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Comments:

I would like to state my objections to the US Forest Service allowing the US Navy to use the roads and airspace of the Olympic National Forest. This is a follow-up to my written comments that I submitted to you in 2014.

- (1) The use of roads and airspace in the Olympic National Forest for Electronic Warfare Training by the US Navy will cause significant environmental degradation and reduction in the quality of recreational and commercial use by the public. A finding of non-significance is clearly not appropriate.
- (2) As you know National Forests were first established by the Forest Reserve Act of 1891 and the processes for planning allowed activities using the National Forests were set forth in Forest and Rangeland Renewable Resources Planning Act of 1974 and in the National Forest Management Act of 1976. It is clear from this legislation and others that the mission of the Forest Service is "to sustain the health, diversity, and productivity of the Nation's forests and grasslands to meet the needs of present and future generations." Its motto is "Caring for the land and serving people." As the lead federal agency in natural resource conservation, the US Forest Service is to provide leadership in the protection, management, and use of the nation's forest, rangeland, and aquatic ecosystems. The agency's ecosystem approach to management must integrate ecological, economic, and social factors to maintain and enhance the quality of the environment to meet current and future needs. Through implementation of land and resource management plans, the agency is to ensure sustainable ecosystems by restoring and maintaining species diversity and ecological productivity that helps provide recreation, water, timber, minerals, fish, wildlife, wilderness, and aesthetic values for current and future generations of people.
- (3) Environmental protection legislation explicitly require all impacts of an action, both immediate and long term, be included in the Environmental Impact Statement. Dividing an action into multiple component parts in order to minimize the potential impact of any part is strictly prohibited. This applies to the Navy's separation of its stationing of additional Growler jets on Whidbey Island (which will be used in the Electronic Warfare Training) and this action on use of US Forest Service Roads for that same training.
- (4) Numerous studies have shown the potential for damage to wildlife and humans from repeated strong bursts of electromagnetic radiation.
- (5) The environment of the Olympic National Forest and the Olympic National Park is both pristine and fragile. This area is designated as a World Heritage Site, in part, because it is one of only a dozen places in the world that is quiet (i.e. only soft natural sounds are heard).
- (6) The Navy's Electronic Warfare Training plan calls for multiple flights of Growler jets on almost a daily basis over the Olympic National Forest and Olympic National Park. This will destroy the environmental soundscape of the area, is likely to increase the sense of endangerment and stress on area wildlife, and reduce the enjoyment and aesthetics of the area to visitors and residents.
- (7) The US Navy has numerous alternative sites in which to conduct Electronic Warfare Training that do not have the same level of environment degradation.

The first and foremost responsibility of the US Forest Service is to preserve and protect the ecosystems on its land and manage those resources for the public and business. Nowhere in its mission is the US Forest Service released from these responsibilities to allow for military training or wargames. The proposed use of the Olympic National Forest for electronic warfare training and the repeated flyovers by military aircraft clearly impacts and greatly detracts from the ecological, wilderness, and aesthetic values the National Forest was established to preserve.