



Save The Olympic Peninsula

savetheolympicpeninsula.org
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June 11, 2019

Naval Facilities Engineering Command Northwest
Attention: NWTT Supplemental EIS/OEIS Project Manager
3730 N. Charles Porter Ave.
Building 385, Admin, Room 216
Oak Harbor, WA 98278-5000

Re: Northwest Training and Testing Draft Supplemental EIS/OEIS Comments

Dear Project Manager:

For years now, Save the Olympic Peninsula (STOP) and its members have been commenting on various environmental documents generated by the United States Navy and/or the United States Forest Service relating to the Pacific Northwest Electronic Warfare Range and Navy training and testing in the waters adjacent to the Olympic Peninsula. For just as many years, the Navy and the Forest Service have been ignoring those comments, and the comments of thousands of other people and organizations, and have been proceeding to severely damage the environment and peace and tranquility of the Olympic Peninsula and surrounding waters and islands.

In large part, STOP's prior comments have been directed at the noise impacts of the jets using the Pacific Northwest Electronic Warfare Range (EWR). No such impacts were ever considered until October 1, 2015, when a noise analysis was finally slipped into the Northwest Training and Testing Final Environmental Impact Statement / Overseas Environmental Impact Statement (NWTT FEIS/OEIS) as its Appendix J. That noise analysis had not been included in the draft environmental impact statement and the public had not been afforded an opportunity to comment on it. That noise analysis was so extremely flawed it appeared to purposefully understate the impacts of the Navy jets.

There is now a new noise analysis. It is included the Northwest Training and Testing Draft Supplemental EIS/OEIS (Draft Supplement), again as an Appendix J. The new noise analysis is also so extremely flawed as too appear to purposefully understate the impacts of the Navy jets. But if anything in the new noise analysis in the Draft Supplement is correct, it is the part that proves how extremely flawed the former noise analysis was in the NWTT FEIS/OEIS.

The new noise analysis shows 2224 EA-18G aircraft per year to have been entering and exiting the Olympic MOA's from 2015 through 2017, of which 1194 are said to have been practicing to suppress enemy air defenses and 318 are said to have been training for electronic warfare close air support. See Table J-3, Page J-8, Draft Supplement, Exhibit J. However, the former noise analysis said there would only be 1558 EA-18Gs per year entering and exiting the Olympic MOA's in these same years, of which 572 were to practice suppressing enemy air defenses and 245 were to train for electronic warfare close air support. See Table 3-7, Page 14, NWTT FEIS/OEIS, Exhibit J.

The Navy's own figures thus show that the NWTT FEIS/OEIS understated the number of flights that would occur in the MOAs by at least 666 flights annually compared to what the Draft Supplement says did occur. Discrepancies like this cast grave doubts on the reliability of the whole process through which the Navy is studying the impacts of its operations. And so do the flaws discussed below that exist in the new noise analysis.

But first, one point that both noise analyses have made correctly is:

"Noise is one of the most prominent environmental issues associated with military training activities."

See Section 2, Noise Metrics, Page 4, of the original Exhibit J; and see J.4, Noise Metrics, Page J-3, of the new Exhibit J.

Despite this acknowledgement, the Draft Supplement EIS/OEIS, and its Exhibit J, continue to give short shrift to the noise impacts of the Navy's training and testing activities in the following ways:

1. The number of projected flights is again understated in the new noise analysis. The new Exhibit J contains the following wording that the old Exhibit J essentially contained.¹

"The numbers reflected in the following tables are based on the number of aircraft sorties, while the numbers in the 2015 NWTT Final EIS/OEIS are the number of activity events; therefore, a comparison between the two sets of data is not easily made. One aircraft sortie could result in the completion of multiple training events, *as a sortie is simply a single operational flight by one aircraft.*¹ Similarly, in some cases, one event could include multiple aircraft sorties."

See Draft Supplement, Exhibit J, Section J.5, Page J-7.

It does not matter whether a comparison is easily made. But it very much does matter that an accurate comparison be made.

The words quoted above are apparently intended to explain away the fact that Table 2.5.1 of the Draft Supplement calls for 574 air combat maneuver events and 3,938 aircraft electronic warfare

¹ These italicized words were not in the old Exhibit J. They do not change the message at all.

training events in the Olympic MOAs annually, whereas the new noise analysis, Exhibit J, Table J-7, only calls for 2540 aircraft missions (presumably "sorties") in the Olympic MOAs annually.

Table 2.5.1, contains a footnote 2 saying the 574 air combat maneuver events "typically involve two aircraft; however, based upon the training requirement, events may involve multiple aircraft." In this context, "multiple" apparently means more than two aircraft.

Table 2.5.1, also contains a footnote 4 saying that for the 3,938 aircraft electronic warfare training events, "on average, two events occur per sortie."

Applying these two footnotes to the events called for by Table 2.5.1, that table specifies there will be a minimum of 3117 (i.e., 1148 + 1969) aircraft sorties annually in the Olympic MOAs.

Comparing this figure with the 2540 aircraft sorties that the new Noise Analysis assumes, it is evident that the projected flights is again understated, this time by at least 577 aircraft sorties.

But the projected flights could be understated far more because there is a huge disparity between the events per sortie figures claimed in footnotes 2 and 4 referred to above, and the events per sortie figures used in the Biological Opinion 01EWF00-2015-F-0251 dated July 21, 2016 (Biological Opinion) under which the Navy received clearance under the Endangered Species Act to operate in the Electronic Warfare Range.

Table 2 of the Biological Opinion, on Page 24, states there are typically 2 to 4 aircraft per air combat maneuver event, but no maximum number of aircraft per event is stated. Table 2 of the Biological Opinion, on Page 26, states there are typically 1 to 4 aircraft per electronic warfare operations event, but no maximum number of aircraft per event is stated. Using these figures, together with the number of training events called for by Table 2.5.1 of the Draft Supplement, there could be between 5,086 and 28,048 aircraft sorties in the MOAs annually. The new noise analysis would then understate the projected flights by a factor of between 2 and 11, or as many as 2,542 to 25,508 sorties.

Considering that the old noise analysis understated the projected flights compared with the flights that subsequently occurred, and considering the large disparities discussed in this Section 1, it is essential that the Draft Supplement and its noise analysis get the ratios of aircraft per event correct. How these ratios are derived should be clearly demonstrated in a dedicated section containing supporting documentation. They simply should not be addressed in footnote statements.

2. The impacts of aircraft activity at all points between Naval Air Station Whidbey Island (NASWI), where the training flights originate and return, and the Olympic MOAs, are again not adequately considered. Six paragraphs in Section 3.0.3.1.3.1 - Navigation and Safety (including one paragraph repeated from Section 2.3.3.2 - Sea Space and Airspace Deconfliction) contain only the following information from which noise impacts could be calculated:

a. Aircraft normally fly southwest from a navigation point named MCCUL (20 NM west-southwest of NAS Whidbey Island) over the Strait of Juan de Fuca normally at or above 15,000

feet MSL to a fixed navigation point (65 NM west-southwest of NAS Whidbey Island) at the boundary of the Olympic MOAs.

b. Aircraft normally exit the Olympic MOAs per instrument Flight Rules clearance given by the Seattle Air Route Traffic Control Center to the navigation point named YETII (30 NM southwest of NAS Whidbey Island). Aircraft normally cross YETII at or above 12,000 feet MSL and then enter the arrival pattern to return to NAS Whidbey Island.

The only figures certain from the information given in the Draft Supplement, and that is qualified by the word "normally," is that MCCUL is crossed at 15,000 feet and YETII is crossed at 12,000 feet. The actual elevations of flights coming out of the MOAs depend on instructions giving by Seattle Air Route Traffic Control and are not specified. The actual elevations of the returning aircraft east of YETII depend on the arrival pattern, which pattern must necessarily decrease from 12,000 feet to ground level at Ault Field.

The Draft Supplement assumes certain noise levels for certain spots in the MOAs and in Olympic National Park based on a flyover event at 14,000 - 15,000 feet MSL. Those noise levels, however, are totally speculative because the actual flight elevations are not specified in the Draft Supplement.

The Draft Supplement does not address any of the noise impacts between Whidbey Island and MCCUL for westbound aircraft, or between YETII and Whidbey Island NAS for eastbound aircraft. These areas are subject to the lowest elevation flights, and include such special places as the Dungeness Wildlife Refuge, Protection Island, the City of Port Townsend, and depending on the takeoff and landing patterns, large portions of the San Juan Islands and the Salish Sea. The Draft Supplement is grossly deficient in not having considered the noise impacts on these areas.

Compounding the seriousness of these deficiencies is the reference in Section 3.0.3.1.3.1 of the Draft Supplement to "flight transit routes between NAS Whidbey Island and the Olympic MOAs." In the context, "flight transit routes" could mean the same as "military training routes," or "MTRs", as discussed in the NAS Whidbey Island Complex Growler FEIS, Section 3.1.2.1.4. Depending on their classification, MTRs can have floors between 200 and 500 feet AGL. Whether it is the Navy's intent to eventually establish these "flight transit routes" as approved "military transit routes," and what floors the Navy would seek on those routes, needs to be clearly addressed.

3. Aircraft events are again assumed to be uniformly distributed throughout the SUAs, including W237A, W237B, Olympic MOA A, and Olympic MOA B. See Exhibit J, Section J.5, Page J-7. This cannot possibly be accurate when, for one reason, the mobile emitter sites that the aircraft will be detecting and targeting are within the Olympic MOAs. This artificially distorts and dilutes the actual impacts of the aircraft within the Olympic MOAs, and within Marbled Murrelet and Spotted Owl Critical Habitat that exists there.

Realistically, flight tracks such as those used to study sound effects at the OLF in the NAS Whidbey Island Complex Growler FEIS at Figure 3.1-6, should be established for each of the

mobile transmitter sites and the noise impacts in the MOAs determined from them. Instead of asserting, as Draft Supplement does, that this is not possible "because the actual locations of any given event are unpredictable," the actual locations of the given events should be predicted as well as possible.

4. The number of aircraft training within a three nautical mile distance from the outside edge of the SUAs towards the interior of the SUAs, on the north, east and south sides of the MOAs, is again difficult to understand. The old noise analysis suggests that no aircraft will train in these offsets. The new noise analysis suggests maybe some aircraft will train (perhaps inadvertently) in these offsets at least some of the time. In both analyses, however, it is impossible to be sure how many aircraft will train in these offsets and for how much of the time. This uncertainty should be addressed by showing throughout the SUA the time that aircraft will be training in any portion of the SUA in any one year. This could be accomplished by a map color coded for different amounts of training time.²

5. There are 40 more Growlers than the 118 covered in the Draft Supplement and previous environmental document. This was confirmed in an email from Mike Welding, T CIV NAS Whidbey Is, N01P, email address michael.welding@navy.mil, to Michael Monson, email address michaelmonson@outlook.com, on February 13, 2017. In that email Mr. Welding attempted to justify the failure to address these aircraft in any environmental document by calling them "preservation aircraft" and claiming they would just be "parked" at NAS Whidbey Island and other locations, and that they will only be used to "replace aircraft at the end of their service life." He also asserts that the number of aircraft is not significant, and that only the number of total operations is significant.

STOP believes the number of aircraft is significant because of the likelihood of a "preservation aircraft" being used as a replacement for another Growler that is temporarily down for repairs. Having 118 Growlers as addressed in environmental documents always available for training will lead to many more flights than would happen if there were only 118 Growlers in existence. Furthermore, it is difficult to believe that perfectly operational "preservation aircraft" would be left on the sidelines for years until the other aircraft have reached the end of their service lives. If those "preservation aircraft" could be used to reduce the number of pilots in need of training, it is a very safe bet that they will be used. The result will be more than 118 Growlers being used at any one time, and more flights occurring. These additional aircraft, and how and when they will be used, should have been addressed in the Draft Supplement.

6. The new noise analysis uses very little real, accurate, and measured noise levels from aircraft utilizing the training areas. Noise predictions are based almost entirely on unreliable, computer generated approximations from dated information. As suggested in a letter dated March 8, 2017, from R. David Allnutt, Director, Office of Environmental Review and Assessment, United States Environmental Protection Agency, Region 10, to Ms. Lisa Padgett, EA-18G Growler Project

² A color coded map showing the time that aircraft will be using various locations within the SUA in any one year would also better help to address the inaccuracies discussed in Section 3. It is very unlikely that the far southwest corner of W-237A will see anywhere near as much traffic as the areas above the three main concentrations of emitter sites in the MOAs. Different colors could be used to code for the different amounts of traffic at these locations, as well as other locations.

Manager, of the Naval Facilities Engineering Command Atlantic, the Navy should have established and used data from a monitoring program to verify the actual noise impacts from its Whidbey Island operations.

7. It is hoped that the United States Navy will seriously consider these comments, and work to eliminate the very adverse impacts of its operations on, over, above, and below the Olympic Peninsula and its adjoining waters. The best way to accomplish this is to move its Growler operations and/or training activities to one or more of the several different facilities such as those considered, but rejected, in the NAS Whidbey Island Complex Growler FEIS, Volume 1, at Section 2.5, or back to Mountain Home AFB, Idaho. Training at these locations would have much fewer adverse impacts on the surrounding areas than continuing to use NAS Whidbey Island.

Using other facilities would have two very important advantages that the Navy has not seemed to consider. First, training in several locations, with varying conditions, would seem to better equip pilots with the experience and skills they would need to fight battles at various locations around the world, than does training at just one site. Second, with the OLF and the MOAs very close to Ault Field, the practice pilots receive does not replicate the fatigue factor the pilots will experience in actual combat.

The reasons offered by the Navy in NAS Whidbey Island Complex Growler FEIS, Volume 1, Section 2.5, as to why a single-site for Growler operations at NAS Whidbey Island is necessary, and why training activities cannot occur anywhere but from NAS Whidbey Island, are contradicted by the email referred to in Section 5 above, from Mike Welding to Michael Monson. Therein Mr. Welding says:

"The 117 or 118 operational Growler aircraft discussed in the DEIS will be assigned to carrier squadrons, expeditionary squadrons and the training squadron home based at NAS Whidbey Island.

Other carrier-based aircraft will be assigned overseas in Japan, while some test aircraft will be assigned to NAS Patuxent River, in Maryland and the Naval Air Weapons Station at China Lake, CA. There will also be some training aircraft assigned to NAS Fallon, NV, as part of the Weapons School located there."

The reasons offered by the Navy in said Section 2.5 as to why a single-site for Growler operations at NAS Whidbey Island is necessary, and why training activities cannot occur anywhere but from NAS Whidbey Island, are so emphatically negative as to offer scant hope for Growlers ever being effective in real military operations at distant locations around the globe. We know that is not the case. The arguments the Navy makes against the alternatives suggests the lack of any open mind. That is to the detriment of both the Navy and the public.

Save the Olympic Peninsula (STOP) is a non-profit, public benefit corporation registered in Washington State since June 16, 2015. The undersigned Ronald N. Richards is the Chair of STOP, and he has been designated as its EWR Lead.

STOP's purposes include ensuring "the best use of the land, the lakes, and the rivers on, and the skies above, the earth below, and the waters adjoining, the Olympic Peninsula of the State of Washington, in order to retain the unique character of the area, protect its environmental qualities, and provide for its enjoyment by generations to come." Through these comments we hope to educate our governmental officials as to why the EWR is not consistent with those purposes.

All the members of STOP's Board of Directors 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 the proposed Pacific Northwest Electronic Warfare Range.

Ronald N. Richards, Chair
for Save the Olympic Peninsula
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