



• Around the Peninsula

# The Loudest Jets in the Quietest Park

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**In the summer of 2014**, the U.S. Navy established an Electronic Warfare Range on large swathes of Washington's Olympic National Forest and in airspace over it, plus airspace over Olympic National Park and surrounding communities. Its purpose was to conduct permanent, continuous electronic warfare attack and detection testing and training for an expanding fleet of supersonic EA-18G "Growler" jets housed on Whidbey Island. The initial justification as stated in documents was that flying to the Olympic Peninsula would save around \$4 million in annual fuel costs, as opposed to flying to Mountain Home, Idaho, located in mostly uninhabited high desert where they'd previously flown. The shorter commute would allow trainees to spend more time with their families, said John Mosher, the Navy official in charge of the public process.

Neither the National Park Service nor the State DNR, nor one of the four western Olympic Peninsula Tribes, all of whom would be impacted, were consulted beforehand. Affected communities on the Olympic Peninsula and Whidbey Island were also unaware of this designation. It's important to understand how it happened, because it triggered the arrival of more than 100 Growlers.

Regardless of whether or not you support the Navy's mission or its expanding presence in our public lands, waters, communities, and in the airspace above us, it's good to take a rational look at how we came to have an electronic warfare range for the loudest jets on the planet over the [quietest national park](#) in the Lower 48.

**First, what is electronic warfare?** It uses concentrated beams of electromagnetic energy or atomic or subatomic particles. These include lasers, electro-optical, infrared, and radio frequency weapons, high-power microwaves, and electromagnetic pulse weapons, "...to attack personnel, facilities, or equipment with the intent of degrading, neutralizing, or destroying [enemy combat](#) capability..."

So, it's logical that residents might have concerns about electronic warfare testing and training nearby where it wasn't before. It's not only reasonable to be afforded the chance to ask questions, it's a legal [requirement](#).

**Unfortunately for Olympic Peninsula residents in 2014**, no notices were printed in newspapers serving their communities, that a public process was underway to establish an electronic warfare range, or that an Environmental Assessment analyzing [impacts and alternatives](#) was available. While the Navy claimed it mailed around 100 postcards, not one Tribe, elected official, government agency, or individual could recall or produce theirs (and many were asked.) Thus, not one public comment was received by the Navy or recorded in the official administrative record. The Navy made its final decision to establish the range despite these obvious procedural flaws.

**In order for a public process to work**, a citizen comment must be based on fact and submitted in writing during the official public comment period, which is usually 4 weeks long; it can take time to read and understand the agency's analysis. Then the agency is obliged to either address the concerns or explain why they didn't. The fact that nobody knew about this proposal for an electronic warfare range, and thus nobody asked questions or voiced concerns before the Navy's 2-week comment period closed, meant that everyone unwittingly waived their legal rights to use the courts for redress of grievances. Most people didn't learn about the warfare range until six weeks after the comment period closed. The only other way for public comments to have been officially recorded (and therefore to matter legally) would have required knowing the nonpublic email addresses of Navy officials, or by navigating a byzantine website to find the documents and where to submit comments in time. Had the Navy held actual public hearings, at least some of the people who might have attended could have had legal standing.

Mosher, the Navy official in charge, later publicly stated that they did not hold hearings because there was not enough money in their budget. But the [law requires](#) public hearings when a proposed action is controversial. When someone pointed this out, he used the rationale that since nobody had objected during the comment period, then hearings weren't necessary. These are Catch-22 tactics; even [recording](#) these officials on video wasn't enough to compel them to behave better.

Three months past their final decision, the Navy held "informational meetings" in Forks, Port Angeles, and Pacific Beach because of thousands of complaints had compelled Rep. Derek Kilmer to ask for them. Attendees thought these would be official hearings, and many held printed comments in their hands, ready to submit for the record. But both the Navy and

Forest Service dismissed the idea of accepting comments on the record, despite repeated requests. "You're too late," they said. The general feeling in those rooms was "We've been bamboozled." At the meeting in Pacific Beach attended by a hundred fifty people, I quietly asked Kent Mathes, the Navy's Northwest Testing and Training Range Complex Manager, "Surely you must be getting an earful of public concern. Won't it change anything?" Mathes replied, "We're here to listen to what they have to say, but we're not going to do anything about it because we don't have to."

When a 9-1-1 dispatcher expressed concern about radio interference to firefighting and Tribal radio communications from a large fixed emitter to be constructed 300 feet from the fire station, Mosher said, "There was an opportunity to comment, there were no comments received, it was advertised in three newspapers..."

"Which newspapers?" she pressed. "Obviously it was not in the North Coast News, which serves Pacific Beach, so how can you receive comments if we don't have the information?"

Mosher: "We do our best to get the word out to the public."

Dispatcher: "How can we get you to address our issues?"

Mosher: "You can address it through your elected representatives. We've completed the comment period."

Dispatcher (angered): "You have extended the comment period right here."

Mosher: "I'm not going to sit here and debate this."

When someone asked why it was necessary to train in a rainforest with endangered species "...when you have White Sands [New Mexico] and Nevada and Arizona, which would be perfect for your training if you're going after ISIS?"

Navy pilot Brian Danielson, in charge of training the Growler squadron, [said](#), "We do that as well, but in the environment that we operate in, in the electromagnetic world that our mission is, it [the location] doesn't really matter, it [the activity] is a transmission. So, I don't have to do that in the desert if I have a transmitter here."

**The Navy's written analysis**, or [Environmental Assessment](#), was so narrow in scope that when the Forest Service was deliberating on the permit to allow use of national forest roads for electronic warfare training, they could consider only the impacts from the truck-and-trailer rigs on the ground, and not from Growler jets flying overhead, despite the fact that you can't have one without the other. No jet noise, emissions, fuel dumping, hazards from air-based electronic attack weapons, chronic radiation, wildlife impacts, fire danger, or other concerns that were brought up by the public were allowed. The Forest Service representative dismissed them as being "outside the decision space."

The Navy cited a four-year-old Environmental Impact Statement as having covered the concerns now being expressed by the public, but it was removed from their website before

most people could read it. I did read it and was surprised that, for example, its analysis of impacts to endangered species relied on an old Biological Opinion about a different location (the North Pacific Ocean) and different conditions (marine) that did not cover the Olympic Peninsula's terrestrial species. When the public challenged this lapse, the Navy did not respond; instead, two years later it retrofitted their 2014 Environmental Assessment with a new Biological Opinion approving the impacts. This was unprecedented.

I asked Mosher if there had ever been any "findings of significant impacts" in any environmental analyses going back over a decade, and he said no. Nor have there been any since. But what is significance? Between the two extremes of significant and non-significant impacts is a large gray area with a lot of wiggle room. While "significance" has high thresholds, a major one is triggered when there is "substantial controversy on environmental grounds." Since the Navy's actions have been controversial, the question becomes: Who got to determine significance? And how was it done? When, for example, they used nine separate public processes to expand a pier, with none of them rising to the level of significance, it was almost impossible to follow and understand the total impacts. When they used seven separate analyses to incrementally add Growlers to their fleet, with each new piecemeal process claiming "no significant impacts" as long as you didn't look at them all together, it made it impossible to assess those impacts, too.

In that fall 2014 Forest Service road permit process, there were 4,000 comments, all but one opposed. This was unusual for such a localized issue, but the comments ended up changing nothing. In every process since, and there have been dozens, no volume of substantive, thoughtful public questions or comments have made a difference; the Navy has always chosen its "preferred alternative," with little to no mitigation. It takes a lawsuit, which is expensive and time-consuming, and only a few citizen groups have tried. In 2019, Washington State's Attorney General sued the Navy over its failure to adequately analyze human health, environmental, and historic impacts of its Growler operations on Whidbey Island. That [litigation](#) is ongoing, and on Tuesday, a U.S. District Court judge [said](#) he is "concerned about the lack of noise monitoring, lack of analysis of differences between bird species and apparent disregard for how noise may impact [children's] learning."

**The Navy did not act** on a 2015 official request by Rep. Kilmer for a noise study until 2020, when it found that noise in Olympic National Park [exceeds 100 decibels](#). This is as loud as holding a handheld drill next to your ear. A [study](#) published later that year in Northwest Science found 88% of noise came from military flights, with the majority of them Growlers, and that the noise affects underwater areas, too.

Military warfare testing and training on public lands, waters, and in and around our communities qualifies as multiple major federal actions that are subject to *proper* public processes under the [National Environmental Policy Act](#) of 1969, or NEPA. That law requires an agency to be responsive to citizen concerns, and it requires assessing *all* impacts cumulatively, not just in piecemeal subsets. It requires holding hearings in affected communities whenever there is controversy—not retroactive and meaningless "informational meetings." Scientific evidence to back up their statements must be thorough, accurate, and available for public scrutiny. And comment periods should not be routinely held over holidays when people are busy with their families. With the arrival of all those Growlers, the public's right to know and participate was severely abridged.

**The most dangerous aspects of flying** are the approach, landing and takeoff—in other words, most of the flight paths around the runways at Whidbey Island. These risks are particularly significant at the World War 2-era runway at Outlying Field (OLF) Coupeville, which is 3,000 feet short of standard for Growlers. Normally, the unoccupied buffer area for naval airfields would be 30,000 to 50,000 acres larger than what the Navy currently has at Coupeville, which is mostly a residential area. However, a self-granted waiver allows the Navy to continue using it.

Thus, Growlers circle at extremely low altitudes—a couple hundred feet above rooftops—over homes and businesses, the Port Townsend-Keystone Ferry, and over a significant chunk of Admiralty Inlet that sees heavy shipping traffic. There is no room for error when flying so low over densely populated areas that include schools and a hospital, where noise levels often exceed 100 decibels—including indoors. These pilots are mostly trainees flying the F-18 airframe, which records show is far more likely to crash than its EA-6B (Prowler) predecessor. From 2013 to 2017, for example, the number of accidents rose by **108 percent**, from 45 to 94 per year. All Growlers and F-18s were **grounded** in 2017 due to a mechanical malfunction at Whidbey Island that severely injured two pilots.

Environmental, safety, and other concerns continue. The “let them train where they want!” refrain loses luster when one remembers that in Washington alone, the Navy owns 46 miles of shoreline and 151,975 acres of land, and that Government Accountability reports have shown for over a decade the Defense Department’s inefficient utilization of the millions of acres it already owns.

How did the Navy get a warfare range for the loudest jets on the planet over the quietest national park? Many who have paid attention might answer, “by being unaccountable.” A fair public process means playing by the rules. And that’s why so many are carefully watching the Washington Attorney General’s lawsuit.