

The flawed public process: Information gaps and omissions in official documents

As we state elsewhere on this web site, a public process is supposed to be a good faith effort. However, major omissions in the Navy's Northwest Training Range Complex Final Environmental Impact Statement (EIS) of 2010, ([Volume 1](#) and [Volume 2](#),) have been built upon in subsequent documents, and are causing credibility problems for these newer documents. For example, a statement by the [2014 Environmental Assessment](#) (EA) on page 2-8 says that all electronic warfare training activities were analyzed in the 2010 EIS, but that is not true. The EA also says that current training levels will remain the same as in 2010, but that is not true, either. Unfortunately, until recently the 2010 EIS was not available to the public because the Navy had removed it from their web site. Eventually they built another web site with links to those documents, but at public meetings the complex, 64-character URL of their web site was flashed on a slide show screen so quickly that few people were able to write it down.

The US Navy's 2010 EIS never considered using National Forests for electromagnetic warfare training or testing, so it's disingenuous to base subsequent documents on a false assumption. Despite a thorough review of the 2010 EIS by citizens, no one has found where the impacts of the aircraft over the mobile emitter sites in the Olympic National Forest and Olympic National Park were ever studied. Why then, did the 2014 Environmental Assessment rely on that EIS if it doesn't include information on this type of testing and its impacts? The notion that the 2010 EIS covered all of the noise, economic impacts and other issues that the ground-based training will trigger is mistaken. A full EIS covering all impacts in one document is what's needed. The public does not view these impacts as separate.

Though the Forest Service's web site linked to the Navy's Environmental Assessment and a couple of decision documents, until very recently (after the public outcry) neither Forest Service nor Navy web pages contained links whatsoever, to any of the supporting documents the agencies so often made reference to at meetings. As a result, the public had to scramble to find them through other avenues. We obtained a copy of the 2010 EIS and other documents from [California Sky Watch](#),

which keeps an excellent archive of Navy documents on its web site. These public documents are now housed on the West Coast Action Alliance's web site as well, where they should be safe from removal by agencies.

What are they? Besides the 2010 EIS, these oft-cited but unavailable documents included the [2005 EA on replacing Prowlers with Growlers](#) as well as others going [back to 1989](#), plus the Fish and Wildlife Service's [2010 Biological Opinion, a number of temporary permits](#) that were issued by the Forest Service to the Navy without public oversight, the [1988 Master Agreement](#) (Memorandum of Understanding) that declared military training to be an "appropriate use" of national forest lands, and supporting documents referenced in the Navy's Environmental Assessment, such as [Joint Publication 3-13.1](#), which describes the methods and intent of electronic attack weapons on the Growler jets that will be training in the Olympic National Forest. All of these documents are now housed on this web site.

This was a violation of public trust, and of the National Environmental Policy Act of 1969, known as [NEPA](#), which says such pertinent documents shall be made available to the public for scrutiny. (18CFR 380.9). Moreover, an explanation of the Forest Service's own updated [NEPA handbook](#) says, "...NEPA procedures regulations [sic] are intended to let interested parties become more effectively engaged in the decision making process rather than merely as reviewer of proposals and final documents. Specifically, the regulations include an option for responsible officials to incrementally develop, modify, and document proposed actions and alternatives through an open and transparent process."

What has been presented to the public so far does not include scientific documentation to verify the Navy's claim that there will be no significant impacts to forests, farms, communities, and surrounding waters, from aircraft noise, pollution, and electromagnetic radiation plus sonar and explosives testing and training. Nor does the Navy provide a definition of the term "significant" when talking about any impacts.

Now let's talk about Electronic Attack training. The [2014 EA](#) makes it clear that the purpose of the training is to maximize the capabilities and provide fully trained and combat-ready Tactical Electronic Attack squadrons whose missions 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."

It is hard to see how the Navy can meet its own goals of producing "fully trained" and "combat-ready Tactical Electronic Attack squadrons" on the proposed Electronic Warfare Range without conducting actual electronic attack training. In the informational meetings at Forks, Port Angeles and Pacific Beach, the Navy promised that electronic attack weapons would not be used in training. They also suggested that electromagnetic radiation 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 it." This does not account for birds flying directly over the emitters, but regardless, the implication appears to be that electromagnetic radiation directed downwards, as it will be from Growlers training in the proposed Electronic Warfare Range, would be dangerous. According to a Navy spokesman in a news interview, part of the training requires identification by aircrews of the signal ID from the emitters, at which point they must initiate a "simulated harm shoot." What exactly is a simulated harm shoot? What type of weapons will be used for that? What are the risks involved? The Navy has chosen not to address this element of the proposed Electronic Warfare Range in any documents that it has shared with the public. [The law](#) does not allow for such an exception.

Assurances have been made by the Navy at public meetings (and recorded on videotape) that no electronic attack weapons would be used during training, but such statements are contradicted by the Navy's own documents. **If true, those verbal assurances must be clearly incorporated, in writing, in the EIS.** What types of electronic attack will be practiced, and what are the potential impacts, intended or otherwise, on the local population and the environment? How can a

Special Use Permit include the use of Electronic Attack weapons if they weren't even discussed in the Environmental Assessment?

The Navy must fully study the impacts and risks to public health and the environment of this electronic attack training in the proposed EIS. All true intentions regarding electronic attack training must be disclosed to the public, and an analysis of economic impacts on affected communities, many of whose economies run on tourism, must be provided.

The EIS that has recently been in the Scoping process covers only the addition of 36 jets and the immediate environs of Whidbey Island.

According to the Navy's statements at public meetings, no attack weapons will be used in training, but according to the EA, the purpose of the Navy's testing and training will be to create electronic attack squadrons that are fully trained and combat-ready. It is hard to see how this could be done without actually using the weapons carried by aircraft.

The Forest Service is required by law to conduct its own scientific investigations into the impacts of these programs and not to rely on old data or information from other agencies. The Navy is not known for its biological expertise. Yet at a public meeting in Port Angeles on November 6, 2014, District Ranger Dean Millett said (and was recorded on videotape saying,) "I think the Navy has done a sufficient job for us on the science." Why did the Forest Service not conduct its own research? If there had been any previous research by the Forest Service on these effects, why was it not cited? Will other National or State Forests be added to the Navy's Electromagnetic Warfare Ranges, and will those electromagnetic weapons tests be part of the new EIS, since they were not part of the old one? Some documents suggest that this will be the case.

The single study cited by the Navy in the 2014 EA, that says effects of electromagnetic radiation on biological tissue are negligible, stands alone in a field of more than 1,000 peer-reviewed studies that refute it. The Navy appeared to be cherry-picking its references. As another

example of omissions, fire danger is not mentioned in any documents, yet EA-18Gs have a crash rate many times higher than other jets and carry thousands of gallons of fuel. Fuel dumping continues to occur, and eyewitness accounts have reported it. Does the Navy keep records on the number of times this occurs, and does it have estimates of the amount of fuel dumped? Have scientific investigations been conducted on the effects of this dumped fuel on surrounding lands and waters? If so, why haven't these been shared with the public? If not, why not?

[Electromagnetic radiation testing and experimentation programs](#) have been going on in other areas of the country for many years. New reports on the results of these experiments should have been considered and not excluded from the Environmental Assessment. In Section 2.1.1.4 of the 2014 [Environmental Assessment](#), the claim that the noise and RF radiation from mobile emitters will not impact what the Environmental Assessment calls Biological Resources is entirely based on the premise that the mobile emitters are moving around the forest, so exposure at any one site is limited. This despite the fact that 3 mobile units will be in operation from 8 - 16 hours per day, 260 days per year, among 15 different sites on the Olympic Peninsula. According to the EA, each mobile emitter site will average 11.15 training events per day, which also includes electronic detection and attack weapons from jets. This works out to an average of 468 hours of electromagnetic radiation per site per year, or 195, 24-hour days per decade. The Department of the Interior has [criticized the FCC's standards](#) for cellphone radiation, saying they are outmoded and no longer applicable, as they do not adequately protect wildlife.

The Forest Service should conduct their own investigations to determine what long-term impacts that chronic radiation exposure will have on our national forestlands. Has the Forest Service investigated any of the other military areas where electromagnetic and other similar warfare testing and experiments are now taking place? No information has been provided to the public. When will research be done into these issues?

One of the only two scientific research papers cited by the Navy in its 2014 EA lists appalling effects of electromagnetic radiation on birds, mammals, amphibians, insects and plants. The same author has done

even more detailed studies. Did the Navy actually read this paper before citing it?

A citizen analysis of violations of law can be found [here](#).