

Date submitted (Pacific Standard Time): 1/13/2017 12:00:00 AM
First name: Tim
Last name: McNulty
Organization:
Title:
Official Representative/Member Indicator:
Address1: 168 Lost Mountain Lane
Address2:
City: Sequim
State: WA
Province/Region:
Zip/Postal Code: 98382
Country: United States
Email: mcmorgan@olympen.com
Phone: 3606812480
Comments:
January 12, 2017

Subject: OBJECTION, Pacific Northwest Electronic Warfare Range Assessment #42759

From: Tim McNulty, 168 Lost Mountain Lane, Sequim, WA 98382, Phone 360-681-2480

Project Name: Pacific Northwest Electronic Warfare Range

Responsible Official Name: Dean Millett, District Ranger

Affected National Forest: Olympic National Forest, Pacific Ranger District

Dear Mr. Millett,

I'm a resident of the Olympic Peninsula and a frequent visitor to Olympic National Forest and Olympic National Park. I submitted timely specific written comments to the earlier EA. My objection is based on those comments and new information that been made available. 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 in the Olympic National Forest, for the following reasons:

1. Insufficient analysis. I object to this permit based on the utter inadequacy of the Navy's analysis. The Navy's finding of "no significant impact" was based on such scant, faulty or nonexistent scientific research that it should be rejected. The Forest Service for its part should have done its own analysis. The National Environmental Policy Act (NEPA), in 42 U.S.C. [sect] 4321 et seq., dictates that federal agencies must take a "hard look" at the environmental consequences of a proposed action, and that the requisite environmental analysis "must be appropriate to the action in question." The Electronic Warfare EA does not examine the effects of jet noise that will result from this permit by the Forest Service. This does not qualify as a "hard look."

The Forest Service considers too few alternatives. The EA fails to consider alternatives that would conduct

exercises elsewhere than over the Olympic Peninsula and the Park. The 1988 Master Agreement specifically required Navy to document that there were no DoD lands where these exercises could be conducted. That analysis is missing from the document.

The only responsible course forward is for the Forest Service to cancel its pending approval of the EA pending development of a full environmental impact statement (EIS) that examines all impacts to public forest lands, bird, fish and wildlife populations, air, water, and user experiences including noise impacts by jets operating in air space over the national forest, national park, and state forest lands. CEQ regulations suggest an EIS is required: "If a federal agency anticipates that ... a project is environmentally controversial, a federal agency may choose to prepare an EIS without having to first prepare an EA." The large number of comments opposing the issuance of this permit certainly meets the first qualification.

2. Lack of adequate public outreach. The EA discusses the Navy's effort to "ensure maximum participation during the public review period," but implementation of the planning process has been the opposite of this. Public involvement in the Navy's environmental planning was nonexistent. The Navy issued a Finding of No Significant Impact immediately following an EA on which it had received not a single comment from elected officials, Tribes, businesses and the general public. That was followed by uncritical endorsement from the Forest Service. This is a complete violation of the public trust. Setting an objection period over the holidays and refusing multiple requests for an extension -- including a request by two US senators and a congressman is irresponsible.

3. Lack of cumulative impact analysis. NEPA defines "cumulative impact" as: the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time. A comment letter from Olympic Park Associates states, "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 area. 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. The Navy's EA insufficiently addresses the impacts of the proposed Navy warfare training and its effects on residents, visitors, wildlife, or Navy personnel on the Olympic Peninsula. [hellip] OPA cannot find an analyses of the aircraft noise that will actually be created by these training exercises in the Navy EA."

The EA did not analyze the cumulative impact of increased aircraft flights over national forest and national park land that would result from the implementation of this project. According to the EA, up to 2,900 training events per year over the course of 260 days may be conducted, consisting of 2,340 hours of emitter use during which multiple aircraft may be doing maneuvers above Olympic National Forest and Olympic National Park, at altitudes as low as 6,000 feet (according to the Northwest Training and Testing EIS/OEIS). This constitutes a significant cumulative impact. Why was this not fully analyzed?

NEPA requires federal agencies to prepare an EIS to thoroughly assess the environmental impacts of "major federal actions that could significantly affect the human environment." Other branches of the Armed Services are planning to train on the Olympic Peninsula; what are the Forest Service's plans to integrate the cumulative impacts of all this military activity? Given the magnitude of impacts from having as many as 153 electronic attack "Growler" jets that burn up to 1300 gallons per hour in flight across the Olympic Peninsula and other land and water bodies within reach of Naval Air Station Whidbey Island for 260 days per year, and given that the

Navy only analyzed impacts it deemed were "truly meaningful" in its EA and that the Forest Service failed to follow up with their own independent scientific investigations, it seems that only an EIS that fully and adequately analyzes all impacts of all jets and mobile emitters in all areas, along with mitigation measures, would suffice for full NEPA compliance.

4. Jet noise impacts on the affected environment. The EA addresses the noise related to operation of the mobile emitters, but does not take into consideration the impact to national forest and national park visitors and wildlife from the dramatic increase in noise caused by intensified numbers of aircraft overflights during training missions. Page 1 of the EA admits mobile emitters are connected to Navy aircraft activities. The Forest Service is obliged to disclose and analyze all direct, indirect and cumulative impacts, and impacts from connected actions. That includes noise impacts from the aircraft that would be conducting training using mobile emitters. I and many visitors to the Olympic Peninsula depend on the peace, tranquility, and silence the area provides. The Navy's own audit found that its jet aircraft emit noise well in excess of the normal human pain threshold. Where is the impact assessment of this?

Olympic National Park provides critically important wildlife and migratory bird habitat. Resident wildlife species and migratory birds in this area will almost certainly be negatively impacted by the noise from overflights.

The marbled murrelet, a small seabird listed as federally threatened with extinction under the Endangered Species Act, declined in population by 26 percent between 2002 and 2009. No studies have been done on the effects of loud noise, radiation and electromagnetic disruption on marbled murrelets or other endangered species or migrating shorebirds, geese and ducks. The Forest Service should require these studies before approving this permit. The northern spotted owl, another bird threatened with extinction, has "critical habitat" designated in the Olympic National Forest, as does the marbled murrelet. Most of the 15 sites where the Navy will place its mobile radiation emitters are within that critical habitat. This fact alone should provide cause to scuttle this dangerous and unnecessary project.

Not only noise from increased overflights resulting from this project significantly impact the quality of national park and forest visitors' experience, area closures and use restrictions on public areas caused by the mobile emitters will further limit visitor opportunities to our public lands. Controlled areas closed to transportation would significantly impact recreation opportunities in terms of trail access and general use.

Noise analysis from other NEPA docs (mostly Navy 2015 EIS) is flawed in many respects, is missing underlying data, and offers no basis for its 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; USFS and Navy attempt to minimize acoustical impacts by assuming an incorrect baseline; they selective use different sound metrics to hide acoustical impacts; they require the public to parse the sound data in an attempt to understand the documents meaning; and they state their conclusions without providing the data underlying the analysis, deterring meaningful comment.

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 the Park and disrupting use of Park by visitors and native wildlife. These impacts alone require a comprehensive EIS documenting impacts to the Park and its visitors.

5. Special exemption for a single user group. The Draft Permit says on page 11 that the Navy will be allowed to fly on weekends so long as it does not interfere with "[hellip]opening day and associated opening weekend of Washington State's Big Game Hunting Season for use of rifle/guns." This is an utterly biased exemption showing deference to a single user group and by implication admitting that the permitted activity would have detrimental impacts to all park and forest users. Otherwise, why this restriction?

Because of an apparently calculated lack of public outreach and flagrant lack of detailed analysis, I urge the Forest Service to reject the Navy's EA and require successful completion of a full EIS under NEPA that would adequately analyze the environmental, social, and economic impacts resulting from this project. This remarkable area deserves no less.

Deny this special use permit. Go back to scoping for and EIS, and conduct this process with some dignity and fairness.

Sincerely,

Tim McNulty

168 Lost Mountain Lane

Sequim, WA 98382