

Date submitted (Pacific Standard Time): 1/13/2017 6:43:58 PM

First name: Peter

Last name: Guerrero

Organization:

Title:

Official Representative/Member Indicator:

Address1: 816 O St.

Address2:

City: Port Townsend

State: WA

Province/Region:

Zip/Postal Code: 98368

Country: United States

Email: studio374photography@gmail.com

Phone: 510-421-1071

Comments:

I object to the pending decision by the Forest Service to grant a five-year special use permit to the US Navy to conduct electronic warfare training in the Olympic National Forest (ONF), for the following reasons:

The documents that I need to understand and properly object to the USFS Draft Decision, and its incorporated analysis, are missing or difficult to find. Examples include: the original draft decision from June 2014 that is not on the USFS website; the current draft references an analysis regarding impacts on sensitive species that is not posted on USFS website; and, most importantly, a 1988 Master Agreement with the Navy indicates the Navy was required to give the USFS an analysis regarding the "unsuitability or unavailability of DOD lands" for these training activities--this analysis is nowhere to be found.

The splitting up of the required NEPA analysis among a plethora of documents (USFS Draft Decision, Navy 2014 EA, Navy 2010 EIS, Navy 2015 EIS) without any no clear discussion of what analysis is to be found where is confusing and violates the spirit and intent of NEPA. Furthermore, when incorporating analysis from other documents, 40 CFR Sec. 1502.21 requires the USFS cite to specific analysis and describe them, which USFS does not do.

--The USFS draft decision improperly attempts to limit scope to impacts from mobile emitter trucks but at same time, on page 1, admits that the mobile emitters are connected to Navy aircraft training activities. NEPA requires the USFS to disclose and analyze all direct, indirect and cumulative impacts, and impacts from connected actions--which includes impacts from the aircraft involved in these training activities. It is both disingenuous and illegal to ignore the impacts of the Navy's Growler aircraft--particularly their impact on protected, endangered species--and the ability of citizens to enjoy the peace and tranquility of their national forests, parks, and federally designated wilderness. This is particularly egregious in light of the Navy's recent proposal to substantially expand its Growler fleet.

--The scope of the analysis also improperly ignores any impacts to Olympic National Park (ONP). All maps used for the analysis do not even bother to identify the Park or acknowledge that some emitter trucks will be parked immediately adjacent to ONP and that Navy aircraft will be flying over the park. The 2014 Navy EA doesn't mention the park even once. The draft USFS decision only mentions the park once (p. 14) and incorrectly concludes no impacts to the Park from its permit decision by incorporating NEPA analysis of noise impacts from aircraft but without indicating what that analysis shows regarding the Park.

--Furthermore, the noise analysis from other NEPA documents (e.g., the Navy 2015 EIS) are flawed to begin with. These documents are missing underlying data and offer no basis for a conclusion that Navy aircraft noise would have only minor impacts on Park and its visitors. For instance, the noise analyses fail to adequately analyze baseline acoustic levels; assumes an incorrect baseline, and selectively uses sound metrics to minimize impacts.

--The USFS considers too few alternatives and does not consider alternatives that would have the Navy's training exercises conducted somewhere other than over Olympic Peninsula wilderness and the ONP. The 1988 Master Agreement specifically required Navy to document that there were no alternative DOD lands where these exercises could be conducted. That analysis is nowhere to be found.

--USFS FONSI does not contain the required convincing statement that USFS decision would not cause significant impacts (40 CFR Sec. 1508.27). Contrary to what the USFS FONSI says, the impacts from Navy aircraft overflights will not be "localized" and will not be limited to the project area on USFS lands. That is especially true in light of real and obvious impacts from Navy aircraft repeatedly overflying ONP, disrupting both federally protected wildlife and ONP use by visitors (40 CFR Sec. 1508.27(3)). These impacts alone require a complete, stand-alone EIS documenting impacts to the Park, its visitors, and federally protected endangered species.