

# PUGET SOUND SHIPBUILDER'S ASSOCIATION

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Megan Duffy  
WSDNR  
1111 Washington Street SE  
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Olympia, WA 98504-7001

Ms. Duffy,

Re: DNR HCP Puget Sound Shipbuilders Association PSSA Draft Response

We agree with others that a broad, "one size fits all" HCP like the one presented by DNR last year is unacceptable and unworkable for the water-dependent industries in Washington. Shipyards in particular have substantial existing over water structures which need to be maintained, improved, and sometimes enlarged to enable repair of the nation's water based commerce network, and the onerous conditions in that draft HCP would create regulatory gridlock and obstacles to the industry.

Our concerns mirror those of others that the draft HCP had the potential to unduly burden the water-dependent businesses that form the backbone of Washington's economy. While we are not supportive of a process that resurrects the draft HCP from last year, we are willing to have a dialogue with DNR regarding DNR's concerns and possible paths forward. That dialogue needs to begin with an honest assessment of ESA issues related to shipyards (if there are any, and the shipyards are not conceding that is the case), and progress through an assessment of all tools available under the ESA to address those issues. A narrowly tailored HCP for shipyards may end up being a good, pragmatic solution to issues raised in that assessment.

To be clear, the PSSA is not interested in a process that essentially validates the prior draft HCP, and would only support an HCP that was substantively very different than that last draft. To be successful, this process needs to start with all parties coming together in good faith to work through difficult legal and technical issues.

We look forward to collaborating with DNR in a focused manner and having an opportunity to discuss DNR's ESA concerns, and potentially shape the HCP process into something manageable and that strikes the appropriate balance between protection of natural resources and the ability of our water-dependent economy to do business in Washington.

Sincerely,

Al Rainsberger  
President  
Puget Sound Shipbuilders Association