



*PROMOTING THE PROTECTION, CONSERVATION AND RESTORATION OF NATURAL FOREST ECOSYSTEMS AND THEIR PROCESSES ON THE OLYMPIC PENINSULA, INCLUDING FISH AND WILDLIFE HABITAT, AND SURROUNDING ECOSYSTEMS*

June 12, 2019

Naval Facilities Engineering Command Northwest  
Attention: NWTT Supplemental EIS/OEIS Project Manager  
3730 N. Charles Porter Ave.  
Building 385, Admin, Room 216  
Oak Harbor, WA 98278-5000

**Subject: Olympic Forest Coalition Comment on the NWTT Draft Supplemental EIS/OEIS**

To Whom It May Concern:

Thank you for the opportunity to comment on the NWTT Draft Supplemental EIS/OEIS. The Olympic Forest Coalition incorporates submitted comments (OFCO/WCAA Comment on Draft EIS Navy Draft EIS – EA-18G Growlers at Naval Air Station Whidbey Island, February 2017; , OFCO/WCAA Comment, Scoping, NWTT Supplemental EIS/OIES, October 2017, among other comments on related activities). The Coalition joins the West Coast Action Alliance, the Olympic Park Associates, and the National Parks Conservation Association in their comments on this draft Supplemental EIS/OEIS.

Our comments include the following areas of concern: a) unjustified reliance on the flawed NWTT FEIS (2015); b) the 2019 study on impacts of military flights on the Olympic Peninsula soundscape was not included; c) inadequate analysis of impacts on threatened and endangered species (Marbled Murrelets and Northern Spotted Owl); d) inadequate cumulative impacts analysis; e) Inadequate consideration of reasonable alternatives; and f) inadequate mitigation measures.

Unjustified Reliance on the Flawed NWTT FEIS (2015).

The Draft SEIS/OEIS incorporates in part the NWTT FEIS published in 2015, unless the literature review undertaken for this Supplemental EIS/OEIS on scientific studies published since 2015 identified new findings. The NWTT FEIS was flawed due to incomplete and inadequate information, segmentation of functionally related Navy action into several “actions” limited in scope, inadequate analysis of all impacts (including noise, prey resources, air, water and soil contamination, and climate change), and lack of cumulative impacts analysis of all functionally related Navy actions. The NWTT FEIS incorporated the US Fish and Wildlife Service Biological Opinion that was completed on inadequate and incomplete information provided by the Navy to the Service. The biological determination made in the BiOp are flawed. WCAA/OFCO commented on this problem and the Draft Supplemental EIS/OEIS does not address the critique. The Navy should undertake a full and adequate Revised EIS that fully addresses all inadequacies before consideration of expanded training activities is completed.

2019 Impacts of Military Flights on Olympic Peninsula Soundscape Findings Not Incorporated in Analysis

The Draft SEIS/OIS does not incorporate a very recent, significant and relevant piece of scientific research directly on point: “Impacts of Military Flights on Olympic Peninsula Soundscapes” (Kuehne, 2019). The research has been presented in regional symposia in beginning stages, and should have been included in the analysis. The two-year study of the impacts on the soundscape by the Navy Boeing EA-18G (“Growler”) aircraft is particularly relevant, and one of a kind. The study was conducted by Lauren Kuehne, MSc Research Scientist at the University of Washington’s College of the Environment, School of Aquatic and Fishery Sciences. Ms. Kuehne carried out one of the only scientific studies of the soundscape on the Olympic Peninsula. Ms. Kuehne “sought to answer two questions: 1) What are the current noise levels and contributions of different aircraft on the Olympic Peninsula soundscape? and 2) How might these levels change with proposed increases in military training and operations?” The study captured sound data from three areas – within the Olympic National Park and adjacent to the Military Operations Area for the Navy training activities that fly out of Naval Air Station Whidbey Island (NASWI). The three study locations on the west side of the Olympic Peninsula were: “Third Beach (elevation 64 m), River Trail (199 m), and Hoh Watershed (28 m)”. The study recorded and distinguished commercial aircraft, military aircraft, and helicopters. The study including capturing data from the Navy Boeing EA-18G “Growler” aircraft in 2017 and 2018, *before* the proposed increase of 36 added aircraft (2019). With the decision to increase the Navy fleet from 82 to 118 jets (Record of Decision for Growler Environmental Impact Statement - 2019), monitoring the increase in noise and related impacts becomes more imperative. Read Ms. Kuehne’s report [[link to PDF](#)]. Results of Ms. Kuehne’s study (excerpts):

- *“The data were compared with the Whidbey Island airfield public notice of flights, 83% of which are the Growler aircraft.*
- *Of the 4,644 flight events identified.*
- *Of these, 85% were classified as military, 8% commercial, 6% propeller, and <1% were helicopters.*
- *On the busiest days, we recorded an average of up to 70-85 flight events per location.*
- *The maximum number of flight events recorded on a single day at locations were 73 (Hoh Watershed), 104 (River Trail), and 81 (Third Beach).*
- *The duration of time in each day and hour that military aircraft were audible was highly correlated across the three locations, indicating flight activities impacted a large geographic area at any given time.*
- *Military aircraft are a dominant contributor to the soundscape of the Olympic Peninsula, representing 85% of the total time aircraft are audible.*
- *Percent time audible was substantial during daytime hours, particularly at the coastal sites, which averaged 12% audible during daytime hours across all 40 recording days. However, to achieve this average level meant that on some individual days the percent time audible during these hours was far greater (e.g., 49-52% of the time). Individual locations can experience in the range of up to 80-100 events in a single day.”*
- *Data showed that areas outside of the MOA are clearly impacted, with the Hoh River location averaging 9-12% audible during daytime hours (with a maximum of 52% recorded on one sampling day- hour).*
- *The River Trail location, positioned 1.8 km outside the MOA, receives consistent noise from military aircraft indicates that the noise footprint extends well beyond the MOA.*
- *An important outcome of this study was demonstrating feasibility in identifying different types of aircraft from audio recordings, that were processed using widely available software. [Kuehne] then used these data to calculate metrics relevant for people and wildlife, which do not experience and respond to noise and disturbance as calculated by long-term averages (i.e., the 24 hr day-night average sound level that is the standard applied by the Federal Aviation Administration).*

These findings are particularly relevant in wilderness areas, the Olympic National Park, and rural communities. As the Olympic Peninsula shoulders the burden for the **entire country** of training pilots on the new aircraft, Ms. Kuehne’s study definitively demonstrates that ground monitoring of noise is feasible and can produce reliable data that on impacts, which can and

should be used to drive mitigation strategies for endangered species like the Northern Spotted Owl and Marbled Murrelet, and rural resident's health. The Draft SEIS/OEIS provided a modeling study of sound impacts (Appendix J), but no actual data. The model employed day nit averages, critiqued in WCAA/OFCO previous comments, and unaddressed in the modeling. The Navy must consider this important new science in a revised EIS and incorporate a full spectrum of mitigation strategies for wildlife, human health and economic losses due to the detrimental impacts on the soundscape of the Olympic Peninsula. The Navy must also implement an independent monitoring program modeled on Ms. Kuehne's study and report to the public in the operational area on findings annually.

### Inadequate Analysis of Impacts on Threatened and Endangered Species

The Draft EIS/OEIS does not provide new nor adequate information on impacts to threatened and endangered species such as the Marbled Murrelet and the Northern Spotted Owl, species that will be impacted by the training and testing exercises of the aircraft. The Draft SEIS/OEIS also proposes to use new technologies, such as the "high energy laser" equipment, without adequate information about the potential environmental impacts on threatened and endangered species. OFCO incorporates the concerns about threatened and endangered species in previous comments, as the concerns are not adequately addressed in the Draft.

Marbled Murrelets, threatened throughout the MOA, will be impacted both on land and in the marine waters area. The populations are in decline in Washington State, as compared to the stable populations in Oregon and California. The expanded and increasing military operations in both the habitats of the Marbled Murrelet – terrestrial and marine – is of grave concern. The increased military operations will impact Murrelet nesting habitat, diving and foraging, marine habitat, and prey fish. The expanded MOA encompasses the marine and terrestrial areas designated as critical habitat for the Marbled Murrelet. While the SEIS made note of new scientific information about sound and climate impacts, no mitigation measures were proposed to address impacts to Murrelets. The Draft SEIS/OEIS reports that a sound study of impacts on Murrelets is in progress, but does not give the scope, methodology, timeline of the study. The Draft indicates no mitigation strategies are proposed for the impacts to Marbled Murrelets. The Navy should not expand the MOA without including mitigation measures to address this threatened species.

Northern Spotted Owls, also threatened throughout the MOA, will be impacted by expanded and increased terrestrial training activities. While the SEIS made note of new scientific information about sound and climate impacts, no mitigation measures were proposed to address impacts to Northern Spotted Owls. The SEIS indicates no mitigation strategies are proposed for the impacts to owls. The Navy should not expand the MOA without including mitigation measures to address this threatened species.

### Inadequate Cumulative Impacts Analysis

The SEIS/OEIS includes a discussion of cumulative impacts that is overly narrow in scope, and does not incorporate all the functionally related activities and impacts, and clouds the analysis by relying on cumulative impacts "tiered" in other documents. The SEIS/OES excludes impacts outside of the narrowly defined project scope (Sec. 4.2), stating:

*"NEPA documents that analyze a specific type of aircraft operation at a military airfield (in this case, the Growler) are focused in and around that airfield and its facility needs. While the Navy has analyzed, and is currently analyzing, various other projects in the area, those projects are not preconditions for Growler operations at the NASWI complex. Growler operations at the NASWI complex are not a precondition for larger military readiness activities on range complexes in the Pacific Northwest. Even in the absence of these Growler operations, military training in the Pacific Northwest would continue independently from this Proposed Action..."*

The aircraft will fly beyond the air fields where the craft are stationed to conduct the training, including the MOAs and transit areas to the MOAs, therefore, cumulative impacts of flights in the MOAs and outside of the MOAs, and the area immediately surrounding the airfields must be considered. In particular the Navy must to assess the impacts over the northern tier of Olympics, including the National Park (Lake Crescent, Hurricane Ridge areas), the coastal communities such as Port Townsend, Port Angeles, Sequim, Forks and others, as flight activities transit between Whidbey Island air base and their official military airspace over the west side of the Olympics.

The impacts from the increased flights to air quality, soils and water from chemical loading due to the training flights are not considered adequately in the SEIS/OEIS, nor is the impacts of carbon. WCAA/OFCO pointed out these inadequacies in our comments on the Draft and scoping for this Supplemental EIS/OEIS. The Supplemental EIS/OEIS has not addressed these shortcomings.

The cumulative impacts of functionally related Navy activities must be fully disclosed and not obfuscated by narrow scope and tiering off other documents, equally narrow in scope. The Navy must undertake a revised EIS that adequately and fully analyzes the cumulative impacts, or take the no action alternative.

#### Reasonable Alternatives Not Considered

The Draft SEIS/OEIS does not adequately consider reasonable alternatives, such as moving the training to areas more suitable to the mission and that protect the environmental resources. The Navy relied on its own personnel for the analysis of alternatives (Section 2). The Navy eliminated any consideration of other areas with the statement that no other area could provide the training needed for the Pacific Northwest region. This is circular reasoning. The Navy must train pilots for warfare, not only in the Pacific Northwest region. The analysis for dismissing other reasonable alternatives was not adequately shared in the Draft SEIS/OEIS.

The Navy dismissed setting geographic restrictions to protect specific species as creating a “patchwork” of training times and areas that would prevent the Navy from fulfilling its training requirements. This analysis also lacks validity and clearly dismisses mitigation for threatened and endangered species. If a species breeding season and forage areas create too great a burden for the Navy to manage in a scheduled training activity, it leaves open to grave concern how the Navy may handle any real-time complexity.

The Navy dismisses the “no action” alternative out of hand. The Navy must fully consider specific alternatives that would reduce impacts on marine, terrestrial and aquatic species and rural residents and economies in a revised EIS/OEIS and present the alternatives for public comment before a final decision is made.

#### Inadequate Mitigation Measures

The Draft Supplemental EIS/OEIS included a description of mitigation measures that will be taken by the Navy, indicating that the mitigation measures are updated from the NWTT FEIS (2015). Section 5 covers the mitigation measures. The Navy reports that it is conducting a study on Marbled Murrelets to refine its assessment of impacts and mitigation measures, but does not incorporate any preliminary findings nor information about the study. The Draft Supplemental EIS/OEIS is premature and does not have adequate recommendations to mitigate impacts.

The Navy reports that it uses a “Protective Measures Assessment Protocol” software tool in planning phases to provide instructions during operations, which includes mitigation measures. The Protocol was not adequately described nor presented in the Draft SEIS/OEIS and should

be made available for independent review to determine if it adequately provides mitigation measures for all natural resources and residents in the MOAs and affected areas.

The Navy indicates that it carries out monitoring and reporting, as well as research on its activities. These reports were not incorporated nor made publically available for review, with the exception of the Marine Species Monitoring Program. The Navy monitoring, research and reporting regime on terrestrial and aquatic species should be made public for affected communities in the MOAs, for independent review, and to expand and assist academic research in relevant fields.

The Navy indicates that it established in 2010 and 2011, an “Integrated Comprehensive Monitoring Program” and a “Scientific Advisory Group”, which adopted planning level assessments, goals and strategies, but provided little in terms of concrete data on impacts, recommendations for mitigation. The Navy indicates it does and will report on Training and Testing activities, but the reports seem limited to wildlife “strikes” and incidents, and not environmental impacts. The reports are not made public.

The Navy reports that it adopted, and will expand, on mitigation measures in two areas: procedural and geographic based “mitigation zones”. Procedural mitigation is planned, but not specific in the Draft. Procedural mitigation includes “look outs” pre and during activities. The Navy will supplement look outs with “passive acoustic devices” that may detect marine mammals, but does not indicate the steps to mitigate the impacts if detected of other species. The Draft Supplemental EIS/OEIS focus’ on marine mammals and turtles, and states it “may” include seabirds. The section focus’ in any specificity on sea turtles as an example, without stating how this is relevant to the MOAs and adjacent areas and specific studies that will be undertaken by the Navy. The mitigation steps to take focus on marine resources, and little information is provided for mitigating the impacts of the aircraft on terrestrial resources, even in the technical section on mitigation zones (Appendix K), focus’ on marine resources in the water, and not the aircraft impacts. The mitigation measures given as examples seem to contradict with the actual activities presented. For example, the Navy states it provides guidance to pilots to not fly over national parks and monuments, and other sensitive habitat areas. The activities in the MOAs include flights over precisely these areas. The Navy must clarify the contradictory mitigation measures presented in the Draft. The Draft SEIS/OEIS states that final mitigation measures will be provided in the Final EIS/OEIS. The Navy must outline with more specificity its recommendations and plans for the threatened and endangered species, terrestrial, aquatic and marine, impacted in the MOAs and adjacent areas in a Revised EIS/OEIS before making a final EIS/OEIS determination, in order to give adequate information to the public to comment.

For these reasons, the Olympic Forest Coalition requests that the Navy conduct a full, adequate and complete Revised EIS/OEIS, present the document to the public for comment, prior to making a final determination on a preferred alternative. In the alternative, the Navy must adopt the “no action” alternative and not increase the training and testing activities in the MOAs and adjacent areas.

Thank you for your kind attention to our concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Patricia Jones", is written over a light gray rectangular background.

Patricia Jones  
Executive Director