

Re: Scoping Comments on the Fall 2014 U.S. Navy EIS for the EA-18G Growler Airfield Operations at Naval Air Station (NAS) Whidbey Island

Protect the Peninsula's Future (PPF) is a non-profit, public benefit corporation registered in Washington State since 1973. I am on the Board of Directors of PPF, and I have been designated as its EWR Lead. Many of our members 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 any increase in the number of EA-18G Growler Aircraft at NASWI. These members are already being adversely affected by the current number of EA-18G's at NASWI, the impacts of which have not been sufficiently evaluated in any environmental document.

PPF has grave concerns that the scope of the EIS as described in the Fall 2014 "A Guide to the Scoping Meeting (for the subject EIS)" is much too limited to comply with the National Environmental Policy Act (NEPA). That act requires all federal agencies to prepare an EIS whenever they undertake any significant action, and further stipulates that all activities that are functionally related must be included.

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 Growlers 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.

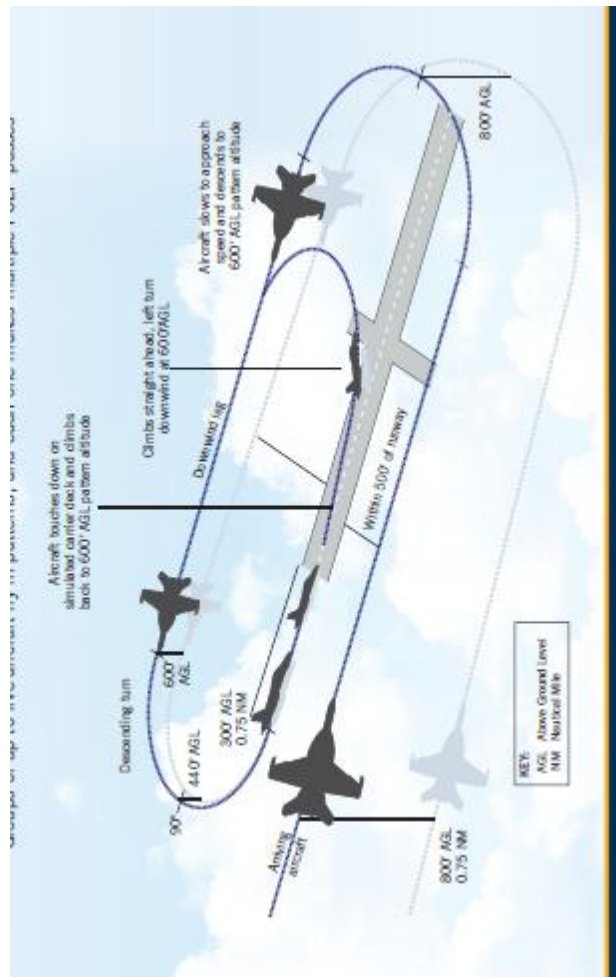
That the NWTTE EIS did not evaluate the activities contemplated by the proposed EWR is apparent from the following statements:

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 NWTTE 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 NWTTE 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 15 mobile 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 NWTTC EIS having 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 FONSI, 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.

Sincerely,

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