

SUBJECT: Pacific Northwest Electronic Warfare Range Environmental Assessment (42759)

Dear Greg Wahl,

Olympic Park Associates (OPA) appreciates this opportunity to comment on the establishment of a permanent electromagnetic warfare training range on the western half of the Olympic Peninsula.

Given the additional time to comment on this EA granting the U. S. Navy's permit application, these comments are a revision of the comments given by OPA for the deadlines October 10 & October 31, 2010. OPA asks that this submission is now considered the comments of OPA on this subject as of November 28, 2014.

Olympic Park Associates is an organization of United States citizens living primarily in Washington State. Members live and/or recreate on the Olympic Peninsula. Our organization's mission is "to protect the wilderness and ecological integrity of Olympic National Park"

OPA strongly opposes the establishment of a permanent electromagnetic warfare training range on the western half of the Olympic Peninsula for the U.S. Navy (Navy). The reasons for our opposition are many:

LACK OF INFORMATION

Public notice and information have been limited and sited documents have been deleted from the website. On October 30, 2014, the EA document sited in District Ranger Millett's Letter of September 26, 2014; File Code: 1950 "The EA is available for review on-line at: <http://www.fs.usda.gov/projects/olympic/landmanagement/projects>" was unavailable. The difficulty in finding documentation of this EA has hindered OPA's ability to make comprehensive comments on the EA. A violation of National Environmental Policy Act of 1969 (NEPA) procedure.

OPA does not find independent study of the Navy's EA providing confirmation by the Forest Service of the Navy's EA's conclusions. OPA submits this is a violation of the NEPA procedure. Independent study and confirmation of the Navy's EA should be provided in an Olympic National Forest EIS for this use permit to be given to the Navy.

IMPACT ON PEOPLE & ECONOMY

Aircraft aerial maneuvers and their resulting horrific noise on the western half of the Olympic Peninsula would have an overwhelming impact on citizens living in the area, citizens recreating in the area, and the over 3 million yearly visitors to the Olympic National Park. A National Park Service (NPS) report issued in July of this year showed that in 2013, 3,085,340 visitors to Olympic National Park spent \$245,894,100 in communities near the park. That spending supported 2,993 jobs in the local area. [2013 National Park Visitor Spending Effects, Natural Resource Report NPS/NRSS/EQD/NRR—2014/824, National Park Service, 2014]

These statistics do not include visits to only the Olympic National Forest (ONF). People visit ONF year around to recreate, fish, hunt, and gather. There is currently a bill in Congress to create wilderness areas within ONF. Some of these areas are within the proposed permanent electromagnetic warfare training range.

The EA, as quoted below, insufficiently addresses the impacts of the proposed Navy electromagnetic warfare training and its effects on residents, visitors, wildlife, or Navy personnel on the Olympic Peninsula.

PURPOSE AND NEED

The purpose and need given in the Navy EA, while laudable in its intent, is inadequate because of the damage that would be done to the people and wildlife on the Olympic Peninsula by its implementation. As stated:

"The purpose of the Proposed Action is to sustain and enhance the level and type of EW training currently being conducted by assets using the NWTRC, to provide the ability to accommodate growth in future training requirements, and to maximize the ability of local units to achieve their training requirements on local ranges. The following list identifies the EW training and needs that will be met by establishing the EW Range: (1) EA-18G and EA-6B Fleet

Replacement Squadron (FRS) personnel and Fleet Squadron Personnel training requirements; (2) support of basic and intermediate EW training for all user requirements of the NWTRC, primarily the locally assigned air, surface, and subsurface units; (3) live training, augmented by virtual training; (4) support of unit EW certifications and sustainment level training; (5) maximization and balance of local unit quality of training with local unit quality of life; (6) reduction in costs of training by conducting more training locally; and (7) reduction in the use of fossil fuel consumption from transit to and from training sites outside the state of Washington.” [PACIFIC NORTHWEST ELECTRONIC WARFARE RANGE ENVIRONMENTAL ASSESSMENT, abstract prepared by United States Department of the Navy, Final (September 2014).]

TRAINING RANGE OPERATION NOISE

OPA cannot find an analyses of the aircraft noise that will actually be created by these training exercises in the Navy EA.

The Navy EA has limited the discussion of noise to: Vehicle Noise, Generator/Emitter Noise, Fixed Emitter Generator Noise, Mobile Emitter Generator Noise, Temporary Demolition/Construction Noise, and only the following about airplane noise. “(1) aircraft noise exceeds 92 dBA Sound Exposure Level (SEL) at a nest site, or aircraft approach within a distance of 110 yards (yd.), whichever is greater; and (2) ground-based activity occurs during the nesting season within 100 m (110 yd.) of a nest site (U.S. Fish and Wildlife Service 2013).” [**BIOLOGICAL RESOURCES 3.2-25**]

There is no discussion of the intensity of aircraft noise generated by this project in relation to above standards. There is no reporting of the noise that would be created by the jets while flying in the training range or the noise created by jets flying to and from the training range. OPA argues this is a significant omission in the EA and violates NEPA. This discussion cannot be separated from the EA or permit application.

OPA asks that the aircraft to be used in the training, fly proposed routes, in the numbers to be used, and that Sound Exposure Levels be recorded in the Olympic National Forest, towns, and Olympic National Park within the proposed permanent warfare training range. During these tests, OPA asks that there be biologists and cameras observing the effects on wildlife within the proposed range which extends into the Pacific Ocean.

POLLUTION CAUSED

OPA cannot find any reporting on the effects of air pollution that would be created by aircraft, flying up to 12 hours a day and up to 260 days a year, to the people or the environment of the area of the training maneuvers. This seems to be a significant omission and violates NEPA.

WILDLIFE CONCERNS

The environmental consequences of this permit request state:

“3.2.4 ENVIRONMENTAL CONSEQUENCES

- **Noise.** Noise from vehicle travel, generators/operation of emitters, and temporary demolition/construction (during the renovation of Building 104 and the construction of the MRES tower), **may disturb wildlife.”**

There is only the following reported:

“As discussed in the Affected Environment section, the ESA-listed bird species that may occur in this portion of the project area are the northern spotted owl, and the marbled murrelet. Critical habitat has been designated for both species, and **the Proposed Action overlaps with this critical habitat** (Figure 3.2-5 and Figure 3.2-6). **The two stressors that could impact the birds are noise and electromagnetic radiation.”**

There is no study that demonstrates this project would result in the following conditions or not:

"ESA-Listed Birds

Marbled murrelets and Northern spotted owls in the project area may be temporarily disturbed by noise associated with the Proposed Action. While owls and murrelets may be disturbed by a wide variety of human activities, the USFWS has anticipated that harassment (or “take”) would occur when the species exhibit behavior

that suggests that the safety or survival of the species is at risk, or that a reproductive effort is potentially lost or compromised (U.S. Fish and Wildlife Service 2006). These behaviors could include species flushing from the nest during incubation, brooding, or fledging, all of which could lead to egg failure or reduced juvenile survival. Abandonment of the nest during a feeding or delaying a feeding could also lead to reduced survival of the juvenile. Recent biological opinions for forest management activities in the Olympic National Forest have noted that these behaviors are likely to occur when (1) aircraft noise exceeds 92 dBA Sound Exposure Level (SEL) at a nest site, or aircraft approach within a distance of 110 yards (yd.), whichever is greater; and (2) ground-based activity occurs during the nesting season within 100 m (110 yd.) of a nest site" (U.S. Fish and Wildlife Service 2013). [PACIFIC NORTHWEST EW RANGE EA FINAL (SEPTEMBER 2014)]

There is no indication in the EA that the permit activities would compromise the conditions as stated above. OPA argues this is insufficient to meet the objectives of NEPA. There is no study or statement of fact that the birds living and flying through this area of the Olympic Peninsula will not be harmed by the activities of jet aircraft using this training range over the years of operation. The stresses of the Navy's activities in this wildlife rich area could result in adding other birds and animals to the threatened and endangered lists.

- **Electromagnetic Radiation.** The electromagnetic field created from the operation of the EW emitters during training activities **may disturb wildlife that use electromagnetic fields for movement and orientation.**" [PACIFIC NORTHWEST EW RANGE EA FINAL (SEPTEMBER 2014)]

Not only are there acknowledged threatened bird species in the area of the training range, the coastal area of the Olympic Peninsula is highly important to migrating birds on the Pacific flyway during the spring, late summer, and fall. Migrating birds would be affected by electromagnetic waves and loud sounds of aircraft. These birds would include shorebirds of all types, including geese, ducks, etc. Without additional studies, these could seriously compromise the intent of the Migratory Bird Treaty.

"ESA-Listed Birds

The impact from electromagnetic radiation is expected to be minimal, short term, and recoverable based on: (1) the source of electromagnetic radiation discussed in this EA does not expose wildlife species to constant radiation; in other words, no area of the project area is continuously saturated with electromagnetic fields because six of the emitters are mobile, and the stationary emitter is not constantly running; (2) beams of electromagnetic radiation (e.g., from EW training) may expose birds in flight to increased levels of radiation; however, the birds in flight would be moving through the area and potentially out of the area of the main beam, once again keeping them from continuous or long duration exposure (especially since non-soaring birds have relatively quick airspeeds); and (3) the beam pattern emitted is directional, which minimizes the area exposed to radiation. For these reasons, long term consequences to individual marbled murrelets and northern spotted owls or populations are not expected to result from proposed training activities. The proposed action does not cause direct or indirect changes that would have a considerable impact on the critical habitat in the Study Area. Therefore, electromagnetic radiation from training activities may affect but is not likely to adversely affect the marbled murrelet or northern spotted owl or their critical habitat." [BIOLOGICAL RESOURCES 3.2-26]

There is no satisfactory indication in the EA on how the aircraft permitted activities would compromise the conditions for these birds. OPA argues this is insufficient to meet the objectives of NEPA.

The sites designated by the plan are on National Forest land. Some of which has been designated as protected areas for spotted owl and marbled murrelet. Marbled murrelets travel up to 50 miles from the forests on the coast to the sea to feed their young. Extensive flight training [up to for 12 hours a day, up to 260 days a year] in this area would disturb, perhaps eradicate, these threatened birds.

OPA argues that the discussion on Environmental Consequences in the EA is insufficient and inadequate for NEPA requirements.

GROWTH IN FUTURE TRAINING REQUIREMENTS

In its application for the Forest Service permit, the Navy EA says,

“1.3 PURPOSE OF AND NEED FOR THE PROPOSED ACTION

The purpose of the Proposed Action is to sustain and enhance the level and type of EW training currently being conducted by assets using the NWTRC, **to provide the ability to accommodate growth in future training requirements,** and to maximize the ability of local units to achieve their training requirements on local ranges”. [PACIFIC NORTHWEST ELECTRONIC WARFARE RANGE ENVIRONMENTAL ASSESSMENT, abstract prepared by United States Department of the Navy, Final (September 2014).]

In Boeing’s website description of the Growler [18G Airborne Electric Attack Aircraft] it says:

“Full Spectrum: The EA-18G's ALQ-218 wideband receiver combined with the ALQ-99 Tactical Jamming System will be effective against any radar-guided surface-to-air threat.

Precision Airborne Electronic Attack: Selective-reactive technology enables the EA-18G to rapidly sense and locate threats with a significantly higher degree of accuracy than was previously possible. **This improved accuracy enables greater concentration of energy against threats.**” [Boeing website 10/27/2014]

If the purpose of the Growler aircraft is to find and disable enemy electronic detection, then the proposed permit request, as written, only allows for testing the detection NOT the disarmament of the enemy equipment.

However, the phrase, “...to provide the ability to accommodate growth in future training requirements, and to maximize the ability of local units to achieve their training requirements on local ranges.” [Navy Abstract] This would indicate that further operation enhancement is possible under this permit and the consequences of that have not been included in this EA. OPA argues this is a violation of NEPA because it deliberately excludes activities, already in use by the aircraft, that should be examined as part of the NEPA process.

OPA argues that there is insufficient information being provided to determine that known activities and their consequences have been provided to insure the safety of all people, including Navy personnel, animals, birds, and fish would not be harmed by these enhancements and is therefore in violation of NEPA. The permit operation, as proposed in this EA, would only allow training for the detection NOT the disabling of the enemy equipment.

The public has been told, and the press has repeated, that the emitters from the tower and the mobile emitters would only be pointed straight up and therefore not damaging to people or animals on the ground. It was reported in the Seattle Times, “No threat to wildlife. The trucks would beam the signal upward, not 360 degrees around. The vehicles would be required to shut down if a logging truck stopped near them, or somebody was walking around.” [Seattle Times, Erik Lacitis, Oct 16, 2014]

OPA questions this declaration, as provided, and argues that it is insufficient under NEPA and therefore is in violation of NEPA. If people in the vicinity would require shutting down of the equipment, it would seem there is a perceived danger to those people and the Navy personnel operating the equipment. Further, if training is to include, now and in the future, the disabling of the enemy source of electromagnetic waves, then there would be additional energy waves pointed down from the aircraft. There is no discussion of this possibility and the consequences of such.

NAVY EA ELIMINATIONS FROM CONSIDERATION

The Navy EA states, “Certain resource areas were eliminated from detailed study in the EA because research revealed that the Proposed Action is unlikely to have any potential environmental impacts on these resources, or that impacts would be negligible. The resources that were not evaluated in this EA included geology, water, **land use, cultural,** transportation, **socioeconomics,** and environmental justice and **protection of children.**” [Executive Summary ES-2 SUMMARY OF IMPACTS]

OPA argues that the purpose of NEPA is to evaluate the project and provide proof that NEPA concerns are met. The applicant cannot make that decision by arbitrarily excluding resources. It is not for the Navy or Forest Service to make the subjective decision to exclude NEPA concerns.

The Navy EA has excluded the following important discussions:

- The Navy has used socioeconomic reasons for the purpose of this permit but has not provided cost comparisons of the permit activities on the environment versus their claimed cost savings.
- The Navy has excluded discussion of land use of the permit activities versus the current use of the Forest Service lands. The proposed activity is not included in the Olympic National Forest Management Plan or the Organic Act of 1897.
- The Navy has removed cultural factors from the permit applications despite the fact that several tribal lands could be affected by the permit activities. Cultural also applies to traditional uses of an area by people. All people living, working, and touring in the area will be impacted by these activities.
- Protection of children was eliminated. Children are people and all people in the area of the training range will be affected by the activities governed by the permit.

LACK OF INFORMATION TO MAKE EA CONCLUSIONS

Further, OPA argues there is insufficient scientific information available to determine the dilatory effects of electromagnetic waves on humans, animals, and other living organisms. Yearly, millions of people and wildlife use the lands in the Olympic National Forest, Olympic National Park, and Olympic Coast National Marine Sanctuary all having land and waters located on the western half of the Olympic Peninsula. Humans, whales to amoebae would be subjected to these electromagnetic waves without discrimination. Therefore, the activities allowed by this permit violate the Marine Mammal Protection Act and could harm humans, birds, vital insects like bees and other pollinators, and other wildlife.

Scientists declare the need for further study on the subject of the impacts of towers and emitting radiation on migratory birds. i.e. "This briefing paper addresses the need to cumulatively assess the impacts of communication towers on migratory birds both from collisions and radiation, especially neotropical migratory songbirds that are most impacted (Shire et al. 2000). The paper discusses some suggested research protocols needed to conduct a nationwide cumulative impacts analysis that would assess effects of tower collisions and radiation on **avifauna and on other wildlife pollinators including bats and bees.**" [Briefing Paper on the Need for Research into the Cumulative Impacts of Communication Towers on Migratory Birds and Other Wildlife in the United States Division of Migratory Bird Management (DMBM), U.S. Fish & Wildlife Service – for Public Release LAST UPDATED: April 17, 2009]

The travel of electromagnetic waves or noise cannot be stopped at Olympic National Park's border nor the border of the Olympic Coast National Marine Sanctuary, nor the Washington Islands National Wildlife Refuges which were established by Theodore Roosevelt in 1907. The refuges include 125-acre Flattery Rocks, 300-acre Quillayute Needles, and 60-acre Copalis, stretching off-shore from Cape Flattery all the way south to Copalis, Washington. More than 600 islands, rocks, and reefs comprise the refuges. Together they provide nesting habitat for the majority of Washington's seabirds.

Because there is insufficient knowledge about the effects of electromagnetic waves on living organisms, we ask that an Environmental Impact Statement (EIS) be provided for this proposal. We also submit that the procedure being followed for this proposal is in violation of the Endangered Species Act because of the admitted possibility of harm to two listed threatened species in the training range area.

OTHER CONSIDERATIONS

Furthermore, Olympic National Park is an International Biosphere Reserve. It was designated a World Heritage Site in 1981. This requested permit allowing these training activities would degrade the status of these designations because of the distraction of jet aircraft maneuvers and their noise that could be seen and heard within Olympic National Park.

DEGRADATION TO PENINSULA WILDERNESS

The activities that would come to the Olympic Peninsula as a result of the establishment of this training warfare range violates the purpose of The Wilderness Act of 1964 by invading the wilderness character of Olympic National Park and the designated Wilderness areas within Olympic National Forest on the west side of the Olympic Peninsula. 95% of Olympic National Park is designated wilderness. Airplane noise generated just outside of the park or the National Forest Wilderness Areas cannot be stopped at their border and therefore destroys their wilderness character.

“A wilderness, in contrast with those areas where man and his own works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain. An area of wilderness is further defined to mean in this Act an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, **with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude** or a primitive and unconfined type of recreation; (3) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value.” [Wilderness Act 1964]

WILDERNESS VALUES

Wilderness is not a place locked up for the use of few. Wilderness' multiple uses are invaluable to our nation, our people, our future, and therefore precious to us all. Wilderness makes our earth livable. Many of the wilderness areas on the Olympic Peninsula attracts many more people than can be accommodated without a permitting system for visitation.

In addition, native vegetation pulls pollution from the air and water; soils and plant roots filter the water. Trees and vegetation also serve to sequester carbon by using it -- trading the carbon dioxide in the air for oxygen. This reduces global warming and ocean acidification.

Wilderness holds nature's storehouse of genes that may someday provide new cures for diseases like cancer and new diseases like HIV, Avian Flu, and Ebola. Over 50% of medical pharmaceuticals currently come from nature. It can hold genes for new and healthier plants and animals for agriculture.

Organisms in an ecosystem run the gamut from less than a cell-size (viruses) to whale-sized mammals. All are necessary to the success of the system.

“...we humans often act as if we are totally independent of our environment, as if our driving thousands of other species to extinction, and disrupting the life-giving services they provide, will have no effect on us whatsoever.

“The fundamental truth is that biodiversity matters profoundly to human health in almost every conceivable way. The roles that individual species, and the ecosystems they make up, play in providing food, fuel and unique medicinal compounds; air, water and soil purification services; and natural regulation of infectious disease, to name a few, are critical to our health and survival. The loss of species as a result of human activity and the degradation of ecosystems ongoing around the world lowers the quality of the planet's natural resources and destabilizes the physical environment. “[E.O. Wilson, Professor Emeritus and Honorary Curator in Entomology, Harvard University]

Further, “Ecosystems provide goods and services that sustain all life on this planet, including human life. If damaged, we cannot fully restore them, no matter how much money we spend.”

“Changes to the environment—be they from pollution, deforestation, greenhouse gas emissions, or other causes—ultimately affect the living world. Once we lose a gene, species, or an ecosystem, it is gone forever.”

“Wild species, like scientific laboratory organisms, may possess attributes that make them uniquely well suited for the study and treatment of human diseases. If these species are lost, they will take these secrets with them.”

[How Our Health Depends on Biodiversity; Eric Chivian M.D. and Aaron Bernstein, M.D., M.P.H; Harvard Medical School and the Center for Health and the Global Environment M.D., M.P.H.]

Additionally, wilderness provides wildlife habitat far better and less expensive than any zoo. This all melds into economical multiple uses and benefits to our country.

ALTERNATIVES

Olympic Park Associates argue that there are areas where the planned training could be done that would result in much less damage to the environment, people, and other living organisms.

We will ask that the Secretaries of Agriculture and Interior uphold their mandate under the Wilderness Act to provide protection of the Wilderness Areas on the western Olympic Peninsula from activities that would violate their wilderness character.

OPA CONCLUSIONS

Olympic Park Associates argues that the stated purpose of this permit does not compare to the damage to the human and wildlife values of the Olympic Peninsula. The value to the people of the United States is far better served by not placing this warfare training range in the proposed location. As proposed it would cause significant economic and environmental harm to the people living on the Olympic Peninsula, and the many tourists that visit this area every year. Because this is federal land set aside for the benefit of all United States citizens, this proposal degrades those benefits to all citizens.

We, as people, have caused considerable environmental damage in the past because of our naive understanding of the effects of our activities on nature. We have introduced plants and animals to areas on earth where they become difficult to impossible to control. (i.e. rabbits to Australia, Kudzu to the Southern United States, African bees escape into the South American environment and spread, becoming “killer bees” in the Americas).

In the past we have exposed our armed force’s personnel to atom bomb detonations in the Nevada desert and South Pacific Islands, despite our knowledge of the effects of dropping atom bombs on Japan during WWII. We have done large scale testing of our technology in the past. Will this be another test using our citizens and wildlife as the guinea pigs? OPA would hope that more controlled testing would take place to better predict outcomes. These are further reasons for an EIS before a permit is considered.

More study is needed before the proliferation of these training ranges are spread across the nation in the laudable attempt to save jet fuel and reduce away time of Navy jet crews from their families. A degrading of the environment could be more costly to all Americans, including the Navy personnel and their families, than the perceived savings of this training range.

Olympic Park Associates asks that the United States Forest Service not issue this permit to the Navy. At minimum, a full EIS is needed before this project proceeds. Our earth’s environment is our home; its degradation gives us all less to defend.

QUESTIONS

The Navy is asking for a permanent permit to use Olympic Forest Service lands. What provisions have there been made in the permit application for 1) standards of operations and conditions for revocation of the permit, 2) consequences for non-compliance of standards, and 3) a sunset provision for re-evaluation of the permit and

the effect of its use upon the citizens and tourists in the area? Who is responsible for compliance to standards and how would the violations be enforced?

Sincerely,

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