

**A Public Scorecard for the Navy's Proposed
Electronic Warfare Training in Olympic National Forest:
A Harper's Index-Style Evaluation of What We Know and Don't Know
As of November 11, 2014**

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FUNDING	
Budgeted funds for Navy's electronic warfare training program in the Olympic National Forest and in airspace over Olympic National Park and Indian Reservation lands:	\$11.5 million
Number of EA-18G Growler jets being built:	36
Cost before overruns, of each Growler jet:	\$77 million
Total cost of building 36 jets, 3 mobile and one fixed emitters:	\$2,785,500,000
Amount of money Navy representative John Mosher said is in Navy's budget for public hearings in affected communities:	\$0
Grade: Funding - A+. Accountability - Fail.	
<i>A military program of electronic warfare on federal land qualifies as a major federal action and is thus subject to a public process under the National Environmental Policy Act, or NEPA, which includes public hearings in affected communities whenever there is environmental controversy. These hearings must be in accordance with NEPA guidelines, which safeguard the public's right to be heard. "Informational meetings" fulfill neither NEPA requirements nor the public's desire to comment, ask questions and receive answers.</i>	
PUBLIC INFORMATION	
Number of public notices placed in papers that directly serve affected communities on the Olympic Peninsula:	0
Number of people at meetings who said they knew about the Environmental Assessment before the comment period closed:	0
Number of public comments the Navy received on the Environmental Assessment within the 2-week comment period:	0
Number of times the Navy said on videotape that the public was "too late to comment on the EA because the comment period is closed:"	At least 2
Number of NEPA-required public hearings held in affected communities, in which the Navy and Forest Service recorded	

public comments:	0
Number of public hearings the Navy intends to hold in affected communities:	0
Number of “informational meetings” held by the Navy and Forest Service as of November 11 because of a request by Rep. Derek Kilmer:	2
Number of people attending the Informational Meeting in Port Angeles:	Over 200
Number of people representing the Olympic National Park or State DNR lands:	0
Number of comments officially recorded at meetings in Forks and Port Angeles:	0
Amount of time each person in P.A. was given to speak:	1 minute
Amount of time each person is supposed to have:	3 minutes
Level of public satisfaction after learning that comments were not being recorded and after listening to the Navy read text from slides that omitted anything on jet noise, emissions, electronic attack weapons, chronic irradiation of “non-observable” smaller animals, endangered species, and many other issues:	0
Number of times the comment period has been extended due to public outcry:	2
Number of public comments formally submitted in writing to the Forest Service as of November 10:	2,077
Percentage of public comments against electronic warfare training on the Olympic Peninsula:	100
What the Forest Service said it would take to stop the issuance of the permit by the Forest Service to the Navy:	“Substantive” comments.
Number of “substantive” comments received, according to Forest Service remarks at the meeting:	0
Number of times the Forest Service defined “substantive” for the public:	0
Number of days left until the comment period closes on November 28:	17
Number of advance public notices for closures in the Olympic National Forest promised by both the Navy and Forest Service:	0
Amount of jet noise, jet radiation and jet emissions evaluated in the Environmental Assessment:	0
<i>Grade: Respect for the public - Spectacular Fail.</i> <i>The Navy and the Forest Service have violated both the spirit and intent of the public process required by the National Environmental Policy Act, or NEPA, which is codified in the Code of Federal Regulations at 40CFR, and in the State of Washington Revised Code, or RCW 42.30.</i> <i>Consideration of private lands first to deploy the emitters is a</i>	

<i>requirement of the National Forest Management Act (NFMA) and the Olympic National Forest's 1990 land and resource management plan. Only if private lands cannot accommodate the deployment should public lands be considered for a special use permit. The Forest Service has not demonstrated that the emitters cannot reasonably be accommodated on private lands, and it has shown its willingness to place the Navy's needs above those of the general public, thus violating both NFMA and NEPA. 40 CFR 1508.9.</i>	
POTENTIAL INJURY OR LOSS OF HUMAN LIFE	
Number of times that electronic attack weapons, such as lasers, infrared, radio frequency, high-powered microwave or EMP, that are carried aboard EA-18G Growler jets, were discussed in the Navy's Environmental Assessment:	0
Quote from the Navy: "Electronic Attack refers to the division of Electronic Warfare involving the use of EM (electromagnetic energy), DE (directed energy), or antiradiation weapons to attack personnel, facilities or equipment with the intent of degrading, neutralizing or destroying enemy combat capability:" Number of times this statement or similar language appears in the Environmental Assessment:	0
Quote from the Navy: "Friendly EA (electronic attack) could potentially deny essential services to a local population that, in turn, could result in loss of life and/or political ramifications." Number of times the Environmental Assessment acknowledges this:	0
Number of times the above statements are mentioned in a supporting document referenced once, on page 2-7 in the Environmental Assessment:	1
Projected number of Growler jets in training over the Olympic National Forest:	36
Projected number at Whidbey Island Naval Air Station:	118
Number of Growler jets flying in trios that will use quiet surveillance:	1
Number per trio that will test/use Electronic Attack weaponry:	2
Number of times this was mentioned in the Environmental Assessment:	0
Number of training events per mobile emitter in a 12-hour day:	11.15
Chance of stopping electromagnetic radiation at the borders of the Olympic military operating area:	Zero
Minimum height in feet above ground that Navy jets are authorized to fly in the Olympic National Forest:	1200
Minimum height in feet above ground level that Navy jets are authorized to fly in the Roosevelt-Okanogan military training areas on the Canadian border:	300

Number of times hikers on mountain trails have seen military jets flying beneath them:	Several
Number of military aircraft crashes found in a quick Google search of news stories for 2014 only, for US military only, through October only:	12
Number of Navy jets that crashed into rural and residential areas and farm fields in 2014:	6
Number of Navy jets that crashed into houses or apartment buildings in 2014:	2
Percentage of Navy jet crashes on land that did not cause fires:	0
Number of large military drones that have crashed in major accidents since 2001 (reported by the Washington Post, June 2014):	418
The Navy's safety record as described by Navy representative John Mosher:	"Excellent"
Grade: Transparency and Honesty - Epic Fail. Safety - Needs to Improve. <i>Omission of critical information needed to determine that the Navy's activities and their consequences will not compromise the safety of people, wildlife, plants and habitats is a violation of NEPA because it deliberately excludes activities such as electronic attack that need examination under authority of the NEPA process. The permit should cover only passive electronic surveillance and detection and not the active use of weapons that disable enemy equipment.</i>	
FIRE DANGER Number of times the Navy's Environmental Assessment addressed the increased fire danger posed by jet and drone crashes, sparks from vehicle transmitters or operators' cigarettes, or misdirected electromagnetic beams hitting tinder-dry vegetation:	0
Number of times the Environmental Assessment mentions climate change in relation to increased fire danger posed by the above, or by aircraft using powerful radiation:	0
Amount or percentage of funding estimated by the Forest Service to put out fires caused by the Navy's activities:	0
Amount or percentage of funding publicly pledged by the Navy for firefighting and fire risk reduction in the Olympic National Forest and Olympic National Park:	0
Grade: Negligence - A+ <i>Omission of fire danger from an Environmental Assessment on potentially flammable activity in a National Forest that is feeling the effects of climate change is egregious.</i>	
IMPACTS TO WILDLIFE AND HABITAT	At least 5 years

Age of data used in a Biological Opinion for which the Navy claims “No Significant Impacts:”	
Amount of new data the Navy claims it has to update that Biological Opinion:	100%
Amount of that new data included in the Navy’s September 2014 Environmental Assessment:	0
Amount of independent research conducted by the Forest Service to verify the Navy’s claims of No Significant Impacts:	None
Number of EA-18G Growler jet annual training events in the Roosevelt-Okanogan military operating area, impacts from which were evaluated in the Biological Opinion:	275
Number of specific electronic warfare training events evaluated in the Biological Opinion for the Olympic National Forest:	0
Number of EA-18G Growler jet training events now proposed for the Olympic National Forest:	2,900
Number of training events proposed for the Roosevelt-Okanogan area:	2,100
Number of times the activity originally evaluated in the Biological Opinion:	20x
Number of acres of land specifically mentioned and evaluated for impacts to endangered species in the Biological Opinion:	875
Location of those acres:	Between Everett and Mount Baker
Number of emitters evaluated:	1
Location of that emitter:	Coupeville
Navy’s assessment of radiation risk to people and wildlife, from mobile emitters:	No threat
Perimeter distance in feet around each emitter marked with “Danger – Radiation” signs and warning tape:	100
Number of minutes of exposure the Navy says it takes to permanently damage liquid eye tissue near a mobile emitter:	15
Number of spotters the Navy will station in the cab of the emitter truck to look for human beings and “observable” wildlife, e.g., large mammals:	1
Amount of training the Navy will give these spotters:	Unknown
Height of mobile emitter above the ground:	14 feet
Number of nesting birds these spotters will miss:	Unknown
Percentage of visibility behind emitter truck while sitting in the cab:	Nearly 0
Percentage of marbled murrelet decline between 2002 and 2010:	26
Rank of reproductive success in marbled murrelet recovery:	1
Analysis of the impacts of noise and electromagnetic radiation on the northern spotted owl and the marbled murrelet:	None
Analysis of the effects of electromagnetic radiation and loud	None

sounds of aircraft on migrating shorebirds, geese, ducks and other birds:	
Number of hours of radiation exposure per site per year, in the 15 sites the mobile emitters will use:	468
Cumulative radiation over ten years, in 24-hour days:	195
Potential lifespan of some trees in temperate rainforests:	500 years
Analysis of chronic radiation effects:	None
Analysis of population effects on threatened bird species:	None
Probability of compromising the intent of the Migratory Bird Treaty Act without additional studies:	High
Probability of compromising the Endangered Species Act without additional studies and consultation with wildlife agencies:	High
Number of peer-reviewed scientific articles that contradict the Navy's finding of "No Significant Impacts" to endangered species from electromagnetic radiation and noise:	At least 3
Number of emitter sites that are located in critical habitat for the marbled murrelet and northern spotted owl:	Most
Analysis of multiple stressors on humans, endangered species and other wildlife:	None
<i>Grade: Environmental Stewardship – Massive Fail</i> <i>So much missing information makes it impossible to assess the true impacts within the Navy's deeply flawed Environmental Assessment. Additionally, if the Navy plans to shut down the mobile emitters whenever people are in the vicinity, then there is a perceived danger that would contradict their assessment that the emitters pose no threats to people and wildlife. If concentrated energy beams are to be pointed at the ground from aircraft in doses strong enough to disable or destroy enemy personnel and equipment, then where is the discussion of this hazard? This omission is a violation of NEPA, and the Environmental Assessment should be withdrawn or revised, with proper public notification of comment periods.</i>	
ECONOMIC IMPACTS	
Number of visitors to Olympic National Park in 2013:	3,085,340
Amount they spent:	\$245,894,100
Number of jobs in communities near the Park:	2,993
Percentage of Jefferson County revenues that rely on tourism in natural areas:	24
Analysis of noise in the Environmental Assessment, from aircraft training and flying to and from the range:	None
Analysis of air pollution from jet emissions from flying 8-16 hours per day, 260 days per year, over the Olympic Peninsula:	None
Number of cultural factors, including traditional uses of the land, described in the permit application:	None
Cost comparisons for jet fuel savings versus effects on the	None

environment from the Navy's activities:	
Potential for degradation of wilderness qualities:	High
Existence of already-developed alternative areas where the Navy could train its pilots without degrading the environmental and economic qualities that make the Olympic Peninsula unique:	Multiple sites
Grade: Economic risks to communities – Unacceptable <i>With so much missing information, so little public notice, and so much risk to the environment and economy, a full Environmental Impact Statement (EIS) is needed in order to assess the range of impacts from this training.</i>	
<u>GAPS IN DOCUMENTATION</u>	
Amount of independent research the Forest Service did to verify the Navy's claims of "No Significant Impacts:"	0
Evaluation of factors in the Environmental Assessment, including protection of children, environmental justice, cultural factors, water, land use, socioeconomics and geology:	None
Requirement of above subjects to be evaluated under NEPA:	All
Date of EIS that the Navy is relying on for its claims of "No Significant Impacts."	2010
Number of double-sided pages in EIS Volumes 1 and 2:	2000
Availability of that EIS to the public on Navy's web site:	Removed
Expiration date of EIS:	January 2015
Date the Navy will issue a "Supplemental EIS" built on the conclusions of the 2010 EIS:	December 2014
Amount of time given to the public last August to read, understand and comment on nearly 4500 pages of scientific and technical information:	2 weeks
Number of examples of case law that say an agency, e.g., the Forest Service, cannot simply accept the conclusions of another agency, that it must conduct its own review independently of the Navy's "self-serving, untrue Environmental Assessment:"	At least 5