



FSEEE Forest Service Employees for Environmental Ethics

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TRANSMITTED ELECTRONICALLY TO comments-pacificnorthwest-olympic-pacific@fs.fed.us

October 9, 2014

Greg Wahl, Project Lead,
USDA-Forest Service
Olympic National Forest
1835 Black Lake Blvd SW
Olympia, WA 98512

RE: Pacific Northwest Electronic Warfare Range Special-Use Permit Application

Dear Mr. Wahl:

These timely comments on the U.S. Navy's application for a special-use permit to conduct the Pacific Northwest Electronic Warfare Range project on national forest land are submitted in response to District Ranger Dean Millett's scoping notice of September 26, 2014. The Navy seeks the Forest Service's permission to deploy three Mobile Electronic Warfare Training System vehicle-mounted emitters along national forest roads leading to 14 Olympic National Forest sites during 260 days each year. The emitters will transmit electromagnetic radiation to Navy aircraft to mimic conditions pilots might face in hostile action.

The National Forest Management Act ("NFMA") requires that "permits . . . for the use and occupancy of National Forest System lands shall be consistent with the land management plan[s]." The Olympic National Forest's 1990 land and resource management plan ("LRMP") requires that special-use permits "may be authorized when such use cannot reasonably be accommodated on private land." LRMP at IV-55.

The environmental assessment fails to consider private land for the deployment of the mobile emitters.¹ Thus, the Forest Service has not demonstrated that the mobile emitters "cannot reasonably be accommodated on private land," in violation of the NFMA. The EA's failure to consider a private land alternative also violates the National Environmental Policy Act. 40 CFR 1508.9.

¹ The EA only considered private land for locating "stationary sites," not the mobile emitters proposed for deployment on the national forest. EA at 2-9.

It is apparent from EA's map of proposed emitter locations (EA at 1-3) that private land is in the same neck of the woods as the proposed national forest sites. In fact, the emitters appear to be located predominately near the national forest boundary (e.g., sites 1, 2, 3, 4, 5, 7, 9, 10, 11, and 15), with private land closely adjacent.

The 1990 LRMP also requires that "the interests and needs of the general public shall be given priority over those of the [special-use permit] applicant." LRMP at IV-55. Nowhere does the EA state this mandatory duty nor explain how the proposed deployment of mobile emitters complies with it. That failure alone violates the NFMA. Second, as explained below, the proposal puts the needs of the Navy above those of the general public.

The use of the emitters will require "warning tape and removable 'Electromagnetic Radiation Hazard' signage, which would warn people to not linger inside the taped area." EA at 2-4. Thus, the permit exposes the general public to hazardous radiation in order that the applicant can carry out its training mission. It would be difficult to imagine a more egregious subordination of the public's needs and interests to the applicant's.

Third, the LRMP requires that permitted uses "should be compatible, and in harmony with, the surrounding landscape." LRMP at IV-55. Once again, the EA simply does not mention this standard, in violation of NFMA. Had the EA assessed the compatibility of locating mobile emitters at the proposed sites, the analysis would have shown that the emitters are inconsistent with the LRMP's management prescriptions for visual quality and recreation opportunities.²

In regard to visual quality, the EA assesses only the effect of the fixed non-national forest emitters on the visual environment. It never mentions the visual quality effects of the mobile emitters. Yet the mobile emitters will affect at least an order of magnitude more land area as they travel along miles of road and park at over a dozen sites on the national forests for over 70% of each year. The transient nature of the emitters is no justification for ignoring their effect on visual quality; if anything, their proposed ubiquitous presence throughout the western flank of the Olympic National Forest argues for more, not less, visual quality consideration.

It goes without saying that the mobile emitters' appearance influences significantly whether their presence is "in harmony" with the surrounding landscape. On this score the EA is misleading, at best. The EA includes no photograph of the mobile

² The LRMP prescribes visual quality objectives (e.g., retention, modification) and recreation opportunities (e.g. Roded Natural, Modified, Rural) for each land allocation. These prescriptions generally reiterate that uses be harmonious in appearance with the natural setting. The EA fails to assess the effects the mobile emitters will have on meeting visual quality objectives or recreation opportunity spectrum ("ROS") prescriptions.

emitters to be deployed. Instead, the EA shows the “conceptual drawing,” reproduced below:



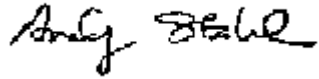
[Public news reports](#), however, show that the mobile emitters the Navy will deploy bear little resemblance to the “conceptual drawing.” Instead, this is what the Navy has in store for our national forests:



Whereas the “conceptual drawing” looks like a camper van with a small television receiver atop, the real thing looks like a [Star Wars fantasy](#). By no stretch of the imagination would the presence of these space-aged monsters be “in harmony” with the Olympic’s sylvan landscape.

In sum, the Forest Service should deny the Navy's application for a special-use permit because the proposed use is inconsistent with the Olympic LRMP.

Sincerely,

A handwritten signature in black ink, appearing to read "Andy Ballew". The signature is written in a cursive, somewhat stylized font.

Executive Director