



January 9, 2015

Naval Facilities Engineering Command Atlantic
6506 Hampton Boulevard
Norfolk, VA 23508

Attn: Code EV21/SS

In addition to our earlier comments submitted on December 24, 2014, we are also concerned that the Navy has separated the ground, air, and sea-based activities of its proposed Electronic Warfare Testing and Training program on and around the Olympic Peninsula into different public processes that have resulted in four separate comment periods in the last five months of 2014:

- The Navy's Pacific Northwest Electronic Warfare Range Environmental Assessment, on use of roads in the Olympic National Forest.
- The Forest Service's decision on whether to issue a Special Use Permit for the above.
- The addition of 36 Growler jets to the fleet of 82 Growlers already at the Naval Air Station on Whidbey Island.
- And, a supplement to the Northwest Training and Testing Draft Environmental Impact Statement (EIS) and the Overseas EIS on the expansion of sonar and explosive activities in the Strait of Juan de Fuca, the waters off Indian Island, and the Olympic Coast National Marine Sanctuary.

The public does not view these electronic warfare testing and training activities as separate, and the Navy's separation of them into four distinct processes have caused, and continue to cause widespread confusion and frustration among the residents of the Olympic Peninsula. We realize that the current EIS component is only about the additional 36 EA-18G Growler jets, but the air and ground-based activities in this training program are far too closely related to be considered separately. The National Environmental Policy Act of 1969 (NEPA) requires all federal agencies to prepare an Environmental Impact Statement whenever they undertake any significant action, and further stipulates that all activities that are functionally related must be included. We believe that these separate and piecemeal evaluations fail to take into account the cumulative impacts of each of the four related proposals. The lack of a cumulative impact analysis not only violates NEPA, it give the impression that the Navy is trying to "game" the system by doing a piecemeal analysis.

Furthermore, a 1988 Master Agreement between the Department of Defense and the US Department of Agriculture requires the Forest Service to study both the impacts of the

proposed land-based training activities and the impacts of the proposed use of airspace if “directly associated with the land-based training.” So the separation of ground and air-based activities into different study processes, one an EA and one an EIS, in which the public must restrict comments to narrowly defined subject areas, goes against both NEPA and the Master Agreement. We ask you to fulfill the stipulations of the Master Agreement and the requirements of NEPA by including a thorough study of the cumulative impacts of all of these training proposals in the DEIS.

Sincerely,

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