying land is not part of the scope of this project.
Defeat HB2341 and SB6456/military overreach.	HB2341 and SB6456 are not part of the scope of the project.
The Navy should choose less densely populated areas for training. The separation of military and public is sacred to some people.	NSWC has done an extensive search for sites that meet its training requirements and do not impact the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the EA, the study area was specifically researched and evaluated for numerous factors, to include suitability to meet training requirements, diversity, complexity and challenge, flexibility, potential impacts to the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected

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	species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts to any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites. As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of reducing impacts to the public, while still meeting its training objectives.
Parks	
Parks should not be used for training as the military use of state parks is at odds with Washington state law.	As stated above, the essence of the proposed training is similar to hiking and overnight camping, just with the intention of not being seen. To conduct activities in State parks, NSWC will coordinate with and obtain a special use-permit from the State of Washington Parks and Recreation Commission, as is required, prior to the use of specified public lands.
Not compatible with the mission of Washington State Parks and violates WAC 325-37-095.	A special use-permit from the State of Washington Parks and Recreation Commission is required prior to the use of specified public lands. In general, training activities are proposed for some State parks, in accordance with all rules and regulations. Training activities are coordinated with local law enforcement and park rangers and would be consistent with management objectives of individual parks, including prohibiting training in sensitive areas containing important natural and cultural resources. For example, if a site has been re-vegetated with native plants and the public is prohibited from entering that area, NSWC would also observe this restriction and not enter the area. Please note that proposed training would not close State parks and other properties. They would continue to operate as normal (“business as usual”) during naval special operations training. Additional questions about the State of Washington Parks and Recreation Commission process for granting a right-of-entry should be referred to that agency.
Parks are sacred places for recreation, conservation and reflection.	The essence of the proposed training is similar to hiking, overnight camping, swimming, and diving, just with the goal of not being seen. Training activities would be consistent with management objectives of individual parks, including prohibiting training in sensitive areas containing important natural and cultural resources. For example, if a site has been revegetated with native plants and the public is prohibited from entering that area, NSWC would also observe this restriction and not enter the area.
Firearms are prohibited in State Parks so why can the Navy bring paint ball guns and other mock weapons into the park.	Please note that simulated building clearance, the only activity that would use paint ball guns, would not be conducted in State parks. Additionally, it should be noted that for other training activities outside of simulated building clearance, no actual guns would be carried by the trainees or instructors. For some training activities, trainees would carry rubber gun substitutions, but this is only to simulate the actual weight of a real weapon and the logistical challenges of carrying a weapon in a real mission. It is for training purposes only, and as mentioned, no actual guns would be in the parks.

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No “foot traffic” study in the EA that is proposed or permitted by the CAMP plans for Washington State Parks.	The EA serves as a study for “foot traffic” and the effects from proposed training. As mentioned, one of the reasons for the numerous sites involved in the Proposed Action is that by having a wider selection of training sites, helps to minimize the potential for overuse of the areas. This also limits impacts to any one location and allows for maintaining the natural habitat. Additionally, training activities would be consistent with management objectives of individual parks, including prohibiting training in sensitive areas containing important natural and cultural resources. For example, if a site has been re-vegetated with native plants and the public is prohibited from entering that area, NSWC would also observe this restriction and not enter the area.
The use of parks for training would discourage people from using public parks and trails.	The proposed NSWC activities are similar to hiking, overnight camping, swimming, and diving, just with the goal of not being seen. Additionally, there is no active on-land training operation for the public to see. The trainees learn skills needed to avoid detection and enter a site at night. Support staff would be dressed as a member of the public and the support staff would only interact with the public if there were a chance the public may unintentionally discover trainees. Support staff would also visit a training site prior to a training event commencing to ensure there is minimal public in the area.
Too many children and families in parks who could get hurt or scared by training.	As stated above, the proposed NSWC activities are similar to hiking, overnight camping, swimming, and diving, just with the goal of not being seen. Additionally, there is no active on-land training operation for the public to see. The trainees learn skills needed to avoid detection and enter a site at night. Support staff would be dressed as a member of the public and the support staff would only interact with the public if there were a chance the public may unintentionally discover trainees. Support staff would also visit a training site prior to a training event commencing to ensure there is minimal public in the area.
Militarization	
Opposed to turning natural spaces into militarized region.	The Navy is not proposing to turn natural spaces into militarized regions. The proposed NSWC activities are similar to hiking, overnight camping, swimming, and diving, just with the goal of not being seen.
Concerned about impact of military presence on general population.	There is no active on-land training operation for the public to see. The trainees learn skills needed to avoid detection and enter a site at night. Support staff would be dressed as a member of the public and the support staff would only interact with the public if there was a chance the public may unintentionally discover trainees. Support staff would also visit a training site prior to a training event commencing to ensure there is minimal public in the area.
Normalizing military training into the lives of civilians regardless of their objections because it is “convenient” for the Navy displays a stunning level of contempt for these communities.	The Navy is not proposing to normalize military training into the lives of civilians. The proposed NSWC activities are similar to hiking, overnight camping, swimming, diving, just with the goal of not being seen. There is no active on-land training operation for the public to see. The trainees learn skills needed to avoid detection and enter a site at night. Support staff would be dressed as a member of the public and the support staff would only interact with the public if there was a chance the public may unintentionally discover trainees. Support staff would also visit a training site prior to a training event commencing to ensure there is minimal public in the area. Additionally, training activities are proposed for locations that have willing property owners, and some State parks, in accordance with all rules and regulations. Activities are coordinated with local and tribal law enforcement, park rangers, and property owners. All training events would be conducted in

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	accordance with military training procedures, approved standard operating procedures, and protective measures, including Chief of Naval Operations Instruction 5100.23G, <i>Navy Safety and Occupational Health Program Manual</i> (2011). Training activities would be consistent with management objectives of individual parks, including prohibiting training in sensitive areas containing important natural and cultural resources. For example, if a site has been revegetated with native plants and the public is prohibited from entering that area, NSWC would also observe this restriction and not enter the area.
Opposed to increasing militarization on Olympic Peninsula, within civilian life, and on children.	The Navy is not proposing to militarize the Olympic Peninsula. The proposed NSWC activities are similar to hiking, overnight camping, swimming, and diving, just with the goal of not being seen. Additionally, there is no active on-land training operation for the public to see. The trainees learn skills needed to avoid detection and enter a site at night. Support staff would be dressed as a member of the public and the support staff would only interact with the public if there was a chance the public may unintentionally discover trainees. Support staff would also visit a training site prior to a training event commencing to ensure there is minimal public in the area.
Trainings would worsen the already deteriorating level of trust between civilians and the Navy.	The Navy has a longstanding relationship with local officials and works together with civil authorities to coordinate special operations and other Navy training activities. NSWC has engaged in extensive public outreach, including conducting early outreach prior to the release of the Draft EA, to keep the public informed of the status of the project and the release of the Draft EA. Furthermore, NSWC takes the safety and security of the public, naval special operations personnel, and environmental resources seriously and employs all necessary safety precautions for their protection. As a reminder, Support staff would always be present during each training event and would interact with the public, if necessary. All training activities would be non-invasive. Finally, the safety of the public and military personnel is of utmost importance to NSWC. As such, NSWC employs data analysis programs, training doctrine, and standard operating procedures to ensure that training activities remain safe. The trainees receive safety briefings and have constant oversight by instructors who are maintaining a safety buffer, a general delineation (not a physical or visible barrier) where instructors would consider trainee safety to be at risk, throughout the training. These steps help ensure public safety and training success.
If you must train in civilian communities, practice in Oak Bay, Bremerton, Everett, and Silverdale - where there may be more acceptance because of the high number of jobs associated with the military.	The Proposed Action is needed to meet training deficiencies. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the EA, each individual site was specifically researched and evaluated for numerous factors, to include suitability to meet training requirements, diversity, complexity and challenge, flexibility, potential impacts to the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations) as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts to any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites. As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and

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	avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and be responsive to training needs.
In communities like Port Townsend and Coupeville, many local residents already feel abused and deafened by the Navy's aggressive misuse of the NEPA regulations.	The Navy takes environmental stewardship seriously and values public participation. As such, the Navy is fully committed to meeting and being in compliance with the requirements of NEPA. These actions are not meant to be perceived as abusive but, rather, thorough in both application and compliance.
Concerned Navy is polarizing community because neighbors may have differing opinions on Navy access.	The Proposed Action is needed to meet training deficiencies. It is not designed or in any way intended to polarize communities.
Stop military expansion.	The concern about military expansion is outside the scope of the project. However, for clarification and as discussed in the EA, Chapter 1, Section 1.2 (Background), naval special operations personnel have been training in certain areas of the Pacific Northwest for decades. The Proposed Action is needed to meet training deficiencies.
NEPA	
Supplement the EA to address inadequacies including consultations being completed.	Per Navy instructions, consultations are supposed to be completed prior to the final decision document. At the time of the Draft EA, some consultations had begun and other consultations were planned but had not yet occurred. Consultations have since occurred and are completed with the U.S. Fish and Wildlife Service, National Marine Fisheries Service, Washington State Department of Ecology for Coastal Zone Management Act compliance, and the State Historic Preservation Office. Please see Appendix B (Correspondence for Naval Special Operations Training in Western Washington State) of the Final EA.
Draft EA makes broad statements and conclusions about impacts without providing supporting citations to relevant scientific studies.	The Draft EA has over 280 references with specific citations to scientific studies that provide the basis for the statements and conclusions contained within the document.
This should be an EIS due to increase in training and size of study area.	The "increase in training" and "size of study area" are not what triggers the need to conduct an EIS. It is based upon impacts.
Lack of supporting documentation.	The Draft EA has over 280 references with specific citations to scientific studies that provide the basis for the statements and conclusions contained within the document.
EA fails to address adverse impacts.	An adverse effect can be a direct or indirect impact, and may include the following: • Physical destruction or damage • Alterations inconsistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties • Relocation of the property • Change in the character of the property's use or setting • Introduction of incompatible visual, atmospheric, or audible elements • Neglect and deterioration • Transfer, lease, or sale of a historic property out of federal control without adequate preservation restrictions

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	Based on this definition, the Proposed Action does not trigger an adverse effect. The proposed training activities are similar to leisure activities of hiking, overnight camping, swimming, and diving, just with the goal trainees are undetected and leave no trace of their presence during or after training activities.
Draft EA fails to examine impacts of the No Action Alternative, thus providing no baseline against which to measure impacts of the action alternatives.	The EA analyzed the No Action Alternative throughout the document. The No Action Alternative continues current training activities, which were evaluated and approved under existing environmental analyses, in Region 1, and includes (1) diver and swimmer, insertion and extraction, launch and recovery, unmanned underwater vehicles, over-the-beach, and special reconnaissance training; (2) up to 70 trainees and support personnel per training block; and (3) two training blocks per year as approved under the Northwest Training Range Complex EIS/OEIS, completed in 2010, the Northwest Training and Testing EIS/OEIS, completed in October 2016, and event-based Categorical Exclusions, as applicable. The Alternative includes use of sites within a subset of Region 1 for no more than 10 events per year (pending receipt of real estate agreement/right of entry permit). Region 1 training areas are within one hour from a recompression chamber at Naval Base Kitsap Keyport and a within a one-hour response time area for equipment repair and recovery. The purpose of and need for the Proposed Action would not be met under the No Action Alternative because it does not meet all the training activities needed for full mission profile training – high angle climbing, UASs, and simulated building clearance.
Draft EA does not cite or consider the Jefferson County Shoreline Development Plan; Final EA should include it.	Please note that the Proposed Action does not include development or construction activities. Subsequently, the Jefferson County Shoreline Development Plan is not applicable.
Draft EA does not address need to obtain Section 401 Water Quality Certification from Washington DOE.	A 401 permit is required when you are expected to obtain a 404 permit. Section 404 of the Clean Water Act (CWA) establishes a program to regulate the discharge of dredged or fill material into waters of the United States, including wetlands. Activities in waters of the United States regulated under this program include fill for development, water resource projects (such as dams and levees), infrastructure development (such as highways and airports), and mining projects. Section 404 requires a permit before dredged or fill material may be discharged into waters of the United States, unless the activity is exempt from Section 404 regulation (e.g., certain farming and forestry activities). With regard to a 401, according to the 401 website (https://ecology.wa.gov/Regulations-Permits/Permits-certifications/401-Water-quality-certification), the federal Clean Water Act enables the Navy to approve, condition, or deny projects proposed in waters of the United States—including wetlands—when a federal permit is needed. Proposed activities in the EA (swimming, walking, and driving boats) do not require a permit under 404; subsequently, they do not trigger the requirements for a 401.
Navy should prepare and publicly distribute a supplemental Draft EA containing point-by-point responses to comments received on the Draft EA,	The Navy is fully meeting and in compliance with the requirements of NEPA and is utilizing this table to summarize and respond to comments received on the Draft EA.

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before the Final EA is prepared.	
Pages 2-1 to 2-6: The description of resources required to conduct training at a particular site is concerning. Land vehicles, surface and submersible water vehicles, and surveillance are all required and will have impacts that are not specifically described in the Draft EA.	The analysis in the Draft EA shows that there would be no long-term environmental consequences or impacts from the Proposed Action.
Pages 5-4 and 5-5: The Draft EA states that "... most resources commitments would be neither irreversible or irretrievable..." and that "...most impacts are short term and temporary". What are the impacts, both short and long term that are not short term and temporary? The Draft EA is silent on these.	As described in the Draft EA Section 5.2 (Irreversible or Irretrievable Commitments of Resources), the amount of materials required for any training-related activities and energy used during the Proposed Action would be small. Although the proposed activities would result in some irreversible or irretrievable commitment of resources such as various metallic materials, minerals, and labor, this commitment of resources is not significantly different from that necessary for many other Navy training activities carried out over the past several years. An example of a short-term impact would be crossing the beach, but natural wave action would cover those tracks up and is creating more impact than the walking.
Among other things, there is no sunset provision for proposed actions in the Draft EA—these actions would continue in the long term—so what are the potential impacts?	There is no expiration date associated with environmental assessments. The document and analysis remain active until there is a change, which would prompt another review. If the change is substantive, then a supplement or new environmental assessment may be prepared. For example, a trigger leading to a supplement or new document could be a newly listed critical habitat or an endangered species, substantial increases in training frequency, or new training activities. The EA's Chapter 4 addresses cumulative impacts. The environmental analysis indicates there would be no significant impacts, as training activities are designed to be minimally invasive and are consistent with other uses in the area. The length of real estate agreements is typically 5 years or less. This is a Navy requirement as specified at the Region level. Real estate agreements are tied to the land owner. New information relating to cultural resources and biological resources like eagle nest sites would be reviewed at time of new or renewed real estate agreements.
The statement that the Proposed Action would not result in an impact that would significantly reduce environmental productivity or permanently narrow the range of beneficial uses of the environment is unsubstantiated and without merit.	The analysis of cumulative impacts is part of the Draft EA evaluation and Naval Special Warfare Command considered the effects of the Proposed Action in combination with other past, present, and reasonably foreseeable future actions taking place in the training locations, regardless of which agency or person undertakes these actions. Through the implementation of standard operating procedures and avoidance and minimization measures, the incremental contribution of the Proposed Action, when added to other past, present, and reasonably foreseeable future actions, would not significantly contribute to cumulative stress on marine mammals, sea turtles, or cultural, socioeconomic, or other resources.

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Draft EA language is ambiguous regarding how many sites would be used by how many people at what frequency.	The purple area is a study area. Training would only occur on lands where there is a real estate agreement with a willing property owner or property manager. Training would occur on military properties identified on the map. In addition, Naval Special Warfare Command would like to achieve agreements with willing public and private land owners for on-land training on approximately 25 percent –30 percent of the shoreline identified on the map, excluding Navy-owned lands. For the preferred alternative, which contains six training blocks per year, the total number of military personnel per year would be 504 (trainees and support staff). Of that number, 144 would be trainees. A training block would have up to 24 trainees, but a single training event typically only has up to 8. While other special operations units may train with Naval Special Warfare Command, they would replace one or two trainees and the total number would not increase. For the Preferred Alternative, no site would be used more than 36 times in a year in Region 1 and three times every other year in Regions 2 and 3. This is described in Chapter 2.
Define “foreseeable future.”	There is not an expiration date associated with environmental assessments. The document and analysis remain active until there is a change, which would prompt another review. If the change is substantive, then a supplement or new environmental assessment may be prepared. For example, a trigger leading to a supplement or new document could be a newly listed critical habitat or an endangered species, substantial increases in training frequency, or new training activities.
Public lands have been used with no chance for public to weigh in.	The Navy values public participation. As such, NSWC engaged in extensive public outreach, including conducting early outreach prior to the release of the Draft EA, which was not required by law. Additionally, the Navy held public meetings for the Draft EA, which was also not required by law. For the Draft EA, display advertisements were published in local and regional newspapers a total of three times (except for the Port Townsend and Jefferson County Leader and Tacoma Weekly, which ran twice), beginning on January 22, 2018 and running through February 7, 2018. Publication dates were dependent on the newspaper’s publication frequency (e.g., daily, semi-weekly, weekly). NSWC also mailed postcards, sent Tribal and Stakeholder Notification Letters, distributed news releases to local and regional media outlets, and posted information on the Navy’s Public Website. The 30-day public comment period on the draft EA was extended to 60 days based on requests received during the comment period. Please see Section 1.7 (Public and Agency Participation and Intergovernmental Coordination) of the Final EA for a full description of public outreach.

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Need better alternatives.	During the development of the alternatives, NSWC considered three training area screening factors (training, safety and logistics) when identifying an area that could support cold-water naval special operations training and satisfy the training requirements as described in the EA Executive Summary (Section ES.3, Alternatives Considered). As stated in Section 2.3 (Alternatives Development and Alternatives Carried Forward for Analysis), after review of the screening factors, it was determined that the training study area in western Washington State fulfills all of the intermediate and advanced-level, cold-water maritime naval special operations training requirements. In addition to meeting the training requirements, the safety and logistical training area screening factors presented in Section 2.2 (Training Area Screening Factors) are also satisfied by western Washington State. Thus, western Washington State fully satisfies all three training area screening factors and is considered the only feasible cold-water location for training naval special operations personnel.
Not enough time for public comment and notification about the project and EA draft.	Please note that the 30-day public comment period on the draft EA was extended to 60 days based on requests received during the comment period. Furthermore, as stated above, the Navy values public participation. As such, NSWC engaged in extensive public outreach, including conducting early outreach prior to the release of the Draft EA, which was not required by law. Additionally, the Navy held public meetings for the Draft EA, which was also not required by law. For the Draft EA, display advertisements were published in local and regional newspapers for a total of three times (except for the <i>Port Townsend and Jefferson County Leader</i> and <i>Tacoma Weekly</i> , which ran twice), beginning on January 22, 2018, through February 7, 2018. Publication dates were dependent on the newspaper's publication frequency (e.g., daily, semi-weekly, weekly). NSWC also mailed postcards, sent Tribal and Stakeholder Notification Letters, distributed news releases to local and regional media outlets, and posted information on the Navy's Public Website. Please see Section 1.7 (Public and Agency Participation and Intergovernmental Coordination) of the Final EA for a full description of public outreach.
Need better alternative options.	During the development of the alternatives, NSWC considered three training area-screening factors (training, safety and logistics) when identifying an area that could support cold-water naval special operations training and satisfy the training requirements as described in the EA Executive Summary (Section ES.3, Alternatives Considered). As stated in Section 2.3 (Alternatives Development and Alternatives Carried Forward for Analysis), after review of the screening factors, it was determined that the training study area in western Washington State fulfills all of the intermediate and advanced-level, cold-water maritime naval special operations training requirements. In addition to meeting the training requirements, the safety and logistical training area screening factors presented in Section 2.2 (Training Area Screening Factors) are also satisfied by western Washington State. Thus, western Washington State fully satisfies all three training area screening factors and is considered the only feasible cold-water location for training naval special operations personnel.
Drone and surveillance activities and emergency recall devices are not disclosed in EA.	Drones (UASs) are discussed in the EA, please see Chapter 2, Section 2.1.1 (Training Activities) and Section 2.1.1.3 (Unmanned Aircraft Systems Training Activities). Please note that the unmanned aircraft systems used during naval special operations training are categorized as Federal Aviation Administration Group 1 or 2 systems. These systems weigh up to 55 pounds, normally operate below 2,000 feet above ground level, would use on-the-ground observers (no

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	manned aircraft observers), and fly in accordance with Federal Aviation Administration authorizations. Unmanned aircraft systems would be used on military installations and Federal Aviation Administration approved airspace (R6701). For training outside of R6701, the unmanned aircraft systems would be flown in accordance with a valid Federal Aviation Administration Certificate of Authorization. For the proposed training in western Washington, trainees would launch and recover battery-powered systems concurrent with other water-based or land-based training activities. Additionally, please note that, per Department of Defense policy, NSWC does not collect, retain, or disseminate information associated with its domestic UAS use. With regard to recall devices, these too were discussed in the Draft EA. See Chapter 2, Table 2-1 (Current and Proposed Equipment for Naval Special Operations Training) for a description of the device.
The public does not understand public domain issues and HB 2541 so they cannot make educated comments or critiques of the Proposed Action, this concept needs to be explained at Open Houses.	HB 2541 is outside the scope of this project and was not an appropriate discussion topic at the open houses. It is a state proposal that the Navy is not/was not involved in. However, please note that State parks and other properties would continue to operate as normal (“business as usual”) during training activities.
Training	
Introducing anxiety and intimidation into ordinary civilian outdoor activities on public or private lands does not represent a healthy relationship between the Navy and surrounding communities.	There is no active on-land training operation for the public to see. The trainees learn skills needed to avoid detection and enter a site at night. Support staff would be dressed as a member of the public and the support staff would only interact with the public if there was a chance the public may unintentionally discover trainees. Support staff would also visit a training site prior to a training event commencing to ensure there is minimal public in the area.
This project would take away visible peace.	There is no active on-land training operation for the public to see. The trainees learn skills needed to avoid detection and enter a site at night. Additionally, as stated in the EA (Section 1.1, Introduction), the Proposed Action would not include the use of live-fire ammunition, explosive demolitions, off-road driving, manned air operations, digging, vegetation cutting or removal, tree climbing, or the building of campfires or infrastructure. Finally, as part of the training intent that the activities be undetected, the support personnel teach trainees that no expended equipment, human waste, or transported liquids remain on site after the training activity is completed. As such, there should be no visible disturbance to take away visible peace.
Do not close any public beaches because of training.	Please note that all training activities would be non-invasive in nature and the Navy has no intention or authority to close public beaches.
UAS training would violate the Fourth Amendment and EO 13045 and WAC 352-37-010, -095 and -230.	The unmanned aircraft systems used during naval special operations training are categorized as Federal Aviation Administration Group 1 or 2 systems. These systems weigh up to 55 pounds, normally operate below 2,000 feet above ground level, would use on-the-ground observers (no manned aircraft observers), and fly in accordance with Federal Aviation Administration authorizations.

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	Unmanned aircraft systems would be used on three military installations (Naval Base Kitsap Keyport, Toandos Buffer Zone, and Naval Magazine Indian Island, and Federal Aviation Administration approved airspace (R6701). For training outside of R6701, the unmanned aircraft systems would be flown in accordance with a valid Federal Aviation Administration Certificate of Authorization. For the proposed training in western Washington, trainees would launch and recover battery-powered systems concurrent with other water-based or land-based training activities. Please note that, per Department of Defense policy, NSWC does not collect, retain, or disseminate information associated with its domestic UAS use. Regarding EO 13045 (Protection of Children from Environmental Health Risks and Safety Risks), that executive order was taken into consideration in the development of this EA and the Proposed Action is fully consistent with that EO. Finally, a special use-permit from the State of Washington Parks and Recreation Commission is required prior to the use of specified public lands. In general, training activities are proposed for some State parks, in accordance with all rules and regulations. Training activities are coordinated with local law enforcement and park rangers and would be consistent with management objectives of individual parks, including prohibiting training in sensitive areas containing important natural and cultural resources. For example, if a site has been re-vegetated with native plants and the public is prohibited from entering that area, NSWC would also observe this restriction and not enter the area. Please note that proposed training would not close State parks and other properties. They would continue to operate as normal (“business as usual”) during naval special operations training. Additional questions about the State of Washington Parks and Recreation Commission process for granting a right-of-entry should be referred to that agency.
Make high-angle climbing not a part of the training. Training is unnecessary.	High-Angle climbing is a very necessary training activity for trainees and would only occur on rock faces at Deception Pass State Park. There would be no activities on bluffs to cause erosion and no new placements of drilled anchoring systems.
Limit the training to the State’s historic forts and only during the week.	Please note that NSWC has done an extensive search for sites that meet its training requirements and do not impact the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the EA, the study area was specifically researched and evaluated for numerous factors, to include suitability to meet training requirements, diversity, complexity and challenge, flexibility, potential impacts to the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts to any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites. As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and be responsive to training needs. Finally, a wide array of training sites more readily

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	allows NSWC to select sites with the goal of reducing impacts to the public, while still meeting its training objectives.
Port Townsend is too busy of a city to conduct military training in.	Please note that there is no active on-land training operation for the public to see. Additionally, the essence of the proposed training is similar to hiking, overnight camping, swimming, and diving, just with the goal of not being seen. During training, the trainees learn skills needed to avoid detection and enter a site at night. Subsequently, all training activities would be non-invasive in nature and not conducted “within” the city.
The number of training troops is too many and unsustainable.	The number of proposed trainees is a maximum based upon current requirements for NSWC to meet its title 10 U.S.C. Section 167 mandate. With regard to the number being “unsustainable,” the number of proposed trainees is very much sustainable by NSWC.
Use technology for training not use of civilians, muscle memory is more important.	The proposed training activities are meant to test trainee’s decision-making skills while exposing them to real-world situations. Civilians are not being “used.” On the contrary, the objective is to avoid civilians and remain undetected. Muscle memory is to some of the training as the objective is to remain hidden, silent, and not detected.
The number of personnel to be involved is too uncertain (84–2000) the number must be clearer in EA.	The number of proposed trainees in the EA represent the current level and the maximum proposed level (see Chapter 2, Description of Proposed Action and Alternatives, of the EA). The maximum level is based on potential future requirements needed to meet NSWC’s title 10 U.S.C. Section 167 mandate.
Against training in Miller Bay in Indianola, WA.	The opposition to training in Miller Bay is duly noted.
Conduct training on Coast Guard Base Kodiak Island, AK instead.	As stated earlier, Kodiak, Alaska was an Alternative considered, but not carried forward for detailed analysis (see Section 2.4.1 [United States Coast Guard Base Kodiak, Alaska] of the Draft EA) because, although it can offer a similar complexity in a few training areas, as well as a diverse environment similar to western Washington, with the requisite complex hydrography and high-volume commercial and personal shipping traffic, the lack of logistics support for the proposed type of training, along with safety compromises, it is an unacceptable location to conduct the advanced level of training intended to be accomplished in western Washington State.
Constrain training in Puget Sound during April-September, the peak beach season, to avoid beach season.	The proposed training activities are similar to leisure activities of hiking, overnight camping, swimming, and diving, just with the goal trainees are undetected and leave no trace of their presence during or after training activities. There should be no impact on the beach season, as there is no active on-land training operation for the public to see. The trainees learn skills needed to avoid detection and enter a site at night.
Against building clearances in state parks and the filming and photography using unmanned aircraft.	Simulated building clearance training activities would not be conducted in State parks. With regard to unmanned aircraft training, UASs would be used in FAA designated restricted airspace (R6701) (Figure 1-2 of the Draft EA) and at Navy properties (Naval Base Kitsap Keyport, Toandos Buffer Zone, and Naval Magazine Indian Island). For training outside of R6701, the UAS would be flown at military installations in accordance with a valid FAA Certificate of Authorization and a Notice to Airmen would be issued. In general, for the proposed training in western Washington, trainees would launch and recover battery-powered systems concurrent with other water-based or land-based training activities. Please note that, per Department of Defense policy, NSWC does not collect, retain, or disseminate information associated with its domestic UAS use.

COMMENTS BY RESOURCE SECTION	
Request by City of Port Townsend that all incorporated Port Townsend, including Fort Worden State Park be left out of the training area.	The request is duly noted. Please note that proposed training would occur on sites with the permission of land owners or managers (e.g., State of Washington Parks and Recreation Commission, private property owners, etc.) and that each individual site was specifically researched and evaluated for numerous factors, to include suitability to meet training requirements, diversity, complexity and challenge, flexibility, potential impacts to the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur.
Hazmat	
Page 3-1: Surface water vessels such as boats and jet skis would emit gas, oil, and hydraulic fuel into pristine Puget waters. The Draft EA fails to consider this and/or provide any mitigation for these impacts.	As stated in the Draft EA Section 3.4 (Public Health and Safety), during training events, NSWC dedicates a vehicle for emergency response. Navy Region Northwest would be contacted if there is a spill of any hazardous substance or oil into state waters, ground, or air in accordance with the Navy's Oil and Hazardous Substance Integrated Contingency Plan (U.S. Department of the Navy, 2016). Navy Region Northwest would also be contacted if there is a spill of oil that would violate water quality standards, cause a film or sheen or discoloration on the water surface or shoreline, or cause sludge or emulsion to be deposited beneath the surface of the water. Should any spill pose a threat to human health, 911 would be called first. Any petroleum-contaminated soil from an accidental spill would be treated, stored, transported, handled, labeled, and disposed of in accordance with federal, state, and local regulations. This ensures safety for the trainees and the training vessels as well as for any commercial and civilian craft that may transit adjacent to the event location.
The Navy needs to provide evidence of consultation and procurement of a Section 401 Water Quality Certificate from the Washington Department of Ecology.	A 401 permit is required when you are expected to obtain a 404 permit. Section 404 of the Clean Water Act (CWA) establishes a program to regulate the discharge of dredged or fill material into waters of the United States, including wetlands. Activities in waters of the United States regulated under this program include fill for development, water resource projects (such as dams and levees), infrastructure development (such as highways and airports), and mining projects. Section 404 requires a permit before dredged or fill material may be discharged into waters of the United States, unless the activity is exempt from Section 404 regulation (e.g., certain farming and forestry activities). With regard to a 401, according to the 401 website (https://ecology.wa.gov/Regulations-Permits/Permits-certifications/401-Water-quality-certification), the federal Clean Water Act enables the Navy to approve, condition, or deny projects proposed in waters of the United States—including wetlands—when a federal permit is needed. The proposed activities in the EA (swimming, walking, and driving boats) do not require a permit under 404; subsequently, they do not trigger the requirements for a 401.

COMMENTS BY RESOURCE SECTION	
Also worried about spills from training accidents.	As stated in the Draft EA Section 3.4 (Public Health and Safety), during training events, NSWC dedicates a vehicle for emergency response. Navy Region Northwest would be contacted if there is a spill of any hazardous substance or oil into state waters, ground, or air in accordance with the Navy's Oil and Hazardous Substance Integrated Contingency Plan (U.S. Department of the Navy, 2016). Navy Region Northwest would also be contacted if there is a spill of oil that would violate water quality standards, cause a film or sheen or discoloration on the water surface or shoreline, or cause sludge or emulsion to be deposited beneath the surface of the water. Should any spill pose a threat to human health, 911 would be called first. Any petroleum-contaminated soil from an accidental spill would be treated, stored, transported, handled, labeled, and disposed of in accordance with federal, state, and local regulations. This ensures safety for the trainees and the training vessels as well as for any commercial and civilian craft that may transit adjacent to the event location.
Consultations	
Has the Navy performed formal consultations with agencies and tribes?	At the time of the Draft EA, some consultations had begun and other consultations were planned but had not yet occurred. Consultations have since occurred with U.S. Fish and Wildlife Service, National Marine Fisheries Service, Washington State Department of Ecology for Coastal Zone Management Act compliance, Advisory Council on Historic Preservation, and Washington State Historic Preservation Office. Please see Appendix B (Correspondence for Naval Special Operations Training in Western Washington State) of the Final EA. Tribal letters were sent in 2017 and then again to tribes in January of 2018. Hard copy letters, which included a copy of the Draft EA on CD-ROM, were mailed on January 24, 2018 to 16 tribal chairpersons of federally recognized tribes who have usual and accustomed hunting and fishing grounds in the Study Area. Three tribes requested additional information, which was provided. Formal government-to-government consultation occurred with one tribe. All consultations concluded by September 2019.
Prevent corrupt contractors from being a part of this project.	This concern is outside the scope of this project. However, Navy contractual actions are controlled by applicable law, rule and regulation, many of which address avoidance of fraud, waste and abuse in the issuance and administration of contractual action.
Navy must consult with Jefferson County about shorelines and sheer cliffs for permitting to be in these areas.	Please note that the Proposed Action does not include development or construction activities nor would it affect bluffs or the shoreline. Subsequently, the Jefferson County Shoreline Development Plan is not applicable.
In the future, Jefferson County would prefer a direct invitation to Open House events especially for ones that impact shorelines and bluffs.	As stated above, the Proposed Action does not include development or construction activities nor would it affect bluffs or the shoreline. Subsequently, the Jefferson County Shoreline Development Plan is not applicable. The open house event was open to all and was well advertised.
Consult local governments that know the local biological environment better than most.	Please note that local governments, Navy and civilian biologists, tribes, and property managers/owners were and would continue to be contacted and consulted to further the Navy's knowledge about the local environments.
Treaty Rights	
Concern about violation of tribal treaty rights.	As stated above, tribal letters were sent in 2017 and then again to tribes in January of 2018. Hard copy letters, which included a copy of the Draft EA on

COMMENTS BY RESOURCE SECTION	
	CD-ROM, were mailed on January 24, 2018 to 16 tribal chairpersons of federally recognized tribes who have usual and accustomed hunting and fishing grounds in the Study Area. Two tribes requested additional information, which was provided. Currently, consultations are concluded. Please Appendix B (Correspondence for Naval Special Operations Training in Western Washington State) of the Final EA for tribal correspondence.
Public Involvement	
Hold additional open house meetings in more accessible locations like Seattle, Tacoma, or Olympia.	Training is not proposed to occur in Seattle or Olympia; as such, it would not be appropriate for the Navy to utilize limited resources conducting open houses in those areas. The Poulsbo meeting was recognized as a good intermediary location for Tacoma stakeholders.
Meetings were not well publicized.	For the Draft EA, display advertisements were published in local and regional newspapers for a total of three times (except for the Port Townsend and Jefferson County Leader and Tacoma Weekly, which ran twice), beginning on January 22, 2018, through February 7, 2018. Publication dates were dependent on the newspaper's publication frequency (e.g., daily, semi-weekly, weekly). NSWC also mailed postcards, sent Tribal and Stakeholder Notification Letters, distributed news releases to local and regional media outlets, and posted information on the Navy's Public Website. In all, over 185 people attended the public meetings and, as mentioned in the opening paragraph of this Appendix, 686 pieces of correspondence were received. Please see Section 1.7 (Public and Agency Participation and Intergovernmental Coordination) of the Final EA for a full description of public outreach.
Navy personnel were not sincere at February 7, 2018 meeting.	NSWC is very interested in the public's input as evidenced by the extensive outreach prior to the development and subsequent release of the Draft EA as well as notifications of the Draft EA and the extension of the comment period. The entirety of the EA is evidence of the Navy's sincere interest in complying with NEPA and its public process.
Some believe that the public comments will not be looked at and discarded.	All public comments are reviewed and taken into consideration. This appendix represents a summary of the public's comments and NSWC's response to those summaries.
Disagree with the format of public meetings. Some citizens would like a more Town Hall format meeting with a Q and A session.	The Navy has in the past conducted meetings in more of a town hall format. However, individuals provided comments that those meetings were not very productive because a few individuals monopolized the meetings and created a disruptive environment, thus not enabling other individuals to voice their concerns or get their questions answered. As a result, the Navy, in response to those comments, changed its meeting format. In this format, everyone gets a chance to voice their concerns, ask questions, and receive feedback.
Toxic relationship with NASWI effects communication.	The Navy agrees that communication is imperative for good relationships and the Navy very much values the public's opinion. Thus, the Navy conducted extensive outreach prior to the development and subsequent release of the EA as well as notifications of the EA and the extension of the comment period.
Location of meetings were bad and crowded.	Meeting locations were based upon numerous factors to include proximity to training activities, perceived local interest, venue availability, and legal timing requirements. Unfortunately, it can be difficult to predict local interest and find appropriate locations and sized venues.
Perceived lack of accountability.	The Navy takes environmental stewardship seriously and values public participation. As such, the Navy is fully committed to meeting and being in compliance with the requirements of NEPA. This EA is an example of the Navy's accountability to the public and the environment.

COMMENTS BY RESOURCE SECTION	
Release the dates of all planned and unplanned exercises.	The proposed training is very fluid and based upon the progression of individual trainees. Releasing dates would not prove beneficial, as schedules can change based upon those needs nor would it provide the security or realism that is required for beneficial training.
FAA	
Concerned with UAS operations at Toandos and about "pop-up" TFR notification from FAA. Small civilian aircraft may not be equipped to receive notifications.	UASs would be used in FAA designated restricted airspace (R6701) (Figure 1-2 of the Draft EA) and at Navy properties (Naval Base Kitsap Keyport, Toandos Buffer Zone, and Naval Magazine Indian Island). For training outside of R6701, the UAS would be flown at military installations in accordance with a valid FAA Certificate of Authorization and a Notice to Airmen would be issued. These events are planned out in advance; as such, a "pop-up" TFR should not occur. Proper airmanship and preflight should alleviate this concern.
Politics	
Urging elected officials to reign in military.	As stated in the EA, Chapter 1, Section 1.4 (Purpose of and Need for the Proposed Action), the Proposed Action is needed to support meeting the requirements of 10 United States Code (U.S.C.) Section 167 for the Commander, U.S. Special Operations Command to provide combat-ready, forward deployed forces. This requirement is mandated by elected officials.
The public has not been able to vote on the issue.	The public's feedback and insight into the NEPA process is extremely valuable, however, this is not a voting issue. The NEPA process is designed to inform the decision maker based upon the analysis as to which alternative they would select. Please reference the "Citizen's Guide to NEPA" for more information.
The country is being controlled by the top 5%.	This concern is outside the scope of this project.
Disturbing international events make training not acceptable at this time.	Disturbing international events make training all the more imperative at this time.
Navy is listening to lobbyists and not citizens.	As stated above, the Navy is meeting its title 10 U.S.C. Section 167 mandate.

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Appendix D: Tables for NRHP Listed/Eligible Archaeological Sites/Shipwrecks and NRHP Listed/Eligible Buildings and Structures in Region 1 Training Area

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Final Environmental Assessment

Naval Special Operations Training in Western Washington State

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Table 1: NRHP Listed/Eligible Archaeological Sites/Shipwrecks in the Region 1 Training Area

#	PROPERTY NAME	LOCATION	DATE LISTED NRHP/ DETERMINED ELIGIBLE	DAHP RESOURCE ID
1	JE00006: Bugge Spit Site	Indian Island	Determined Eligible	639580
2	JE00080: Port Ludlow Sawmill and Towns	Port Ludlow	Potentially Eligible	639616
3	JE00202: Burials	South of Port Ludlow	Potentially Eligible	639646
4	JE00302: Historic Railroad	Dosewalips State Park	Potentially Eligible	639717
5	KP00146-Historic Bridge/Debris	West of Kingston	Potentially Eligible	641463
6	KP00049: Historic Debris	Blake Island	Potentially Eligible	641429
7	JE00276: Shell Midden	Indian Island	Potentially Eligible	639698
8	JE00376: Sheridan Site	Indian Island	Potentially Eligible	659443
9	JE00023: Pond-Farm Site	Indian Island	Potentially Eligible	639597
10	JE00020: Bishop Point Site	Indian Island	Potentially Eligible	639594
11	JE00028: Jorgen Hill	Indian Island	Potentially Eligible	639601
12	JE00397: Crescent Bay Site	Indian Island	Potentially Eligible	661529
13	JE00018: Dynamite Point	Indian Island	Potentially Eligible	639592
14	JE00016: Walan Point Site	Indian Island	Potentially Eligible	639590
15	JE00377: Ferry Master's Site	Indian Island	Potentially Eligible	659444
16	Alaska Reefer (Shipwreck)	Indian Island	Unevaluated	No Number
17	Unknown Wreck	Indian Island	Unevaluated	No Number
18	Unknown (Shipwreck)	Off Old Fort Townsed	Unevaluated	No Number
19	Unknown (Shipwreck)	East of Mats Mats Bay	Unevaluated	No Number
20	Unknown (Shipwreck)	East of Mats Mats Bay	Unevaluated	No Number
21	JE000368: Port Ludlow Log Booming	Port Ludlow	Potentially Eligible	659085
22	Unknown Wreck	Port Ludlow	Unevaluated	No Number
23	Unknown Wreck	Port Ludlow	Unevaluated	No Number
24	Unknown Wreck	Port Ludlow	Unevaluated	No Number
25	JE00203: Burials	South shore Port Ludlow	Unevaluated	639646
26	JE00206: Shell Midden/Burials	South shore Port Ludlow	Unevaluated	639649
27	JE00333: Historic Debris	Point Hannon State Park	Potentially Eligible	639725
28	JE00365: Shell Midden	Shine Tidelands State Park	Potentially Eligible	658433
29	JE00364: Shell Midden	Shine Tidelands State Park	Potentially Eligible	658432
30	JE00357: Brinnon Hotel/Road Grade	Dosewalips State Park	Potentially Eligible	656455
31	JE00356: Historic Bridge	Dosewalips State Park	Potentially Eligible	656454
32	KP00227-Shell Midden	NBK Bangor	Determined Eligible	657676

**Table 1: NRHP Listed/Eligible Archaeological Sites/Shipwrecks in the Region 1 Training Area
Continued**

33	KP00151: Port Madison Mill	East shore Bainbridge Island	Potentially Eligible	641468
34	Unknown Wreck	East of Fay Bainbridge Park	Unevaluated	No Number
35	Unknown Wreck	Liberty Bay	Unevaluated	No Number
36	KP00236: Pig Bone Site	NBK Keyport	Potentially Eligible	659473
37	Unknown Wreck	SE of Gilberton	Unevaluated	None
38	Unknown Wreck	SE of Gilberton	Unevaluated	None
39	KP00009: Burial	East side Manette Bridge, Bremerton	Determined Eligible	641395
40	KP00116: Shell Midden	Elwood Point	Determined Eligible	641448
41	KP00120: Shell Midden	Southwest shore Ostrich Bay	Listed in NRHP	641452
42	KP00123: Shell Midden	Central Rocky Point Peninsula, Dyes Inlet	Determined Eligible	641455
43	KP00121: Shell Midden	Evergreen Park	Determined Eligible	641453
44	KP00117: Midden	NBK Manchester	Potentially Eligible	641449
45	KP00119: Midden	NBK Manchester	Potentially Eligible	641451
46	KP00118: Midden	NBK Manchester	Potentially Eligible	641450
47	KP00014: Midden	Blake Island	Potentially Eligible	641400
48	KP00013: Midden	Blake Island	Potentially Eligible	641399
49	PI00102: Midden	Gig Harbor	Potentially Eligible	646873
50	PI01335: Dickman Mill Headsaw	Point Defiance	Potentially Eligible	660702
51	JE00012	Kunn Spit	Listed in NRHP	639586
52	JE00027	Port Hadlock	WA State Register	639600
53	JE00085	Near Quilcene Boat Haven	Listed in NRHP	639620
54	JE00289	North of Port Hadlock	Potentially Eligible	639704
55	JE00290	Head of Quilcene Bay	Potentially Eligible	639705
56	JE00300	Head of Pleasant Harbor	Potentially Eligible	639715
57	JE00358	Irondale	Potentially Eligible	656619
58	JE00026	Old Fort Townsend	Potentially Eligible	657015
59	JE00368	Port Ludlow	Potentially Eligible	659085
60	KP00110	Port Blakely	Potentially Eligible	641442
61	KP00146	West of Kingston	Potentially Eligible	641463
62	PI00447	Near Chambers	Potentially Eligible	647050
63	PI00706	Port of Tacoma	Potentially Eligible	647173
64	PI00975	Port of Tacoma	Potentially Eligible	653467
65	JE00344	NW of Bywater Bay	Potentially Eligible	653977
66	JE00371	Westside Quilcene Bay	Potentially Eligible	659288
67	JE00372	Port Hadlock	Potentially Eligible	659289

**Table 1: NRHP Listed/Eligible Archaeological Sites/Shipwrecks in the Region 1 Training Area
Continued**

68	JE00373	Indian Island	Potentially Eligible	659290
69	JE00374	Indian Island	Potentially Eligible	659441
70	JE00375	Indian Island	Potentially Eligible	659442
71	KP00237	Keyport	Potentially Eligible	659474
72	KP00240	Bangor	Potentially Eligible	659898
73	KP00284	Near Harper Park	Potentially Eligible	661497
74	KP00287	North of Poulsbo	Potentially Eligible	670027
75	PI01331	Chambers	Potentially Eligible	660565
76	PI00159	Point Defiance Park	Potentially Eligible	661596
77	PI01350	Point Defiance Park	Potentially Eligible	661997

Table 2: NRHP Listed/Eligible Building and Structures in the Region 1 Training Area

#	PROPERTY NAME	LOCATION	DATE LISTED NRHP/ DETERMINED ELIGIBLE	DAHP RESOURCE ID
78	Fort Warden Historic District (FWHD)	Fort Worden State Park (FWSP)	National Historic Landmark	674629
78a	Building 1: Commanding Officer's Quarters	FWSP	Contributes to FWHD	58723
78b	Bldg 4: Officers' Duplex	FWSP	Contributes to FWHD	58266
78c	Bldg 5: Officers' Duplex	FWSP	Contributes to FWHD	58270
78d	Bldg 6: Officers' Duplex	FWSP	Contributes to FWHD	58267
78e	Bldg 7: Officers' Duplex	FWSP	Contributes to FWHD	58271
78f	Bldg 9: Officers' Duplex	FWSP	Contributes to FWHD	58272
78g	Bldg 10: Officers' Duplex	FWSP	Contributes to FWHD	58268
78h	Bldg 11: Officers' Duplex	FWSP	Contributes to FWHD	58269
78i	Bldg 15: Field Officers' Quarters	FWSP	Contributes to FWHD	58274
78j	Bldg 16: Officers' Quadruplex	FWSP	Contributes to FWHD	58275
78k	Bldg 25: War Department Theatre	FWSP	Contributes to FWHD	62979
78l	Bldg 26: Balloon Hangar	FWSP	Contributes to FWHD	
78m	Bldg 200: Administration Building	FWSP	Contributes to FWHD	58459
78n	Bldg 201: Enlisted Men's Barracks	FWSP	Contributes to FWHD	
78o	Bldg 202: Enlisted Men's Barracks	FWSP	Contributes to FWHD	58463
78p	Bldg 203: Enlisted Men's Barracks	FWSP	Contributes to FWHD	
78q	Bldg 204: Enlisted Men's Barracks	FWSP	Contributes to FWHD	
78r	Bldg 205: Band Barracks	FWSP	Contributes to FWHD	
78s	Bldg 223: Administration Building	FWSP	Contributes to FWHD	58462
78t	Bldg 224A, B, C, & D: Battery Stoddard	FWSP	Contributes to FWHD	
78u	Bldg 225: Enlisted Men's Barracks	FWSP	Contributes to FWHD	
78v	Bldg 229: Alexander's Castel	FWSP	Contributes to FWHD	65199
78w	Bldg 234 A & B: Battery Putnam	FWSP	Contributes to FWHD	
78x	Bldg 270: NCO Hospital Steward Quarters	FWSP	Contributes to FWHD	
78y	Bldg 298: Hospital	FWSP	Contributes to FWHD	58460

Table 2: NRHP Listed/Eligible Building and Structures in the Region 1 Training Area Continued

78z	Bldg 300: Guard House	FWSP	Contributes to FWHD	
78aa	Bldg 305: Quartermaster Office and Warehouse	FWSP	Contributes to FWHD	
78ab	Bldg 306: Commissary and Office	FWSP	Contributes to FWHD	
78ac	Bldg 308: Storehouse	FWSP	Contributes to FWHD	
78ad	Bldg 310: PX and Gymnasium	FWSP	Contributes to FWHD	58461
78ae	Bldg 313: Corps of Engineers Workshop	FWSP	Contributes to FWHD	
78af	Bldg 315: Power House	FWSP	Contributes to FWHD	
78ag	Bldg 324: Quartermaster Storehouse	FWSP	Contributes to FWHD	
78ah	Bldg 325: NCO Duplex	FWSP	Contributes to FWHD	
78ai	Bldg 331: NCO Duplex	FWSP	Contributes to FWHD	58276
78aj	Bldg 332: NCO Duplex	FWSP	Contributes to FWHD	58278
78ak	Bldg 333: NCO Duplex	FWSP	Contributes to FWHD	
78al	Bldg 334: NCO Duplex	FWSP	Contributes to FWHD	
78am	Bldg 335: NCO Duplex	FWSP	Contributes to FWHD	
78an	Bldg 336: NCO Duplex	FWSP	Contributes to FWHD	
78ao	Bldg 352: NCO Duplex	FWSP	Contributes to FWHD	58277
78ap	Bldg 353: NCO Duplex	FWSP	Contributes to FWHD	
78aq	Bldg 372: Wagon Shed and Teamsters Quarters	FWSP	Contributes to FWHD	
78ar	Bldg 409: Ordnance Storehouse	FWSP	Contributes to FWHD	
78as	Bldg 413: Militia Storehouse	FWSP	Contributes to FWHD	
78at	Bldg 414: District Signal Station	FWSP	Contributes to FWHD	62980
78au	Bldg 426: Primary Dorm, Gun & Observ. Crew	FWSP	Contributes to FWHD	
78av	Bldg 427: Combined Prim Fire Control Station	FWSP	Contributes to FWHD	
78aw	Bldg 433: Switchboard	FWSP	Contributes to FWHD	
78ax	Bldg 484-487: Concrete Storehouses	FWSP	Contributes to FWHD	
78ay	Bldg 490: Battery Commander's Station	FWSP	Contributes to FWHD	
78az	Bldg 492: Searchlight Shelter	FWSP	Contributes to FWHD	
78ba	Bldg 493 A & B: Battery Powell	FWSP	Contributes to FWHD	

Table 2: NRHP Listed/Eligible Building and Structures in the Region 1 Training Area Continued

78bb	Bldg 493 C & D: Battery Brannan	FWSP	Contributes to FWHD	
78bc	Bldg 493E: Plotting Room	FWSP	Contributes to FWHD	
78bd	Bldg 494A & B: Battery Randol	FWSP	Contributes to FWHD	
78be	Bldg 495A & B and 496C: Battery Quarles	FWSP	Contributes to FWHD	
78bf	Bldg 496A & B: Battery Ash	FWSP	Contributes to FWHD	
78bg	Bldg 497A & B: Battery Benson	FWSP	Contributes to FWHD	
78bh	Bldg 498A, B, C, & D: Battery Tolles	FWSP	Contributes to FWHD	
78bi	Bldg 498E: Searchlight Powerplant	FWSP	Contributes to FWHD	
78bj	Bldg 499: Battery Walker	FWSP	Contributes to FWHD	
78bk	Bldg 501: Artillery Engineer Cable House	FWSP	Contributes to FWHD	
78bl	Bldg 502: Ordnance Machine Shop	FWSP	Contributes to FWHD	
78bm	Bldg 594: Searchlight Powerplant	FWSP	Contributes to FWHD	
78bn	Bldg 596: Searchlight Shelter	FWSP	Contributes to FWHD	
78bo	Bldg 598A & B: Battery Kinzie	FWSP	Contributes to FWHD	132403
78bp	Bldg 599A & B: Battery Vicars	FWSP	Contributes to FWHD	
79	Point Wilson Lighthouse	FWSP	Listed in NRHP	65145
80	Port Townsend Historic District (PTHD)	Port Townsend	National Hist Landmark	674589
80a	Fowler House	Port Townsend	Contributes to PTHD	66631
80b	Rothschild House	Port Townsend	Contributes to PTHD	63226
80c	St. Paul's Episcopal Church	Port Townsend	Contributes to PTHD	66629
80d	Diamond Point Quarantine Station Building	Port Townsend	Contributes to PTHD	66128
80e	Downs House	Port Townsend	Contributes to PTHD	674939
80f	DeLeo House	Port Townsend	Contributes to PTHD	66430
80g	Joh Fuge Houses	Port Townsend	Contributes to PTHD	66604
80h	Starrett House	Port Townsend	Contributes to PTHD	66367
80i	James House	Port Townsend	Contributes to PTHD	66506
80j	C.C. Bartlett Building	Port Townsend	Contributes to PTHD	66125

Table 2: NRHP Listed/Eligible Building and Structures in the Region 1 Training Area Continued

80k	Terry Building	Port Townsend	Contributes to PTHD	66675
80l	Waterman and Katz Department Store	Port Townsend	Contributes to PTHD	66364
80m	Franklin House	Port Townsend	Contributes to PTHD	66248
80n	City Hall	Port Townsend	Contributes to PTHD	66126
80o	F.W. Pettygrove Building	Port Townsend	Contributes to PTHD	2839
80p	Miller and Burkett	Port Townsend	Contributes to PTHD	66210
80q	First United Presbyterian Church	Port Townsend	Contributes to PTHD	64282
80r	Port Townsend Post Office and Customs House	Port Townsend	Contributes to PTHD	66523
80s	Manresa Hall	Port Townsend	Contributes to PTHD	65142
80t	Charles DeVoe House	Port Townsend	Contributes to PTHD	66414
80u	F.W. Hastings Residence	Port Townsend	Contributes to PTHD	66232
80v	First Bell Tower	Port Townsend	Contributes to PTHD	66737
80w	N.D. Hill Building	Port Townsend	Contributes to PTHD	66251
81	Herbert Beecher Foote Home	Port Townsend	WA Heritage Register	66146
82	Old German Consulate	Port Townsend	Listed in NRHP	66138
83	Parrish House	Port Townsend	WA Heritage Register	66200
84	Captain James McIntyre House	Port Townsend	WA Heritage Register	66506
85	Francis Wilcox James House	Port Townsend	Listed in NRHP	66544
86	Tree of Heaven	Port Townsend	WA Heritage Register	66738
87	Old Fort Townsend State Park	Old Fort Townsend State Park	WA Heritage Register	65067
88	Irondale Historic District	Irondale	Listed in NRHP	65047
89	Port Hadlock/Hadlock Bay Culture Resources	Port Hadlock	WA State Register	65060
90	Washington Co-Op	Port Hadlock	Determined Eligible	377535
91	Portage Canal Bridge	Port Hadlock	WA Heritage Register	662747
92	Grange Store	Port Hadlock	Determined Eligible	106955
93	Bldg 69	Indian Island	Determined Eligible	622437
94	Bldg 70	Indian Island	Determined Eligible	622438
95	Fort Flagler Historic District (FFHD)	Fort Flagler State Park	Listed in NRHP	674955
95a	Bldg 7: NCO Quarters	Fort Flagler State Park	Contributes to FFHD	106568
95b	Battery Grattan	Fort Flagler State Park	Contributes to FFHD	107073

Table 2: NRHP Listed/Eligible Building and Structures in the Region 1 Training Area Continued

95c	Bldg 111	Fort Flagler State Park	Contributes to FFHD	74728
95d	Bldg 110: Officers' Quarters	Fort Flagler State Park	Contributes to FFHD	74733
95e	Barracks	Fort Flagler State Park	Contributes to FFHD	74735
95f	Bldg 104: Theater	Fort Flagler State Park	Contributes to FFHD	107072
95g	Bldg 8: Warehouse	Fort Flagler State Park	Contributes to FFHD	157039
95h	Bldg 39: Hospital	Fort Flagler State Park	Contributes to FFHD	74738
95i	Battery Bankhead	Fort Flagler State Park	Contributes to FFHD	74721
95j	Bldg 16	Fort Flagler State Park	Contributes to FFHD	74719
95k	Quartermaster's Warehouse	Fort Flagler State Park	Contributes to FFHD	74727
95l	Bldg 5: Hospital Steward's Quarters	Fort Flagler State Park	Contributes to FFHD	74729
95m	Bldg 29: Stables	Fort Flagler State Park	Contributes to FFHD	157048
95n	Bldg 10: Stables	Fort Flagler State Park	Contributes to FFHD	74731
95o	Hospital Admin Building	Fort Flagler State Park	Contributes to FFHD	157051
95p	Battery Wansboro	Fort Flagler State Park	Contributes to FFHD	132620
95q	Bldg 106	Fort Flagler State Park	Contributes to FFHD	671294
95r	Park Office	Fort Flagler State Park	Contributes to FFHD	107086
96	Tollef Sole House	Mystery Bay	Listed in NRHP	674970
97	Johnson House	Mystery Bay	Listed in NRHP	674972
98	624 Olympus Blvd	Southeast Mats Mats Bay	Potentially Eligible	74489
99	Zelatched Point Historic District (ZPHD)	Zelatched Point	Determined Eligible	
99a	Facility 453	Zelatched Point	Contributes to ZPHD	613138
99b	Facility 461	Zelatched Point	Contributes to ZPHD	613139
99c	Facility 469	Zelatched Point	Contributes to ZPHD	613146
99d	Facility 470	Zelatched Point	Contributes to ZPHD	613143
99e	Facility 471	Zelatched Point	Contributes to ZPHD	613141
99f	Facility 472	Zelatched Point	Contributes to ZPHD	613144
99g	Facility 475	Zelatched Point	Contributes to ZPHD	613147

Table 2: NRHP Listed/Eligible Building and Structures in the Region 1 Training Area Continued

99h	Facility 476	Zelatched Point	Contributes to ZPHD	613148
99i	Facility 477	Zelatched Point	Contributes to ZPHD	613137
99j	Facility 486	Zelatched Point	Contributes to ZPHD	613149
99k	Facility 805	Zelatched Point	Contributes to ZPHD	613140
100	Emel House	Scenic Beach State Park	Potentially Eligible	63229
101	Building 7400	NBK Bangor	Determined Eligible	68179
102	Building 7501	NBK Bangor	Determined Eligible	68183
103	Building 7800	NBK Bangor	Determined Eligible	613827
104	Building 7801	NBK Bangor	Determined Eligible	613828
105	Building 7044	NBK Bangor	Determined Eligible	613824
106	Kitsap Memorial Community Hall	Kitsap Memorial State Park	Potentially Eligible	63224
107	Kitsap Memorial Kitchen Shelter	Kitsap Memorial State Park	Potentially Eligible	63225
108	Agate Pass Bridge	Agate Pass	Listed in NRHP	662562
109	Moran School	East shore Bainbridge Island	Determined Eligible	5993
110	Keyport Industrial Historic District (KIHD)	NBK Keyport	Determined Eligible	No Number
110a	Facility 1	NBK Keyport	Contributes to KIHD	6187
110b	Facility 12	NBK Keyport	Contributes to KIHD	679794
110c	Facility 38	NBK Keyport	Contributes to KIHD	6116
110d	Facility 40	NBK Keyport	Contributes to KIHD	67891
110e	Facility 73	NBK Keyport	Contributes to KIHD	67907
110f	Facility 74	NBK Keyport	Contributes to KIHD	67908
110g	Facility 81	NBK Keyport	Contributes to KIHD	67909
110h	Facility 84	NBK Keyport	Contributes to KIHD	6136
110i	Facility 85	NBK Keyport	Contributes to KIHD	
110j	Facility 97	NBK Keyport	Contributes to KIHD	67929
110k	Facility 98	NBK Keyport	Contributes to KIHD	67910
110l	Facility 101	NBK Keyport	Contributes to KIHD	67930
110m	Facility 105	NBK Keyport	Contributes to KIHD	67933
110n	Facility 186	NBK Keyport	Contributes to KIHD	6180
110o	Facility 233	NBK Keyport	Contributes to KIHD	6194
110p	Facility 234	NBK Keyport	Contributes to KIHD	67946
110q	Facility 440	NBK Keyport	Contributes to KIHD	
110r	Facility 825	NBK Keyport	Contributes to KIHD	67904
110s	Facility 1055	NBK Keyport	Contributes to KIHD	

Table 2: NRHP Listed/Eligible Building and Structures in the Region 1 Training Area Continued

110t	Facility 1074	NBK Keyport	Contributes to KIHD	
111	Keyport Residential Historic District (KRHD)	NBK Keyport	Determined Eligible	
111a	Facility 16	NBK Keyport	Contributes to KRHD	
111b	Facility 35	NBK Keyport	Contributes to KRHD	6113
111c	Facility 149	NBK Keyport	Contributes to KRHD	6169
111d	Facility 150	NBK Keyport	Contributes to KRHD	6170
111e	Facility 159	NBK Keyport	Contributes to KRHD	6172
111f	Facility 160	NBK Keyport	Contributes to KRHD	
111k	Quarters A	NBK Keyport	Contributes to KRHD	6084
111l	Quarters E	NBK Keyport	Contributes to KRHD	6085
111m	Quarters F	NBK Keyport	Contributes to KRHD	6086
111n	Quarters G	NBK Keyport	Contributes to KRHD	6087
111o	Quarters H & I	NBK Keyport	Contributes to KRHD	6088
111p		NBK Keyport	Contributes to KRHD	6089
111q	Quarters K	NBK Keyport	Contributes to KRHD	6090
111r	Quarters L	NBK Keyport	Contributes to KRHD	6091
111s	Quarters O	NBK Keyport	Contributes to KRHD	6092
111t	Quarters P, Q, & R	NBK Keyport	Contributes to KRHD	6093
111u	Quarters S	NBK Keyport	Contributes to KRHD	6094
111v	Quarters T, U, & V	NBK Keyport	Contributes to KRHD	6095
112	Facility 6	NBK Keyport	Determined Eligible	
113	Pappas Apartments	Bremerton	Determined Eligible	45259
114	Schutt House	Bremerton	Determined Eligible	45260
115	Johnson House	Bremerton	Determined Eligible	45262
116	Payne House	Bremerton	Determined Eligible	45269
117	Cox House	Bremerton	Determined Eligible	45289
118	Lazar House	Bremerton	Determined Eligible	45263
119	Gavstad House	Bremerton	Determined Eligible	45264
120	Winsor House	Bremerton	Determined Eligible	45272
121	Boyd House	Bremerton	Determined Eligible	45273
122	Jensen House	Bremerton	Determined Eligible	45265
123	Sprague House	Bremerton	Determined Eligible	45266
124	Weber Apartments	Bremerton	Determined Eligible	45267
125	USHC House Type 204A	Bremerton	Determined Eligible	45286
126	USHC House Type 202	Bremerton	Determined Eligible	45288
127	USHC House Type 201A	Bremerton	Determined Eligible	45295
128	USHC House type 204A	Bremerton	Determined Eligible	45292
129	Morken House	Bremerton	Determined Eligible	45285

Table 2: NRHP Listed/Eligible Building and Structures in the Region 1 Training Area Continued

130	Bay Theater/Bay Bowl	Bremerton	Determined Eligible	45278
131	Bremerton Gardens	Bremerton	Determined Eligible	45280
132	Sweeney House	Bremerton	Determined Eligible	45284
133	Port Washington Narrows Bridge	Bremerton	Listed in NRHP	675452
134	Dominion Tug Boat	Bremerton	Determined Eligible	671764
135	USS Turner Joy	Bremerton	Determined Eligible	107231
136	Puget Sound Naval Shipyard NHL (PSNS)	Bremerton	Listed in NRHP	674678
136a	Facility 58	Bremerton	Contributes to PSNS	620696
136b	Facility 59	Bremerton	Contributes to PSNS	664571
136c	Facility 78	Bremerton	Contributes to PSNS	5567
136d	Facility 79	Bremerton	Contributes to PSNS	683123
136e	Facility 147	Bremerton	Contributes to PSNS	74372
136f	Facility 290	Bremerton	Contributes to PSNS	
136g	Facility 357	Bremerton	Contributes to PSNS	682980
136h	Facility 408	Bremerton	Contributes to PSNS	682983
136i	Facility 420	Bremerton	Contributes to PSNS	682984
136j	Facility 427	Bremerton	Contributes to PSNS	620278
136k	Facility 431	Bremerton	Contributes to PSNS	622166
136l	Facility 435	Bremerton	Contributes to PSNS	682995
136m	Facility 438	Bremerton	Contributes to PSNS	683011
136n	Facility 448	Bremerton	Contributes to PSNS	683011
136o	Facility 452	Bremerton	Contributes to PSNS	670515
136p	Facility 460	Bremerton	Contributes to PSNS	620277
136q	Facility 469	Bremerton	Contributes to PSNS	74373
136r	Facility 507	Bremerton	Contributes to PSNS	683054
136s	Facility 508	Bremerton	Contributes to PSNS	683055
136t	Facility 539	Bremerton	Contributes to PSNS	683057
136u	Facility 554	Bremerton	Contributes to PSNS	683058
136v	Facility 555	Bremerton	Contributes to PSNS	683061
136w	Facility 693	Bremerton	Contributes to PSNS	683081
136x	Facility 694	Bremerton	Contributes to PSNS	683082
136y	Facility 701	Bremerton	Contributes to PSNS	624324
136z	Facility 702	Bremerton	Contributes to PSNS	664548
136aa	Facility 703	Bremerton	Contributes to PSNS	80019
136ab	Facility 704	Bremerton	Contributes to PSNS	624329
136ac	Facility 705	Bremerton	Contributes to PSNS	624321
136ad	Facility 709	Bremerton	Contributes to PSNS	683011

Table 2: NRHP Listed/Eligible Building and Structures in the Region 1 Training Area Continued

136ae	Facility 713	Bremerton	Contributes to PSNS	5708
136af	Facility 714	Bremerton	Contributes to PSNS	623981
136ag	Facility 715	Bremerton	Contributes to PSNS	677668
136ah	Facility 716	Bremerton	Contributes to PSNS	621026
136ai	Facility 717	Bremerton	Contributes to PSNS	None
136aj	Facility 753	Bremerton	Contributes to PSNS	683128
136ak	Facility 754	Bremerton	Contributes to PSNS	683129
136al	Facility 755	Bremerton	Contributes to PSNS	683131
136am	Facility 756	Bremerton	Contributes to PSNS	683138
136an	Facility 761	Bremerton	Contributes to PSNS	683141
136ao	Facility 762	Bremerton	Contributes to PSNS	683142
136ap	Facility 787	Bremerton	Contributes to PSNS	683145
136aq	Facility 843	Bremerton	Contributes to PSNS	683155
136ar	Facility CRTKG	Bremerton	Contributes to PSNS	
137	Officers' Row Historic District (ORHD)	Bremerton	Listed in NRHP	674681
137a	Facility 138	Bremerton	Contributes to ORHD	
137b	Facility 615	Bremerton	Contributes to ORHD	
137c	Facility 616	Bremerton	Contributes to ORHD	
137d	Facility 617	Bremerton	Contributes to ORHD	5795
137e	Facility 618	Bremerton	Contributes to ORHD	5795
137f	Facility 619	Bremerton	Contributes to ORHD	5795
137g	Facility 620	Bremerton	Contributes to ORHD	5796
137h	Facility 621	Bremerton	Contributes to ORHD	5796
137i	Facility 622	Bremerton	Contributes to ORHD	5797
137j	Facility 623	Bremerton	Contributes to ORHD	5797
137k	Facility 624	Bremerton	Contributes to ORHD	5798
137l	Facility 625	Bremerton	Contributes to ORHD	5798
137m	Facility 626	Bremerton	Contributes to ORHD	5799
137n	Facility 627	Bremerton	Contributes to ORHD	5799
137o	Facility 628	Bremerton	Contributes to ORHD	5800
137p	Facility 629	Bremerton	Contributes to ORHD	5800
137q	Facility 630	Bremerton	Contributes to ORHD	5801
137r	Facility 631	Bremerton	Contributes to ORHD	5801
137s	Facility 632	Bremerton	Contributes to ORHD	5801
137t	Facility 633	Bremerton	Contributes to ORHD	5802
137u	Facility 634	Bremerton	Contributes to ORHD	5802
137v	Facility 635	Bremerton	Contributes to ORHD	5803
137w	Facility 636	Bremerton	Contributes to ORHD	5803

Table 2: NRHP Listed/Eligible Building and Structures in the Region 1 Training Area Continued

137x	Facility 637	Bremerton	Contributes to ORHD	5804
137y	Facility 638	Bremerton	Contributes to ORHD	5804
137z	Facility 639	Bremerton	Contributes to ORHD	5805
137aa	Facility 640	Bremerton	Contributes to ORHD	5806
137ab	Facility 641	Bremerton	Contributes to ORHD	5807
137ac	Facility 757	Bremerton	Contributes to ORHD	5806
137ad	Facility 772	Bremerton	Contributes to ORHD	None
138	Puget Sound Radio Station Historic District (PSRSHD)	Bremerton	Listed in NRHP	674681
138a	Facility 51	Bremerton	Contributes to PSRSHD	
138b	Facility 133	Bremerton	Contributes to PSRSHD	
138c	Facility 192	Bremerton	Contributes to PSRSHD	5680
138d	Facility 377	Bremerton	Contributes to PSRSHD	5680
138e	Facility 413	Bremerton	Contributes to PSRSHD	
138f	Facility 466	Bremerton	Contributes to PSRSHD	
138g	Facility 477	Bremerton	Contributes to PSRSHD	
138h	Facility 599	Bremerton	Contributes to PSRSHD	5676
138i	Facility 601	Bremerton	Contributes to PSRSHD	
138j	Facility 604	Bremerton	Contributes to PSRSHD	
138k	Facility 642	Bremerton	Contributes to PSRSHD	5812
138m	Facility 643	Bremerton	Contributes to PSRSHD	5812
138n	Facility 651	Bremerton	Contributes to PSRSHD	5813
138o	Facility 666	Bremerton	Contributes to PSRSHD	5694
138p	Facility 668	Bremerton	Contributes to PSRSHD	5676
139	Old Naval Hospital Historic District (ONHHD)	Bremerton	Listed in NRHP	674679
139a	Facility 443	Bremerton	Contributes to ONHHD	
139b	Facility 491	Bremerton	Contributes to ONHHD	
139c	Facility 644	Bremerton	Contributes to ONHHD	5785
139d	Facility 645	Bremerton	Contributes to ONHHD	5785
139e	Facility 646	Bremerton	Contributes to ONHHD	5786
139f	Facility 647	Bremerton	Contributes to ONHHD	5786
139g	Facility 648	Bremerton	Contributes to ONHHD	5787
139h	Facility 649	Bremerton	Contributes to ONHHD	5788
139i	Facility 650	Bremerton	Contributes to ONHHD	5788
140	Old Marine Reservation Historic District (OMRHD)	Bremerton	Listed in NRHP	674680
140a	Facility 652	Bremerton	Contributes to OMRHD	5789
140b	Facility 653	Bremerton	Contributes to OMRHD	5789

Table 2: NRHP Listed/Eligible Building and Structures in the Region 1 Training Area Continued

140c	Facility 654	Bremerton	Contributes to OMRHD	5790
140d	Facility 655	Bremerton	Contributes to OMRHD	5790
140e	Facility 656	Bremerton	Contributes to OMRHD	5791
140f	Facility 657	Bremerton	Contributes to OMRHD	5791
140g	Facility 658	Bremerton	Contributes to OMRHD	5792
140h	Facility 659	Bremerton	Contributes to OMRHD	5792
141	Terrace Park Apartments	Sinclair Inlet	Determined Eligible	5776
142	Waterman Barn	Sinclair Inlet east of Port Orchard	WA Heritage Register	675464
143	Fort Ward Historic District Expansion	Manchester State Park	Listed in NRHP	674590
144	Middle Point Command Post	Manchester State Park	Determined Eligible	106877
145	Torpedo Storehouse	Manchester State Park	Determined Eligible	74521
146	Facility 1	NBK Manchester	Determined Eligible	5749
147	Facility 12	NBK Manchester	Determined Eligible	5760
148	Artondale School	Gig Harbor	Listed in NRHP	675745
149	Glein House	Gig Harbor	Listed in NRHP	none
150	Eddon Boatyard Marine Railways	Gig Harbor	Determined Eligible	none
151	Eddon Boathouse	Gig Harbor	Determined Eligible	none
152	Ivanovich Netshed	Gig Harbor	Determined Eligible	617843
153	Commencement	Gig Harbor	Determined Eligible	none
154	Ancich Netshed	Gig Harbor	Determined Eligible	56050
155	Skansie Net Shed and House	Gig Harbor	Listed in NRHP	675940
156	Point Defiance Pagoda	Point Defiance	Listed NRHP	675948
157	Supervisor's Lodge	Point Defiance	WA Heritage Register	24960
158	Fort Nisqually Restoration	Point Defiance	WA Heritage Register	675698
159	Fort Nisqually Granary and Factor's House	Point Defiance	Listed in NRHP	662458
160	Camp Six	Point Defiance	Listed in NRHP	675702
160a	Handcars	Point Defiance	Contributes to Camp 6	24957
160b	Shay No. 7 Logging Locomotive	Point Defiance	Contributes to Camp 6	24956
160c	Dolbeer Donkey Engine	Point Defiance	Contributes to Camp 6	24955
160d	Loaded Log Train	Point Defiance	Contributes to Camp 6	24950
161	Salmon Beach Historic District (SBHD)	Point Defiance	WA Heritage Register	674638
161a	Structure 3	Point Defiance	Contributes to SBHD	
161b	Structure 4	Point Defiance	Contributes to SBHD	

Table 2: NRHP Listed/Eligible Building and Structures in the Region 1 Training Area Continued

161c	Structure 7	Point Defiance	Contributes to SBHD	
161d	Structure 8	Point Defiance	Contributes to SBHD	
161e	Structure 10	Point Defiance	Contributes to SBHD	
161f	Structure 18	Point Defiance	Contributes to SBHD	
161g	Structure 20	Point Defiance	Contributes to SBHD	
161h	Structure 21	Point Defiance	Contributes to SBHD	
161i	Structure 25	Point Defiance	Contributes to SBHD	
161j	Structure 39	Point Defiance	Contributes to SBHD	
161k	Structure 42	Point Defiance	Contributes to SBHD	
161l	Structure 43	Point Defiance	Contributes to SBHD	
161m	Structure 46	Point Defiance	Contributes to SBHD	
161n	Structure 49	Point Defiance	Contributes to SBHD	
161o	Structure 53	Point Defiance	Contributes to SBHD	
161p	Structure 58	Point Defiance	Contributes to SBHD	
161q	Structure 63	Point Defiance	Contributes to SBHD	
161r	Structure 64	Point Defiance	Contributes to SBHD	
161s	Structure 65	Point Defiance	Contributes to SBHD	
161t	Structure 66	Point Defiance	Contributes to SBHD	
161u	Structure 67	Point Defiance	Contributes to SBHD	
161v	Structure 73	Point Defiance	Contributes to SBHD	
161w	Structure 79	Point Defiance	Contributes to SBHD	
161x	Structure 85	Point Defiance	Contributes to SBHD	
161y	Structure 87	Point Defiance	Contributes to SBHD	
161z	Structure 89	Point Defiance	Contributes to SBHD	
161aa	Structure 95	Point Defiance	Contributes to SBHD	
161ab	Structure 96	Point Defiance	Contributes to SBHD	
161ac	Structure 97	Point Defiance	Contributes to SBHD	
161ad	Structure 100	Point Defiance	Contributes to SBHD	
161ae	Structure 101	Point Defiance	Contributes to SBHD	
161af	Structure 103	Point Defiance	Contributes to SBHD	
161ag	Structure 104	Point Defiance	Contributes to SBHD	
161ah	Structure 111	Point Defiance	Contributes to SBHD	
162	Bowes Building	Port of Tacoma	NRHP	
163	City Waterway Bridge	Port of Tacoma	Listed in NRHP	43054
164	XXX E F St	Port of Tacoma	Determined Eligible	
165	Albers Brothers Mill	Port of Tacoma	Listed in NRHP	24697
166	Fire Station	Port of Tacoma	Listed in NRHP	
167	Fire Station #15	Port of Tacoma	Listed in NRHP	25389