



Electronic Warfare Range Update

Update of 10-31-15

New Document Changes the Electronic Warfare Range Landscape

On October 1, 2015, the Navy released the Northwest Training and Testing Final Environmental Impact Statement/Overseas Environmental Impact Statement (FEIS). This document covers the Navy's anticipated training activities in an area stretching from Northern California to Alaska.

The most important feature of the FEIS, as far as the Olympic Peninsula Electronic Warfare Range (EWR) is concerned, is an analysis of the impacts of the training activities of the aircraft using the EWR. This analysis was missing from the draft version of the FEIS. What has been added, however, is a very incomplete and legally insufficient analysis in many ways.

Relationship of the FEIS to the Forest Service Special Use Permit Proceeding

The Environmental Assessment (EA) used by the Forest Service in issuing its October, 2014, proposed approval of the Special Use Permit (SUP) for the EWR relied upon this anticipated FEIS in making its original determination. As one example, the EA said "any changes to the type or tempo of training conducted in the [Electronic Warfare Range] **WILL BE** addressed in the Northwest Training and Testing Environmental Impact Statement/Overseas Environmental Impact Statement (NWTTEIS/OEIS)." At the time, the draft version of the FEIS, called a "DEIS," simply did not address those changes. The FEIS now attempts to correct this obvious deficiency of the EA and the DEIS.

The "**WILL BE**" in the prior quote exemplifies just how bad the EA for the EWR was. Yes, the Forest Service actually issued its October, 2014, proposed approval of the SUP on the basis of a document whose draft version did not contain the necessary analysis of aircraft training activities, and whose final version was yet to be issued.

Now, it is a foregone conclusion that the anticipated final decision by the Forest Service on the SUP for the EWR will refer to this FEIS. In fact, it is probable that the Forest Service delayed its action until this FEIS was completed so that a claim could be made that the impacts of the aircraft training activities had been analyzed.

Illegalities of the FEIS/OIES

An exhaustive study of the FEIS needs to be done before all of its insufficiencies and illegalities can be determined. It can be very counter-productive to our cause of keeping the EWR off the Olympic Peninsula to make claims regarding the FEIS without having thoroughly reviewed the whole document. Several glaring omissions, however, are obvious. Examples are as follows:

- Although the aircraft using the EWR will overfly almost the entire Olympic National Park and World Heritage Site, the impacts of those aircraft were only studied in that portion of the Park and World Heritage Site that is overlain by the Olympic Military Operating Ranges.
- The FEIS does not use real aircraft sound measurements, and it does not contain the projected flight paths of the aircraft using the EWR.
- No analysis was made of the impacts of the aircraft using the EWR on the area between Whidbey Island, where the aircraft are based, and the EWR.

Challenging the FEIS in Court

In order to challenge any issuance of a SUP by the Forest Service on the basis of noncompliance with the National Environmental Policy Act (NEPA) and other laws for which the NEPA analysis is important, we must challenge both the EA and FEIS. This is a large task for which we must retain legal counsel, and for which we again need volunteers to review the pertinent documents.

Every page of the FEIS must be scrutinized. To accomplish this, we need to reactivate the research group that did such a good job of analyzing previous environmental documents, and we need additional volunteers to assist this group.

We are in the process of hiring our legal team. It is anticipated that a minimum of \$10,000 will be required to do an adequate study of the FEIS. The cost will be much more without volunteer assistance in document analysis.

Your help is urgently needed!

This matter is highly important to the future economy and environment of our beloved Olympic Peninsula. We ask you to contribute your money and your time generously to the extent you are able.