

Karen Sullivan
West Coast Action Alliance
Port Townsend, Washington 98368

To: 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

June 11, 2019

Dear Sir/Madam,
Thank you for the opportunity to comment.

For years the West Coast Action Alliance has provided extensive comments to the Navy on its proposed actions, including a 47-page letter that spelled out in detail the factual and ethical deficiencies of its previous plans and public processes to expand the Growler fleet and electronic warfare testing and training, in area waters and over our communities and public lands. Those comments remain standing, and those concerns, still unaddressed, are hereby brought forward onto the public record. Like many concerned citizens, we have spent hundreds of hours reading, analyzing and discussing Navy NEPA documents, have followed instructions to back up specific concerns with specific explanations, references, and facts, have attended public meetings, and have in turn, like every other commenter with serious, substantive concerns, been completely ignored.

Despite the trappings of yet another NEPA process in a long confusing line of EISs, Supplements, and EAs, each concluding no significant impacts, the message the Navy continues to transmit to the public who are not in its immediate circle of supporters, is the same message we were given verbally and in person in 2014: at a meeting in Pacific Beach, the Navy's NWTT range manager said, "We're here to listen to your objections, but we don't have to do anything about them." Despite NEPA's intent, and with substantive and informed concerns being provided by the thousands over the years, and despite abundant evidence of harm to communities and wildlands, no concessions or changes in the Navy's plans to reduce impacts have been made evident. No significant impacts have ever been found in any Navy NEPA products dating back more than a decade. This defies logic. If no significant impacts have ever been found, then why is the public so upset with the Navy's actions, and why are communities and wildlands suffering in ways that have been extensively documented and were not there before the Navy's actions? The Navy is also not responsive to FOIA requests for information that was once freely available to the public. Also: The limitation of 5,000 characters in your online comment form restricts the public's ability to comment on a proposed action that affects many lives. By not informing the public of this online limit in advance, the Navy does not

fulfill its statutory obligations for a public process. All of this adds up, and the public is taking note.

With the determination of noise impacts by a recent scientific study, published by the University of Washington, that military traffic was responsible for 85 percent of all audible air traffic in three locations on the west side of the Olympic Peninsula, including outside the Olympic Military Operations Area, there is no doubt in anyone's mind but the Navy's that disturbance events, some numbering as many as 80 – 100 per day, are damaging the unique ecological, cultural, social, educational, and economic qualities of the area. And based on the steady stream of ever-expanding EISs, there also appears to be no upward limit to the noise the Navy is willing to inflict on surrounding communities and wildlands.

The Navy has failed to correct its own noise studies that omitted the low-frequency signatures of Growlers, used modeling and not actual measurements, and relied on software that the DOD's own Strategic Environmental Research and Development Program has determined to be outdated. Thus, the Navy routinely underestimates and understates noise impacts, not only to communities but also to a World Heritage Site and Biosphere Reserve containing many species that rely on hearing to survive. Our comment letter on the original EIS describes this in detail. One hour of non-afterburner Growler flight emits 23 percent more carbon dioxide than a Washington resident emits in an entire year. The increase in exhaust emissions was deceptively presented for the entire impact area; the Navy cannot segment the very air by failing to analyze impacts of exhaust emissions outside the MOA, as it did for takeoffs and landings only in the original EIS. Our previous comment letter described this in detail.

The Navy does not consider impacts that occur outside the MOA, but Growlers fly and cause significant impacts well beyond MOA boundaries. Thus it renders estimates of noise and exhaust emission impacts invalid in yet another example of segmentation in the NEPA process. NEPA was never designed to provide the public with the equivalent of death by a thousand paper cuts. Our previous comment letter describes segmentation problems in detail.

The public largely views this incessant warfare activity newly expanded in and around civilian communities and public wildlands, along with the Navy's refusal to back off despite the evidence of harm, as if your neighbors are the enemy you are practicing on. In fact, it appears we are. This may sound off-topic for a Growler comment, but it is an example of the public's holistic view vs the Navy's segmented one: the intent was clearly stated by a Navy representative during a 2018 open house regarding SEALs training in our state parks, beaches, and on private lands along 260 miles of Puget Sound shoreline. He confirmed to a group of astonished listeners that civilians were intended to be used as proxies for the enemy: they would be surveilled as unwitting participants in military exercises, should they wander in unintentionally, and they will not be informed of this. He also said, "you

should watch what you do in the woods, because you never know when we'll be watching.”

Please do not assume that the public separates these issues—SEAL training, Growlers, at-sea exercises—and their impacts, which have been endlessly segmented to apparent insignificance, but which cumulatively are serious. You may win your NEPA argument by segmenting impacts, but only on paper, because the real impacts in their entirety cannot be segmented out of existence.

Therefore, please DO assume that the public has a long memory.

To most members of the public, the Navy is one giant behemoth of an organization, and when one of your commanding officers does a dress-uniformed meet and greet at our farmers market and tries to say he's at Indian Island and does not represent NASWI, nobody buys it. You wear the uniform, you represent the Navy. All of it. You cannot segment a Navy uniform. National Park Service employees cannot get away with such denial, and neither should the Navy. Any officer who believes that wearing the uniform entitles him to represent only part of the Navy is living in a bubble.

Former Secretary of Defense Ash Carter said in a recent interview that when he was Secretary he always tried to be careful, and that he told the troops the same thing. He told them, “You're doing a serious thing. War is a serious business, the public trust is a serious business, and I expect you to behave yourselves. Your conduct and compartment really matters.”

By its behavior over the last few years, which includes an extremely low-altitude circling of my home twice by a Navy MH-60 helicopter shortly after I wrote an opinion piece in the local paper, it appears that the Navy no longer prizes good conduct and compartment. I did not include an address in this letterhead, not because I do not wish to hear from you, but because my trust that the Navy respects people who disagree with it no longer exists.

By promising its neighbors only a ten percent increase in Growler flights in the 2014 NEPA process and then increasing that to 400 percent in 2019, the Navy demonstrates what the public interprets as disingenuousness. Trust once lost is very slowly recovered, if at all.

Sincerely yours,
Karen Sullivan
West Coast Action Alliance
<http://westcoastactionalliance.org>