

## **The flawed public process: The Navy has not substantiated its need for National Forest lands**

The Navy already has a lot of land available to its pilots. It currently conducts electronic warfare testing and training on at least 4 bases in Washington, Oregon, Idaho, and Nevada, but said in its [2014 Environmental Assessment](#) that it needs the Olympic National Forest, because it would save \$5 million per year in fuel costs from not flying the 400 miles to Mountain Home, Idaho. This in turn would save 45 minutes of flying time each way, that Whidbey-based Navy personnel could spend with their families. But the addition of 36 jets that burn up to 1300 gallons per hour hardly qualifies as a fuel-saving event. What are the tradeoffs for the Olympic Peninsula, for that \$5 million in savings? The Navy has not done a cost analysis for jet fuel savings versus the impacts on cities, towns, and public and private lands in this relatively pristine and remote corner of the continent.

A [1988 Master Agreement \(MOU\)](#) between the Department of Defense and the US Department of Agriculture clearly states, in the preface, under section C, that "...training activities on National Forest System lands will be authorized when compatible with other uses and in conformity with applicable forest plans, provided the Department of Defense determines and substantiates that lands under its administration are unsuitable or unavailable."

With all of the areas available for training in the Northwest and across the nation, the Department of Defense has not substantiated as per the MOU, that those other lands are unsuitable or unavailable. While the stated official reasons for taking the Olympic National Forest are fuel savings and more time with families, the real reason appears to be scheduling. The other bases are owned by other Armed Services, and the Navy wants its own warfare range. Scheduling issues have grudgingly been acknowledged at public meetings as their most compelling reason. What appears to be driving the scheduling conflicts is the unbridled growth of the budget for the Department of Defense, resulting in significant expansion of the size of its fighter jet fleets, specifically the F-35 and the EA-18G Growler models.

[Nowhere does federal law justify](#) overriding the public interest for totally incompatible functions and purposes that conversion to an electronic warfare range presents to our National Forest and its neighboring Olympic National Park. The Navy has not demonstrated that such great "need" cannot be met by using existing facilities already in operation. If it's a scheduling problem, then the Department of Defense needs to do a better job of managing its existing warfare ranges.

Is it compatible to fly unmuffled Navy jets at low altitudes, over areas of camping, environmentally protected species, agriculture and businesses? As the Navy states in its EA, this activity is for:

-11.152 events per day per mobile emitter;

-2900 events per year. (Current number in the Olympic MOA is 1200.)

- Run up to 16 hours a day;
- In use 45 minutes of each hour;
- The equipment will be in use up to 260 days a year.

Additionally, the ground based training element that the Navy seeks via its [2014 Environmental Assessment](#) was never included, in any way shape or form, in the 2010 EIS ([Volume 1](#) and [Volume 2](#)) to which the Navy refers as background for that EA. The 2010 EIS dealt with flights only for sea-based training. So the justification for this ground-based expansion is missing.

If the public and others must pay user and other fees, then how much is the Navy proposing to pay for this use of the National Forest per year? Will the Forest Service require the Navy to pay fees and to pay for any public lands the Navy intends to use for warfare testing? If the Navy were to impair or destroy National Forest Lands, what is their liability for said damage? These questions have been asked but never answered.

The Navy should be legally obliged to create an [Environmental Impact Statement \(EIS\) process](#) that deals specifically with the large increase in new use, and the effects it may have on the entire Olympic Peninsula, including the National Park, residential communities, and businesses. It needs to include environmental, socioeconomic and public health impacts. This means ALL impacts in ONE document with a clear process, not five separate processes being thrown at the public in one year. This means enough time to read and understand the material, which in 2014 has amounted to more than six thousand pages of technical writing that cannot be fully or widely understood in the short comment periods given. The Navy is well aware of the advantage it gains by separating the issues. It is well aware of the requirement to substantiate its need for our Olympic National Forest, and of the fact that scheduling problems are not sufficient justification for that. If they were sufficient, they would have been mentioned in the Environmental Assessment.

Stipulations in the [1988 Master Agreement](#) should be followed before the Navy can unilaterally turn a National Forest and the airspace over our homes, businesses and natural surroundings into an electronic warfare range.