



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

17 November 2014

RE: Addendum to Sierra Club's Comments Dated 28 October 2014 on the Pacific Northwest Electronic Warfare Range Special-Use Permit Application, Finding of No Significant Impact, and the Navy's Pacific Northwest Electronic Warfare Range Final Environmental Assessment, September 2014.

Dear Mr. Wahl:

On behalf of the Sierra Club North Olympic Group (NOG) and our hundreds of members and activists, and supporters here on the Olympic Peninsula, we are writing to submit additional comments on the US Forest Service's (USFS) concurrence with the Navy's finding of "No Significant Impact" (FONSI) and your potential issuance of a special use permit and the Navy's final Environmental Assessment (EA) for their proposed Pacific Northwest Electronic Warfare Range, September 2014. Please consider both our comment letter of 28 October 2014 and this letter to represent our entire set of comments.

Additional inadequacies in the Navy's final EA that negate the FONSI conclusion include the following:

- The finding of "no significant impact" from electromagnetic radiation on human DNA fragmentation, leukemia, and cancer due to intermittent exposure to extremely high levels of electromagnetic radiation is erroneously supported in the EA by research that does not apply (Focke, et al, 2009 page 3.1-1 and -2), as this research used low frequency radiation of 50 Hz and not the several Giga HZ frequencies (2-18 GHz) that the Navy proposes to use (almost a billion times greater frequency).
- The EA fails to evaluate the use of "simulators" by the Navy to achieve the same testing and training mission. Use of simulators would also have the advantage of

smaller carbon footprint, less impact on climate change, does not require the Navy units to travel to remote areas of our forests.

- The EA fails to propose and evaluate at least one multi-featured alternative to all the EW training in military operations areas (MOAs). For instance, the Navy should propose and evaluate an alternative 3 that looks similar to the following: 40-50% of the EW training would continue to occur at Mountain Home Air Force Base, 30 to 40% of the EW training would occur with the use of simulators, and 10 to 20% of the EW training (if needed) would occur within the Okanogan and Roosevelt MOAs [and only after the Navy prepares and can finalize a full environmental impact statement (EIS)].

Further concerns about the process the Navy used in drafting and finalizing the EA include:

- The Navy violated National Environmental Policy Act (NEPA) procedure by not notifying or consulting with Olympic National Park staff during the drafting and finalizing of the EA.
- The Navy violated NEPA procedure by not addressing future impacts of this project. The Navy states that this project aims to “accommodate growth in future training requirements”, yet the EA does not specifically disclose what that growth will include, nor analyze its impacts.
- The Navy has not consulted with the Washington State Department of Natural Resources (DNR) about their proposed use of our state-controlled logging roads and the State permits needed (for 3 mobile emitter sites). Further, the Navy is disingenuous in the final EA by implying that DNR has been consulted and that any DNR requirements will be or have been met. Also missing is a summary of DNR requirements and how the Navy intends to meet them.

Finally, the Department of Defense and US Navy do not have the right to override the Forest Service’s own management plan and the National Forest Management Act. Electronic warfare training is not consistent with the public purposes for which national forests are reserved. According to the US Forest Service’s own regulations, military use our public lands is not permissible if the military has other “suitable and available” lands for their proposed action. Additionally, the Forest Service’s own management policy states that when considering issuing such a permit, “the interests and needs of the general public shall be given priority over those of the applicant.”

## **Conclusions**

In conclusion and based on our extensive comments, NOG believes that the Forest Service should not accept the FONSI and should decline the Navy a Special-Use Permit and access to the Forest Service roads for their mobile EM emitters until the Navy prepares and finalizes a full EIS for this Electronic Warfare Range project. Further, the project should not

move forward until the State DNR is engaged and their permit requirements are made public along with Navy's responses as to how these State requirements shall be met.

Thank you for the opportunity to comment and we look forward to your responses.

Sincerely,

Bob Sextro, Acting Chair  
North Olympic Group Sierra Club  
P.O. Box 714  
Carlsborg, WA 98324