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We are writing in opposition to the U.S. Forest Service's pending decision to give a special use permit of five years to the U.S. Navy. If approved, the Navy would be allowed to conduct electronic warfare range testing in the Olympic National Forest. This would involve destructive noise impacts of aircraft such as the Navy's EA-18G Growler jets flying over and near the Olympic National Park, one of our country's most pristine and beautiful parks.

Although we believe in a strong and ready U.S. military, there are other more suitable places for the training of Growler crews. The Olympic National Park and Olympic National Forest would be subjected to extremely loud jet noise if the Forest Service's pending decision were approved. And there are concerns about radiation exposure to humans as well as birds, small mammals, and amphibians.

The Olympic peninsula is "the most acoustically diverse" and "least noise polluted" place in the Lower 48 states, according to Gordon Hempton, a natural sound expert. The lush forests, high mountain meadows with whistling marmots, bugling Roosevelt elk, ocean surf, and flowing rivers all create a natural soundscape that millions of visitors travel long distances to enjoy. Both of us have hiked throughout the habitats of the Olympic National Park and have appreciated its unique wildness. We want those experiences to be available to future generations.

Let us describe some of the reasons for our objection to the Forest Service's pending decision to grant the five-year permit to the Navy to conduct electronic warfare exercises that would be detrimental to the beauty and tranquility of the Olympic peninsula. We believe these issues are relevant to the original range of points and comments raised in 2014.

1. The Navy's Environmental Assessment (EA) in 2014 grossly underestimated the flight increases that will occur. The Navy claimed there would be only a 10 percent increase in flights. But emails obtained by FOIA from the Forest Service reveal a 38.6 percent increase. In addition, the recently released Growler Environmental Impact Statement (EIS) reveals further increases in flights, including a 600 percent increase at OLF Coupeville. The Forest Service permit should not be granted because it is based on outdated and incorrect information from the Navy EA.

2. The Navy failed to demonstrate the need for national forest lands. Before we allow the Growler flights to destroy the tranquility of the Park, it makes sense to look at other possible sites. The Navy has ample land available to its pilots. Currently, similar warfare testing and training occur on at least four bases in Washington,

Oregon, Idaho, and Nevada. At no time has the Department of Defense substantiated that lands under its administration are unsuitable or unavailable for these activities, as required by the 1988 Master Agreement between the Defense Department and the Agriculture Department. The alternative bases and geographical areas available to the Navy exist, but nevertheless it seeks to override the MOU and use the Olympic National Forest instead. Why? The Navy EA in 2014 said it would save several million dollars in fuel compared to flying to its nearby base in Idaho. The damage done by this project will far outweigh such savings.

3. The Navy omitted key geographical details in its EA that would have enabled the public to understand where the proposed training would occur. The Navy maps in the EA made it appear the Navy would be operating in the middle of nowhere. The law defines "misleading conduct" in part as "inviting reliance on a sample specimen, map, photography, boundary mark, or other object that is misleading in a material respect." One possible remedy might include rescinding the decision to grant the Navy's permit and requiring that an EIS, rather than an EA, be produced, due to the controversial nature and scope of this proposed activity. That EIS should contain accurate maps without omitting critical details, such as major rivers, Olympic National Park boundaries, and even Lake Quinault.

4. The National Environmental Policy Act (NEPA) requires a "hard look" at the environmental consequences of a proposed action. The Forest Service and the Navy did not meet that requirement. The Electronic Warfare EA failed to examine the effects of jet noise that will be triggered by the issuance of a permit to an agency that flies the jets. That amounts to segmentation of impacts and fails the NEPA "hard look" test.

5. The areas impacted by this decision did not receive adequate public notification. The Navy failed to notify affected Olympic peninsula communities of the existence of the EA. Its brief 15-day comment period with no notification of affected communities on the North Olympic peninsula was an egregious breach of the public process. The Forest Service also failed to place adequate notifications for its own public process. Dean Millett, Forest Service District Ranger, publicly admitted the decision not to place notices in publications that service communities on the northern and western Olympic peninsula. The one exception: Millett did place a single sheet of paper in the window of the post office in Forks, Washington. Forks is a three-hour drive from some of the impacted communities. Mr. Millett is the Responsible Official on the pending decision. We believe the decisions on this matter were effectively made BEFORE the public process was initiated and that those decisions ignored public health and safety as well as economic and environmental concerns. In addition, true public hearings in affected communities were not held. Some "public information meetings" occurred at the request of Rep. Derek Kilmer, but neither the Navy nor the Forest Service would allow comments to be accepted for the record. This violated the intent and spirit of NEPA. Because the Forest Service has endorsed a Navy EA on which not one public comment was received, and for which no hearings were held in affected communities, the public process should be considered invalid.

6. The Forest Service did not conduct its own research. An agency cannot simply adopt the conclusions of another agency. The Forest Service has a duty to conduct its own independent scientific review of the impacts of activities that it allows or condones. The National Environmental Policy Act "requires each agency to indicate the research needed to adequately expose environmental harms." Alternatives must be "affirmatively studied." The decisions make "the completion of an adequate research program a prerequisite to agency action." Because the Forest Service did not present the requisite research to the public, we conclude it was not done. This is unlawful.

7. There is a failure to examine the cumulative impacts. NEPA requires agencies to assess impacts and effects that include "ecological[hellip]aesthetic, historic, cultural, economic, social, or health, whether direct, indirect, or cumulative." The Navy EA separates impacts so they can't be added together, then dismisses many long-term and cumulative effects as "not reasonably foreseeable" when, in fact, they are. The Navy cannot legally

dismiss such impacts, but it did. The Forest Service should have conducted its own biological research to evaluate the Navy's cumulative impacts analysis. This undermines the Navy EA's scientific validity and its legality.

8. The use of "tiered" NEPA documents has resulted in inaccurate claims. The Forest Service permit could trigger low-level training and "dogfighting," yet these activities were not evaluated. The Navy contends many of the impacts of the Growler warfare flights had been evaluated in other EISs, but that did not occur. The 2010 Northwest Training Range Complex EIS did not evaluate the proposed activities in the electronic warfare range, because the emissions it discussed included ships and aircraft, but not mobile emitter trucks. The 2014 Northwest Testing and Training Draft EIS mentions only overflights by jets at high altitude en route to train at sea, not the low-level training the Forest Service would permit.

9. Climate Change as a potential magnifier of impacts was not evaluated in the Navy EA. The entire segment on climate change was non-specific boilerplate material. We cannot ignore the Navy's contribution to air pollution and climate change in the Pacific Northwest. One hour of flight by a single EA-18G Growler jet produces more than the annual CO2 emissions of a typical Washington state citizen. A Growler jet consumes 1,304 gallons of jet fuel per hour and produces about 12.5 metric tons of CO2 per hour (when not using afterburners). The Navy's 2015 EIS for Northwest Training and Testing analyzed emissions not from Growlers, but from Prowlers no longer being flown. Therefore, the Forest Service's proposal to grant the permit is not based on real data about climate change, as the law requires. The proposed decision should be withdrawn.

10. The Navy EA failed to disclose surface ship involvement. It also failed to disclose that contractors, not Navy personnel, would operate equipment. The EA does not mention ship involvement, yet the emails gathered by the FOIA process from the Forest Service disclose 275 events per year with ships offshore using mobile emitters. In addition to the impacts of jet noise, pollution, and other effects not addressed by this EA, surface ship involvement clearly expands the scope of the project. This clearly requires a new public process. The EA also does not disclose that contractors, not Navy personnel, will operate equipment involved with the project. There is no discussion of these contractors' training. Will they be armed? What are the legal liabilities and rules of engagement with citizens who happen upon a mobile emitter in Olympic National Forest? What assurances can be made and legally enforced that these contractors will operate safely and in a responsible manner? Again, the failure to include such information and disclosures requires that a new public process occur that is more forthcoming.

11. The Forest Service failed to disclose to the public in a timely manner that it had already granted four temporary permits to the Navy for use of national forest roads to conduct electronic warfare. District Ranger Dean Millett signed four temporary permits between 2010 and 2014, yet Millett at a public information meeting said only one such permit had been given. This misled the public, which had a right to know the full extent of Forest Service involvement. It invalidates the necessary public process required by law.

12. Definitions are inadequate in the Navy EA and the documents it supposedly tiered off. What constitutes an "event" or an "activity" is never specifically defined. As such, it is impossible to determine the true environmental impacts of the Navy's proposed actions. An "event" can last for seconds, minutes, hours, or days as discussed in other Navy EISs. If the number of annual "events" over the Olympic peninsula is estimated in the Electronic Warfare Range EA at 5,000, it makes a tremendous difference in impacts if those "events" are brief or lengthy. The public cannot evaluate impacts without the missing definitions. This makes the Navy EA incomplete. Therefore, it should be rejected.

13. There are serious questions about chronic radiation exposure to hikers, campers, photographers, boaters, and others as well as birds, small mammals, and amphibians. Yet such questions were dismissed in the EA. The EA did reveal that mobile emitters would transmit electromagnetic radiation for a total of 2,340 hours per site per year, and 7,020 hours across three sites each year. News reports cited the Navy's September 28, 2014 statement that fifteen minutes of exposure is enough time to sustain damage to soft tissue, such as the eyes. In the EA, the Navy says there are "no conclusive direct hazards to human tissue as a result of electromagnetic radiation." It called links to leukemia, cancer, and DNA fragmentation "speculative." The study it cites (the Focke study) actually deals with extremely low frequency exposure, such as the kind we get from the wiring in our houses, rather than the type of exposures that will occur in the Olympic National Forest if this pending decision goes through.

14. The EA does not deal with "Electronic Attack." Yet the purpose of the training conducted by the Navy is "to turn out fully-trained combat-ready electronic attack crews." Directed energy in the form of weaponized lasers or microwaves or other technology used by Growlers is not mentioned in the EA. Nor are any potential impacts from electromagnetic radiation discussed in any previous "tiered" NEPA documents. So the Navy EA, designed to promote warfare training using electromagnetic weaponry, failed to include any in-depth discussion of impacts from exposure to this electromagnetic radiation. The Forest Service's uncritical endorsement of the Navy's EA--without questioning this deficiency or conducting its own research--amounts to a dereliction of duty.

15. The Forest Service should have examined the dangers of electronic warfare on public roads in Washington State. The Navy stated it planned to drive mobile emitters "on existing roads and trails throughout the Olympic peninsula. . . ." A map on page 5 of the 2013 temporary permit shows that public roads already were being used as sites for testing and evaluation." This raises important questions. The Navy will require a 100-foot taped-off hazard perimeter around the emitters in remote forested locations. What hazards are there for people on public roads shared with mobile Navy emitter vehicles sending out electromagnetic radiation and other signals in the training process for Growler crews? The lack of analysis of the Navy's conduct of electronic warfare training on public roads requires that this Forest Service pending approval be withdrawn.

16. The Forest Service permit, if it stands, will unleash noise that has never been evaluated. The Navy's EA failed to evaluate several types of impacts because it claimed such impacts had been previously evaluated in "tiered" NEPA documents. That is particularly true of the noise impact of the Growler jets. The Navy's 2005 EA on transitioning from Prowler jets to Growlers established limits of sound exposure that promised a 36 percent reduction in the number of individuals in surrounding areas who would be exposed to aircraft noise greater than 65 decibels. No noise evaluations were made for areas beyond the immediate Whidbey environs. But the number of Growlers has grown significantly and includes a 368 percent increase in flight operations at OLF Coupeville compared to what was predicted in that 2005 EA and a 479 percent increase in nighttime flights, which accounted for 84 percent of operations. There thus is a significant underestimate of the impact to surrounding communities. Because there is no established baseline, the noise limits just keep creeping up. Without baselines, it is all but impossible to document future impacts. The Navy's Electronic Warfare EA segmented impacts in a way that makes it impossible to understand and assess them and, in fact, impacts from jet noise just were not addressed. Because impacts have undergone substantial increases, the 2014 EA should be found by any measure to be badly out of date. For the Forest Service to grant a permit after all this would be a mistake.

As we contemplate the numerous failures of this process by the U.S. Forest Service and U.S. Navy, we are appalled that any permit could be issued. But let us provide possible remedies for your consideration:

A. Rescind the decision to grant the permit, pending the actions urged below.

B. Require that an EIS, rather than an EA, be produced due to the controversial nature and scope of this proposed activity. That EIS should contain accurate maps without omitting critical details, such as major rivers, Olympic National Park, and Lake Quinault.

C. Respond to longstanding public requests by having the Navy provide details about the roles and training of contractor-operators, whether they will be armed, what type of armament they will be carrying, and what the public can expect when encountering them.

D. Correct scientific inaccuracies contained in the EA to standards that Forest Service biologists can support.

E. Conduct a new, far more inclusive and fair public process, including holding real public hearings in affected communities, as required by NEPA.

F. Conduct independent scientific investigations (run by the Forest Service) on all reasonably foreseeable impacts and cumulative analyses in order to verify the Navy's questionable Findings of No Significant Impacts.

G. Ensure that alternatives have been carefully considered, along with mitigation measures, to avoid or minimize adverse environmental impacts.

H. Do not grant a permit until the EA or EIS examines the emissions and cumulative air quality impacts of more than 100 Growler jets and other aircraft flying overhead the Olympic National Park and Olympic National Forest. The 2014 EA addressed emissions only from the mobile emitters and associated "construction activities."

I. Require proper analysis of effects of these activities on climate change, not the boilerplate the Navy has used. The U.S. military is the world's largest single user of fossil fuels. It owes the public an objective, scientific, and detailed analysis of the impacts of this electronic warfare project.

J. No permit should be granted until the improperly "tiered" NEPA documents are replaced with necessary studies, scientific analyses, and facts.

K. No permit should be granted until adequate clarifications are given on terms like "event" and "impact." The public must have definitions that are detailed and accurate in order to understand and evaluate the proposal.

L. Stop downplaying the potential health effects and risks from radiation coming from directed energy weaponry

or mobile emitter trucks. The potential impacts of such radiation on humans and on migratory birds, amphibians, and other species must be completely and accurately evaluated and described to the public.

M. Steps must be taken to heal the public mistrust that resulted from this disingenuous process.

N. Real baselines must be established for aircraft noise impact evaluation.

O. The Forest Service must require the substantiation of the need for use of national forest lands as directed by the 1988 Master Agreement between the Defense Department and the Agriculture Department.

In conclusion, we believe the noise from Navy aircraft is being significantly and chronically underestimated. We believe there will be severe effects in some Washington State communities that have never been evaluated. We believe that there must be an evaluation of electromagnetic radiation impacts that is absent from the Navy EA and other NEPA analyses. We believe that the noise impact cannot be evaluated unless the process accounts for the Growler jet noise, not just the mobile emitter noise. We believe your process did not adequately address the air pollution that will result from granting a permit. We believe the Forest Service failed to conduct its own scientific research as required by law, and instead just "rubber stamped" the Navy's claims. We believe that an unfair, unethical process has created a deep well of public anger and mistrust.

We urge the Forest Service to rescind the decision to issue this permit and to start again with an EIS free of the deficiencies outlined above.

Signed:

Erin Jakubek

Lead Objector Who Commented in 2014

Deanna Fuller

Additional Objector