

TALKING POINTS

on Navy EIS/OEIS March 2019 Draft Supplemental Environmental Impact Statement/Overseas Environmental Impact Statement for Northwest Training and Testing

- Only the **No Action Alternative** is acceptable to the Olympic Peninsula's environment
- Ask that the comment period be extended to a total of 90 days, so more people have time to understand and comment
- The Growlers will fly search patterns over the Hoh Rainforest, Queets, Bogachiel, and Quinault valleys, and the Olympic wilderness coast for up to 16 hours a day and up to 260 days per year.
 - Growler warfare training will include flights over Washington Islands Wilderness; Washington Islands National Wildlife Refuges; Washington State Department of Natural Resources land; Quinault, Quileute, and Hoh Reservations; and thousands of acres of private land, including the towns of Forks and Amanda Park.
 - People in Forks have reported 94 dBA (decibels) with current flights. This EIS will bring many times more of these flights.
- The activities stated in this EIS will damage Olympic National Park and Olympic Coast National Marine Sanctuary.
- This training operation will change one of the quietest places in America, Olympic National Park/Hoh Rainforest, to never again.
- Since 1907, areas of the Olympic Peninsula have been set aside to protect the Peninsula wildlife. Beginning with Theodore Roosevelt and a series of congressional acts, this protection is in wildlife refuges, a national park for the enjoyment of its citizens, elk, other unique wildlife, wilderness areas to protect the resources from human damage, and a national marine sanctuary. The area the Navy wishes to convert into an electronic warfare training area has been designated as an environmentally sensitive area for 112 years.
- In the Olympic Coast National Marine Sanctuary, the EIS is asking for extension of a NOAA permit for "incidental takes of marine mammals ... and incidental takes of threatened and endangered marine species." [EIS p. ES-4]
- The Olympic Coast National Marine Sanctuary was set aside by Congress to protect the sea life of the area. The Naval activities will cause unnecessary damage and should be, and can be, done elsewhere.
- The noise of jet training emitter search flights will be harmful to the wildlife, people of the Peninsula, and the visitors to it. This makes the plan a detriment to the health and economy of the Peninsula and the state of Washington.
- Idaho and Nevada training areas were designed for warfare training—the Olympic Peninsula was not.
- This is not the way to treat a national park or a marine sanctuary. They were created to protect our environment.
 - The Navy says there will be 5,000 "Growler" jet flights a year over the Olympics. [EIS Appendix J, p. 12] (This would be an average of more than 19

search flights per day over the "Study Area"—5000 flights/260 days). This does not include training flights going out to and from vessels off the coast.

- Noise levels (admitted to by the Navy) within the Olympic airspace range from over 80 dB to 100 dB at times [EIS J-22], which the Navy compares to hearing a garbage disposal to a handheld drill [EIS p. J-5].
 - "Continued exposure to noise above **85 dBA** (adjusted decibels) over time will cause hearing loss. The volume (dBA) and the length of exposure to the sound will tell you how harmful the noise is. In general, the louder the noise, the less time required before hearing loss will occur." [Center for Hearing and Communication]
 - People in Forks have reported hearing 94 dBA flights under current EIS
- There are other health problems that are caused or made worse by noise:
 - Noise causes & aggravates health problems
 - High blood pressure (hypertension)
 - Heart disease (ischemic heart disease)
 - Increases or creates mental health problems
 - Other locations for this training are dismissed in 7 lines (out of 1,800 pages) as not offering the same proximity of ships and planes elsewhere in the Pacific Northwest (EIS Section 2, p. 2-21). But with millions of miles of coastline in the U.S., what about other parts of the country?
- Growlers will be routed over Olympic National Park, Lake Crescent, Sequim and Port Townsend as they transit back and forth between their Whidbey Island base and the Olympic training areas over the Hoh Rainforest and Forks (map on p. 2-19) (19-20 times 2 = 38-40 passes over this area a day). The map also shows arrows of flight over the Olympic Mountains. The Navy has denied flying over Olympic National Park. This is untrue. Not only is this untrue, it is nearly impossible **not** to fly these missions over the Park.
- "This Supplemental (EIS) does consider the cumulative impacts from these three projects as well as other past, present, and reasonable foreseeable future actions in Chapter 4 (Cumulative Impacts)" [NAVY EIS p. I-9]. This is an unacceptable statement because the EIS does not. The EIS assumes if there is no study, then none is needed. There is a list of activities that could be cumulative; the list is far from complete.
- Information on off-shore activities are vague but asking for "incidental takes" of threatened and endangered mammals is very concerning.
- Many of the wildlife impact statements end with "are not anticipated." This usually means the result is unknown because of a lack of experience or knowledge.
- Noise effects on people: EIS research reference is "Miller, J. D. (1974), Effects of noise on people. *The Journal of the Acoustical Society of America*, 56(3), 729-764." [EIS p. 3.9-110] Unbelievable that there are not more recent studies on this subject.
- If this EIS becomes operational, vacation trips to the Peninsula will no longer be a relaxing getaway.