September 19, 2017

Naval Facilities Engineering Command Northwest
Attention: NWTT Supplemental EIS/OEIS Project Manager
3730 North Charles Porter Ave., Building 385
Oak Harbor, WA 98278-3500

Re: *Northwest Training and Testing Supplemental Environmental Impact Statement/Overseas Environmental Impact Statement (EIS/OEIS*

Dear Project Manager:

Save the Olympic Peninsula (STOP) is a non-profit, public benefit corporation registered in Washington State since June 16, 2015. The undersigned Beverly Goldie is the President of STOP, and she has been designated as its lead for Pacific Northwest Electronic Warfare Range and Growler aircraft related issues. Stop considers the preparation of the subject Supplemental EIS/OEIS a related issue.

STOP's purposes include ensuring "the best use of the land, the lakes, and the rivers on, and the skies above, the earth below, and the waters adjoining, the Olympic Peninsula of the State of Washington, in order to retain the unique character of the area, protect its environmental qualities, and provide for its enjoyment by generations to come." Through this letter we hope to educate our governmental officials as to why the EWR is not consistent with those purposes.

All the members of STOP's Board of Directors live, work, recreate, hike, fish, or travel in areas of Olympic National Park, Olympic National Forest, and Clallam, Jefferson, Grays Harbor, Island, and San Juan Counties that will be adversely affected by the proposed Pacific Northwest Electronic Warfare Range and the activities of the Growler aircraft operating out of NAS Whidbey Island.

It is for these purposes and with these interests in this issue that STOP submits these suggestions for the preparation of the subject Supplemental EIS/OEIS.

The impacts of the activities related to the Northwest Electronic Warfare Range (EWR) are as large as the impacts from any of the Navy's other activities covered by the Northwest Training and Testing EIS/OEIS (NWTT). Since the EWR was first publicly announced by the Navy thousands of comments have been addressed to the Navy and to the United States Forest Service (USFS) regarding the EWR and the various environmental documents which are claimed by the Navy and the USFS to have studied the impacts of the EWR. Almost all of these comments have been very critical of the manner in which the impacts of the EWR have been studied. Almost all of these comments have been ignored by the USFS and the Navy.

It is time for the Navy to stop ignoring these thousands of comments. It is time for the Navy to do a proper study of all of the impacts of the EWR in one document. STOP therefore re-submits its comments (copied below) on the Draft Environmental Impact Statement for the additional Growler Aircraft on Whidbey Island, and the comments therein on related environmental documents (including the NWTT), as suggestions as to what the Supplemental EIS/OEIS should address and correct.

Exihibits "J" and "K" of the NWTT rely heavily on Biological Opinion 01EWFWOO-2015-F-0251 dated July 21, 2016. As addressed in the comments copied below, that Biological Opinion is so heavily flawed, it should be redone and corrected before the Navy places in further reliance on that document in the subject Supplemental EIS/OEIS.

Respectfully submitted by:

Save the Olympic Peninsula, by

_____

Beverly Goldie, President

360-683-7097

Save the Olympic Peninsula
124 Township Line Rd
Port Angeles, WA 98362

(See below)

February 20, 2017

EA-18G Growler EIS Project Manager
Naval Facilities Engineering Command Atlantic
6506 Hampton Boulevard
Norfolk, VA 23508
Attn: Code EV21/SS

Via: http://www.whidbeyeis.com/Comment.aspx

RE: Draft Environmental Impact Statement for the additional Growler Aircraft on Whidbey Island.

Dear Project Manager:

Save the Olympic Peninsula (STOP) is a non-profit, public benefit corporation registered in Washington State since June 16, 2015. The undersigned Beverly Goldie is the President of STOP, and she has been designated as its lead for Pacific Northwest Electronic Warfare Range and Growler aircraft related issues.

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All the members of STOP's Board of Directors live, work, recreate, hike, fish, or travel in areas of Olympic National Park, Olympic National Forest, and Clallam, Jefferson, Grays Harbor, Island, and San Juan Counties that will be adversely affected by the proposed Pacific Northwest Electronic Warfare Range and the activities of the Growler aircraft operating out of NAS Whidbey Island.

It is for these purposes and with these interests in this issue that STOP offers the following comments on the Draft Environmental Impact Statement for the additional Growler Aircraft on Whidbey Island.

The DEIS is deficient in the following respects:

1. The DEIS is merely another segment in the illegal segmentation of the environmental studies related to the Navy's training activities conducted out of NAS Whidbey Island. The impacts of all the aircraft training activities conducted out of NAS Whidbey Island must be considered in one comprehensive environmental impact statement considering the activities of all the aircraft, wherever they fly and whatever they do, from takeoff to landing.

2. Alternatives to using NAS Whidbey Island for aircraft training activities were not adequately addressed. As admitted in an email from michael.welding@navy.mil to michaelmonson@outlook.com on February 13, 2017 at 8:31:25 AM PST, the Growler training can be conducted in Japan, at Patuxent River, MD, at China Lake, CA, and at Fallon, NV. That training can also obviously be conducted at Mountain Home, ID, where it is currently being conducted.

3. At least some of the 40 Growlers referenced in the above mentioned email will be using NAS Whidbey Island at least some of the time. The impacts of those Growlers should have been considered in the DEIS.

4. The noise modeling and the noise averaging on which the DEIS is based is inappropriate. The DEIS must be based on actual noise measurements, as opposed to computer generated noise approximations, and the effects of instantaneous sound levels must be considered.

5. The impacts of aircraft crashes were not addressed.

6 The impacts on children were not adequately addressed.

7. The impacts of fuel dumping were not addressed.

8. The economic impact on tourism, property values, population declines, and loss of business is not adequately addressed.

9. The impacts on the marbled murrelet and the spotted owl are not adequately addressed.

10. The other environmental documents that have been prepared by the Navy as part of the unlawful segmentation scheme referred to in 1, above, have not adequately addressed any of the DEIS's deficiencies as discussed above. In this respect please see the attached comments as submitted by Save the Olympic Peninsula in response to the U.S. Forest Service DN/FONSI issued on November 29, 2016, in regard to the Navy's request for a Special Use Permit for the Pacific Northwest Electronic Warfare Range. STOP resubmits them now as comments on how the subject DEIS must be modified to meet NEPA standards.

Respectfully submitted by:

Save the Olympic Peninsula, by

_____

Beverly Goldie, President

360-683-7097
Save the Olympic Peninsula
124 Township Line Rd
Port Angeles, WA 98362

January 9, 2017

United States Forest Service
1835 Black Lake Blvd. SW
Olympic, WA 98512
Attention: Reta Laford, Reviewing Officer

to: https://cara.ecosystem-management.org/Public/CommentInput?project=42759

Re: Objection Pacific Northwest Electronic Warfare Range (EWR)
More Specifically Re: The Draft Decision Notice and Finding of No Significant Impact (DN/FONSI) issued on November 29, 2016, by the Responsible Official, Dean Millet, the District Ranger of the Pacific Ranger District of the Olympic National Forest, which is the affected National Forest

Dear Reviewing Officer and District Ranger:

Save the Olympic Peninsula (STOP) is a non-profit, public benefit corporation registered in Washington State since June 16, 2015. The undersigned Beverly Goldie is the President of STOP, and she has been designated as its EWR Lead.

STOP's purposes include ensuring "the best use of the land, the lakes, and the rivers on, and the skies above, the earth below, and the waters adjoining, the Olympic Peninsula of the State of Washington, in order to retain the unique character of the area, protect its environmental qualities, and provide for its enjoyment by generations to come." Through this letter we hope to educate our governmental officials as to why the EWR is not consistent with those purposes.

All the members of STOP's Board of Directors live, work, recreate, hike, fish, or travel in areas of Olympic National Park, Olympic National Forest, and Clallam, Jefferson, Grays Harbor, Island, and San Juan Counties that will be adversely affected by the proposed Pacific Northwest Electronic Warfare Range.

STOP did not previously submit comments on the EWR because we had not yet been formed at the times of the previous comment period. However, we believe we are entitled to participate during this comment period and in any future litigation related to the proposed DN/ FONSI for the reasons stated below:

The following NEW INFORMATON has arisen after previous opportunities to comment closed:

a. The Navy has proposed a significant expansion of the number of EA-18G Electronic Warfare Growler Jets that will be based at Naval Air Station Whidbey Island (NASWI) and will train in the EWR. This will result in a significant increase in the environmental and

other damage caused by the testing and training activities in the EWR. It is certainly a reasonably foreseeable future action that must be, but has not been, considered by the Forest Service in its National Environmental Policy Act proceedings. See 40 CFR 1508.7.

b. The U.S. Fish and Wildlife Service has issued its Biological Opinion 01EWFW00-2015-F-0251 (Biological Opinion) related to the EWR dated July 21, 2016. That Biological Opinion is cited in the Forest Service's proposed DN/ FONSI. As discussed later in this letter, that document presents reasons as to why the DN/FONSI should be withdrawn.

c. The U. S. Navy has issued its Northwest Training and Testing FEIS/OEIS that contains Exhibits "J" and "K" related to the EWR. That FEIS/OEIS also contains revised figures for how many aircraft would be using the EWR. That FEIS/OEIS is cited in the Forest Service's new DN/FONSI. As discussed later in this letter, that document presents reasons as to why the DN/FONSI should be withdrawn.

d. The Forest Service has included new arbitrary, capricious, and unlawful justifications for the DN/FONSI.

FURTHERMORE, as noted in the proposed DN/FONSI at page 22, "objections must be submitted within 45 days following the publication of the legal notice in . . . *The Peninsula Daily News* (Port Angeles, Washington)." The first time any legal notice was published in *The Peninsula Daily News* of any proposed decision by the U.S. Forest Service relating to the EWR was on November 29, 2016. Consequently, nobody can be precluded from now commenting for not having commented earlier than 45 days from November 29, 2016.

Therefore, we hereby submit the following objections to the proposed DN/FONSI:

1. The Forest Service has failed to follow the requirements of the National Environmental Policy Act by illegally segmenting its environmental review of the mobile emitters from the environmental review of the impacts of the aircraft that will be directly associated with the mobile emitters. In this respect, the arguments submitted by Protect the Peninsula's Future as Scoping Comments on the Fall 2014 U.S. Navy EIS for the EA-18G Growler Airfield Operations at Naval Air Station (NAS) Whidbey Island are still valid until the studies suggested in Appendix A are included in the proposed EIS to which those comments were originally directed, or in another EIS. Those comments are reproduced in the attached Appendix A as the comments of STOP in regard to the proceedings here.

2. That a study of the impacts of the associated aircraft between NASWI and the EWR is especially important is evident from Table 3.1-2 of the recently released Draft EIS for EA-18G "Growler" Airfield Operations at NASWI Complex. Therein it is noted that ground level sound levels for aircraft transiting to and from NASWI can reach 116 dba, and that aircraft in transit can operate as low as 200 feet above ground level. Large portions of Olympic National Park, Olympic National Forest, and remaining portions of the Olympic Peninsula and the Strait of Juan de Fuca lie under the necessary transit routes. These areas contain critical habitat for both the spotted owl and the marbled murrelet. See, e.g., Figures 3.2-5 and 3.2-6, of the PNWEWR Draft

Environmental Assessment. The Biological Opinion states that noise levels in excess of 92 dba can harm both spotted owls and marbled murrelets.

3. The Forest Service has failed to follow the requirements of the National Environmental Policy Act by relying on Exhibit "J" of the Northwest Training and Testing EIS without the impacts considered in that Exhibit ever having been considered in the full environmental review procedure required by NEPA. Those impacts were never mentioned in any scoping document required by NEPA; they were never addressed in any draft environmental impact statement, and they were never subjected to any public review and comment process.

4. The Forest Service has failed to follow the requirements of the National Environmental Policy Act by relying on the NWTT FEIS/OEIS, which document fails to meet the requirements of NEPA by failing to address the impacts of the electronic warfare weapons and jamming equipment that will be used in the EWR. While the NWTT FEIS/OEIS contains extensive descriptions of the type, characteristics and specifications of the conventional weapons to be used in the training and testing activities, it contains no description of the type, characteristics and specifications, of the electronic warfare weapons and jamming equipment. Without such information in the NWTT FEIS/OEIS, or in any other document considered by the Forest Service, no adequate analysis of the impacts of the electronic warfare weapons on the EWR can be made.

5. The proposed DN/FONSI is contrary to the record, makes inconsistent claims, and is arbitrary and capricious, as demonstrated for example by the following:

a. Footnote 3, Page 15 of the DN/FONSI, and the Forest Service's responses to Concerns Nos. 49, 53, 56, and many others, in Appendix B of the DN/FONSI make claims to the effect that:

> "To allow flexibility of training in these areas, the Navy has estimated that a 10 percent increase in flights may occur related to EW training activities, which averages to less than one additional flight per day."

The Forest Service is sadly mistaken here, so much so that it appears it has not read much of the information provided by the Navy.

First, the increase in flights related to the EWR will be far more than the "less than one additional flight per day" considered by the Forest Service.

The Navy has repeatedly stated that the baseline usage in the MOA is 1,250 flights per year. A Navy internet document entitled NASWI EW Range FAQ.pdf states:

> "The average number of flights in the Olympic Military Operations Area is 1,250 annually. That number is based on data collected over the past two years. Annual flight requirements and actual flight activities tend to fluctuate from year to year based on many variables, such as world events, deployment schedules for squadrons, budget allocations and the cost of fuel. To allow flexibility of training in these areas, the Navy

> has estimated that a 10 percent increase in the current averages for flight numbers may occur related to electronic warfare training activities, which amounts to less than one additional flight per day."

This exact language is also used in an email (by michael.welding@navy.mil to a citizen at wxxxxxxx716@msn.com) sent on Mon, 2 Feb 2015 20:19:04 +0000.

Comparing this language to that used by the Forest Service in Appendix B, it is evident that the 10 percent increase considered by the Forest Service is a 10 percent increase from the 1,250 annual average number of flights, or about 125 flights per year. Based on the Navy's plans to operate 5 days a week for 50 weeks, or 250 days, this does amount to "less than one additional flight per day."

But the actual increase in the flight numbers that the Navy now claims will result from the EWR in the official environmental documents is much larger.

Table 2.8-1, beginning at page 2-55 of the NWTT FEIS/OEIS, and Table 2 beginning on Page 24 of the Biological Opinion, list 550 air combat maneuver events per year, and 5,000 electronic warfare operations events per year, in W-237 and the Olympic MOA. Table 2 of the Biological Opinion, on Page 24, states there are typically 2 to 4 aircraft per air combat maneuver event, but no maximum number of aircraft per event is stated. Table 2 of the Biological Opinion, on Page 26, states there are typically 1 to 4 aircraft per electronic warfare operations event, but no maximum number of aircraft per event is stated.

Because the number of flights is not broken out between the W-237 and the MOA, this information could mean from 6,100 to 22,200 flights per year could occur in the Olympic MOA. This would mean an increase of between 4,850 to 20,950 or more flights per year. That would mean an increase of between 19 and 84 flights per day. This would mean an increase of between 388 per cent and 1,676 per cent in the number of flights per day or per year.

At Section 2.7.1.4 of the NWTT FEIS/OEIS, on Page 2-48, the Navy attempts to explain away the significance of these increases by saying:

> "It is estimated that the additional flights proposed as part of Alternative 1 will result in an approximate 10 percent annual increase in actual flights, which equates to approximately one or two additional flights per day. This is because each flight could accommodate multiple Electronic Warfare training events."

However, this is contradicted by the Navy's admission in the Biological Opinion, referred to above, that there are "typically 2 to 4 aircraft per (air combat maneuver) event" and "typically 1 to 4 aircraft per (electronic warfare operations) event." See Table 2, Proposed Training Activities, Pages 24 and 26 of the Biological Opinion.

To avoid an arbitrary and capricious decision, the Forest Service must identify the real number of flights that will take place over the MOAs, and it cannot allow the Navy's

contradictory claims to how many aircraft are involved per training event to remain unexplained. As more fully discussed in Appendix A, it must also analyze the impacts of the aircraft based on a determination of the flight paths and power levels of the aircraft as they approach the various mobile emitter sites and any critical habitat of the spotted owl or marbled murrelet.

With vast differences between the wildlife and environmental conditions that exist in W-237 and the wildlife and environmental conditions that exist in the MOAs, and with the Forest Service lands only located within the MOAs, the failure of the Forest Service to require precise figures on how many aircraft will be operating over the MOAs is inexcusable.

b. The responses to Concerns Nos. 49, 53, 56, and many others, in Appendex B of the DN/FONSI make claims to the effect that:

> "With the EW training, the aircraft themselves will not be emitting EW signals, but instead will be passively receiving signals from the vehicle signal transmitters positioned on existing Forest Service Roads."

This statement is demonstratively contradicted by the record. See Section 2.1.2 of the EA for the proposed EWR that states: “The activities of the Proposed Action center on two divisions of EW, known as electronic warfare support (ES) and electronic attack (EA)." Also see Section A.1.4 of the NWTT FEIS/OEIS that states:

> "Electronic warfare is the mission area of naval warfare that aims to control use of the electromagnetic spectrum and to deny its use by an adversary. Typical electronic warfare activities include threat avoidance training, signals analysis for intelligence purposes, and use of airborne and surface electronic jamming devices to defeat tracking systems";

and Section A.1.4.1 of the NWTT FEIS/OEIS that states: "Fixed-wing aircraft employ active jamming and deception against enemy search radars to mask the friendly inbound strike aircraft mission." Also see the related discussion in Appendix A below.

c. The DN/FONSI is based in part on a noise study set forth as Exhibit "J" to the NWTT FEIS/OEIS that is arbitrary and capricious, and violates NEPA, in several ways. Specifically:

> i. An analysis of the impacts of aircraft was omitted from the Scoping Document for the NWTT EIS/OEIS, and from the NWTT Draft EIS/OEIS, and from the Supplement to the NWTT Draft EIS/OEIS;
>
> ii. The statement in the EWR EA that "[A]ny changes to the type or tempo of training conducted in the Olympic MOAs and W-237 will be addressed in the Northwest Training and Testing (NWTT) EIS/OEIS" indicates that the Navy intentionally omitted the impacts of the aircraft from the preliminary steps of

preparing an EIS, and planned all along to slip any mention of the impacts into the NWTT FEIS/OEIS;

iii. Exhibit "J" is not based on the actual plans of the Navy and uses lower levels of aircraft activity than are said to be contemplated by the NWTT FEIS;

iv. Exhibit "J" is based on "performance parameters (airspeed, altitude, and power settings) provided by the aircrews who fly the missions", whereas the actual airspeed, altitude, and power settings that the Navy intends to use should be what is analyzed;

v. Exhibit "J" bears no understandable relationship to the NWTT FEIS/OEIS. See Paragraph 9.4.1, Section 3, of Appendix "J" that states:

> "The numbers reflected in the following tables are based on the number of aircraft sorties, while the numbers in the [NWTT FEIS] are the number of activities; therefore, a comparison between the two sets of data in not easily made. One aircraft sortie could result in the completion of multiple training activities. Similarly, is some cases, one activity could include multiple aircraft sorties."

This is further contradicted, complicated and confused by the Navy's admission referred to above, that there are "typically 2 to 4 aircraft per (air combat maneuver) event" and "typically 1 to 4 aircraft per (electronic warfare operations) event." See Table 2, Proposed Training Activities, Pages 24 and 26 of the Biological Opinion.

vi. Exhibit "J" fails to consider any aircraft activity between Naval Air Station Whidbey Island (NASWI), where the training flights originate and return, and the EWR. Large portions of those areas between NASWI and the EWR overlie Olympic National Park, a World Heritage Site and an International Biosphere Reserve;

vii. Exhibit "J" fails to consider any aircraft activity within a three nautical mile distance from the outside edge of the SUAs towards the interior of the SUAs, whereas aircraft must transit that area in order to reach the interior of the SUAs, and they must operate within that area to detect and target mobile emitter sites that are to be located within that area;

viii. Exhibit "J" assumes that the aircraft events are uniformly distributed throughout the SUAs, including W237A, W237B, Olympic MOA A, and Olympic MOA B when in fact that cannot possibly be accurate when, for example, the mobile emitters that the planes will be detecting and targeting are planned to be at specific sites within the Olympic MOAs;

ix. The assumption noted in viii, above, distorts and dilutes the actual impacts of the aircraft within the Olympic MOAs, and within Marbled Murrelet and Spotted Owl Critical Habitat as defined by the Endangered Species Act that exist within the Olympic MOAs;

x. Nowhere is the training range of the aircraft flying out of NASWI defined, and nowhere are the boundaries of the so-called Pacific Northwest Electronic Warfare Range defined. Without these training ranges and boundaries being defined, it is impossible for the Forest Service to have properly assessed the impacts the Navy's plans will have on the environment;

xi. No noise studies included in Exhibit "J" use real, measured, and accurate noise levels generated by the aircraft that would utilize the training areas. All studies are based on unreliable, computer generated approximations from dated information.

xii. No flight profiles are provided in Exhibit "J" from which to analyze the impacts of the aircraft that would utilize the training areas.

d. The DN/FONSI is based in part on a noise study set forth in the Biological Opinion that is arbitrary and capricious, and violates NEPA, in all the ways Exhibit "J" does as stated above. The following statement at Page 214 of the Biological Opinion is an example of the cavalier approach that the USFWS took, and the Forest Service accepted, it the consideration of the impacts of the EWR:

"Without knowing the location and flight pattern of each training flight, we assumed that the training flights will be evenly distributed throughout the Olympic MOAs."

The mobile emitter sites which the electronic warfare aircraft will be targeting are generally in the higher elevation areas of the MOAs, and are mostly located in the critical habitat of the spotted owl and the marbled murrelet. To proceed without the knowledge of flight profiles of each training flight in these circumstances precludes the Navy and the Forest Service from determining the real environmental impacts of the proposed action.

6. The proposed action violates the Endangered Species Act. The proposed DN/FONSI, at page 17, states:

"The U.S. Fish and Wildlife Service determined that the project may affect, likely to adversely affect marbled murrelets due to noise from aircraft use and that the project will have no effect to marbled murrelet critical habitat."

This is correct except for the conclusions that the project will have no effect to marbled murrelet critical habitat.

Figure 3.2-6 of the EWR EA shows that emitter sites 1 through 8, 12 through 15, will all be located in marbled murrelet critical habitat.

Furthermore, Section 2.1.14 of the EWR EA states that

"Once at the site, the trucks would pull off the road utilizing the “pull-outs” or turnarounds that already exist at the preselected training sites, park, and shut down their engines. The

existing pull-outs and turnarounds have already been cleared (harvested), or have natural open areas that would allow emitter use to the west/northwest in the Olympic National Forest and would not cause an obstruction for other vehicles or ground disturbance. Furthermore, these sites have been preselected because, in general, they are on a cliff or ridgeline and/or currently provide an open area to the west of the pull-out that enables the mobile emitter a clear line of sight to the west."

Clearly, portions of the spotted owl critical habitat were selected and cleared for the emitter sites for the project. That is a physical effect of the project on marbled murrelet critical habitat.

Furthermore, sound is a physical effect. Just as waves on the water can turn a calm surface into a tumultuous sea, sound waves can turn the atmosphere into an uninviting environment - which in this case the Forest Service concedes damages the marbled murrelet. With expected noise levels of up 116 dba, this must be considered physical damage to marbled murrelet critical habitat.

For all these reasons, and many more that the limited time given for responses to the DN/FONSI at a busy time of the year precluded us from fully analyzing and commenting upon, we urge you to reject the proposed DN/FONSI and deny the Navy's request for the Special Use Permit.

Respectfully submitted by:

Save the Olympic Peninsula, by

_____

Beverly Goldie, President

360-683-7097

Save the Olympic Peninsula
124 Township Line Rd
Port Angeles, WA 98362

See attached Appendix A

Appendix A

The geographic area proposed to be covered by the EIS is limited to the Whidbey Island area generally, and to landings, takeoffs, and touch and go training at Ault and OLF fields. In this regard, a diagram on the left side of the "Growler Operations" page of the Scoping Meeting Guide is most telling. That diagram includes three flight paths that extend to the southwest of the area shown as follows:

Those flight paths, we are sure, lead to the Navy's proposed Pacific Northwest Electronic Warfare Range (EWR). The impacts of the Gowlers on those flight paths do not end at the boundaries of the Navy's diagram. The impacts extend as far as the Growlers fly.

Under NEPA those impacts must be evaluated in the EIS – both in the area between Whidbey Island and the proposed EWR, and in the area of the proposed EWR. Because that was not done in the Navy's Environmental Assessment (EA) for the proposed EWR, it should be done now. This is also necessary under the 1988 Master Agreement between the Department of Defense and the US Department of Agriculture. That Master Agreement requires the Forest Service to study both the impacts of the proposed land-based training activities and the impacts of the proposed use of airspace if "directly associated with the land based training."

We are mindful that the Navy's EA for the EWR states at Page 2-8:

"All of the EW training activities and locations that would be associated with the implementation of the Pacific Northwest EW Range were analyzed in the NWTRC EIS/OEIS. The NWTRC EIS/OEIS has an October 2010 Record of Decision that approved an alternative that included EW training activities associated with the establishment of a fixed emitter in the Pacific Beach area. Current training levels in the Olympic MOAs and W-237 will remain the same as per the NWTRC EIS/OEIS, and any changes to the type or tempo of training conducted in the Olympic MOAs and W-237 will be addressed in the Northwest Training and Testing (NWTT) EIS/OEIS."

However, neither underlined statement is accurate. That the NWTRC EIS does not evaluate the activities contemplated by the proposed EWR is apparent from the following tables:

Table 3.2-2 lists the emission sources for all training activities evaluated by the NWTRC EIS. The only emission sources listed for Electronic Combat are from aircraft and ships or boats. There are no emission sources listed for ground based mobile emitters. Had the activities contemplated by the proposed EWR been evaluated by the NWTRC EIS, the ground based mobile emitters should have been listed here as an emission source.

Table 3.3-8 lists, by activity and training area, the stressors and hazardous materials that would be associated with the activities evaluated by the NWTRC EIS. For Electronic Combat the only areas listed are the Darrington Area and W-237. Had the activities contemplated by the proposed EWR been evaluated by the NWTRC EIS, the Olympic MOAs should have been listed here as a training area.

Table 3.16-1 lists by Range and Training Site, the training environment and the type of training activity covered by the NWTRC EIS. For Electronic Combat the only area listed is W-237. Had the activities contemplated by the proposed EWR been evaluated by the NWTRC EIS, the Olympic MOAs should have been listed here as a training area.

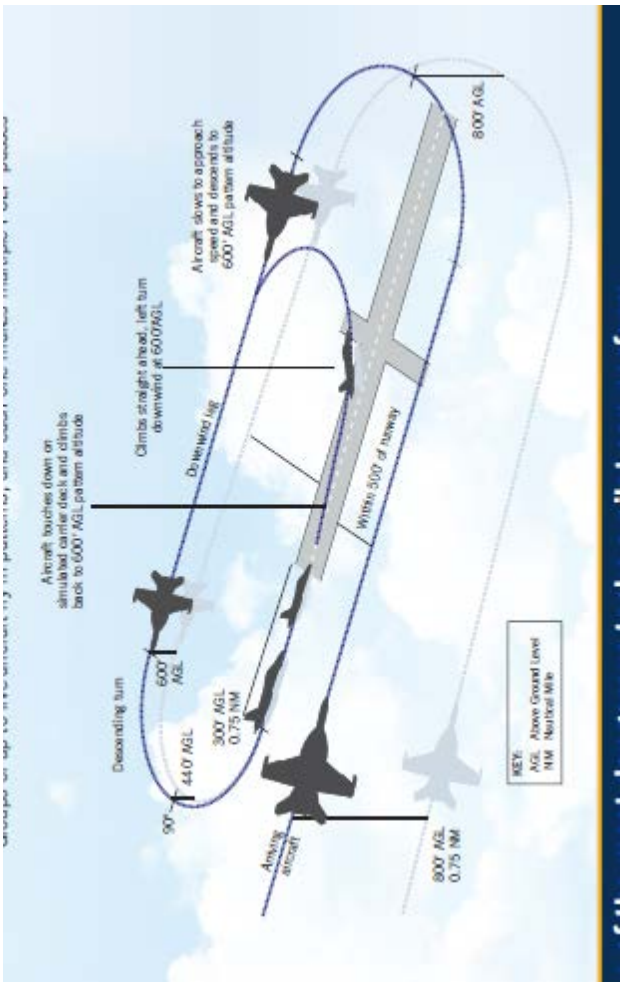
Table 3.16-2 lists by warfare type the area in which it would be conducted. For Electronic Combat the only areas listed are W-237a and the Darrington Area. Had the activities contemplated by the proposed EWR been evaluated by the NWTRC EIS, the Olympic MOAs would should have been listed here as a training area.

That the NWTT EIS did not evaluate the activities contemplated by the proposed EWR is apparent from the following statements:

At Page 2-3 it says “The land resources affected by the use of the Olympic MOAs A and B will be evaluated as they are directly impacted by overflights for at-sea activities.” To emphasize the obvious, only overflights of the MOAs for training at sea was contemplated in the NWTT EIS. No mention is made of impacts on the Olympic MOAs from Electronic Combat training there.

At Page 3.6-18 it says “The training activities involving aircraft in the Olympic MOAs evaluated in this EIS/OEIS are similar to the training evaluated in the NWTRC EIS.” With Electronic Combat training in the Olympic MOAs not having been evaluated in the NWTRC EIS, this sentence demonstrates it was not evaluated in the NWTT EIS either.

PPF expects the Navy in the proposed EIS to evaluate the impacts of the Growlers, both in the area between Whidbey Island and the proposed EWR, and in the area of the proposed EWR, with the same intensity and specificity it evaluates the impacts of the Growlers in the Whidbey Island area. In this regard, a diagram on the right side of the “Growler Operations” page of the Scoping Meeting Guide is helpful. It shows a detailed portrayal of the flight paths of Growlers using the OLF for Field Carrier Landing Practice (FCLP). A copy is shown below.



It is commendable that the Navy has gone to such extents to study the impacts of the 36 new Growlers at OLF. However, the same detailed portrayal of flight paths of Growlers going to and returning from, and using, the proposed EWR, is essential for a proper evaluation of the impacts in those locations.

Because there are 15mobile emitter sites in the proposed EWR, and one fixed emitter site, there are essentially 16 OLFs in the proposed EWR. A detailed portrayal of flight paths for each of the 16 proposed emitter sites is needed. The same is true of every possible flight path to and from the proposed EWR.

With neither the NWTRC EIS nor the NWTT EIS having adequately evaluated Electronic Combat in the Olympic MOAs, or aircraft flights in the area between Whidbey Island and those MOAs, the impacts of the 82 or so Growlers currently at NASWI, as well as the proposed 36 new Growlers, must now be evaluated in the proposed EIS.

Prior to preparing an EIS as suggested above, the Navy should consider that the Master Agreement referred to above authorized military use of National Forest lands only if that use is "…compatible with other uses and in conformity with applicable forest plans, provided the Department of Defense determines and substantiates that lands under its administration are unsuitable or unavailable." NASWI is already conducting electronic warfare training at several Department of Defense bases in the Northwest that include restricted airspace and nearly half a million acres of land. Only one, the Fallon Training Range Complex, is mentioned, in a single paragraph on page 2-9 of the EA for the proposed EWR. This does not qualify as the kind of determination and substantiation required by the Master Agreement. Also, Capt. Michael Nortier, the commanding officer at NASWI, stated in a Commentary in the Peninsula Daily News on December 26, 2014, that "The armed services have decades of experience successfully operating similar fixed and mobile emitters at a variety of locations across the nation." This being the case, the Navy cannot meet the condition under the Master Agreement that lands already "under [the DOD's] administration are unsuitable or unavailable" for an electronic warfare range. Consequently, no mobile emitter sites in Olympic National Forest can be used for the proposed EWR.

In the proposed EIS, the Navy must also consider the impacts related to both parts of Electronic Combat – Electronic Surveillance and Electronic Attack. In the informational meetings held in Forks and Port Angeles to explain the proposed EWR, the Navy repeatedly stressed that training for Electronic Attack would not take place in the proposed EWR. Capt. Michael Nortier said the same in the

Commentary mentioned above. The official documents say otherwise. Specifically:

Section 2.1.2 of the EA for the proposed EWR, says "The activities of the Proposed Action center on two divisions of EW, known as electronic warfare support (ES) and electronic attack (EA)";

Section 1.3 of the EA for the proposed EWR, and the related Forest Service and Navy FONSIs, say "The purpose of the Proposed Action is to … maximize the ability of local units to achieve their training requirements on local ranges";

Section 4.2.1.3 of the EA for the proposed EWR says "The Wing's mission is to support U.S. Naval Air Forces and the Unified Command Structure by providing combat-ready Tactical Electronic Attack squadrons which are fully trained, properly manned, interoperable, well-maintained, and supported";

The Proposed Action section of the Fall 2014 "A Guide to the Scoping Meeting (for the subject EIS)" says "The Navy is proposing to increase electronic attack (VAQ) capabilities by adding up to 36 aircraft to support an expanded VAQ mission and training at NAS Whidbey Island; and

The VAQ Mission and Training section of the above mentioned Guide says "The missions of the VAQ squadrons include electronic surveillance and attack against enemy radar and communications systems. This involves the use of jamming equipment and anti-radiation missiles. The Growler has an advanced electronic system that allows it to identify targets and protect itself from those targets."

The Navy cannot "maximize" the use of the proposed EWR, nor can it produce "fully trained" "combat-ready Tactical Electronic Attack squadrons" on the proposed EWR without electronic attack training being conducted there. Nor can the Navy meet the Proposed Action and VAQ Mission and Training goals for the proposed action without electronic attack training being conducted on the proposed EWR. The Navy must study the impacts of this electronic attack training in the proposed EIS. It should also stop denying its true intentions regarding electronic attack training in its public statements.

In the Navy's informational meetings at Forks and Port Angeles on the proposed EWR, as well as in the EA for the proposed EWR, it is suggested that EMF from the proposed emitters would not be dangerous, in part because it was directed upwards and away from any living thing that could be adversely affected by the EMF. The implication from this is that EMF directed downwards, as it will be from Growlers training in the proposed EWR, would be dangerous. Perhaps that is why the Navy chose not to address this element of the proposed EWR in its environmental documents. NEPA, however, does not allow for that exception.

PPF is encouraged by the statement in the above mentioned Guide that:

"A noise assessment will be conducted as part of the EIS and it will include a supplemental noise analysis, a potential hearing-loss analysis, and an assessment of non-auditory health effects. The supplemental noise analysis will include an evaluation of sleep disturbance, indoor speech interference, and classroom learning interference. The potential hearing loss analysis will focus on any portion of the local population that may be exposed to noise levels greater than 80 DNL. Lastly, the assessment of non-auditory health effects will consist of a comprehensive literature review."

These studies, however, must be done with real noise level data obtained from actual on ground measurements under the actual, specifically located flight paths that the Growlers will travel, wherever they travel, and at whatever power levels they travel, including all times when their afterburners are operating. These studies must also be done by time of day and by time of year. This latter consideration is particularly important in relation to nesting seasons for endangered birds and tourist seasons for Olympic National Park and surrounding areas. It is not sufficient to assume that training will take place at a constant number and duration of flights throughout the year, unless in fact it does.

These studies should include C-Weighted sound measurements and analysis, they must incorporate supplemental noise measurements including Sound Exposure Level (SEL) and Peak Sound Level (Lmax), in addition to Ldn, and they must document the projected annual number of events that exceed 60 dB SEL and Lmax in 5 dB increments throughout the impacted areas. These studies should also address the health effects of "Startle Reactions" and the effects on a person's feelings of loss of control

over their environment when subjected to noise impacts beyond their control.

The mention of certain impacts herein, does not mean to imply that there are not other impacts to cover. The proposed EIS must consider the full range of environmental issues and not eliminate any issues on the basis of preliminary, incomplete studies that purport to reveal resources upon which the proposed action is unlikely to have any potential environmental impacts. In the EA for the proposed EWR, the exclusion of geology, water, land use, cultural, and transportation resources, and socioeconomics, and environmental justice and protection of children, was simply not excusable.

In evaluating the impacts on Olympic National Park, the Navy should pay special attention to the fact that the Park is a World Heritage site, an International Biosphere Reserve, and the home of One Square Inch of Silence, one of the quietest places in the United States. The Park includes the world's last remaining coastal rainforest ecosystem of its kind. It is an irreplaceable cultural and natural resource. It is also the economic hub of the Olympic Peninsula. No proposed action by the Navy should adversely impact this treasure in any way.

Because so much more should be evaluated in the Proposed EIS than was presented in the Scoping documents, a whole new Scoping evaluation should be conducted by the Navy, with another opportunity for the public to comment.