



Navy's Electronic Warfare Range Environmental Analysis is Grossly Deficient

Update of 12-21-15

STOP's ongoing review of the Navy's recently released Northwest Training and Testing Final Environmental Impact Statement (FEIS) has identified what we believe are a number of significant violations of the National Environmental Policy Act (NEPA).

In our last update, we discussed how other government agencies have criticized the Navy's analysis of the noise impacts of the aircraft using the proposed Pacific Northwest Electronic Warfare Range.

In this update we discuss another gross deficiency - the complete failure to analyze the impacts of the electromagnetic radiation that would be emitted by the electronic warfare weapons with which the aircraft using the proposed EWR will be equipped.

Section 2.3 of the FEIS has an extensive listing and description of sonar systems, ordnance, munitions, targets, and other systems to "facilitate understanding of both the activities and the analysis of the environmental effects of their use." The potential environmental impacts of those systems are then analyzed in Section 3 of the FEIS.

However, no such listing or description is included in the FEIS for the electronic attack weapons with which the EA-18G Growlers are fitted. This is especially ironic because the whole purpose of the EWR is to provide testing and training in the operation of those systems.

Instead, without limiting or describing in any way just what electronic attack weapons will be used, Section 3.0.5.3.2.1 of the FEIS dismisses any consideration of their impacts by claiming that "these systems will be operated at power levels, altitudes, and distances from people and animals to ensure that energy received is well below levels that could disrupt behavior or cause injury."

Just as with the Navy's more conventional weapon systems, however, a listing of the types of electronic attack weapons and their specifications, and the "power levels, altitudes, and distances from people and animals at which the weapons will be used," is needed to "facilitate understanding of both the activities and the analysis of the environmental effects of their use."

A recent article in the online publication *Defense Systems* noted the Navy "is upgrading its electronic attack aircraft, the EA-18G Growler" and described the Growler as "an advanced airborne electronic attack platform, with electronic warfare capabilities" including "non-traditional electronic attack" weapons.

According to its Environmental Assessment, the EWR is intended to "sustain and enhance the level and type of EW training currently being conducted by assets using the [Northwest Training Range Complex], to provide the ability to accommodate growth in future training requirements, and to

maximize the ability of local units to achieve their training requirements on local ranges." It is also intended to provide "combat-ready Tactical Electronic Attack squadrons which are fully trained." This degree of training would require the use of "non-traditional electronic attack" weapons within the EWR.

A United States Army document entitled "Bioeffects of Selected Nonlethal Weapons" released in 2006 discussed electronic warfare weapons that could induce sounds in human subjects, trigger epileptic seizures, and induce blinding. In 2013, the Air Force awarded General Dynamics a \$49,000,000 contract to conduct bio-effects research on directed energy weapon effectiveness and safety, directed energy bio-mechanisms, radio frequency bio-effects modeling and simulation, and human effectiveness analysis and integration. This 2013 contract indicates that the development of the selected nonlethal weapons mentioned in the 2006 document is very much being pursued by the Department of Defense. These types of weapons would seemingly qualify as "non-traditional electronic attack weapons."

Before any rational analysis of the effects of the EWR can be made, it is essential that the specifications of all the electronic attack weapons to be used in the EWR, including "non-traditional electronic attack" weapons, be known. This is especially so with non-traditional electronic attack weapons being a part of the Growler's arsenal, and with those weapons apparently being designed to harm people.

We invite all of you to share your knowledge and concerns regarding electronic attack weapons with us and the public so that this aspect of the EWR might receive the proper attention. We invite the Navy to recognize the deficiencies in its NEPA documents, and to start anew by drafting a scoping document to begin the proper analysis of the environmental impacts of the EWR.