



*"Promoting Birding and Conservation as Community Educators,  
Volunteers, and Stewards"*

P.O. Box 502 Sequim, WA 98382

January 12, 2017

**Subject: OBJECTION, Pacific Northwest Electronic Warfare Range**

From: Olympic Peninsula Audubon Society

Robert Phreaner 430 Marine Dr. Sequim, WA 98382 Phone: 360-504-2110  
Objector's Name address and telephone

*/s/ Robert Phreaner*

Lead Objector's signature, if more than one Objector

Mary Porter-Solberg 184 Cassie-Boyce Ln. Sequim, WA 98382 Phone: 360-683-8072  
Objector's Name address and telephone

*/s/ Mary Porter-Solberg*

Objector's signature

Project Name: Pacific Northwest Electronic Warfare Range  
Responsible Official Name: Dean Millett, District Ranger  
Affected National Forest: Olympic National Forest, Pacific Ranger District

Dear Ms. Laford and Mr. Millett,

On behalf of the Olympic Peninsula Audubon Society (OPAS), we object to the pending decision by the Forest Service to grant a five-year special use permit to the US Navy to conduct electronic warfare in the Olympic National Forest, for the following reasons:

**OBJECTIONS BASED ON NEW INFORMATION NOT PREVIOUSLY PRESENTED BY EITHER USFS OR US NAVY**

- 1) The 11/29/2016 USFS Draft Decision references an analysis regarding impacts on sensitive species that is not posted on the USFS website. That is a failure to disclose important information.**

- 2) The USFS considers too few alternatives and does not consider alternatives that would have electronic warfare exercises conducted somewhere other than over the Olympic Peninsula and Olympic National Park. The 1988 Master Agreement specifically required the Navy to document that there were no DoD lands where these exercises could be conducted. This analysis is not published for review. That is a failure to publish required information.
- 3) Segmentation of NEPA documents is obfuscation. Splitting the Navy 2010 EIS, the Navy 2014 EA, the Navy 2015 EIS, and the USFS draft Decision intentionally separates operations that are intrinsically interconnected. Mobile emitter vehicles are connected to Navy aircraft activities. The USFS must disclose and analyze all direct, indirect and cumulative impacts, and impacts from connected actions. This includes impacts from the aircraft that would be conducting training using mobile emitter vehicles.

**OBJECTIONS BASED ON OUR PREVIOUS 2014 COMMENTS TO USFS; OPAS COMMENTS ARE IN ITALICS.**

- 1) **WE OBJECT TO THE USFWS BIOLOGICAL OPINION AS INADEQUATE:** *We believe the “findings of no significant impact” are unjustified by best available science and ask for a USFWS Biological Opinion reviewing the latest literature to be published.*
  - a) **The 7/2016 USFWS Biological Opinion failed to include the latest peer-reviewed research recently summarized in “A Synthesis of two decades of research documenting the effects of noise on wildlife” (Shannon et al. 26 June 2015) which lists the diverse consequences of noise disturbance from 65 studies on birds alone <sup>1</sup>. These documented impacts include; avoidance of noisy areas, changes in vocalization patterns, increased physiological stress, reduced reproductive success, declines in abundance and occupancy of sites, and changes in bird communities and interactions. None of the NEPA analysis includes impacts from aircraft noise on USFS sensitive species.**
  - b) **The USFWS Biological Opinion failed to recognize a comprehensive peer-reviewed field study, “Impacts of acute and long-term vehicle exposure on physiology and reproductive success of the northern spotted owl” (Hayward, LS, AE Bowles, JC Ha, SK Wasser 2011) that examined the impacts of simulated off-highway vehicle noise on endangered Northern Spotted Owls (*Strix occidentalis*) <sup>2</sup>. The study documented increased physiological stress levels and reduced fledging as a result of noise disturbance. A study in the Biological Opinion of noise impacts to the spotted owl quoted a study by the U.S. Air Force (2012) in New Mexico that was unpublished and was not peer-reviewed.**
  - c) **The USFWS Biological Opinion also failed to recognize a peer-reviewed study that specifically examined low-level military flights on Harlequin ducks**

*(Histrionicus histrionicus)* <sup>3</sup>. The Harlequin duck breeds on the Olympic Peninsula rivers and, if you notice our letterhead, it is emblematic of the Olympic Peninsula Audubon Society. A study by Goudie and Jones published December 2004 in the peer-reviewed journal, *Environmental Conservation*, found that for 1.5 hours after a military jet fly-over the duck decreased courtship and for 2 hours following the noise disturbance the duck showed increased antagonism. The scientists concluded that these kinds of residual effects implied whole-body stress with potentially serious and long-term consequences that warrant further study.

2) *The Biological Opinion should consider peer reviewed science published recently in the journal Nature that contradicts the finding of no significant impact on wildlife from electromagnetic wave emitters. We believe that the EA should be rejected and a full Environmental Impact Statement (EIS) be prepared. Until the EIS is completed and made available for public comment, we ask the Navy to select the No Action alternative and continue training at the USAF Mountain Home Range, ID or NAS Fallon, NV.*

a) **The USFWS Biological Opinion failed to consider Engels, S. et al (2014) Anthropogenic EM Noise Disrupts Magnetic Compass Orientation in Migratory Birds, Nature 509, 353 - 356 (doi 10.1038/nature13290) <sup>4</sup>.**

**SUGGESTED REMEDIES:**

1. **WITHDRAW THE USFS'S DRAFT NOTICE OF DECISION**
2. **REQUEST THAT THE U.S. NAVY PREPARE A FULL ENVIRONMENTAL IMPACT STATEMENT**
3. **ALLOW THE REQUIRED NEPA PROCESS FOR SIGNIFICANT AND HIGHLY-CONTROVERSIAL PROJECTS TO GO FORWARD INCLUDING FORMAL PUBLIC HEARINGS TO FULLY DETERMINE THE "INTERESTS AND NEEDS" OF THE GENERAL PUBLIC**
4. **RE-EVALUATE THE EFFICACY OF CONSIDERING THE US NAVY'S REQUESTED SPECIAL USE PERMITS TO USE OUR PUBLIC LANDS FOR MILITARY TRAINING WHEN OTHER MILITARY-CONTROLLED LANDS ARE AVAILABLE.**

We appreciate this opportunity to offer objections to the Pacific Northwest Electronic Warfare Range.

Sincerely,

Bob Phreaner and Mary Porter-Solberg  
Conservation Co-chairs  
Olympic Peninsula Audubon Society

References:

<sup>1</sup> Shannon et al. (26 June 2015) *A Synthesis of two decades of research documenting the effects of noise on wildlife. Biological Reviews*

<sup>2</sup> Hayward, LS, AE Bowles, JC Ha, SK Wasser (2011) *Impacts of acute and long-term vehicle exposure on physiology and reproductive success of the northern spotted owl. Conservation Biology*

<sup>3</sup> Goodie, R.I., and I. L. Jones, (2004) *Dose-response relationships of harlequin duck behavior to noise from low-level military jet over-flights in central Labrador. Environmental Conservation 31:289-298*

<sup>4</sup> Engels, S. et al (2014) *Anthropogenic EM Noise Disrupts Magnetic Compass Orientation in Migratory Birds, Nature 509, 353 - 356 (doi 10.1038/nature13290).*

Cc:

Sarah Creachbaum, Superintendent ONP

U.S. Senator Patty Murray

U.S. Senator Maria Cantwell

Congressman Derek Kilmer

WA State Senator Kevin Van De Wege

WA State Representative Mike Chapman

WA State Representative Steve Tharinger

Gail Gatton, Director Audubon WA