



Help STOP Analyze the Navy's Faulty FEIS

Update of 02-27-16

We need your help! The Navy's first noise analysis of the jets using the Electronic Warfare Range (EWR) appeared in the Northwest Training and Testing Final Environmental Impact Statement (NWTTFEIS). Those actions deprived you of two opportunities to comment on the environmental impacts of the jets using the EWR - first at the scoping stage, and then at the draft environmental impact statement stage. However, it's not too late to contribute. We ask that you review the Navy's noise analysis and send us your comments at savetheolympicpeninsula@gmail.com. Your observations will help us educate the Navy, through litigation or otherwise, on what the law requires them to do.

Our initial review of the noise analysis indicates it is deeply flawed. It does not appear to have been a serious attempt to comply with the National Environmental Policy Act (NEPA). Examples of its shortcomings are:

1. No mobile emitter sites were shown on the area maps, and their locations did not enter into the noise model calculations;
2. Flights were assumed to occur, with one exception, evenly across all of the Special Use Areas involved in the study, rather than to be concentrated in the area of the mobile emitter sites;
3. The one exception mentioned above, was to assume there would be no flights within the Military Operating Areas (MOAs) closer than three miles from the outside boundaries of the MOAs. Two mobile emitter sites, however, are within the area in which flights were thus assumed not to occur. Because the purpose of the EWR is to detect and target these emitters, it is highly improbable that no flights would occur within those areas.
4. The cumulative result of the above shortcomings is to understate the actual average sound levels that will occur in the areas of the mobile emitters, which just happen to be areas of critical habitat for both the marbled murrelet and the spotted owl.
5. The noise analysis made no mention of marbled murrelet or spotted owl critical habitat. No critical habitat was shown on the area maps.

There are many more shortcomings. But we want to hear them from you, rather than to suggest them to you. Your views could give us new and even better arguments with which to address the issues. To this end, please review the Navy's noise analysis in the FEIS. It is referred to as [Appendix "J" \(click here to view\)](#) at some places in the FEIS, and it is physically located between Appendix "I" and Appendix "K" in Volume 4 of the FEIS. You will not find on the document, however, any heading calling it Appendix "J".

We also ask you to review [Appendix "K" \(click here to view\)](#) which is a flawed analysis of the effects of the EWR on the Olympic National Park World Heritage Site. The erroneous conclusions in Exhibit "K" are largely dependent on the erroneous noise analysis of Appendix "J".

The FEIS can be downloaded at nwtteis.com. In doing your review, please consider every assertion made by the Navy. Ask yourself whether that assertion is true. Ask yourself whether that assertion is misleading. Ask yourself if there is more to the story than the Navy is saying. Treat this as a mystery game. It can be a challenge that will give you a sense of accomplishment when you find something in need of more study. It will also increase your interest in helping the Navy correct its abuse of our environmental laws.